

South Staffordshire Local Plan Review Examination in Public Hearing Statement for Matter 3

On behalf of Persimmon Homes

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1. INTRODUCTION

- 1.1. Pegasus Group is instructed by Persimmon Homes (Persimmon) to respond to the South Staffordshire Local Plan Examination: Matters, Issues and Questions produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan Review 2023-2041 (the Plan).
- 1.2. This Statement relates to Matter 3 and it's respective MIQ's as identified by the Inspectors. Separate Statements have been prepared and submitted in relation to Matters 4 8, and this Introduction has been duplicated across all Statements.
- 1.3. Persimmon are promoting Land at Cherrybrook Drive, Penkridge, which is identified as a proposed allocation in the Plan at Policy SA5 as 'Site Ref OO5 Land at Cherry Brook' with a minimum capacity of 88 homes. For accuracy, it should be noted that the name of the site/road is 'Land at Cherrybrook Drive', and this should be amended throughout the Plan.
- 1.4. Persimmon Homes has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, as well as the earlier iteration of the Regulation 19 Publication Plan document consulted upon in 2022. These earlier representations included the production of a Vision Document to demonstrate how the site could be delivered; the Vision Document is attached again for ease at Appendix 1, to the Matter 7 Hearing Statement.
- 1.5. The site extends to some 4.2ha and is located in the highly sustainable settlement of Penkridge. It sits immediately north of the existing residential area and adjoining the current settlement boundary for Penkridge.
- 1.6. The Site is subject of a long-standing allocation as 'Safeguarded Land' under Policy GB4 of the South Staffordshire Local Plan 1996. This was subsequently replaced by Policy GB2 of the Core Strategy upon its adoption in December 2012. Policy SAD3 of the Site Allocations Document (2018) retained the Site's 'Safeguarded Land' status. It is the last and only remaining of the 1996 safeguarded sites to be brought forward with a positive allocation, the others having all since been developed.
- 1.7. The site is also now the subject of a live full planning application for 88 homes under LPA ref 25/00004/FULM, as illustrated below.





- 1.8. Persimmon's previous submissions to the Regulation 19 consultation, remain before the Examination. This Hearing Statement though, necessarily reflects the current position in relation to the relevant MIQs, having regard to the SoCG agreement reached with the Council and signed by them on 10th June 2024, and the Inspectors' specific questions.
- 1.9. This Plan has been brought forward under the December version of the NPPF, and references throughout this Hearing Statement are to that NPPF unless expressly indicated otherwise.



2. MATTER 3: VISION AND STRATEGIC OBJECTIVES

Issue 1: Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy, and positively prepared.

1. Is the Vision of the Plan for South Staffordshire ambitious, and yet realistic in terms of its scope and deliverability?

- 2.1. No. The Vision should refer to delivering housing and economic growth, with these being key to the achievement of sustainable development, as highlighted in Paragraph 8 of the National Planning Policy Framework (NPPF). In order to ensure that the Vision is positively prepared and consistent with national policy, which emphasises the importance of planning to meet an area's objectively assessed need, and significantly boosting the supply of homes, it is imperative for reference to be made to this, and for the vision to refer to the pivotal role South Staffordshire can play in accommodating unmet need from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), in line with the Duty to Cooperate. Aspiring to meet the pressing need for homes, both within South Staffordshire and in neighbouring authorities, would bolster the vision and make it far more ambitious, aligning with national policy and supporting Government aspirations to deliver 1.5 million homes over this parliament.
- 2.2. In terms of its scope and deliverability, Persimmon consider the Vision to be realistic. The Vision is broadly the same as that presented in the adopted Core Strategy, and this has proven to be suitable and deliverable.

2. Is the plan period justified?

- 2.3. Yes. The plan period is 18 years, which is in excess of the 15-year minimum stipulated by Paragraph 22 of the NPPF.
 - 3. Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realized through their implementation?
- 2.4. Strategic Objective 2 refers to making a "proportionate contribution towards the unmet needs" of the GBBCHMA and the wider Functional Market Area, yet Policy DS4 only commits to a 640-home contribution to meet this need, down from 4,000 in the previous Reg 19 plan (November 2022). As set out in Persimmon's previous representations, and in their Hearing



Statement on Matter 4, we contend that the Local Plan should make a greater contribution towards accommodating the unmet needs of neighbouring authorities, particularly those in the Black Country, and this should be reflected in Policy DS4 and the spatial distribution of allocations, to better reflect the aspirations of Strategic Objective 2 in this respect, in ensuring that a truly proportionate contribution is made.

- 2.5. There are no further comments from Persimmon on the Strategic Objectives with respect to the MIQs, and it is otherwise considered that their scope and thrust are reflected in the proposed policies and allocations to an acceptable degree.
 - 4. Are the objectives of the Plan clearly set out and are these measurable?
- 2.6. No comment.



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