

South Staffordshire Local Plan Review

Examination in Public

Hearing Statement for Matter 5

On behalf of Persimmon Homes

Author: KF/AG



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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 5 and it's respective MIQ's as identified by the Inspectors. Separate Statements have been prepared and submitted in relation to Matters 3, 4, 6, 7, and 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 005 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, of 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 5: SPATIAL STRATEGY

Issue 1: Whether there is a clear Spatial Strategy which is justified, effective, and consistent with national policy.

1. How was the settlement hierarchy derived? When qualifying your answer, is the methodology used to determine the hierarchy appropriate and sufficiently robust?

- 2.1. The settlement hierarchy is informed by the Rural Services and Facilities Audit Study 2021 (Doc Ref **EB15**). This assessed access to services and facilities, namely convenience stores/supermarkets, community facilities, retail centres, employment locations, education facilities, and public transport, scoring each settlement depending on its accessibility to these. A description was developed for each Tier of the hierarchy, and this assisted in categorising settlements. Whilst there are a number of limitations, including the lack of a capacity analysis, no consideration of constraints which may affect suitability for development, and the use of static data, meaning that conclusions may not reflect recent changes or developments in the area, potentially leading to outdated conclusions, it is considered that the methodology is generally appropriate and sufficiently robust for the purpose of establishing a hierarchy, which is broadly consistent with the previous settlement hierarchy set out in the 2012 Core Strategy (paragraph 4.8).

2. How has the level of development anticipated in different settlement categories been derived? Does the settlement hierarchy appropriately reflect the role and function of these settlements?

- 2.2. The Spatial Strategy Topic Paper (Doc Ref **EB14**) sets out the various growth options which SSDC considered. Option I is selected as the preferred spatial strategy, and the reasons for this are discussed in response to question 3(b) below. Option I directs growth to Tier 1 settlements, and thus Green Belt release is restricted to these settlements, with two strategic allocations which will deliver 1,374 dwellings. This is followed by 914 homes in Tier 2 settlements, 228 homes in Tier 3 settlements, 30 homes in Tier 4 settlements, 81 homes south of Stafford, and 194 homes in other locations and Tier 5 settlements. This is considered to be appropriate.

3. In terms of the distribution of housing and employment distribution across the plan area:

3 a) Is it clear how and why the preferred spatial strategy has been selected?

- 2.3. Section 5 of the Spatial Strategy Topic Paper 2024 (Doc Ref **EB14**) draws conclusions on why SSDC have selected Spatial Option I. SSDC state that this is their preferred option as they consider it to balance the need to deliver housing against the constraint placed by Green Belt land, restricting the release of this to Tier 1 settlements, which are considered the most sustainable locations.

3 b) What options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?

- 2.4. The Spatial Strategy Topic Paper 2024 provides a detailed assessment highlighting advantages and disadvantages for each of the nine spatial options. These are set out in Section 4 of the Topic Paper. Persimmon support the identification of Penkridge as a Tier 1 settlement.
- 2.5. Windfall development across the Plan period is proposed at 600 homes. But windfall development does not allow for the delivery of planned strategic infrastructure nor the range of market and affordable housing which the delivery of carefully considered housing allocations can deliver.
- 2.6. Having confirmed such a small capacity on brownfield sites, it is unclear what windfall developments will come forward to deliver housing, particularly as the SHELAA 2023 (Doc Ref EB19) identifies a substantial number of the identified brownfield sites as being neither suitable or available.
- 2.7. Further, historic windfall delivery rates have been based on densities of 35 dwellings per hectare on average. However, since the Core Strategy was adopted in 2012, matters such as 10% mandatory BNG, Nationally Described Space Standards and M4(2) and M4(3) compliant homes have been / are being introduced. These all have capacity implications for housing delivery and a lower density should be assumed, which may in turn reduce the expected windfall allowance.

3 c) Are the areas identified for new development the most appropriate locations? Is the rationale behind choices and reasoning for conclusions clear and justified by the evidence? How have the locational needs of different sectors been addressed?

- 2.8. The Spatial Strategy relies on over a third of the housing requirement to be delivered on land east of Billbrook and land north of Penkridge. Whilst these are sustainable locations for growth and appropriate in line with Spatial Option I and the evidence base, including the Rural Services and Facilities Audit Study 2021, sites of this scale have longer lead-in times, thus they will not address the immediate need for housing in South Staffordshire and the GBBCHMA. The SHELAA 2023 (Doc Ref **EB19**) suggests there is a lead-in time of between 4–5 years for allocations of 500–1,000 homes, which is optimistic given current delays in the planning system. There is no new evidence to suggest that lead in time has reduced and we are not aware of any planning applications before the Council for those sites. On that basis, the housing Trajectory submitted to the Examination (Doc **SST/ED7b**) should be updated to show those sites as not delivering before 2029–2030, which will impact the delivery of homes in the earlier years of the Plan, Persimmon support the continued recognition of Land at Claybrook Drive, Penkridge as being available for early delivery in the plan period, in a Tier 1 settlement, where the larger allocations will take longer to deliver.

5. Have the social, economic, and environmental impacts of the spatial strategy on neighbouring areas been identified and addressed?

- 2.9. As discussed in response to question 3(c), the selected Spatial Strategy reduces the contribution South Staffordshire makes towards accommodating unmet needs from the GBBCHMA, contrary to the evidence base, and this is addressed in greater detail in Persimmon's Hearing Statement on Matter 4.

Town & Country Planning Act 1990 (as amended)
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