

# South Staffordshire Local Plan review

Examination in Public

## Hearing Statement for Matter 5 – Spatial Strategy

On behalf of Taylor Wimpey

Representor Ref: AGT24-032-08-02

Date: April 2025 | Pegasus Ref: P23-1570

Author: SB

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## Document Management.

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FINAL	11/04/2025	SB	SB	FINAL – SUBMISSION



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## Introduction

Pegasus Group is instructed by Taylor Wimpey to respond to the South Staffordshire District Council Local Plan Examination: Matters, Issues and Questions Identified by the Inspectors, which has been produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan ('the Plan').

This Statement relates to Matter 5 – Spatial Strategy

Taylor Wimpey has a specific land interest in the proposed housing allocation in the Tier 2 settlement of Wombourne, identified at Policy SA3, as '*Site Ref No. 285 Pool House Road*' with a minimum capacity of 82 homes ('the Site'). A Site Location Plan is at **Appendix 1**.

The draft site allocation extends to some 3.9ha, with Taylor Wimpey having a wider land interest extending to 5.4ha and is located in the highly sustainable settlement of Wombourne. The site lies to the north west of Wombourne adjoining residential development to the west and is safeguarded land for future residential development in the adopted 2015 Site Allocations Development Plan Document (SAD). It was removed from the Green Belt within the SAD but identified as safeguarded land for future development.

A planning application (LPA ref: 24/O1088/FULM) for the '*erection of 89 residential dwellings, associated landscaping, public open space, vehicular and pedestrian access and all other works*' is currently before South Staffordshire Council for determination as local planning authority. The proposed Site Layout is at **Appendix 2**.

Taylor Wimpey supports the proposed allocation, but has specific comments on various parts of the allocation and other draft policies in the South Staffordshire emerging Local Plan that is the subject of this examination.

## Matter 5: Spatial Strategy

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

**Q1. How was the settlement hierarchy derived? When qualifying your answer, is the methodology used to determine the hierarchy appropriate and sufficiently robust?**

The settlement hierarchy is informed by the Rural Services and Facilities Audit Study 2021. 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).

**Q2. 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?**

The Spatial Strategy Topic Paper 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, although Tier 2 and 3 settlements could accommodate more housing to meet a higher housing requirement which will provide a greater contribution towards accommodating unmet needs in the GBBCHMA, given the sustainability credentials of these settlements, as highlighted in the Rural Services and Facilities Audit Study 2021. In some instances, this would necessitate Green Belt release in these locations. Overall, the settlement hierarchy is considered to reflect the role and function of the settlements.

**Q3. In terms of the distribution of housing and employment development across the plan area:**

**a. Is it clear how and why the preferred Spatial Strategy has been selected?**

Section 5 of the Spatial Strategy Topic Paper 2024 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.

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

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.

However, the role the District plays in the wider GBBCHMA and FEMA must be emphasized and recognised further in Policy DS5. Spatial Strategy Option I and the large reliance on Tier 1 settlements fails to reflect the District's relationship with the adjoining areas of Dudley and Wolverhampton, where there is a high employment commuting ratio from the District to these urban areas via key infrastructure links. In addition to housing at Tier 1 settlements and to the north of the district, the spatial strategy should therefore place greater emphasis on housing growth along the eastern edge of the District, as has been highlighted in the GBBCHMA Strategic Growth Study.

Similarly, the protection afforded to the District's Green Belt should not be at the expense of sustainable development patterns and strategies. The Council's evidence base acknowledges that Tier 2 and 3 settlements can also accommodate housing growth to deliver sustainable development. The use of brownfield land and release of Green Belt land should be balanced to deliver a range of sites to deliver a range of housing, without, for example, overreliance on flatted developments on brownfield site, reduced affordable housing due to viability issues of brownfield delivery and thus failure to deliver the right housing in the right places. Tier 2 and 3 settlements are often sustainable in nature with bus services and facilities within the settlement – a train station is not the only factor that should be considered.

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.

Furthermore, 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 identifies a substantial number of the identified brownfield sites as being neither suitable or available.

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.

**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.**

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 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 greater recognition should be given to a range of housing sites across South Staffordshire to deliver balanced growth that can meet the short-term needs of South Staffordshire and the GBBCHMA, in order to ensure a policy and spatial strategy that is effective and justified.

Spatial Option I greatly reduces South Staffordshire’s contribution towards accommodating unmet needs in the GBBCHMA, and completely fails to reflect the district’s relationship with the adjoining areas of Dudley and Wolverhampton, and the high employment commuting ratio from the district to these urban areas. The rationale for this is unconvincing, and the Spatial Strategy should place a greater emphasis on housing growth in the eastern edge of the District, as recommended in the GBBCHMA Strategic Growth Study (2018), which forms part of the evidence base, thus such an approach would be fully justified. Small and medium-scale housing allocations here, on sites which are sustainably located, with good accessibility and public transport links, would contribute towards meeting short term needs in the GBBCHMA, closest to the source of this need.

Notwithstanding, land at Pool House Road, Wombourne, a proposed allocation in a Tier 2 settlement which is considered an acceptable and sustainable location for growth, offers the opportunity to deliver much needed market and affordable homes to meet the identified need in the emerging Plan. The site will deliver infrastructure improvements through appropriate s106 contributions, policy compliant affordable housing and on site open space and biodiversity enhancements for the benefit of the wider community.



# Appendix 1

Site Location Plan

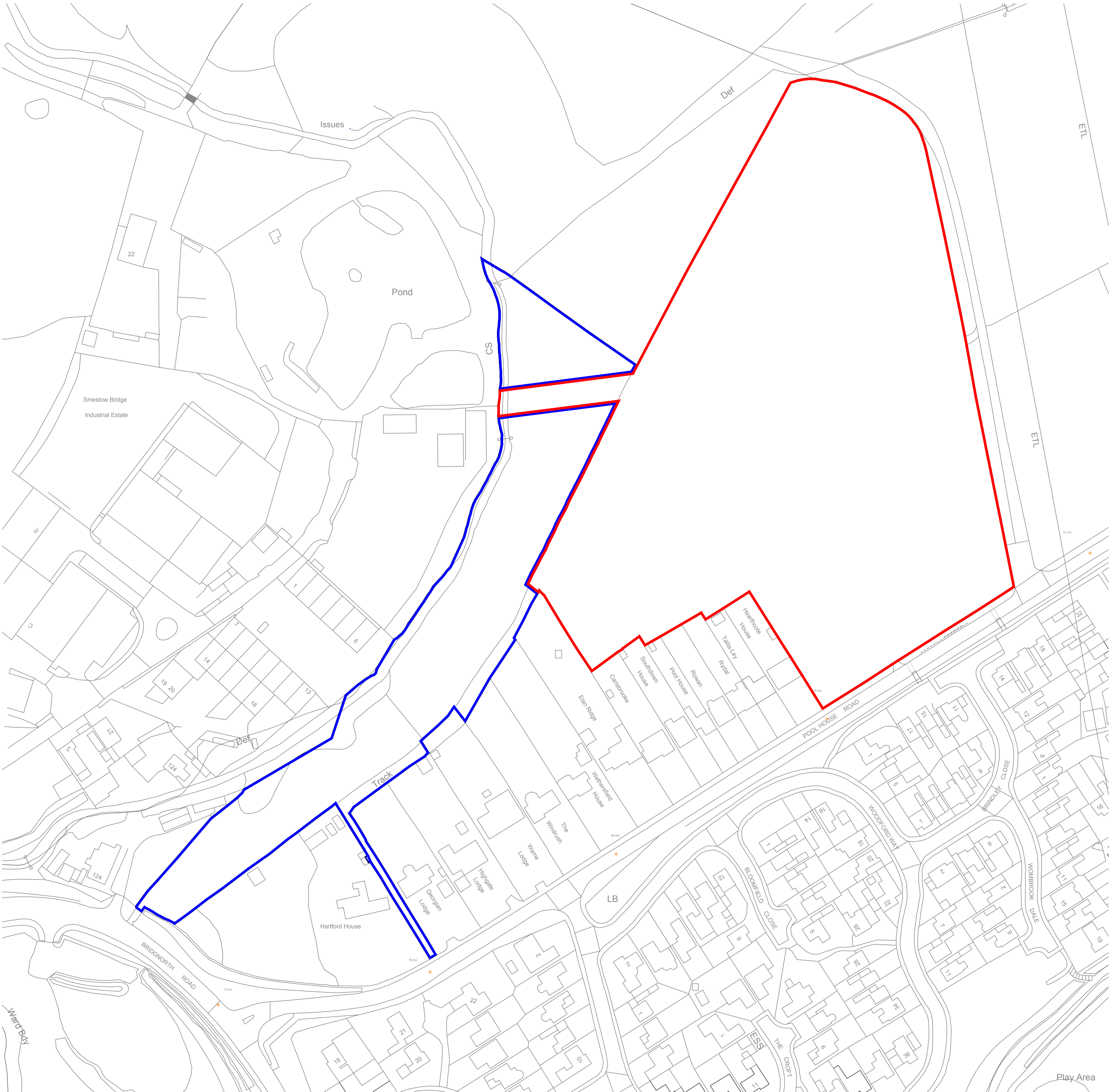


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Rev A: Red Line amended to Title Plan. [28.10.2024 JDW]  
FIRST ISSUE: 15.10.2024

## POOLHOUSE ROAD, WOMBOURNE | SITE LOCATION PLAN

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: JDW | APPROVED BY: SJW | DATE: 23.08.2024 | SCALE: 1:1000@A1 | DRWG: P23-I570\_DE\_001-01 | REV: A | CLIENT: TAYLOR WIMPEY STRATEGIC LAND





## Appendix 2

Proposed Site Layout



LEGEND

- Application Boundary

EMA-XXX Housetype Code

BEAFORD Sales Name

CA. I Elevation style / Character area

AS/OPP Handing

Affordable Housing Allocation

Chimney Location

1800mm high timber gate

1800mm high brick screen wall

1800mm high close-boarded timber fence

1200mm Estate railing (black)

450mm Timber Knee Rail

Demountable Steel Bollards

Feature Hedgerow (subject to landscape architects details)

Bin Collection Point

Block paving

Grass-crete surfacing

Existing vegetation to be retained

Root protection area

Indicative trees (subject to landscape architects details)
- For further information relating to the proposed dwellings, please refer to the Housetype Portfolio.

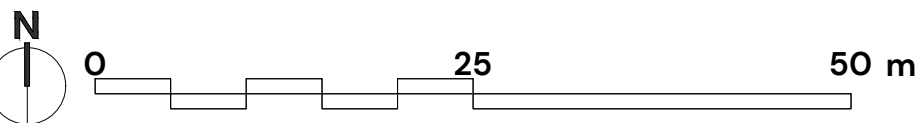
For further information relating to the proposed boundary treatments, please refer to the Enclosures Plan.

For further information relating to the proposed retention and removal of trees, please refer to the Arb survey.

SCHEDULE OF ACCOMMODATION							
HOUSE NAME	CODE	QUANTITY	BEDS / PERSON	FLOOR AREA (sqft)	TOTAL AREA (sqft)	MIX PERCENTAGE	NDS COMPLIANT
PRIVATE (60%)							
Beaford	EMA22	5	2b3p	792	3960	70%	Y
Eynford	EMA33	8	3b4p	987	7896		Y
Keeleford	EMA34	12	3b4p	1037	12444		Y
Aynedale	EMT31	8	3b4p	1073	8584		Y
Hartton	EMB31	4	3b4p	1154	4616		Y
Colford	EMA43	6	4b7p	1268	7608	30%	Y
Plumdale	EMT41	3	4b7p	1268	3804		Y
Rightford	EMA46	7	4b6p	1392	9744		Y
		53			58656		
AFFORDABLE (40%)							
SOCIAL RENT (50% OF AFFORDABLE MIX)							
Alstead	EMAP11	1	1b2p	430	430	11%	N
Barnslead	EMAP12	1	1b2p	621	621		Y
Beaford	EMA22	10	2b3p	792	7920	56%	Y
Eynford	EMA33	4	3b4p	987	3948	22%	Y
Witherslead	EMAP41	2	4b6p	1225	2450	11%	Y
		18			15369		
SHARED OWNERSHIP (50% OF AFFORDABLE MIX)							
Bungalow	BU2	4	2b4p	755	3020	67%	Y
Beaford	EMA22	8	2b3p	792	6336		Y
Eynford	EMA33	6	3b4p	987	5922		Y
		18			15278		
SITE TOTAL		89			89303		
				Hectares	Acres		
Gross Site Area				3.8	9.5		
Net Area				TBC	2.4	5.9	
Density (dph)				TBC	37		
sqft per acre				TBC	-	16136	

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Rev E: Schedule of accommodation updated to reflect client comments [08.01.2025 SW]  
Rev D: Layout updated to provide northern connection to PRow [22.11.2024 SW]  
Rev C: Layout revised to reflect comments received from client 12.11.2024 [12.11.2024 CR]



POOLHOUSE ROAD, WOMBOURNE | PLANNING LAYOUT

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: CR | APPROVED BY: SJW | DATE: 04.06.2024 | SCALE: 1:500@A1 | DRWG: P23-1570\_DE\_004-01 | REV: E | CLIENT: TAYLOR WIMPEY STRATEGIC LAND





Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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