

## SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION – MATTER 5– SPATIAL STRATEGY

RAPLEYS LLP ON BEHALF OF VISTRY UK  
APRIL 2025

### ISSUE 1 – WHETHER THERE IS A CLEAR SPATIAL STRATEGY WHICH IS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY

1. This Hearing Statement should be read in conjunction with the Regulation 19 representations submitted by Rapleys on behalf of Vistry and Hearing Statements on Matters 2, 4 and 9 as the issues are all inter-related.
2. This Hearing Statement focusses on Questions 2 and 3. Vistry has no issue with the methodology used to determine the settlement hierarchy.
3. Policy DS5 (spatial strategy) identifies growth will be distributed to the district's most sustainable settlements, these being Tier 1 and are Codsall/Bilbrook, Penkridge and Cheslyn Hay/Great Wyrley. No new allocations are proposed in lower order settlements, relying instead on safeguarded land and existing planning permissions/allocations to deliver the identified housing requirement. This spatial strategy derives from the environmental capacity led approach that the Council is now following which principally seeks to address its own housing needs.
4. Vistry is generally supportive of the strategy in terms of focussing new development on the most sustainable settlements. In doing this, rather than focussing development on urban extensions to the Black Country conurbation, ensures that South Staffordshire retains its own identity and enables the Green Belt immediately adjacent to the conurbation to be retained for its rightful key purpose.
5. However, Vistry is concerned that the strategy does not meet the wider housing needs of the GBBCHMA. In response to Matter 4, Vistry has set out why it does not consider the contribution of 640 dwellings to the unmet need is appropriate, justified, effective or sound, and that at the very least, the unmet need number should be increased to the original 4,000 dwellings.
6. The Plan does not make clear what allocations are providing the 640 dwellings of unmet need – logically, these would be located closer to the area deriving the need, or in Tier 1 settlements where facilities and public transport provision and access is greatest.
7. The scale of unmet housing needs in the GBBCHMA is such that Green Belt release is fundamentally required to meet longer-term and current needs. Furthermore, increasing unmet needs coupled with the changes to the Standard Method and the development levels required, it is evident that the Council will have to revisit Green Belt boundaries and release more Green Belt in due course. In this context, it is surprising that the Local Plan does not identify any safeguarded land, whereas the adopted Local Plan did. This provides a clear direction of travel and would enable landowners and developers to be ready to submit an application as soon as the site was required, rather than unnecessarily delaying delivery.
8. That said, the unmet need is immediate and rising. Therefore, there is a need now to allocate more sites in the sustainable Tier 1 settlements. In this context, Vistry's site on the northern edge of Bilbrook (a Tier 1 settlement) should be included as a logical and sustainable strategic housing allocation (the Regulation 19 representations refer). It has the capacity to provide a significant contribution to the unmet need equation and is in close proximity to the major employment area known as I54, where further allocations are being made for its expansion. The release of this site to the northern edge of Bilbrook would be consequently more consistent with Green Belt policy.
9. The spatial strategy is not positively prepared or effective as the unmet need is not being met where it is practical for it to do so.