

SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION – MATTER 7 -SITE ALLOCATIONS

RAPLEYS LLP ON BEHALF OF VISTRY UK
APRIL 2025

ISSUE 1 – WHETHER THE PREFERRED SITE ALLOCATIONS ARE POSITIVELY PREPARED, 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 the Hearing Statements submitted on Matters 2,4,5. This Hearing Statement focusses on housing allocations rather than employment allocations.
2. Vistry's concern is not an in principle objection to any one specific site allocation (as all the sites are needed to meet the identified local housing need), but to the collective failure to accommodate sufficient housing in terms of unmet need (refer to Hearing Statement on Matter 4), over reliance on existing commitments - both allocations and permissions - and without a sufficient buffer to counter any lapse rates, unimplemented permissions, over reliance on windfalls (most of which are small sites of less than 10 dwellings) (Hearing Statement Matter 4), or reductions in estimated site capacities resulting from other local plan policy requirements, such as BNG, etc.
3. This is particularly pertinent to those safeguarded sites which were given that status at a time when BNG, etc were not mandatory and yet there is no evidence of a reconsideration of the capacity of those sites. In Codsall such allocations account for 584 dwellings, in Wombourne 280 dwellings and Cheslyn Hay/Great Wyrley 218 dwellings. Policy principle requires provision of BNG on-site first – there is no evidence that this has been factored into site capacity assessments on these longstanding safeguarded sites.
4. Furthermore, a number of the existing allocations (whilst acknowledging some are safeguarded land) have shown no signs of coming forward in the adopted plan period – there is no evidence that this will alter within the new plan period.
5. The site allocations are not positively prepared or effective.

