



HEARING STATEMENT

in respect of
South Staffordshire Local Plan Examination Matter 5
on behalf of
Barberry Perton Ltd

10 April 2025
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1. Introduction

- 1.1. This hearing statement is made by RCA Regeneration Ltd on behalf of Barberry Perton Ltd to the South Staffordshire Local Plan (SSLP) EIP.
- 1.2. This statement relates to Matter 5 – Spatial Strategy.
- 1.3. We have not provided answers to all questions under this heading and have only offered answers where we consider it to be necessary.

2. Matter 5: Spatial Strategy

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

Question 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 largely underpinned by the council's Rural Services and Facilities Audit (RSFA) 2021 which explored the level of service provision at each settlement.
- 2.2. The hierarchy is not entirely based on an assessment of 'self-contained' facilities and services, because, in the example of Perton – it is not self-contained. Perton is a modern housing estate on the edge of Wolverhampton and is classed as a Tier 2 settlement in the RSFA.
- 2.3. Even in the Council's own evidence base, Perton is seen as forming part of Wolverhampton - for instance at para 3.20 Green Belt Study¹, 2019: *'Although not a town in its own right, Perton is sufficiently close to Wolverhampton, for these settlements to be considered to constitute part of a town'* (in that case, Wolverhampton is of course a city).
- 2.4. It is acknowledged in the RSFA that Perton has access to education facilities in the adjacent urban area of Wolverhampton, although other services and facilities within the urban area are not acknowledged in full. Perton, for instance, is a 20 minute neighbourhood – being well within a 20 minute walk to primary and secondary schools and colleges; community and leisure facilities including a library, medical centre, recreation grounds, playgrounds, allotments, Perton Golf Course, and; local supermarkets, shops, chemists, bank, post office and pubs.
- 2.5. Perton is located approximately 4 miles from Wolverhampton city centre and bus services (15-20 minute bus services) into Wolverhampton mean that the university, further education facilities, large scale employment, the main line railway station and other higher order retail can be accessed quickly.
- 2.6. So the reality is that whilst settlements like Perton have been assessed as being virtually self-contained (with the exception of acknowledging local schools technically in Wolverhampton). The fact remains that it is not appropriate to assess Perton in this way because it is in effect a suburb of Wolverhampton being a modern housing estate abutting the edge of Wolverhampton with access to far more services and facilities than that of the Tier 1 settlements of Codsall, Penkridge, Cheslyn Hay, Great Wyrley and Bilbrook.
- 2.7. We do not consider the methodology applied to create the settlement hierarchy is sufficiently robust and does not apply much flexibility in acknowledging the proximity of certain 'settlements' to the edge of Wolverhampton.

Question 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?

- 2.8. Table 8 shows the different levels of development proposed at each settlement within the hierarchy.

¹ https://www.sstaffs.gov.uk/sites/default/files/2024-02/council-south_staffordshire_green_belt_study_2019_-_new_acre_stables.pdf

- 2.9. The Housing Site Selection Topic Paper 2024 identifies how some sites have been identified as having unmitigable constraints which has meant they have looked more at a 'capacity-led' approach to allocations, with no new allocations to Tier 2-5 settlements.
- 2.10. Going back to Perton as an example, it was identified that there were '*major negative effects predicted in the Sustainability Appraisal due to the distance of [Perton sites] from local schools*'. The safeguarded site was removed from the Green Belt (despite this) and was still considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018.
- 2.11. This demonstrates a contradictory approach. It is clear that Perton should have been considered for far more growth (and new allocations) given its proximity to many schools within walking distance (which just happen to be over the administrative boundary in Wolverhampton). We do not consider the Council have adequately justified their approach to allocations within the settlement hierarchy, which seems to be about supressing as much growth as possible to Tier 2-5 settlements, despite the evidence to justify it being patchy.

Question 5 Have the social, economic and environmental impacts of the Spatial Strategy on neighbouring areas been identified and addressed?

- 2.12. No. We do not agree that these impacts have been adequately assessed – particularly as (just for Dudley and Wolverhampton alone) are facing a shortfall of 11,000 homes and nowhere for them to be accommodated. The impacts of a lack of housing (including affordable housing) to these areas could be devastating for local people in the form of overcrowding, homelessness, worsening affordability, increasing private rents as a result of reduced housing choice and pressure on councils to pay more and more for temporary housing costs (in order to fulfil their legal duties).
- 2.13. When there is insufficient, quality affordable housing available people put off making decisions about having children and are often unable to move out of their parental homes. Many may choose to move away to more affordable locations, which can undermine the mix of people living in an area and can make it harder for employers to find employees.
- 2.14. This is explained by Shelter in a 2015 report² explaining what happens when we do not build enough homes.
- 2.15. We add more detail to this and explain why assessing the impacts on neighbouring authorities is so important in our statement under Matter 4.

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https://assets.ctfassets.net/6sxvmndnnpn0s/1KxYndCJohoRVAeeTwpd7z/9f8a23666da6bec09e3ec5b283b4de23/7350_General_Election_Report_v7_4.pdf

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