

South Staffordshire Local Plan Review

Response to Inspector's Matters Issues and Questions (MIQs) on behalf of Clowes Developments

Representor ID: AGT24-037-02

Matter 5: Spatial Strategy

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

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

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.

SSDC claim to be pursuing a 'capacity-led' approach to development and the chosen Spatial Strategy (Option I) directs growth towards sustainable non Green Belt development sites and limited Green Belt development in Tier 1 settlements that are well-served by public transport. Such an approach is not suitably justified.

The District immediately borders the built up edge of the Black Country conurbation. The Black Country conurbation provides a wide range of shops, services and facilities as well as job opportunities and is arguably more sustainable than any of the settlements in the District.

It is therefore not clear in SSDC's evidence base why their spatial strategy has not sought to direct growth immediately adjacent to the Black Country conurbation. The 2022 Publication Plan did propose allocations adjacent to the built development edge so SSDC has evidenced that there is capacity on suitable sites adjacent to the Black Country.

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

Greater consideration should be given to the range of social, economic and environmental impacts of linking housing delivery in South Staffordshire to neighbouring areas. Without consideration of LPA boundaries, the Black Country conurbation is in effect a collection of individual settlements, with a range of infrastructure such as shops and services already in existence.

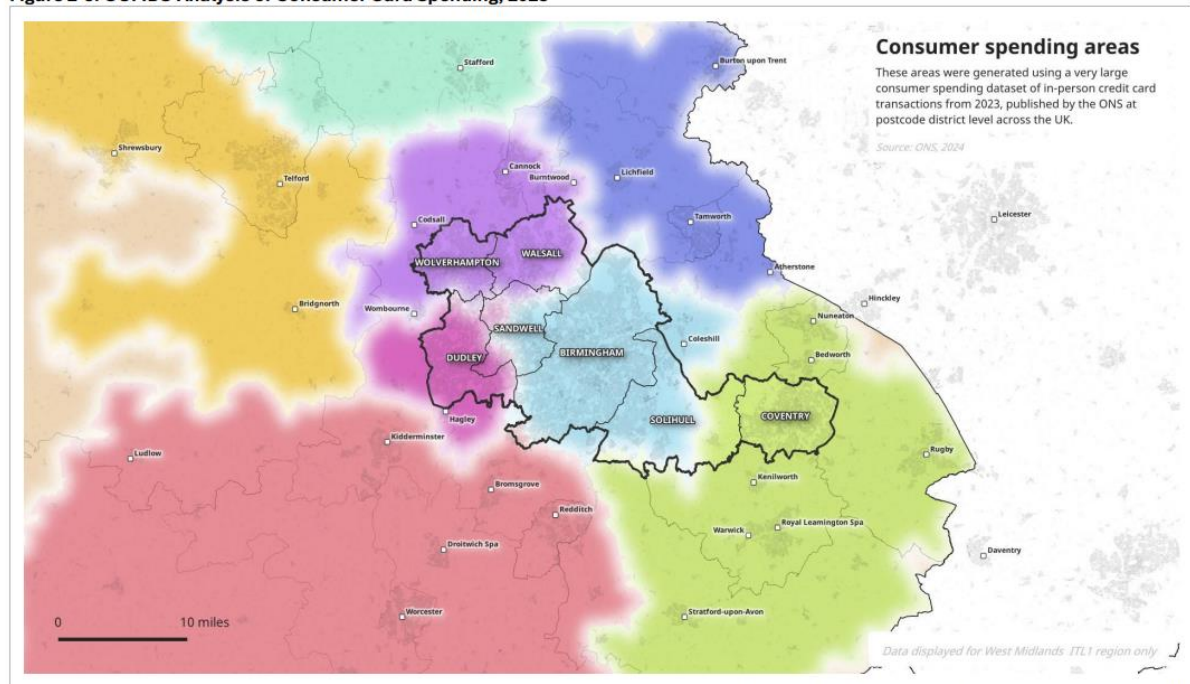
For example, Lawnswood is classed as a tier 5 settlement. The Council's strategy, as set out in Policy DS5, is that these settlements are not intended to experience further housing growth. If the site was only adjoining Lawnswood and isolated from other areas, it may be considered appropriate to rule out development of the site. However the site at Lawnswood Road is not in this position. It adjoins the urban area of Wordsley which is linked to the wider Black Country conurbation.

The adopted Dudley Borough Development Strategy states that Wordsley is a local centre (Tier 3). The edge of the Local Centre itself is approximately 1 mile from the centre of the site, with the wider Wordsley settlement bordering the site. A number of shops and services are also located closer to the site, outside of the local centre. From an economic perspective, the viability and vitality of such services would be enhanced by increased patronage from housing development nearby. Such an increase in the critical

mass of residents would likely also bring social benefits of increasing the critical mass of residents available to access services such as doctors, dentists and schools which may suffer from a lack of patronage otherwise.

This sort of linkage is evidenced in a document entitled “West Midlands Futures: Economic Geographies of the West Midlands” produced by West Midlands Combined Authority which sets out that in respect of consumer card spending, a clear linkage between the Southern part of South Staffordshire and Dudley in this regard, potentially suggesting a linkage of people using shops and services within Dudley Borough in this part of South Staffordshire, as shown by the below plan:

Figure 2-5: COMBO Analysis of Consumer Card Spending, 2023



Source: Automatic Knowledge analysis of consumer card spend data, ONS

Desktop research undertaken by Savills (submitted with our Regulation 19 representations) indicates that six shops / newsagents are within 1.5 miles of the centre of the site. Two dental surgeries and a doctors surgery are also located in the same range, in addition to a pharmacy and opticians. These services are located in Wordsley (Dudley Borough).

It is important to consider this when looking to plan for the unmet need of the wider Black Country conurbation. The existing urban area contains plenty of services such as those in Wordsley which can be supported by development in neighbouring authorities such as South Staffordshire.

We consider that greater consideration should be given for the spatial context surrounding the site which includes connections to sustainable settlements in the Black Country such as Wordsley, and should support extensions to sustainable settlements such as this.

The Spatial Strategy should be amended to reflect a strategy which is positively prepared and fully justified. The Council needs to provide evidence to demonstrate that the proposed strategy is truly ‘capacity-led’ despite other sites being assessed as performing similarly to those allocated.