

South Staffordshire Local Plan Examination

Matters, Issues and Questions

Matter 7 Statement: Site Allocations



Stantec UK Limited

Prepared for:

Catesby Estates

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South Staffordshire Local Plan Examination, Matters, Issues and Options

Matter 7 Statement: Site Allocations

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1 Introduction

1.1 Context

This Matter 7 Statement has been prepared by Stantec on behalf of Catesby Estates (our Client) which is promoting Land at Yieldfields Farm, Bloxwich (the 'site') for residential development¹ (Call for Sites Ref: 492a, 492b and 492c).

It is submitted that our Client's site is suitable for meeting the housing needs of South Staffordshire and the wider County in the Plan period and should be identified as an allocation in the South Staffordshire Local Plan.

This Matter Statement should be read in conjunction with our representation made to the Regulation 19 'Publication' consultation of April 2024 (under the name L&Q Estates), in addition to Representations made to the Issues and Options Consultation in November 2018, the Spatial Housing Strategy and Infrastructure Delivery Consultation in October 2019, the Preferred Options Consultation in December 2021 and the Preferred Options Consultation in December 2022 (all made under the name Gallagher Estates).

¹ Land at Yieldfields Farm, Bloxwich has previously been promoted by L&Q Estates (Respondent ID AGT24-040-01). However, Urban&Civic Plc, which includes Catesby Estates, acquired L&Q Estates from L&Q Group as of 6th August 2024. The Site is accordingly now being brought forward by Catesby Estates in partnership with the landowner.



2 Issue 1

Issue 1: Whether the preferred site allocations are positively prepared, justified, effective and consistent with national policy.

[Focus: Policies MA1, SA1, SA2, SA3, SA4, SA5]

Question 1 – In terms of the proposed planned housing and employment developments:

A. Is the spatial distribution of the allocations across the South Staffordshire area justified and is it consistent with the Spatial Strategy?

Policy DS4 of the *Local Plan Review* defines the Spatial Housing Strategy for the District, whilst Policy DS5 identifies a settlement hierarchy. The December 2022 version of the *Local Plan Review* previously included 'Growth adjacent to the neighbouring towns and cities in the Black Country' as its own distinct tier within this hierarchy. However, this tier has been removed in the April 2024 *Local Plan Review* and this has resulted in the removal of three allocations which were included to meet the unmet need of GBBCHMA – Land at Cross Green (formerly Policy SA2), Land North of Linthouse Lane (formerly Policy SA3) and Land at Langley Road (formerly included within Policy SA5).

Whilst Policy DS5 seeks to deliver the *local* housing for South Staffordshire need identified through Policy DS4, we consider that further housing allocations are required in order to meet the identified GBBCHMA shortfall. The rationale for this is described in our Matter 4 Statement and is not repeated here.

In this regard, Policy DS5 states that “*an integral part of the Strategy will be to ensure that growth is distributed to the district's most sustainable locations, avoiding a disproportionate level of growth in the district's less sustainable settlements, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances*” [our emphasis].

The current strategy through Policies SA1 – SA5 no longer proposes any homes along the northern or Western edge of the Black Country urban area, which is undeniably a sustainable location and would serve to meet unmet housing need as close as possible to its origin. As described in our Matter 4 Statement, the Council has previously tested the provision of 4,000 homes through the Local Plan Review (and Sustainability Appraisal) process and found it to be sustainable. This position has not changed, and the current iteration of the Local Plan Review now ignores the functional relationship between the District and the wider GBBCHMA in terms of commuting to work patterns and will accordingly exacerbate commuting distances from further afield within the District.

PPG requires a Sustainability Appraisal to “*provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of alternatives*” (Reference ID: 11-018-20140306). We do not consider that sufficient justification has been provided for not pursuing Option G (or a hybrid of Option G and I) when it was previously assessed by the Council in 2022 as being the most suitable option (Sustainability Appraisal 2022). From our review, it appears that Option I has been ‘created’ by the Council in order to achieve their interpretation of the amended NPPF 2023 and support the reduction in housing to meet local and wider housing market area needs.



Table 5.7 of the Sustainability Appraisal (2024) compares all of the spatial options assessed. Despite Options G and I scoring the same overall, the Council has decided to pursue Option I as it proposes a significantly lower quantum of growth. The Sustainability Appraisal does not state why Option G is no longer the preferred spatial strategy and the only justification provided to support Option I is that it delivers less housing growth, despite Spatial Option I failing to consider that there are settlements outside of the District, for example the edge of the Black Country, which are far more sustainable than the Tier 1 settlements assessed.

The NPPF requires plans to be prepared positively (Paragraph 16) supported by evidence (Paragraph 31). The Council has clearly updated its evidence in order to support an already known preferred strategy (a desire to deliver less housing in the 2024 *Local Plan Review*), rather than the evidence being used to inform the preferred strategy.

As drafted, we therefore consider Policies SA1 – SA5 (in conjunction with Policies DS4 and DS5) are not positively prepared, justified, effective nor consistent with national policy and therefore cannot be considered sound in line with the NPPF.

In light of the above, we consider that further strategic housing sites, including Yieldfields Farm (Call for Sites Ref: 492a, 492b and 492c), should be allocated within the South Staffordshire Local Plan, in order to assist the Council in meeting the unmet housing need arising from the GBBCHMA. Such an allocation would be consistent with the now removed tier '*Growth adjacent to the neighbouring towns and cities in the Black Country*'.

The southern section of Land at Yieldfields Farm, located in Walsall, previously benefitted from a draft housing allocation for 978 homes in the Black Country Plan 2039. It is considered that the Site's proximity to the urban area of Bloxwich, which can easily be accessed via sustainable modes of transport, means that it could have a significant role in meeting the cross boundary unmet needs of the Black Country and provides an opportunity to create a sustainable new community.

The need to deliver a sufficient supply of homes is emphasised in the NPPF and Paragraph 60 identifies that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. In addition, Paragraph 73 of NPPF confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages or towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Paragraph 74 further identifies that strategic policy-making authorities should work with other authorities, if appropriate, to identify sustainable locations for such development where this could help to meet identified needs in a sustainable way. It is therefore considered providing large urban extensions focused to the north of the Black Country where there is an unmet housing need, aligns with the aims of NPPF.



B. Has the identification and selection of the proposed site allocations been robustly evidenced and subject to robust, consistent and transparent methodologies, including in relation to the approach to existing committed sites?

As described above, Policies SA1 - SA5 are not considered to be sound as they are not positively prepared, not justified and not consistent with national policy for the following reasons:

The Council has produced a Housing Site Selection Topic Paper (2024), which follows the previous Housing Site Selection Topic Papers (September 2021 and November 2022) which all form part of the evidence base supporting the Local Plan.

The documents set out how the Council will assess and allocate housing site options to meet its proposed housing target for the Local Plan. It summarises which sites are proposed for housing and which are not, including summary reasons for this decision. To ensure all relevant factors for site selection are highlighted on a site-by-site basis, the Council has prepared proformas for each of the sites shortlisted for assessment (included at Appendix 3 of the Housing Site Selection Topic Paper).

Within the site assessment proformas, major positive and major negative effects arising within the post-mitigation site assessments in the Sustainability Appraisal are recorded. These findings are linked to the Sustainability Appraisal, which has also been updated in 2024.

The updated 2024 Housing Site Selection Topic paper summarises Land at Yieldfields Farm (Site Ref: 492 a, b and c), in the context of the Council's new preferred spatial strategy (Option I), concluding that the land is not adjacent to a Tier 1 settlement and thus is not consistent with the preferred spatial strategy.

It is submitted that this assertion is misleading and is evidence of preparing evidence to suit an already known preferred strategy, rather than the evidence being used to inform the preferred strategy.





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