

# South Staffordshire Local Plan examination – matter 5 (spatial strategy)

Barratt David Wilson

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## Introduction

1. This statement is submitted on behalf of Barratt David Wilson ('BDW') in response to the Inspector's matters, issues and questions to the South Staffordshire Local Plan.
2. BDW is promoting land at south of New Road, Featherstone (site ref: 396). Details regarding the site can be found in DBW's representations to the 2024 reg 19 publication plan consultation.
3. We have responded to the questions most relevant to BDW's interests at Featherstone.

## Issue 1 Questions

**Q1: how was the settlement hierarchy derived? When qualifying your answer, is the methodology used to determine the hierarchy appropriate and sufficiently robust?**

4. This is set out in the Rural Services and Facilities Audit (2021) (EB15). Appendix 5 of the audit provides a scoring matrix.
5. There is no clarity as to whether any measuring metric has been given more weight than any other.
6. Featherstone (proposed as a tier 3 settlement) has a strong offering of services and facilities, but most critically it is within close proximity to where the majority of the district's employment growth is being directed, at i54, the West Midlands Interchange and the ROF Featherstone employment site (as recognised at para 2.3 of the 2024 reg 19 publication plan). This accessibility elevates Featherstone and should therefore be given greater weight when determining where each settlement sits in the hierarchy.

**Q2: how was the level of development anticipated in different settlement categories been derived? Does the settlement hierarchy appropriately reflect the role and function of these settlements?**

7. See our response to Q1 above.

**Q3: in terms of the distribution of housing and employment development across the plan area:**

***a. is it clear how and why the preferred spatial strategy has been selected?***

***b. what options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?***

***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.***

***d. what roles have the Sustainability Appraisal and Viability Study had in influencing the spatial strategy?***

8. Featherstone has a greater capacity for accommodating housing growth than proposed even if South Staffordshire's total housing need is not increased.
9. Should the decision be made not to increase South Staffordshire's housing requirement to align more closely with NPPF 2024 local housing need ('LHN') and the increased housing needs across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') then land at south of New Road, Featherstone should be identified as safeguarded land for future development needs (an approach taken by the current development plan), to de-risk the plan.

## **Issue 2 Questions**

**Q1. Is the approach taken in the plan sound, and:**

***a. Taken as a whole and in view of gaps in the Infrastructure Delivery Plan about project costings and timescales, what evidence supports a conclusion that the growth proposed by the Plan is deliverable when anticipated in terms of infrastructure capacity?***

***b. How has the availability of key public services influenced the selection of the preferred Spatial Strategy been considered?***

10. No comment.