

Peveril Securities Limited

Matter 12: Hearing Statement

Respondent Reference Numbers:

AGT24-048-01-01, AGT24-048-01-02 and AGT24-048-01-03

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PLANNING

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1.0 Introduction

CarneySweeney are acting on behalf of Peveril Securities Limited in making representations to the emerging South Staffordshire Local Plan (SSLP), with representations having been made to the previous Regulation 19 consultation stage in relation to two sites within Peveril Securities Limited's ownership: land north-west of Featherstone and land south of Hilton Cross Strategic Employment Site.

Our previous representations are not repeated here but should be read in conjunction with this Hearing Statement to the Inspectors' Matters, Issues and Questions for Matter 12.

As requested, we have provided separate Hearing Statements for the following Matters:

- Matter 2: Duty to Co-operate
- Matter 4 - Development Needs and Requirement
- Matter 12: Building a Strong Local Economy
- Matter 14: Protecting and Enhancing the Natural Environment

This document covers Matter 12 – Building a Strong Economy with responses provided in respect of employment development.



2.0 Matter 12 – Development Needs and Requirement

Respondent Reference Numbers: AGT24-048-01-01, AGT24-048-01-02 and AGT24-048-01-03

Issue 1: *Whether the approach of Policy EC1 to sustainable employment growth is justified, effective and consistent with national policy.*

Questions:

1. *In terms of being justified and consistent with national policy:*

a. *What is the basis for this policy approach?*

This is a question for the Council to respond to, and depending on their response, we may wish to comment in the Hearing Session.

b. *Is the proposed employment land strategy justified through robust evidence and is it consistent with the Spatial Strategy and the National Planning Policy Framework?*

Whilst we support Policy EC1 where it states economic growth will be primarily focused on the district's six strategic employment sites including Hilton Cross, this policy and other policies in the Plan relating to employment growth fail to acknowledge that land immediately adjacent to established employment sites such as Hilton Cross can also represent sustainable locations for further employment development.

The focus on bringing forward new employment sites should not be at the expense of supporting the growth of existing employment sites. In the case of Hilton Cross, which is well placed to deliver small scale employment opportunities close to the M54, only some 5 hectares are still available to be developed.

It is unclear from the evidence base whether, when developing the employment land strategy, consideration has been given to extending the boundaries of existing strategic employment sites such as Hilton Cross to accommodate employment growth, as opposed to focusing employment growth on newly allocated sites. We believe the Council should review its Green Belt boundaries and where appropriate, propose alterations to its boundaries meet the needs of existing employment areas.

2. *In terms of being effective:*

a. *How does the employment land strategy adequately recognise the economic impacts of housing*



delivery?

This is a question for the Council to respond to, and depending on their response, we may wish to comment in the Hearing Session.

- b. How will the preferred employment land strategy be effective in meeting the range of identified quantitative and qualitative employment needs of the district for the plan period in a sustainable way?*

This is a question for the Council to respond to, and depending on their response, we may wish to comment in the Hearing Session.

- c. How will the preferred employment land strategy promote sustainable travel patterns, including from planned housing growth within the plan period and commuting patterns with neighbouring areas?*

This is a question for the Council to respond to, and depending on their response, we may wish to comment in the Hearing Session.

- d. Should Policy EC1 provide clear criteria to determine the acceptability of specific proposals on employment land within the district?*

This is a question for the Council to respond to, and depending on their response, we may wish to comment in the Hearing Session.

- e. How does the Plan address employment development on unallocated sites?*

The Plan does not directly address employment development on unallocated sites. The Plan should support development adjacent to existing strategic employment sites where there are no suitable development opportunities within the employment site.

3. Are any modifications necessary in the interests of soundness of the Plan?

In the interests of soundness, the scope of the evidence base should be extended to consider the suitability of land adjacent to existing allocated employment sites to deliver further employment development. Where applicable, this process should include a review of the Green Belt boundaries.

Additional wording is also needed in Policy EC1 to support employment on land adjacent to existing employment sites where suitable development opportunities are not available.

