

# St Francis Group (Featherstone 2) Ltd

## Matter 5: Hearing Statement

**Respondent Reference Numbers:**

**AGT24-048-02-01, AGT24-048-02-02, AGT24-048-02-03, AGT24-048-02-04 and  
AGT24-048-02-05**

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PLANNING

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## **1.0 Introduction**

CarneySweeney are acting on behalf of St Francis Group (Featherstone 2) Ltd in making representations to the emerging South Staffordshire Local Plan, with representations having been made to the previous Regulation 19 consultation stage.

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

- Matter 5: Spatial Strategy
- Matter 7: Site Allocations
- Matter 12: Building a Strong Local Economy

This Hearing Statement covers Matter 5 – Spatial Strategy with responses provided in respect of employment development.



## 2.0 Matter 5: Spatial Strategy

**Respondent Reference Numbers: AGT24-048-02-01, AGT24-048-02-02, AGT24-048-02-03, AGT24-048-02-04 and AGT24-048-02-05**

### Issue 1

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

#### Questions:

*3. 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?*

Yes. The Sustainability Appraisal (EB2a) and the Economic Strategy & Employment Site Assessment Topic Paper (EB42) set out the Council's employment land approach and assessment of sites to meet the employment land requirements for the plan period.

Paragraph 5.2.3 of EB2a provides an overview of the reasonable alternatives assessed through the plan making process for both employment growth options and employment spatial distribution options summarised as follows:

- Employment Growth Options x3 (see the Issues and Options SA Report, 2018)
- Employment Spatial Distribution Options x4 (see the Issues and Options SA Report, 2018)

Paragraphs 5.3.10 - 5.315 (including Table 5.4) of EB2a provides further detail on the appraisal of the Employment Growth Options comprising the following:

- *Option A: To reflect the oversupply of employment land in the district deallocate the poorest quality employment land as identified by the by the EDNA and reallocate poorer quality sites that would be suitable for alternative uses*
- *Option B: Maintain current protections for the existing employment land stock.*
- *Option C: Allocate additional employment land to meet cross boundary employment needs, where an*



*undersupply in other areas of the Functional Economic Market Area (FEMA) is robustly demonstrated.*

The preferred employment spatial option is shown to be a combination of Option B and Option C, with the Council's reasoning stated as follows on Page 33 of EB2a:

*"Comment from Council: The Council's chosen employment growth option is a combination of Option B (maintain protection of existing employment land) achieved through the implementation of Policy EC2, and Option C – allocating additional employment land to meet cross boundary needs. This is achieved through Policy DS4, that confirms the Council's ability to meets its own objectively assessed needs for employment land (62.4ha) plus a 45.2ha contribution to unmet needs of the Black Country (plus a proportion of West Midlands Interchange). The decision to proceed with this approach has been led by the Council's Economic Development Needs Assessment (EDNA) which confirmed strong functional links between South Staffordshire and the Black Country authorities, and demonstrated a surplus pipeline of strategic employment land that is bolstered further by the allocation of the suitable new site allocation at M6, Junction 13."*

The employment spatial distribution options assessed are set out at Paragraphs 5.4.8 – 5.4.13 (including Table 5.6) of EB2a, summarised as follows at Paragraph 5.4.8:

- *Employment Distribution Option A – Continue with the existing policy approach and focus employment growth around the four existing freestanding strategic employment sites (ROF, i54, Hilton Cross and Four Ashes);*
- *Employment Distribution Option B – Identify new freestanding employment sites;*
- *Employment Distribution Option C – Deliver small scale employment allocations in the district's larger villages; and*
- *Employment Distribution Option D – Deliver employment allocations as part of mixed-use schemes.*

The preferred employment distribution option comprises a combination of Option A and Option B, with the Council's reason for this approach stated as follows on Page 37 of EB2a:

*"Comment from Council: The Council's chosen employment growth option is a combination of Option A of focusing employment growth at the existing freestanding strategic employment sites and Option B of identifying new freestanding employment sites. This is a result of most of the existing pipeline of employment land being on the existing strategic employment sites, most notably at i54 and ROF Featherstone, which have been assessed by the Council through its employment site assessment topic paper as suitable for re-allocation. Proceeding with Option B reflects the opportunity to allocate the*



*West Midland Interchange (WMI) as a strategic employment site which already has DCO consent through the NSIP process, as well as the opportunity to allocate a non-Green Belt site assessed as suitable through the employment site assessment topic paper at M6, Junction 13.”*

The above therefore demonstrates that the Council has considered reasonable alternatives in respect of the spatial strategy and distribution for employment land in the district.

The preferred employment spatial strategy further forms part of the Publication Plan (CD1) with the Council seeking to provide for their own employment needs and to accommodate a proportion of cross boundary needs through Policy DS4. The preferred employment distribution also forms part of Policy DS5 with employment growth being directed to the existing freestanding strategic employment sites (ROF, i54, Hilton Cross and Four Ashes), and two new proposed strategic employment sites (West Midlands Interchange and M6 Junction 13, Dunston).

*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.*

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

*d. What roles have the Sustainability Appraisal and Viability Study had in influencing the Spatial Strategy?*

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

## **Issue 2:**

*Whether the Plan’s approach to infrastructure planning is justified, effective and consistent with national policy.*

## **Questions**

*1. 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?*

Whilst we have no comments on this question at this stage, it is noted that the Council are due to provide a



response through submission of their Hearing Statement, following a review of which, we may wish to make comments during the Hearing Session.

