

St Francis Group (Featherstone 2) Ltd

Matter 7: 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 7 – Site Allocations with responses provided in respect of employment development.



2.0 Matter 7: Site Allocations

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

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

Questions:

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?

Yes. As per our response to Matter 5 Question 3 a) and b) the employment spatial strategy reflects the Council seeking to provide for their own employment needs and to accommodate a proportion of cross boundary needs through Policy DS4 of CD1. Employment development is also 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), Policy DS5 of CD1. The distribution of employment allocation is therefore considered to be consistent with the Spatial Strategy.

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?

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

Chapter 4 of EB42 sets out the site assessment process and methodology applied, assessing new site submitted via the Call for Sites process, including an assessment of sites with available land and without full/reserved matters planning permission (as at April 2023) to determine if these sites "... are still suitable for employment development and therefore need to be reallocated through the new Local Plan...".



g. The Council has set the requirements for each site allocation within appendix B. Is that approach effective? Are the key requirements for each site allocation justified and sufficiently clear?

We have no comments to make in respect of this question.

h. Do the proposed allocations have a reasonable prospect of meeting the other relevant policies of the development plan? What evidence of this exists?

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 3:

Whether the preferred employment sites are justified, effective and consistent with national policy.

[Focus: Policy SA5]

Questions:

1. Are the allocations for employment development underpinned by a robust evidence base that reflects existing business needs?

Yes in the context of the proposed allocation of ROF Featherstone. The proposed uses forming part of this site, being Use Class E(g); B2; B8 as shown in Policy SA5, reflects the uses approved through planning permission reference: 20/01131/OUT, and subsequent reserved matters approval reference: 23/00378/REMM.

We do not wish to comment on the other proposed employment allocations.

2. How were different sites considered for inclusion as employment allocations?

a. What process did the Council follow in deciding which sites to allocate?

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.

b. How did the Council consider the viability and deliverability of sites in deciding where to allocate development?

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.



3. Are the employment site allocations identified as gross or net hectares?

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.

4. Have site specific key requirements for each employment allocation been considered and identified within the Plan?

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.

5. Are any modifications necessary for reasons of soundness?

In part yes in respect of Policy SA5 (CD1) and Inset Map 51 (PM3: 51).

The inclusion of the following reference in Policy SA5 is not necessary for the policy to be effective as this statement will become immaterial with the passage of time:

“... the above sites represent those within the district’s pipeline supply of sites as at April 2023 without a full or reserved matters planning permission, in addition to West Midlands Interchange”

In terms of Inset Map 51 (PM3: 51), including the maps on page 223 and page 246 of CD1, there are some discrepancies with the extent of the ‘Green Infrastructure’ boundary shown for the proposed allocation at ROF Featherstone against the planning approval (reference: 20/01131/OUT) and reserved matters approval (reference: 23/00378/REMM). It is also noted that Inset Map 51 does not show the position of the access road, which is currently shown in the adopted Site Allocations Document. Two separate access routes were shown on the policies map in the Site Allocations Document to show the indicative access solutions, and also subsequently approved through planning permission reference: 20/01131/OUT.

