

Lu2 Snow Hill
Birmingham
B4 6GA

T: 0121 794 6250
F:

Your ref: 239
Our ref: J0053613

Louise St John Howe
Programme Officer
PO Services
PO Box 10965
Sudbury
Suffolk
CO10 3BF

Via Email Only: louise@poservices.co.uk

9th April 2025

Dear Inspectors K Ford MSc MRTPI and C Dillon BA (Hons) MRTPI,

WRITTEN STATEMENT FOR SOUTH STAFFORDSHIRE DISTRICT COUNCIL'S LOCAL PLAN EXAMINATION

LAND WEST OF WROTTESLEY PARK ROAD (SOUTH) – DRAFT ALLOCATION 239

Carter Jonas is instructed by LF (Perton) Limited to submit a Written Statement in respect of the Examination of South Staffordshire District Council's (SSDC) Local Plan Review. As a key strategic landowner within South Staffordshire, our client is delighted to be able to respond to this further consultation and we look forward to working with SSDC in the future implementation of this Local Plan, once adopted.

Land West of Wrotesley Park Road (South), is a draft allocation (Reference: 239) for a minimum of 150 dwellings under Policy SA3 (Housing Allocations) of the Plan (referred to from now as "the Site").

The Regulation 19 Representations previously produced by Carter Jonas on the Site (Respondent Reference No. AGT24- 008-01-01) confirmed that the draft allocation is positively prepared, justified by a robust evidence base, effective, and consistent with national planning policy. This considered that the process to produce the Local Plan can be considered sound and our conclusion in this letter remains the same.

SSDC's Housing Topic Paper (2024) concluded that the Site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.

Having reviewed the comments made at the most recent Regulation 19 consultation stage and relevant Statements of Common Ground produced thereafter, we offer the following observations in relation to **Matter 7 (Site Allocations), Issue 2 (Whether the preferred housing sites are justified, effective and consistent with national policy)**. Where relevant, specific questions under this issue are cited below.

Housing Trajectory

In regard to question j, the minimum rate of dwelling delivery is agreed in the Statement of Common Ground (23/04/2024) at the following rate which is still considered achievable. Notably, the Council's Five Year

Housing Land Supply Report (December 2024), reported that 47 homes were completed by Severn Homes during FY 23/24 within the adjoining site which was previously promoted by the Client.

2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
0	0	45	45	45	15	0

Our client is progressing with preparing a planning application for the Site. We intend to undertake a pre-application enquiry with SSDC and are in the process of instructing consultants to produce the technical documentation. The proposed rate of delivery considers the fact an application is being prepared imminently, allowing sufficient time to agree terms with a housebuilder and for a Reserved Matters and Discharge of Condition applications to be submitted and determined.

SSDC are proposing to provide 4,086 homes in the district between 2023-2041, plus approximately 10% additional homes. The draft allocation contributes to meeting this housing need and assisting in significantly boosting the supply of homes in accordance with the Government's overarching objective in relation to housing, as detailed in paragraph 60 of the NPPF (2023).

The Site presents an opportunity to deliver a mix of housing to meet the needs of the local community. A forthcoming scheme will comply with emerging Policy HC1 (Housing Mix) and Policy HC3 (Affordable Housing) by providing a mix of market and affordable homes.

The forthcoming scheme will consider the following requirements raised in the draft allocation in the Publication Plan (2024).

We can confirm that a forthcoming scheme will retain trees and hedgerows which border the Site and will include a comprehensive landscaping scheme which will include additional planting along the northern boundary. Furthermore, any historic environment mitigation which is considered justified will be undertaken, noting that the South Staffordshire Local Plan Historic Environment Site Assessment (October 2022) considers the Site's impact on the historic environment to be low.

We note the requirements for a scheme to include transport mitigation and, where necessary, junction improvements to A41/Wrotesley Park Road. Any forthcoming planning application will be supported by a Transport Assessment which will assess the proposed developments potential impact and will provide mitigation measures if considered necessary. We are shortly due to engage in pre-application discussions with the Highways Authority.

Highways

In relation to question k, we have had positive discussions with the Highways Authority on the existing access to the Site. Subsequently, we secured a Statement of Common Ground with SSDC on 23/05/2023 which agreed to provide vehicular and pedestrian access via the neighbouring allocated site to the south which connects to the existing roundabout on Wrotesley Park Road.

We note discussions during the Regulation 19 consultation stage regarding modelling requirements to understand any cross-boundary impacts for our Site in relation to a planning application.

Drainage

In relation to question l, we have undertaken discussions with the Lead Local Flood Authority (LLFA) since the Regulation 19 consultation period in regard to the drainage and flood risk at the Site. This included submission of Flood Risk Assessment and Sustainable Drainage Report as part of a pre-application engagement enquiry.

During the pre-application discussions, it was agreed with the LLFA that the discharge rates are appropriate for the Site and the flood risk considerations had been identified accordingly. The LLFA agreed that the areas of surface water flood risk in the south of the Site will be managed onsite via highway corridors and ground reprofiling.

This will be aided by the development of the field to the south in which positive drainage networks will further remove surface water runoff entering the Site, subject to planning permission and significant progress delivering the scheme in line with the housing trajectory. The LLFA confirmed that the submission was robust and thorough.

Education

In relation to question I, the Site falls outside of the ideal catchment area for local schools, however we consider that it is sequentially preferable for allocation. The Lead Education Authority's response to the Regulation 19 consultation did not object to this allocation.

This is supported by the Housing Site Selection Topic Paper (2024) which states:

"The site assessment process has revealed no unmitigable constraints to the site's delivery, other than the major negative effects predicted in the Sustainability Appraisal due to the distance of the site from local schools. However, as this land has already been removed from the Green Belt and was considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, this is not considered to be a barrier to development in this instance."

Any future planning application will consider whether education related developer contributions are necessary, noting comments made by the Local Education Authority.

Conclusion

In summary, the draft allocation contributes to meeting SSDC's housing need and positive discussions have been undertaken on technical matters as part of the Applicant's work producing a planning application for this Site.

Noting the above, the draft allocation is clearly a deliverable site and supports the overarching strategy promoted by the Local Plan which we believe is sound.

Should you have any questions or wish to discuss any matters further, please do not hesitate to get in contact.

Yours sincerely,

Andy Cowan MRTPI
Associate Partner

E: Andy.cowan@carterjonas.co.uk
T: 0161 674 0480
M: 07776 490276