

# South Staffordshire Local Plan review

Examination in Public

## Hearing Statement for Matter 5 – Spatial Strategy

On behalf of St Philips (Bratch Common, Wombourne)

Representor Ref: AGT24-030-07-02

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Author: SB

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## Document Management.

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## Introduction

Pegasus Group is instructed by St Philips to respond to the South Staffordshire District Council Local Plan Examination: Matters, Issues and Questions Identified by the Inspectors, which has been produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan ('the Plan').

This Statement relates to Matter 5 – Spatial Strategy.

St Philips have a specific interest in land at Bratch Common Road, Wombourne, which has capacity to deliver up to 250 dwellings ('the Site'). A Site Location Plan is at **Appendix 1**.

St Philips has previously submitted details of the Site alongside detailed representations to all previous stages of the Local Plan process including the Issues and Options and the Spatial Housing Strategy and Infrastructure Delivery consultation in October 2019; the Regulation 18 Preferred Options consultation in December 2021; the Regulation 19 Submission Plan consultation in 2022; and the Regulation 19 Submission Plan consultation in 2024.

The Site extends to approximately 28 hectares and is located to the northwest of Wombourne but immediately adjacent to the settlement's north western boundary. The Site is bound by Bratch Common Road and Trysull Road on its southern and western boundaries, with the north and western edges adjacent to open countryside beyond.

## Matter 5: Spatial Strategy

**Issue 1: Whether there is a clear Spatial Strategy which is justified, effective and consistent with national policy**

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

The settlement hierarchy is informed by the Rural Services and Facilities Audit Study 2021. This assessed access to services and facilities, namely convenience stores/supermarkets, community facilities, retail centres, employment locations, education facilities, and public transport, scoring each settlement depending on its accessibility to these. A description was developed for each tier of the hierarchy, and this assisted in categorising settlements. Whilst there are a number of limitations, including the lack of a capacity analysis, no consideration of constraints that may affect suitability for development, and the use of static data, meaning that conclusions may not reflect recent changes or developments in the area, potentially leading to outdated conclusions, it is considered that the methodology is generally appropriate and sufficiently robust for the purpose of establishing a hierarchy, which is broadly consistent with the previous settlement hierarchy set out in the 2012 Core Strategy (paragraph 4.8).

**Q2. How has the level of development anticipated in different settlement categories been derived? Does the settlement hierarchy appropriately reflect the role and function of these settlements?**

The Spatial Strategy Topic Paper sets out the various growth options which SSDC considered. Option I is selected as the preferred spatial strategy, and the reasons for this are discussed in response to question 3(b) below. Option I directs growth to Tier 1 settlements, and thus Green Belt release is restricted to these settlements, with two strategic allocations which will deliver 1,374 dwellings. This is followed by 914 homes in Tier 2 settlements, 228 homes in Tier 3 settlements, 30 homes in Tier 4 settlements, 81 homes south of Stafford, and 194 homes in other locations and Tier 5 settlements. This is considered to be appropriate, although Tier 2 and 3 settlements could accommodate more housing to meet a higher housing requirement which will provide a greater contribution towards accommodating unmet needs in the GBBCHMA, given the sustainability credentials of these settlements, as highlighted in the Rural Services and Facilities Audit Study 2021. In some instances, this would necessitate Green Belt release in these locations.

Wombourne is a good example of a Tier 2 settlement, which has been demoted from Tier 1 but which has an excellent range of facilities and services, and also good transport links. It is considered an acceptable location for development and there are locations that could deliver development to meet needs.

**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?**

Section 5 of the Spatial Strategy Topic Paper 2024 draws conclusions on why SSDC have selected Spatial Option I. SSDC state that this is their preferred option as they consider it to balance the need to deliver housing against the constraint placed by Green Belt land, restricting the release of this to Tier 1 settlements, which are considered the most sustainable locations.

Notwithstanding, Wombourne was a Tier 1 settlement and appears to have been demoted because it does not have a train station. This does not make it an unsustainable location and it has other transport links that make it sustainable. It should therefore be considered to accommodate development instead of focusing growth and development into a few locations and particularly concentrating on Codsall and Penkridge. St Philips' land interest at Bratch Common Road would represent such a location.

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

The Spatial Strategy Topic Paper 2024 provides a detailed assessment highlighting advantages and disadvantages for each of the nine spatial options. These are set out in Section 4 of the Topic Paper.

However, the role the District Plays in the wider GBBCHMA and FEMA must be emphasized and recognised further in Policy DS5. Spatial Strategy Option I and the large reliance on Tier 1 settlements fails to reflect the District's relationship with the adjoining areas of Dudley and Wolverhampton, where there is a high employment commuting ratio from the District to these urban areas via key infrastructure links. In addition to housing at Tier 1 settlements and to the north of the district, the spatial strategy should therefore place greater emphasis on housing growth along the eastern edge of the District, as has been highlighted in the GBBCHMA Strategic Growth Study.

Similarly, the protection afforded to the District's Green Belt should not be at the expense of sustainable development patterns and strategies. The Council's evidence base acknowledges that Tier 2 and 3 settlements can also accommodate housing growth to deliver sustainable development. The use of brownfield land and release of Green Belt land should be balanced to deliver a range of sites to deliver a range of housing, without, for example, overreliance on flatted developments on brownfield sites, reduced affordable housing due to viability issues of brownfield delivery and thus failure to deliver the right housing in the right places. Tier 2 and 3 settlements are often sustainable in nature with bus services and facilities within the settlement – a train station is not the only factor that should be considered.

Windfall development across the Plan period is proposed at 600 homes. But windfall development does not allow for the delivery of planned strategic infrastructure nor the range of market and affordable housing which the delivery of carefully considered housing allocations can deliver.

Furthermore, having confirmed such a small capacity on brownfield sites, it is unclear what windfall developments will come forward to deliver housing, particularly as the SHELAA 2023 identifies a substantial number of the identified brownfield sites as being neither suitable nor available.

Further, historic windfall delivery rates have been based on densities of 35 dwellings per hectare on average. However, since the Core Strategy was adopted in 2012, matters such as 10% mandatory BNG, Nationally Described Space Standards and M4(2) and M4(3) compliant homes have been / are being introduced. These all have capacity implications for housing delivery and a lower density should be assumed, which may in turn reduce the expected windfall allowance.

**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.**

Spatial Option I greatly reduces South Staffordshire's contribution towards accommodating unmet needs in the GBBCHMA and completely fails to reflect the district's relationship with the adjoining areas of Dudley and Wolverhampton, and the high employment commuting ratio from the district to these urban areas. The rationale for this is unconvincing, and the Spatial Strategy should place a greater emphasis on housing growth in the eastern edge of the District, as recommended in the GBBCHMA



Strategic Growth Study (2018), which forms part of the evidence base, thus such an approach would be fully justified. Small and medium scale housing allocations here, on sites which are sustainably located, with good accessibility and public transport links, would contribute towards meeting short term needs in the GBBCHMA, closest to the source of this need.

This could include land at Bratch Common Road, which would represent a suitable and sustainable Green Belt release, as set out in Matter Statements on Matter 6, Green Belt and for which exceptional circumstances exist to amend Green Belt boundaries.



# Appendix 1

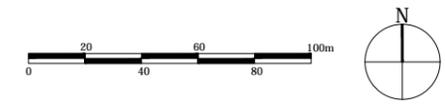
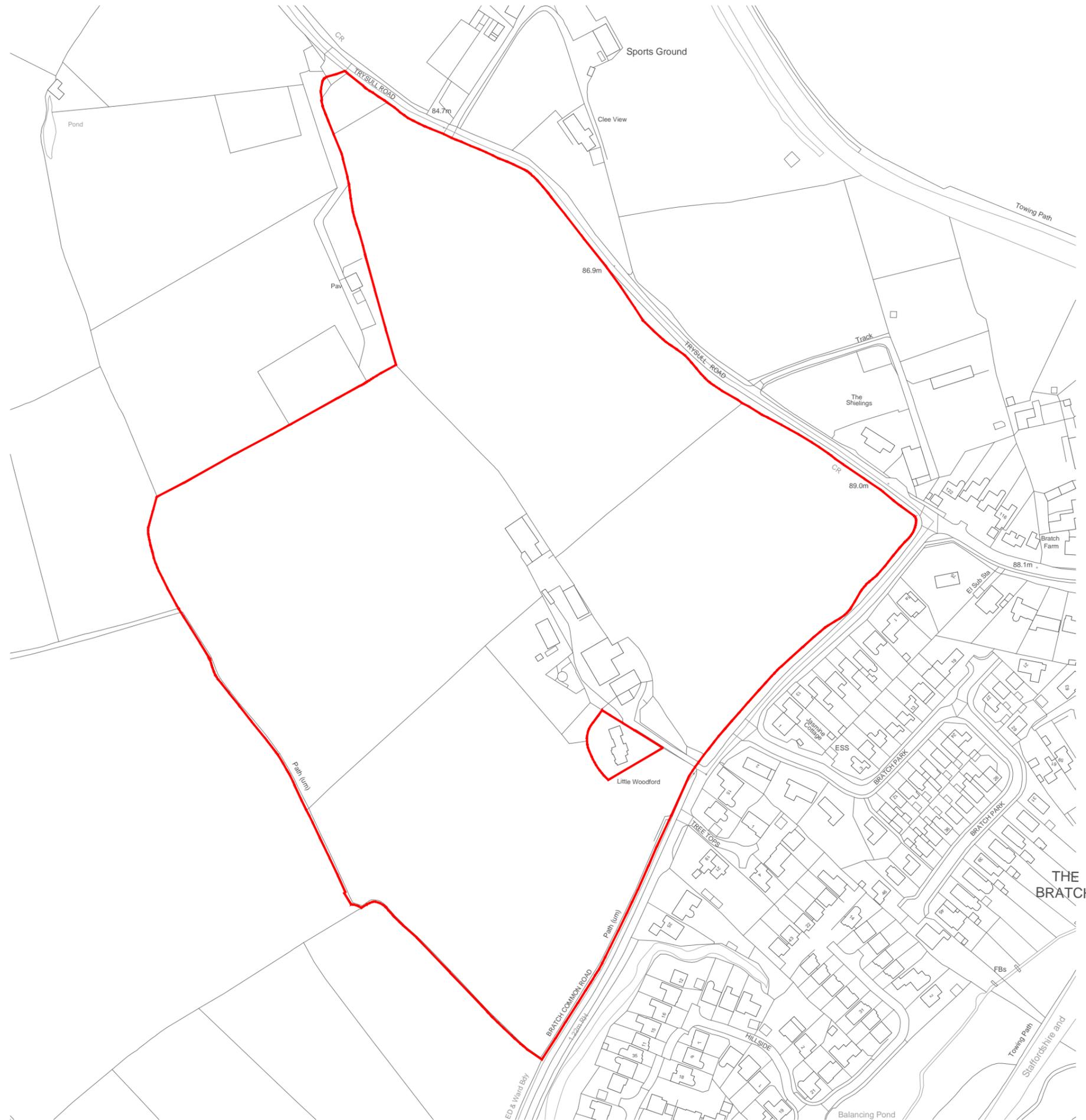
Site Location Plan

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A Little Woodford removed from site boundary	03.08.18	EMB	CDB

### LEGEND

 Site Boundary  
 12.71 Ha



Project  
**Bratch Common Road**  
**Wombourne**

Drawing Title  
**Site Boundary Plan**

Date	Scale	Drawn by	Check by
20.07.18	1:2500 @ A3	KU	EB
Project No	Drawing No	Revision	
29042	9000	A	



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