

Matter 5 – Issue 1

Question 2.

**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 settlement hierarchy does not appropriately reflect the role and function of some settlements and the level of growth being directed to the settlements is disproportionate and unjustified.

In the adopted Core Strategy (document reference DP1), Kinver is categorised as a Main Service Village which is the highest category in the settlement hierarchy. South Staffordshire District Council's ('SSDC') are proposing to downgrade Kinver within the settlement hierarchy in the emerging plan as a Tier 2 settlement (document reference CD1). As set out in our Regulation 19 response, SSDC has failed to justify why the settlement should be downgraded. Kinver is the largest settlement in the southern part of the District with good access to the Black Country. The very limited growth being directed to Kinver (only through committed developments) will lead to a disproportionate amount of growth in the southern part of the District. 60.6% of the growth proposed is being directed to the north of District.

In light of the above, the settlement hierarchy should not be amended in the emerging plan and Kinver should continue to be identified as one of the most sustainable settlements in the District with an appropriate level of growth being directed to it.

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

Barratt West Midlands has provided responses to each of the points below.

- a) It is not clear how the preferred spatial strategy was selected. SSDC's misinterpretation of the National Planning Policy Framework ('NPPF') 2023, led them to pursue an alternative spatial and growth strategy within the 2024 Publication Plan (Document reference CD1) than that considered in the 2022 Publication Plan (Document reference PC1) and its evidence base. The preferred 'Option I' was not an option assessed in the Sustainability Appraisal ('SA') 2022 (Documents reference EB3-EB3b) and was 'created' as a new option to suit SSDC's interpretation of the NPPF 2023 and support the reduction in housing to meet the wider Housing Market Area needs.
- b) 'Option G' was the preferred option in the 2022 Publication Plan. Sufficient justification has not been provided for not pursuing Option G (or a hybrid of Option G and I) when it was previously assessed by SSDC in 2022 as being the most suitable option (SA 2022). Despite Options G and I scoring the same overall in the SA 2024 (Document reference EB2-EB2b), SSDC decided to pursue Option I. The SA (2024) does not state why Option G is no longer the preferred spatial strategy and the only justification provided to support Option I is that it delivers less housing growth which is not a sound approach nor does it align with the Government's objective to significantly boost the supply of homes (NPPF paragraph 60) or support economic growth.

- c) SSDC claim to be pursuing a 'capacity-led' approach to development and the chosen Spatial Strategy (Option I) directs growth towards sustainable non Green Belt development sites and limited Green Belt development in Tier 1 settlements that are well-served by public transport. SSDC has not provided justification on the reasonable alternatives assessed around the Tier 1 settlements. There are dismissed sites adjacent to Tier 1 settlements which perform comparatively to the draft allocations but have not been allocated. There are also sites allocated for residential development which are in the Green Belt and not in Tier 1 settlements.

In addition to the above, the NPPF (paragraph 147) does not states that only the most sustainable settlements should be the subject of growth and settlements well served by other forms of public transport, such as buses, cannot be considered suitable. SSDC has not duly considered the accessibility of settlement which are not Tier 1 but well served by buses, such as Kinver.

At the very least, the plan should include safeguarded land which can be delivered within the plan period (prior to the 'early' review being adopted) should SSDC continue to fail to demonstrate a 5YHLS. We know that there is capacity in the District for the plan to allocate additional land, such as Barratt West Midlands' land to the north and south of Dunsley Road, Kinver (site references 549 and 550).

- d) See above comments on the SA – it has not sufficiently evidenced why SSDC is pursuing Option I and other options are no longer considered suitable.

Question 5.

Have the social, economic and environmental impacts of the Spatial Strategy on neighbouring areas been identified and addressed?

These impacts have been identified but in light of the comments above on the failure to justify the proposed HMA contribution, the spatial strategy pursued and the implications of reducing the housing requirements on economic growth, they have not been addressed and therefore fails the justification test (NPPF paragraph 35).