



## **South Staffordshire Local Plan Review**

### **Response to Inspector's Matters Issues and Questions (MIQs) on behalf of Clowes Developments**

**Representor ID: AGT24-037-02**

#### **Matter 1 – Procedural and Legal Requirements**

##### **Sustainability Appraisal**

##### **9. In terms of the Sustainability Appraisal:**

##### **f. Is consideration of reasonable alternatives and reasoning for rejecting alternatives clearly justified?**

SSDC undertook a second Regulation 19 consultation based on their misinterpretation of the NPPF 2023 (para 145), which led them to pursue an alternative spatial and growth strategy within the 2024 publication plan (Document reference CD1).

Option I (primarily focusing development at Tier 1 settlements) is referred to in the Regulation 19 Plan as being the Council's preferred option. Option I was not an option assessed in the Sustainability Appraisal ('SA') 2022 (Documents reference EB3-EB3b).

The SA (2024) does not properly consider why Option I is preferred above other options. It considers a combination of other options to make a composite "Option I". This is a fundamental flaw of the Sustainability Appraisal. It therefore also fails to adequately assess reasonable alternatives in terms of the overall scale of housing pursued and the distribution of it across the District. This means that the plan is not justified with a suitable evidence base.