

**Matter 5 - Issue 1**

**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?**

Taylor Wimpey has provided a response to each of the above points below.

- a) It is not clear how the preferred spatial strategy was selected. South Staffordshire District Council's ('SSDC') misinterpretation of the National Planning Policy Framework ('NPPF') 2023, led them to pursue an different spatial and growth strategy within the 2024 Publication Plan (Document reference CD1) from that which was 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, SSDC has not considered sustainable settlements which are not within the District. In the context of a significant Housing Market Area ('HMA') shortfall and the District providing a contribution to this shortfall, the Plan and its evidence base has not sufficiently considered the sustainability of settlements adjacent to the District. The District immediately borders the built up edge of the Black Country conurbation. The Black Country conurbation provides a wide range of shops/services/facilities as well as job opportunities and is arguably more sustainable than any of the settlements in the District. It is therefore not clear in SSDC's evidence base why their spatial strategy has not sought to direct growth immediately adjacent to the Black Country conurbation. The 2022 Publication Plan did propose allocations adjacent to the built development edge so SSDC has evidenced that there is capacity on suitable sites adjacent to the Black Country.

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, for example the Cross Green (Policy SA2 of Publication Plan 2022) and Linthouse Lane (Policy SA3 of Publication Plan 2022) sites which were previously proposed to

be allocated but were subsequently removed in the 2024 Publication Plan as a result in SSDC's change in strategy rather than the Sites not being suitable for development.

- 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).

**Matter 5 - Issue 2**

**Question 1.**

**Is the approach taken in the Plan sound, and:**

**a. Taken as a whole and in view of gaps in the Infrastructure Delivery Plan about project costings and timescales, what evidence supports a conclusion that the growth proposed by the Plan is deliverable when anticipated in terms of infrastructure capacity?**

**b. How has the availability of key public services influenced the selection of the preferred Spatial Strategy been considered?**

Taylor Wimpey has provided a response to both points below.

- a) Land at Cross Green (site references 646a and 646b) previously allocated in the 2022 Plan (Draft Policy SA2) was proposed to deliver safeguarded land to facilitate future delivery of a rail-based park and ride, comprising of a 2-platform station and 500 car parking spaces as well as the access road to deliver the strategic employment site, ROF Featherstone. These are significant infrastructure projects and included within the Infrastructure Delivery Plan 2024 (Document reference CD11). However, there is no acknowledgement in the Plan or its evidence base on what the impact of the removal of the Land at Cross Green as an allocation will have in the delivery of these key projects. The approach is therefore not justified or positively prepared as required by paragraph 35 of the NPPF.
- b) SSDC's decision to change their preferred Spatial Strategy has not considered the potential impact on the delivery of infrastructure projects and has purely been focussed on pursuing a new option (Option I) which seeks to limit the level of housing growth being planned for. SSDC has also failed to acknowledge the potential implications of reducing the level of housing growth on economic growth. As a minimum this approach is considered to be negatively prepared and has not been justified or demonstrably effective and so fundamentally fails paragraph 35 of the NPPF.