



**South Staffordshire Local Plan Examination
Response to Matter 12: Building a Strong Local Economy**

Wain Estates

April 2025

Introduction

This statement Matter 12 (Building a Strong Local Economy) of the examination of the South Staffordshire Local Plan Review (SSLPR) is submitted by Wain Estates (Land) Ltd ('Wain Estates'). Separate representations have been submitted in respect of the following Matters:

- Matter 2: Duty to Co-operate
- Matter 3: Vision and Strategic Objectives
- Matter 4: Development Needs and Requirement
- Matter 5: Spatial Strategy
- Matter 7: Site Allocations
- Matter 8: Delivering the Right Homes
- Matter 9: Housing Land Supply
- Matter 14: Protecting and Enhancing the Natural Environment
- Matter 16: Enhancing the Historic Environment

It follows representations submitted on behalf of Wain Estates (by Emery Planning) to the (Regulation 19) Pre-submission Draft of the South Staffordshire Local Plan Review in May 2024 in respect of our land interests at Penkridge Road, Acton Trussell which we are promoting for residential development. For reference, the representations comprised those identified under the following Representation IDs by the Council: AGT24-016-02-01 to AGT24-016-02-14.

The National Planning Policy Framework [NPPF] outlines that during the examination process, a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector's questions which set out why Wain Estates considers changes to the are necessary to ensure the soundness of the plan.

The Plan was submitted on the 11th December 2024 and thus the December 2023 NPPF is wholly applicable for the purposes of assessing this plan, in accordance with paragraph 234 to 236 of the revised December 2024 NPPF. Reference is therefore made to the December 2023 NPPF in response to the Inspector's questions, unless otherwise stated.

This Statement has been prepared in line with the Guidance Note for the Examination (SST/ED8).

Matter 12: Building a Strong Local Economy

[Focus: Policies EC1, EC2, EC3, EC4, EC5, EC6, EC7]

Issue 4: Whether the approach of Policy EC4 to the rural economy is justified, effective and consistent with national policy?

Questions:

1. In terms of being justified:

a. What is the basis for this policy approach?

No comment.

b. How will the acceptability of the proposal relative to the tier and scale of the settlement be consistently determined, and is that approach clear and justified?

No comment.

2. In terms of being effective:

a. How does the policy address rural windfall developments beyond defined settlement boundaries relating to both new and existing businesses?

No comment.

b. Are the policy criteria consistent with one another?

Part 2 of the policy supports rural employment outside development boundaries, subject to a number of criteria. However, some of the criteria are conflicting. In particular, we object to criterion b, which requires development to comprise the conversion and reuse of rural buildings.

If such development can satisfy criteria c (the development is not capable of being located within the development boundaries of a village, by reason of the nature of the operation or the absence of suitable sites) and d (it is supported by an appropriate business case which demonstrates that the proposal will support the local economy, which in turn would help sustain rural communities), then it is an unreasonable constraint for the policy to only apply to the conversion and reuse of rural buildings. We note that the conversion and re-use of rural agricultural buildings is also covered under part 3 of the policy.

c. Is the inclusion of criteria on the conversion and re-use of rural agricultural buildings consistent with Policies EC5 and EC6?

No comment.

3. In terms of being consistent with national policy:

a. Is the policy approach consistent with the National Planning Policy Framework?

The policy is unsound on the basis that its criteria are not justified in context of each other. The plan therefore fails to comply with paragraph 35 b) of the NPPF in this regard.

b. Is the policy criteria consistent with the heritage approach of the National Planning Policy Framework?

No comment

c. Are any modifications necessary in the interests of soundness?

The policy should be re-worded to make clear that it does not only apply to the conversion and reuse of rural buildings.