



**South Staffordshire Local Plan Examination
Response to Matter 3: Vision and Strategic Objectives**

Wain Estates

April 2025

Introduction

This statement Matter 3 (Vision and Strategic Objectives) 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 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 12: Building a Strong Local Economy
- 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 3: Vision and Strategic Objectives

Issue 1: Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy and positively prepared.

Questions:

1. Is the Vision of the Plan for South Staffordshire ambitious, and yet realistic in terms of its scope and deliverability?

No comment.

2. Is the plan period justified?

The proposed plan period for the South Staffordshire Local Plan is 2023 to 2041. The base date used for the monitoring of the housing and employment land supply, as referenced at numerous points within the plan, is April 2023. Therefore, the end date of the strategic policies relating to housing and employment land supply is 31 March 2041. This means for the strategic policies to cover at least 15-years from adoption, it must be adopted by 31 March 2026.

The Council's current Local Development Scheme (dated September 2023) projects that the plan will be adopted in 'winter 25/26'. That date is extremely close to the final possible adoption date of 31 March 2026 based on a plan period end date of 2041.

Local Plan examinations can last multiple years. Examples of protracted examinations include the Birmingham Development Plan and the Local Plans for Bath and North East Somerset, Cheshire East, Central Bedfordshire, Cambridge and South Cambridgeshire; all of which took much longer than 2 years between submission and adoption. A live current example of a plan that is also seeking to meet in part unmet needs for another area is Shropshire, where the plan was submitted for examination in September 2021 and has still yet to be adopted (and is now likely to be withdrawn).

Therefore, there is a significant risk that the South Staffordshire Local Plan Review will not be adopted by March 2026, and will not cover a 15-year plan period from adoption. If that is the case then the plan would be unsound, as it is inconsistent with national planning policy. To avoid this risk, the plan period should be extended. We consider a plan period to 2042 or 2043 would be more appropriate to sufficiently cover any delays to adoption.

3. Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realised through their implementation?

No comment.

4. Are the objectives of the Plan clearly set out and are these measurable?

No comment.