



**South Staffordshire Local Plan Examination
Response to Matter 5: Spatial Strategy**

Wain Estates

April 2025

Introduction

This statement Matter 5 (Spatial Strategy) 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 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 5: Spatial Strategy

Issue 1: Whether there is a clear Spatial Strategy which is justified, effective and consistent with national policy.

Questions:

1. How was the settlement hierarchy derived? When qualifying your answer, is the methodology used to determine the hierarchy appropriate and sufficiently robust?

The approach set out in Policy DS5 is not consistent with the national planning policy objectives of enhancing the vitality of rural communities, or providing opportunities for villages to grow and thrive, especially where this will support local services.

Table 8 of the SSLPR sets out the distribution of housing across the district. The Tier 4 villages are proposed to receive just 0.6% of housing growth (30 dwellings), with no sites allocated. The Tier 5 settlements are wrapped together with the remainder of the rural area, and are proposed to receive just 3.7% of housing growth (194 dwellings), with again no sites allocated and the distribution purely based on existing commitments. The actual percentage of development to go to these locations may actually be lower than the figures stated above, because the 11.5% (600 dwellings) to be delivered through windfall development on small sites may be primarily attributable to upper tier settlements.

The council's Rural Services and Facilities Audit (RSFA) only considers current service provision and as such it in no way provides a sound basis to justify the proposed distribution of development. The Council's justification in the Spatial Housing Strategy Topic Paper is also predicated on existing service provision.

The Council's justification is largely based upon reducing reliance upon journeys by private car. This fails to recognise that the NPPF (page 76) defines sustainable transport as "*any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.*" The Council's approach has no regard to the role that cycling, ultra low and zero emission vehicles, car sharing and public transport can play in Tier 4 and 5 settlements, including the opportunities brought about by new development, as well as other means to increase the sustainability such as the rollout of gigabit-capable broadband and satellite broadband in rural areas.

The Council's proposed approach would serve to severely limit and constrain development within villages, such that housing supply and affordability issues in the rural areas would perpetuate or worsen, rather than be alleviated. Service provision within villages will only improve if there is a population sufficient to support such services. The Council's approach would do absolutely nothing to support local services, and it certainly would not provide opportunities for villages to grow and thrive. Rather, the proposed approach would only lead to further stagnation.

A level of development should be directed to the Tier 4 and 5 settlements, to accord with national planning policy and to achieve the objectives set out within the plan. A more finer grained assessment is necessary which considers existing services and facilities in each village, whether further development would assist with their vitality and viability, and an

assessment of local housing needs within the lower tier villages to understand where development can assist in meeting local needs for both market and affordable housing.

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 identification of Acton Trussell as a Tier 5 settlement is based upon the assessment of existing service provision within the RSFA. Whilst we acknowledge that service provision within Acton Trussell is currently limited, we consider that the RSFA presents an inaccurate picture of Acton Trussell because it fails to look at the wider picture of sustainability.

In particular, there is a major employment site located 1km walking or cycling distance from Acton Trussell (Acton Gate), there is a primary school located less than 1km walking distance at the neighbouring village of Dunston (a tier 4 settlement), and the settlement is located just 1.5km from the edge of Stafford. The settlement is also located within cycling distance (approx. 4km) of Penkridge (a Tier 1 village), where a range of shops and services are available including a train station, supermarkets, convenience store, a middle school, two first schools, a high school, GP surgery, dental surgery, leisure centre, day care nursery, library, village hall, cafes and public houses. Penkridge Train Station provides access to a variety of destinations including Stafford, Birmingham, Wolverhampton, and Liverpool.

Therefore, the identification of Acton Trussell as a Tier 5 settlement provides an inaccurate picture of its sustainability. Taking into account service provision at neighbouring Dunston, Acton Gate, the settlement could be considered as a Tier 3 settlement, or individually as a Tier 4 settlement based on existing service provision. However, we maintain our view that a more fine-grained assessment is necessary to defining the settlement hierarchy, considering needs and opportunities within settlements. The evidence on Acton Trussell further underlines this view. Through development there is an opportunity to make the settlement more sustainable and provide services such as a village shop (which could be provided on our site at Penkridge Road, Acton Trussell).

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?

For the reasons set out in this Matter Paper we do not consider that it is 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?

We do not consider that reasonable alternatives have been considered. In this regard we note that South Staffordshire is heavily constrained by Green Belt (over 70% of the land is designated Green Belt), except for an area to the north of the Borough running from Acton Trussell to Weston-under-Lizard.

In its justification for reducing the housing requirement and the contribution to the unmet needs of the GBBCHMA in comparison to the previous Regulation 19 consultation, the Council refers to the 2023 changes to the Framework, interpreting these to mean that there is no requirement

for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared. Regardless of whether that interpretation is correct, within South Staffordshire there are also non-Green Belt options available to meet the housing requirement and any unmet needs from the GBBCHMA. This includes our omission site at Penkridge Road, Acton Trussell that lies outside of the Green Belt.

Under the Council's site selection methodology any site within Acton Trussell was automatically discounted due to it being a Tier 5 settlement. However, given that the Borough is heavily constrained by Green Belt, the Council should be considering all other reasonable alternatives, with a view to minimising the amount of Green Belt release. Our site at Penkridge Road provides a key opportunity for this, and in our view should be allocated to assist in addressing the very significant levels of unmet need from the GBBCHMA.

Such an allocation would also contribute to meeting needs within the rural areas and Acton Trussell itself, noting that Acton Trussell has far greater sustainability credentials than a typical Tier 4 or Tier 5 settlement owing to the proximity to Stafford and major employment development at Acton Gate. Furthermore, there could have been consideration of expanding Acton Trussell as a new garden village / settlement, similar to the new settlement considered at Dunston under Option A of the spatial housing options (Spatial Housing Strategy Topic Paper, 2024).

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.

For the reasons set out in this Matter Paper we consider that Acton Trussell is an appropriate location for development and should be identified as a higher tier settlement.

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

No comment.

4. In terms of highways considerations:

a. How have the traffic impacts of the Plan on both the local and wider highway network been assessed?

No comment.

b. How have the traffic assessment findings shaped the plan proposals for the scale and distribution of development within the plan period?

No comment.

c. How have the cumulative highway effects of the Plan on neighbouring authorities, including Wolverhampton been considered and addressed?

No comment.

d. Are there any outstanding concerns from National Highways or Local Highway Authorities? If so, what are they and should they be addressed prior to adoption of the Plan?

No comment.

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

No comment.