



**South Staffordshire Local Plan Examination
Response to Matter 7: Site Allocations**

Wain Estates

April 2025

Introduction

This statement Matter 7 (Site Allocations) 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 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 7: Site Allocations

Issue 1: Whether the preferred site allocations are positively prepared, justified, effective and consistent with national policy.

[Focus: Policies MA1, SA1, SA2, SA3, SA4, SA5]

Questions:

1. In terms of the proposed planned housing and employment developments:

a. Is the spatial distribution of the allocations across the South Staffordshire area justified and is it consistent with the Spatial Strategy?

Our representations to policies DS4 and DS5 (Matters 4, 5 and 9) raise significant concerns in relation to the proposed housing requirement, distribution of development and supply. In summary:

- The housing requirement is too low, principally because the proposed contribution towards addressing the unmet needs of the GBBCHMA is insufficient.
- Insufficient flexibility is provided within the housing land supply to meet the proposed requirement.
- The Council has not provided sufficient evidence to demonstrate a five year housing land supply on adoption of the plan.
- Development should be provided within the Tier 4 and Tier 5 villages, to allow opportunities for villages to grow and thrive.
- The plan should distribute additional housing to non-Green Belt areas such as Acton Trussell. Such development would meet local needs and can contribute to addressing unmet need within the GBBCHMA, whilst minimising the amount of Green Belt release.

Draft Policy SA3 is considered to be unsound on the basis that it is not justified or positively prepared having regard to meeting the area's objectively assessed needs, thus failing to meet the requirements of paragraph 35 a) and b) of the NPPF.

To address the above matters, we propose an omission site for allocation (land at Penkridge Road, Acton Trussell). Further details of the site are provided in our Regulation 19 representations and we have provided a summary of the key points below.

The site is located adjacent to the built up area of Acton Trussell and represents an opportunity to deliver high quality homes, including affordable housing, alongside benefits such as public open space and a local shop, while supporting the sustainable growth of a rural settlement.

No technical constraints exist on the site which could not be adequately addressed or mitigated as part of the proposed development. The site is located in the open countryside, but is well contained by existing tree lines and hedgerow, with further potential to strengthen the boundaries through additional planting.

The site is suitable, achievable and available and would be deliverable in the short term. It would assist with delivering dwellings to meet South Staffordshire's housing needs and those of the wider GBBCHMA.

We therefore consider that the site should be allocated in the emerging Local Plan.

b. Has the identification and selection of the proposed site allocations been robustly evidenced and subject to robust, consistent and transparent methodologies, including in relation to the approach to existing committed sites?

No comment.

c. Is the methodology for assessing the heritage impacts of site allocations robust and are the site-specific requirements for each site allocation consistent with it?

No comment.

d. What evidence is there that education provision can be secured in a sustainable manner to support each of the housing allocations?

No comment.

e. Is the approach of the Plan to air quality matters relating to planned growth sound?

No comment.

f. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

No comment.

g. The Council has set the requirements for each site allocation within appendix B. Is that approach effective? Are the key requirements for each site allocation justified and sufficiently clear?

No comment.

h. Do the proposed allocations have a reasonable prospect of meeting the other relevant policies of the development plan? What evidence of this exists?

No comment.

2. In terms of Policy MA1:

No comment.

a. Is it clear what is meant by 'large scale' or 'complex applications'?

No comment.

b. Is it clear how a Strategic Master Plan produced by an applicant will be agreed by the Council?

No comment.

c. Are the requirements of the policy contained in clauses a-j clear and justified?

No comment.

d. Are any amendments required to the Policy wording for soundness?

No comment.