

South Staffordshire Local Plan Examination

Response to Matter 5: Spatial Strategy

St Philips (Orton Lane)

10 April 2025

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1.0 Introduction

- 1.1 This statement to Matter 5 (Spatial Strategy) of the examination of the South Staffordshire Local Plan Review (“the LPR”) is submitted by Lichfields on behalf of St Philips in relation to their land interests at Land off Orton Lane or Sites: 416 and 416a (“the Site”).
- 1.2 Separate representations have been submitted in respect of the following Matters:
- Matter 6 – Green Belt; and
 - Matter 7 – Site Allocations.
- 1.3 It follows St Philips’ representations to the LPR Publication Consultation (Regulation 19) (April-May 2024) in respect of their land interests at Land off Orton Lane. For reference, the representations comprised those identified under the following Representation References: AGT24-026-02-05, AGT24-026-02-06, and AGT24-026-02-07.
- 1.4 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 St Philips’ view on the soundness of the LPR.
- 1.5 The Plan was submitted on the 11th of December 2024 and thus the December 2023 NPPF is wholly applicable for the purposes of assessing this plan, in accordance with paragraphs 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.
- 1.6 This Matter Statement has been prepared in line with the Guidance Note (SST/ED8) for the Examination.

2.0

Matter 5: Spatial Strategy

Issue 1: Site Allocations

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

Q. 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?

2.1

St Philips is generally supportive of South Staffordshire Council's ("the Council") proposed Spatial Strategy, whereby growth is distributed to the District's most sustainable settlements. Policy DS5 (The Spatial Strategy to 2041) is clear that growth will be distributed to the district's most sustainable locations, with the policy going on to set out a settlement hierarchy, with Wombourne identified as a Tier 2 settlement. In respect of Tier 2 settlements, Policy DS5 2024 states that:

"These settlements [Tier 2 settlements] hold a wider range of services and facilities than other smaller settlements in the district's rural area. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-Green Belt site allocations."
(Emphasis Added)

2.2

However, the LPR does not propose any new allocations at Tier 2, Tier 3, Tier 4 or Tier 5 Villages. Instead, the Council is relying upon Safeguarded Land, existing planning permissions, and allocations to deliver growth in these locations. Indeed, Policy SA3 (Housing Allocations) goes on to identify two sites allocations in Wombourne; namely, Land off Orton Lane (57 dwellings), and Pool House Road (223 dwellings). Notably, both sites were identified as Safeguarded Land in the adopted Site Allocations Document 2018 [SAD] to meet the longer-term development needs for the period 2028-2038.

2.3

In this context, the NPPF is clear that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services, and enable the enhancement or maintenance of the vitality of more rural communities (Para 83). It is also clear that planning policies should be responsive to local circumstances and support

housing developments that reflect local needs (Para 82). It is also clear that prior to releasing Green Belt land under the ‘exceptional circumstances’ (Para 145), LPAs should demonstrate that they have examined fully all other reasonable options for meeting its identified need for development (Para 146) (i.e. a ‘sequential approach’).

- 2.4 In this regard, St Philips considers that the Council’s proposed approach to directing growth to Tier 2 settlements, such as Wombourne, is broadly consistent with the NPPF. The settlement is one of the most sustainable locations within the district for housing growth, with the Council’s ‘Housing Site Selection Topic Paper’ (2024) [HSSTP] (EB20-20b) stating that the proposed Spatial Strategy *“recognised the settlements’ level of facilities and public transport links compared to other rural settlements in the District, with Wombourne being the District’s largest tier 2 settlement. Unlike all other Tier 2 settlements, Wombourne also carries one of the District’s three Large Village Centres, reflecting its wider retail offer.”*
- 2.5 The ‘Rural Services and Facilities Audit 2021’ (EB15) also sets out the variety of existing services and facilities in Wombourne, including amongst others, primary and secondary schools, shops, restaurants, dental practices, and a GP; highlighting that the settlement is well served by local facilities and infrastructure. Moreover, the ‘Spatial Housing Strategy Topic Paper (2024)’ (EB14-14a) and iterative Sustainability Assessment [SA] evidence base underpinning the LPR has demonstrated that the growth at Wombourne is sustainable (EB1-EB2b). To this end, it is fundamentally clear that Wombourne is an appropriate location for sustainably accommodating some of the District’s development needs, reflecting its sustainability credentials and role within the settlement hierarchy.
- 2.6 Notwithstanding St Philips later response in relation to Green Belt release, the utilisation of Safeguard Land – already removed from the Green Belt – within the Spatial Strategy is entirely sensible, sustainable, and supported by the sequential approach required to be undertaken prior to concluding ‘exceptional circumstances’ justify the release of Green Belt (Para 146). In this regard, it is clear to St Philips that Land off Orton Lane is an appropriate location within Wombourne to address the settlement’s housing needs, given its Safeguard Land designation.
- 2.7 The above, when taken together, demonstrates that – in terms of soundness – the Council’s proposed approach to directing growth to Wombourne, and particularly Land off Orton Lane (Policy DS5/SA3), is generally ‘sound’. This is because St Philips considers that the proposed Spatial Strategy, in so far as it relates to directing ‘growth’ to Wombourne, is underpinned by relevant and up-to-date evidence (Para 31), is broadly ‘justified’ (Para 35b) and is consistent with national policy (Para 35d) having regard to the wider directions in the NPPF in respect of the release of Green Belt land (Paras 145-146).

However, St Philips has some concerns in relation to the Spatial Strategies approach to non-Safeguarded Land in Tier 2 settlements. In particular, St Philips is concerned that the Council’s chosen approach does not fully support the vitality of lower-tier settlements (Tier 2, 3, 4 and 5 villages), which have the most capacity to accommodate growth, nor does it sufficiently address local affordability issues, when having regard to the reasonable alternatives – this is discussed further in St Philips’ responses to Matter 6 and Matter 7.

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