

South Staffordshire Local Plan Examination

Response to Matter 5: Spatial Strategy

St Philips (Wedges Mills)

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 Wolverhampton Road, Wedges Mills Cannock. Please refer to the full introduction included within St Philips Matter Statement 2 in respect of Wolverhampton Road, Wedges Mills Cannock.
- 1.2 Separate representations have been submitted in respect of the following Matters:
- Matter 2 – Duty to Cooperate;
 - Matter 3 – Vision and Strategic Objectives;
 - Matter 4 – Development Needs and Requirement; and
 - Matter 6 – Green Belt.
- 1.3 This 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. 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?

- 2.1 No. St Philips do not consider that the proposed growth – or lack thereof – in the settlements on the edge of Cannock reflects their role of function. By way of example, the Council’s ‘Rural Services and Facilities Audit 2021’ (EB15) [RSFA] defines Wedges Mills as a Tier 5 settlement. Policy DS5 (The Spatial Strategy to 2041) is clear that no growth is directed to Tier 5 settlements on the basis that *“settlements are not intended to experience further housing or employment growth, owing to their poorer public transport links and lack of services and facilities relative to other settlements within the district.”*
- 2.2 In this regard, St Philips strongly disagrees with the conclusions of the RSFA. Wedges Mills has high sustainability credentials in terms of proximity to the existing shops and services in Cannock, and access to existing transport routes and infrastructure. This is because much of these services and infrastructure are within 1 mile of the settlement’s boundary and can be accessed by public transport. Indeed, the RSFA has not even properly considered this, as demonstrated by the fact that the Council’s assessment of the settlement within the RSFA Settlement hierarchy scoring (Appendix 5, EB15b) scores poorly (i.e. Red, in Red, Amber, Green scoring system). This is despite the fact that as a part of the RSFA’s assessment of Public transport access to higher-order services outside of the villages (Appendix 2), the settlement consistently scores well in terms of access to services and facilities within 0-10 minutes; namely, in Cannock.
- 2.3 As a consequence of the Council’s unjustified approach to assessing the settlements on the edge of Cannock within the settlement hierarchy, St Philips consider that the Spatial Strategy has had no proper regard for the role that Cannock’s ‘higher order’ services have for the residents of settlements along its boundary, such as Wedges Mills. In essence, in St Philips’ view, the level of development anticipated in Wedges Mills is unjustified and does not reflect the role and function of the settlement. It is also at odds with the National Planning Policy Framework’s (2023) [NPPF] requirement to 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).

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?

- 2.4 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. In addition, and 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).
- 2.5 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, with no growth directed towards Wedges Mills at all. As noted above in St Philips response to Question 2, St Philips does not consider that the Council's proposed Spatial Strategy has proper regard for the role Wedges Mills plays within the settlement hierarchy and therefore disagrees with the Council's approach of not directing any growth to the edge of Cannock.
- 2.6 St Philips has consistently made this point to the Council, and despite the Council adjusting its site selection methodology in 2022 to consider "*urban edge locations which do not strictly conform to*" (Housing Site Selection Topic Paper' (2024) [HSSTP] (EB20-20b) the Council's preferred Spatial Strategy, it remains the case that the Council's distribution of development still ignores directing growth to this area within the District. In St Philips' view this is unjustified.
- 2.7 The Council's HSSTP justifies this, with its rationale for the level of new allocations – or not in this instance – stating that "*No growth, reflecting lack of significant land options below high and very high harm Green Belt*" (Appendix 2, EB2b). However, St Philips fundamentally disagrees with the Council's position.
- 2.8 Firstly, as set out in detail in St Philips' responses to Matters 2, 3 and 6, there is an acute unmet housing need arising from the Greater Birmingham and Black Country housing Market Area [GBBCHMA] that can and should constitute an 'exceptional circumstances' (Para 145) to justify the release of Green Belt land. The revision to the NPPF do not preclude authorities from reviewing the Green Belt, and the Council has clearly

demonstrated that the ‘sequential approach’ set out by paragraph 146 of the NPPF has so be complied with. To this end, St Philips considers that the Council’s contrived approach to releasing only a small number of Green Belt sites in Tier 1 settlements is not justified, and it is entirely reasonable and consistent with the NPPF for the Council to release further Green Belt land to assist in addressing the unmet housing needs of the GBBCHMA.

- 2.9 Moreover, as set out in St Philips’ response to Matter 6, whilst it is justified to consider ‘harm’ in the balance when assessing exceptional circumstances for Green Belt release, it is not required by national policy to release only those sites which perform the worst against the Green Belt purposes (i.e. low Green Belt harm). St Philips remains of a view that it is an essential part of the exceptional circumstances test that logically exceptional circumstances must be capable of trumping the purposes of the Green Belt¹. For example, it is conceptually possible for Green Belt land that fulfils strong Green Belt purposes to be released if it is consistent with the Local Plan strategy for meeting requirements for sustainable development, for example, to secure more sustainable patterns of development or enable settlements to grow and thrive or support local services and infrastructure.
- 2.10 It is fundamentally clear to St Philips that Wedges Mills is an appropriate location for sustainably accommodating some of the District’s development needs, reflecting its sustainability credentials associated with its access to services and facilities in Cannock. Its exclusion from the Spatial Strategy is not justified by evidence and does not support the settlement growing, nor meeting its future resident’s housing needs.
- 2.11 In terms of soundness, the Council’s proposed approach to directing growth to the most sustainable settlements could generally be considered ‘sound’. However, St Philips has some concerns in relation to the Spatial Strategies approach to disregarding the growth of settlements on the edge of Cannock, which are – or could – be made sustainable, purely on the premise of an unjustified settlement hierarchy and contrived approach to limiting Green Belt release. 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.
- 2.12 Notwithstanding the above, as set out in St Philips’ responses to Matters 2, 3 and 6, the Council has inferred that it will address the acute unmet housing needs of the GBBCHMA through a future LPR. Whilst it is noted that the revised NPPF and Standard Method published in December 2024 are not being considered in this examination, the implications of the ‘transitional arrangements’² and the Council’s revised SM figure increasing to 685 dwellings per annum. When taken together, it is clear that the longer term housing needs of the Council and wider unmet needs will require further Green Belt release in due course. In this regard, the NPPF is clear that: *“strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”* (Para 145). It goes on to state that when defining Green Belt boundaries, plans should, where necessary, identify areas of

¹ Paragraph 42, *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078

² Per the December 2024 NPPF’s transitional arrangements, set out in paragraphs 234-236, authorities with an emerging Local Plan at Regulation 22 as of 12th March 2025 and whose emerging housing requirements do not address 80% of their revised SM local housing need will need to undertake an immediate Local Plan Review under the New Local Plan system.

safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period (Para 148c).

- 2.13 In the context of the forthcoming markedly higher housing need in the District, the permanence of the Council's currently proposed Green Belt boundaries is in doubt, as it is very likely that the Council will again need to revisit releasing Green Belt land in due course. In this regard, the identification of additional Safeguarded Land – per the approach taken previously by the Council – will ensure that Green Belt boundaries will not need to be altered at the end of the plan period. This approach would be entirely in accordance with the NPPF and will ensure that the Green Belt boundaries will not need to be reviewed again until the end of the next plan period (Para 148c, NPPF).

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