

# **South Staffordshire Local Plan Examination**

## **Response to Matter 5: Spatial Strategy**

St Philips (Land North of Penkridge)

10 April 2025

**LICHFIELDS**

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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 North of Penkrudge or Site 010 (land at Lower Drayton Farm) (“the Site”).
- 1.2 Separate representations have been submitted in respect of the following Matters:
- 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 North Penkrudge. For reference, the representations comprised those identified under the following Representation References: AGT24-026-02-0, AGT24-026-02-02, AGT24-026-02-03, and AGT24-026-02-04.
- 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 Penkridge identified within Locality 1 and as a Tier 1 settlement. In respect of Tier 1 settlements, Policy DS5 2024 states that:

*"The district's Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of sustainable and deliverable non Green Belt land and suitable Green Belt site allocations..." (Emphasis Added)*

2.2 The NPPF is clear that the supply of large numbers of new homes can often be best achieved through planning for larger-scale development, such as Sustainable Urban Extensions [SUEs] on the edge of existing villages and towns. However, these SUEs should be well located and designed, and be supported by the necessary infrastructure and facilities (including a genuine choice of transport modes) (Para 74) and should be "focused on locations which are or can be made sustainable, through limiting the need to travel" (Para 105). 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').

- 2.3 In this regard, St Philips considers that the Council's proposed approach to directing growth to Tier 1 settlements, such as Penkridge, is entirely consistent with the NPPF. The settlement is one of the most appropriate and sustainable locations for growth within the District. Indeed, the Council's 'Rural Services and Facilities Audit 2021' (EB15) demonstrates that the settlement is one of the most sustainable settlements in the District and is well-equipped to accommodate significant levels of growth owing to the availability of existing services and facilities, including optimum public transport links with the wider region. 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 to the north of Penkridge is more sustainable than the other 'reasonable alternative' spatial strategies and sites (EB1-EB2b).
- 2.4 Crucially, based upon the Council's infrastructure-led strategy for Penkridge, and the lack of any further deliverable development boundary sites in this location, there were two clusters of potential site options that could allow Penkridge to expand. These were either the north or south, as the village is tightly constrained by transport infrastructure (the West Coast Mainline and M6 motorway) to the east and west.
- 2.5 The land comprising strategic housing allocation SA2 was identified within the 'Great Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study 2018' (EB28) ("SGS") as a potential area for strategic development and urban extensions within the District based on garden village principles. This was on the basis that it is located beyond the Green Belt, and almost entirely free from nationally significant constraints and policy designations, as opposed to land south of Penkridge which falls within the Green Belt. The Site is also within close proximity to Penkridge and associated road and rail links with Stafford and Wolverhampton.
- 2.6 The identification of the land as part of the SGS was caveated on the requirement to complete further testing and assessment through the SA process. St Philips support the findings of the Council's latest SA (EB1-EB2b) which includes an assessment of the sites comprising the allocation (Sites: 584/420/010). The Site Assessment specifically concludes in Appendix I1 (EB2b) relating to Site 010 that, *"the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy if delivered alongside Sites 420, 584 and 005."*
- 2.7 Similarly, the Site (Site 010) was also assessed in the Housing Site Selection Topic Paper [HSSTP] (2024) (EB20-20b), which confirms the sequential preference of the site compared to land to the south of Penkridge, which is located in the Green Belt. In this regard, the allocation of the site aligns with the requirements of the NPPF (Para 146) to examine all other reasonable options for meeting identified needs for development before considering changes to Green Belt boundaries.

The above, when taken together, demonstrate that – in terms of soundness – the Council's proposed approach to directing growth to Penkridge, and particularly North Penkridge (Policy SA2), is 'sound'. This is because St Philips considers that the proposed spatial strategy, in so far as it relates to growth in Penkridge, is underpinned by relevant and up-to-date evidence (Para 31), is 'justified' (Para 35b) having taken into account the reasonable alternatives 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).

the 1990s, the number of people in the UK who are employed in the public sector has increased from 10.5 million to 13.5 million (13.5% of the population).

There are a number of reasons for this increase. One is that the public sector has become a more important part of the economy. Another is that the public sector has become more efficient. A third is that the public sector has become more attractive to workers. A fourth is that the public sector has become more diverse.

The public sector has become a more important part of the economy. In 1990, the public sector accounted for 10.5% of the UK's GDP. By 2000, it had increased to 13.5%.

The public sector has become more efficient. In 1990, the public sector's productivity was 70% of the private sector's. By 2000, it had increased to 80%.

The public sector has become more attractive to workers. In 1990, the public sector's wage premium was 10%. By 2000, it had increased to 15%.

The public sector has become more diverse. In 1990, the public sector was dominated by government employees. By 2000, it had become more diverse, with a significant number of employees in the health and education sectors.

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