

RIGBY ESTATES LLP



**SOUTH STAFFORDSHIRE COUNCIL  
LOCAL PLAN REVIEW – PREFERRED OPTIONS**

**REPRESENTATION BY RIGBY ESTATES LLP**

**DUNSTON GARDEN VILLAGE**

**Issue Nr: 01      Date: DECEMBER 2021**

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CONTENTS

1.	INTRODUCTION .....	1
2.	INTRODUCING DUNSTON GARDEN VILLAGE.....	4
3.	LOCAL PLAN REVIEW EVIDENCE BASE .....	14
4.	HOUSING NEED (CHAPTER 4) .....	29
5.	POLICY DS4 - LONGER TERM ASPIRATIONS FOR A NEW SETTLEMENT (CHAPTER 4) .....	40
6.	DEVELOPMENT MANAGEMENT POLICIES (CHAPTER 6) .....	43
7.	CONCLUSIONS .....	44
	APPENDIX 1 – DUNSTON GARDEN VILLAGE PROMOTIONAL DOCUMENT (DEC 2021) .....	46
	APPENDIX 2 – PREVIOUS DUNSTON GARDEN VILLAGE VISION DOCUMENT (DEC 2019) .....	47

## 1. INTRODUCTION

1.1 On behalf of our client Rigby Estates LLP, FWP have been commissioned to make representations to the South Staffordshire Local Plan Preferred Options (2018-2038) in relation to their land interests in Dunston.

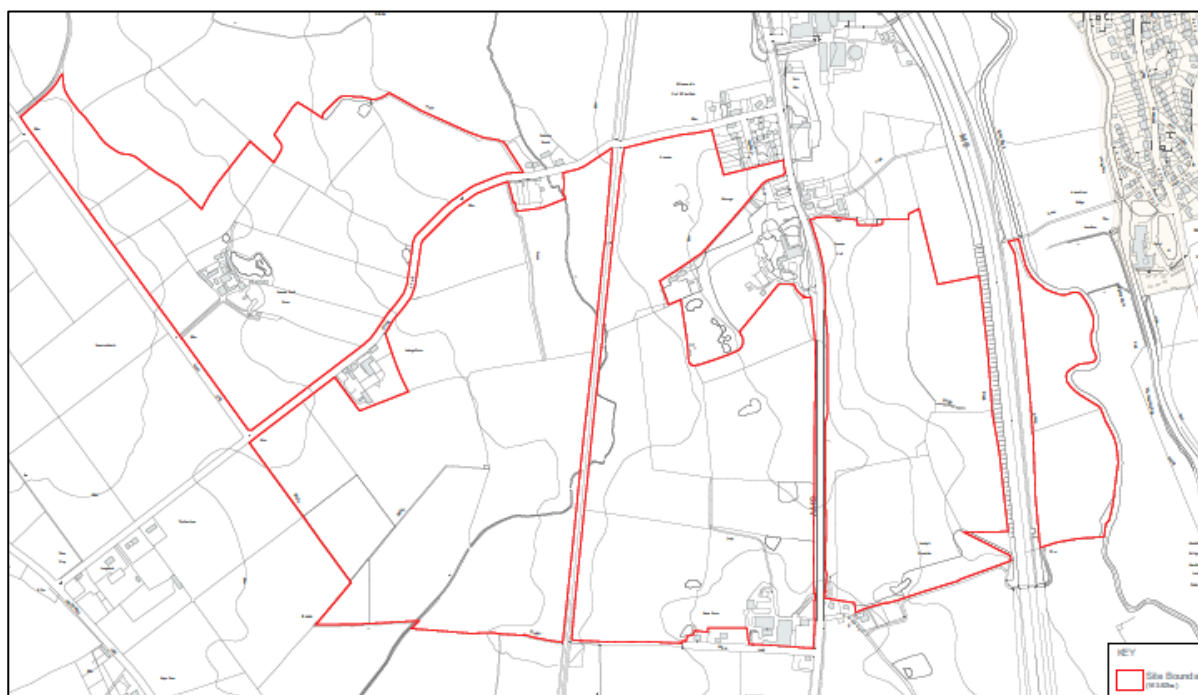
### Rigby Estates Interests

1.2 Rigby Estates is a large private landowner with control of over 810 Ha of land across the UK, which is being used and promoted for a variety of uses including renewable energy generation, agriculture, residential and mixed use development.

1.3 Indeed, sustainable stewardship is a critical and defining value of the Estate, who have a significant history in optimising the land for the generation of clean, renewable energy including the delivery of solar farms, bio-mass plants and with a general focus on ensuring wider environmental benefits from all developments.

1.4 Rigby Estates are promoting the land known as the Dunston Estate Staffordshire. This comprises 160 Ha of agricultural fields set across two parcels, split by a railway line, which is currently designated as open countryside.

*Figure 1.1 - Rigby Estates Ownership*



1.5 Further detail is set out in the **updated Promotional Document attached at Appendix 1** which suggests the site is capable of accommodating between 3,000 and 6,000 homes, dependant on densities and whether adjacent land is allocated alongside this site.



- **Local Plan Spatial Housing Strategy and Infrastructure Delivery (October 2019)** – FWP made representations to this consultation to highlight the suitability of this site to deliver a new settlement, owing to its large single ownership, location outside the Green Belt, connections with the national road and rail networks and relative lack of other environmental constraints. This submission included a comprehensive Vision Document (dated December 2019) which we attach again at **Appendix 2** for clarity, and an illustrative masterplan (at page 40) showing approximately 3,000 homes within Rigby Estates ownership. These representations also highlighted that the baseline OAN figure should be increased over and above the standard housing calculation figure.

### Report Format

1.7 The remainder of this representation is set out as follows:

- In **Section 2** we introduce the Dunston Garden Village Proposals
- In **Section 3** we critique the Council's evidence base where it considers the Dunston site;
- In **Section 4** we review the proposed housing requirement and needs within South Staffordshire and the wider Greater Birmingham Region.
- In **Section 5** we consider Policy DS4 which relates to longer term aspiration for a new settlement
- In **Section 6** we comment briefly on the Development Management policies.
- In **Section 7** we provide a summary of our overall conclusions.

## 2. INTRODUCING DUNSTON GARDEN VILLAGE

### The Site

- 2.1 The site comprises over 160 hectares of open countryside which abuts the southern and western edge of the settlement of Dunston. The site is surrounded by open countryside to the north, west and south. To the east of the site is the River Penk and the Staffordshire and Worcestershire Canal. Beyond the eastern boundary is the settlement of Acton Trussell. The south western boundary is comprised of Long Lane and the southern boundary is made up of agricultural field boundaries, Swan Lane and a minor access road. The northern boundary is made up of School Lane and agricultural field boundaries.
- 2.2 This site is made up of undeveloped agricultural land which contains a number of farm buildings located both within the red line boundary of the site and on the edge of the site boundary. The existing development located along School Lane (ribbon residential development and farm buildings), Swan Lane (agricultural buildings) and the A449 (Bovis Homes offices) will be retained and incorporated into the proposed development of the site.
- 2.3 Pothooks Brook runs through the site, starting on the western side of the site and crossing under the West Coast Mainline to the eastern part of the site. There are a small number of existing ponds within the site boundary.
- 2.4 This land holding is dissected by a number of key infrastructure assets, including; the West Coast Mainline, the A449 and the M6 motorway. The West Coast Mainline runs north to south through the site and divides the Garden Village in half. School Lane forms part of the northern boundary of the site with a bridge crossing over the railway line. School Lane then runs in a south westerly direction and runs through the proposed Garden Village area. School Lane is the only existing made road within the site.
- 2.5 The A449 runs parallel with the West Coast Mainline but is located towards the eastern section of the site. The M6 also runs north to south through the eastern section of the site, resulting in a parcel which is bound by the River Penk and the M6 and somewhat isolated from the rest of the development.
- 2.6 The site comprises a mixture of Flood Zone 1, 2 and 3 land. The majority of the land holding is located within Flood Zone 1, with the Flood Zone 2 and 3 land located along the West Coast Mainline and to the south of School Lane. There are no Listed Buildings located within the red line boundary.
- 2.7 The site is not located within a Conservation Area or SSSI, but Cannock Chase (a Special Area of Conservation) is located 8km from Dunston Heath Farm, and therefore the landholding falls within the 15 km zone of influence. Having said that, this applies to the vast majority of land proposed for development within South Staffordshire.

- 2.8 In respect of agricultural land the majority of the site is Grade 3 dairy land, 47% is Grade 3b, and 33% is within Grade 3a, with much of the remainder in Grade 4 (poor). As such the majority of the site is not best and most versatile agricultural land (BMV).
- 2.9 The entirety of the proposed Garden Village is within a single landholding, namely Rigby Estates LLP, and is being promoted by FWP and other supporting consultants to meet the future development needs of South Staffordshire.

### Surroundings

- 2.10 The land in the Dunston estate is located to the south of the existing village of Dunston. Dunston is a small village comprising of 281 inhabitants according to the 2011 census, and 91 dwellings. The village comprises of a primary school (St Leonard's Church of England First School), Dunston Village Hall, Dunston St Leonard Church, Dunston House and the Bovis Regional Office.
- 2.11 The land is designated as open countryside **and is not located within the Green Belt**. This is a significant benefit of the site, considering that **approximately 80% of the District** is made up of Green Belt land, including the other sites proposed for a new settlement.
- 2.12 The existing settlement of Dunston is characterised by a mix of semi-detached and detached properties, including some single storey dwellings.
- 2.13 There are a several Grade II Listed Buildings in the settlement of Dunston including the Grade II Dunston Farmhouse, Grade II Dunston House, Grade II Church of St Leonard, Grade II Former Stable Block, albeit no higher grade buildings. There are also Scheduled Ancient Monuments at Moat House Farm Moated Site, just east of the site beyond the river Penk, and the Hay House Moated site approximately 750m west of the site.

### Accessibility

- 2.14 Dunston is located on the western side of the A449 trunk road, in close proximity to Junction 13 of the M6 motorway, and approximately 3km south of the urban area of Stafford and 5 km south of Stafford Town Centre.
- 2.15 The site is closer to the market town of Penkridge, approximately 3.5km to the south, which has a wider retail and employment offer. Penkridge offers a range of services and facilities, including; cafés, pubs, restaurants, take-aways, market, library, sports centre, dentist, doctors' surgery, hotel etc. Penkridge also is well connected in terms of access to rail services. Penkridge rail station is on the Birmingham branch of the West Coast Mainline, with links to Wolverhampton, Birmingham, Stafford, Crewe, Liverpool Lime Street and London Euston. On weekdays, there are two trains per hour southbound and one northbound, with some additional services during the peak hours and an hourly service each way on Sundays.



- 2.16 Stafford has a population of over 68,000 residents as per the 2011 census and is the County Town, with a higher level of services and facilities to those offered in Penkridge, including: leisure centres, hotels, casinos, hospitals, colleges as well as a larger range of national supermarkets and other multiple retailers. Stafford Railway Station is approximately 4.5km to the north which offers additional services to London, Manchester, Bristol, Reading and other destinations.
- 2.17 The majority of bus stops that are within the site are located along the A449, which cuts through the site parcels. Dunston Hall bus stop is served by the National Express no 54 which has hourly services to Wolverhampton and Stafford, whilst the Arriva no 75 provides hourly services to Cannock and Stafford.
- 2.18 In respect of the road network the site is directly adjacent to Junction 13 of the M6 and therefore has strong links with the national road network, whilst the A449 is one of the key north/south routes through the district linking to Wolverhampton. As such, in strategic terms, the site has excellent accessibility to the national road network, with realistic opportunities to improve public transport infrastructure, as addressed later in this representation.

### **The Vision**

- 2.19 As set out in the Promotional document, **Rigby Estates are seeking to create a highly sustainable new community that delivers:**
- A vibrant and accessible community heart with a new train station, alongside retail, entertainment and community uses that create an immediate sense of place.
  - 3,000 - 6000 new homes within walkable neighbourhoods that make best use of renewable energy and sustainable forms of construction;
  - Around 8 Ha of complementary employment uses reducing travel to work distances and taking advantage of proximity to the M6;
  - Significant enhanced green infrastructure through the heart of the settlement to provide an attractive setting that provides health and wellbeing benefits and bio-diversity net gain;
  - The site is eminently deliverable, with multiple road frontages and direct access to the national rail network within one ownership; and
  - Additional land ownerships to extend the settlement up to 6,000 homes to aid the delivery of key infrastructure should this be deemed beneficial.
- 2.20 As noted, the quantum of housing and employment provision is dependent on the level of density that can be achieved on site and whether adjacent land parcels are brought in and allocated alongside this site, with the majority of the surrounding land also considered suitable for allocation, particularly to the

north and west towards the M6 junction, given this is also outside the Green Belt and has similar accessibility credentials and physical characteristics.

**The Proposed Development**

2.21 The Masterplan shown in Figure 2.1 below (from page 4 of the Promotional Document at Appendix 1) and Figure 2.1 represents the latest scheme for the Rigby Estates site, to demonstrate what can be achieved within this single, unique, ownership; notwithstanding the fact that there is potential for further expansion as noted above should this be required to meet the region’s needs, or to deliver the required level of supporting infrastructure.

*Figure 2.1 – Illustrative Masterplan*



- **Residential:** developable area of 64.25 Ha, which could deliver up to 3,000 dwellings at varied densities, with higher density towards the train station and local centre and other facilities, and lower densities near the landscape sensitive areas at the rural fringe. A mix of densities will allow for different types of dwellings in term of size and tenure, which in turn will accommodate a variety of households. This will provide a hierarchy of dwellings from large detached properties with big plots through to smaller terraced forms allowing for a variety in the proposed streetscape as seen within the local area. The homes will prioritise the use of localised district heating, renewable energy and sustainable construction opportunities.

- **Employment:** area of 7.8 Ha in the south east corner, separate from the main residential area and with direct connection to the A449. This will assist the sustainability of the settlement by offering employment opportunities within the development itself to reduce out commuting. Demand for such uses is expected to be particularly high within the Warehousing and Distribution sectors (Use Classes B2 and B8) due to its direct connection to the M6 and national road network.
- **New railway station:** with 2 platforms, a shelter and associated parking (measuring 1.5 Ha). This is proposed at the centre of the site connecting to the West Coast Mainline, between the existing stations at Stafford and Penkridge. This will further enhance the sustainability of the settlement by increasing access for job opportunities for the existing and future residents via sustainable modes of transport. This is one of the Council's key aspirations for any new settlement in the borough, and there is a longer-term aspiration for the West Coast Mainline to support more localised rail services when HS2 is complete. An alternative park and ride facility could also be provided for Stafford station, if Network Rail or other key stakeholders determine that a station here is not practicable.
- **Local Centre:** measuring 2 Ha is at the heart of the scheme, to serve both the new development and to provide additional community facilities for the area. The Local Centre will provide a range of local services and facilities, which could include: shops, restaurants, public house, hairdressers etc., and potentially a GP surgery. A diverse mix of uses will contribute towards making this area an active and vibrant place throughout the day. It will also ensure that the Garden Village is self-sufficient and reduce residents need to travel to access day to day facilities. The Local Centre is positioned adjacent to the proposed primary school to maximise the use and accessibility of the Local Centre. It has also been positioned along a strategic cycle route, footpath corridor and public transport corridor giving the option for journeys to be made using sustainable modes of transport (walking/cycling) as opposed to by car.

**Primary School:** Land for a one form entry primary school (measuring 1.5 Ha) is provided adjacent to the Local Centre at the heart of the site. The location of the Primary School, alongside the public transport routes and strategic cycle routes, will ensure there are sustainable transport options for future users. This location also integrates into the northern end of the green wedge that runs through the centre of the site. The school is located within 500m of a large proportion of the proposed residential housing, and directly adjacent to the higher density local centre residential area where it is envisaged there will be a higher proportion of homes suitable for young families.

- **Neighbourhood Centres:** Two further neighbourhood centres (measuring 2 Ha combined) are shown to the west of the site at the existing Dunston Heath Farm and to the south along the edge of the A449. The provision of smaller local centres will ensure there are local services and facilities within a walkable distance available to all residents within the Garden Village. The

southern centre is proposed for roadside type retail and leisure uses (convenience store, coffee shop, public house); whilst the western centre is proposed as a small Business Village type development with B1 uses mixed with small scale retail.

- **Access:** The Garden Village has been designed to create a number of key internal access routes through the village. The access routes have been designed to be tree-lined boulevards with concentric design to maximise connectivity/ permeability through the site, which uphold key garden village principles, creating fully walkable neighbourhoods. The principal access routes will be via the existing School Lane which will be upgraded and a new east west route further south connecting both east and west parts of the development of the A449.
- **Open Space:** The masterplan shows the provision of generous areas of open space (over 35 Ha), which will be mainly located in the centre and east of the site. These areas of public open space will not only serve the development itself, but also the wider community, including the potential to include SANGS areas (suitable alternative natural greenspace) to reduce visitor pressure on the nearby Cannock Chase SAC. As shown in the masterplan, there are areas within the development (to the east of the M6 and to the west of the train line) which could also be used for ecological enhancement or mitigation to ensure significant biodiversity net gain, or for district heating/ renewable energy generation.

2.22 A full consultant team has been appointed to investigate a range of environmental and technical matters, with the following listed documents submitted alongside representations to the 2019 Spatial Growth Strategy Consultation (which and can be provided again on request):

- *Landscape and Visual Appraisal – Pegasus Environment - Appendix 3;*
- *Flood Risk Appraisal – Weetwood - Appendix 4;*
- *Ecology Report – TEP – Appendix 5; and*
- *Rail Capacity Review – MDS Transmodal – Appendix 6.*

2.23 One notable recent addition to the Development Team, is the **Master Developer Brookbanks**, who Rigby Estates are partnering with to help facilitate the vision and drive delivery on site. Brookbanks is one of only a handful of businesses in the UK to carry out this role with an outstanding and tested track record nationally of planning, designing, and delivering a large number of new settlements and major urban extensions. Such schemes include:

- the award winning 5,500 new home Sherford new settlement,
- the 8,000 home Cranbrook new settlement,
- the 2,000 home Comeytrove Urban extension.



- 2.24 A Master Developer's role is the ownership of a Place, with the delivery of all physical and social infrastructure. Such a role and responsibility helps to ensure the quality of the environment, the consistency of the local relationships/engagement and leaves the leading housing developers to do what they do best and build the site out.
- 2.25 Additional detail on Brookbanks credentials and track record can be provided on request, whilst further reports and detail will be submitted to the Council as the Local Plan Review process progresses and may result in the masterplan being amended over time, with supporting technical justification.

### **National Policy on New Settlements**

- 2.26 Whilst it does not refer to Garden Villages specifically, Paragraph 22 of the NPPF was recently expanded in July 2021 and represents a clear progression in how national government expect local authorities to consider and plan for new settlements and other larger scale developments across multiple plan periods. It states **(with recently added text in bold)**:

*'Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. **Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery**'.*

- 2.27 Paragraph 73 of the NPPF goes further to state;

*'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as **new settlements**... provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way'.*

- 2.28 It then sets out five criteria for large scale developments which we address in turn:

- a) **consider existing or planned infrastructure, the area's economic potential and the scope for net environmental gains** – Dunston Garden Village proposes a new train station which is a key aspiration within this area of search, harnesses the economic potential of this area which already has a high level of self-containment in terms of travel to work patterns. Significant areas of open space and blue/green corridors are proposed throughout the site which offer real opportunities for environmental gain; whilst Rigby Estates track record in renewable energy projects and sustainable stewardship will ensure wider environmental benefits arise from the development.

- b) **ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself** – Dunston Garden Village proposes a self-sufficient community with residential, employment, commercial and community and recreation uses all within walking distance of each other and interlinked.
- c) **set clear expectations for quality development and how this can be maintained (such as by following Garden City principles), and ensure that appropriate tools such as masterplans and design guides** – these representations along with the attached Promotional Document (and previous detailed Vision Document) fully uphold Garden Village principles.
- d) **make a realistic assessment of likely rates of delivery (which could extend beyond the plan period)** – there is no expectation or reliance on delivery from this site within the emerging plan period, although this could well be accelerated given the single willing landowner, non-Green Belt status, relative lack of constraints, and the involvement of a Master Builder in Brookbanks with a track record of driving delivery on large schemes such as this. As such the site could make a significant contribution to development needs within this plan period and beyond.
- e) **consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size** – not applicable given site’s location outside the Green Belt.

2.29 The Preferred Option addresses this issue in Policy DS4 ‘Longer Term Growth Aspirations for a New Settlement,’ within Chapter 4, and we cover this in section 5 of this report.

2.30 However, in short, we have concerns with the policy as drafted, as this proposes a wide area of search for a new settlement, whereas we feel this needs a bolder commitment from the Council to allocate a specific site to deliver the NPPF’s aspiration and make this policy effective. Indeed, it follows that a site should be identified at the earliest opportunity to give the developer the confidence and time to invest to ensure the site can be delivered.

2.31 It is our strong view that the land at Dunston is the only credible candidate site at this stage, as it:

- meets all the criteria of NPPF paragraph 73 as noted above;
- is the only new settlement option site that is located outside the Green Belt;
- has a single willing landowner, who has partnered with a Master Developer; and
- is the only option where a full consultant team has been appointed, and where a detailed Masterplan and technical work have been submitted.

### Garden Village Principles

- 2.32 The government’s commitment to Garden Settlements has been demonstrated through the investment of significant sums of money in recent years, with 14 pilot Garden Village schemes announced in 2017, backed by £6 million of government funding. These initial schemes were expected to deliver over 48,000 homes, with 25,000 housing starts expected by 2020.
- 2.33 This has been supported by various guidance setting out criteria for different sized Garden Settlements, with those over 10,000+ considered Garden Towns and those between 1,500 and 10,000 home considered Garden Villages, with the initial eligibility criteria noting that such villages should be freestanding, rather than extensions to existing towns (albeit this document has now been archived).
- 2.34 Further investment in recent years including £9 million to support 21 Garden Villages and Towns in February 2019, £3.7 million for 5 new Garden Towns announced on 25<sup>th</sup> March 2019, with a further £2.85 million pledged for a further 19 Garden Villages on 28<sup>th</sup> June 2019; with the latest list confirming that there are 49 active Garden Community Schemes across England.
- 2.35 MCHLG published a Garden Village Prospectus in August 2018 setting out their concept, and this has been supplemented with a toolkit dated 27<sup>th</sup> September 2019, which includes the following checklist, which we respond to:

GARDEN COMMUNITY TOOLKIT CRITERIA	DUNSTON GARDEN VILLAGE RESPONSE
1. Making a case for a garden community: To deliver a successful garden community you’ll need long-term support, local leadership, partnership and financial backing.	These representations and associated Promotional Document make a strong case for a Garden Village at Dunston, confirming its feasibility and presenting a clear vision for the site.
2. Site feasibility: How to test if there are suitable, available and deliverable locations and sites for a garden community.	
3. Developing a vision: How to successfully guide the development by creating a clear vision for your garden community.	
4. Engagement: Engaging the local community and stakeholders can create a garden community plan with roots in the local context.	Rigby Estates have already engaged with the Local Authority and various Infrastructure stakeholders in working up the initial proposals, and will involve the local community as the plans develop.
5. Planning policy: Local Plan policies provide an important framework to guide development proposals and aid decision-making for garden communities.	Rigby Estates is fully engaged with the Local Plan process.
6. Planning permission: Information about how to develop a planning permission strategy for your garden community.	A planning application strategy will be developed if and when the site is identified in the Local Plan, with revised para 22 of the 2021 NPPF requiring Local Plans to provide firmer policy support for such developments,
7. Masterplanning and design: Masterplanning is integral to creating well-planned and designed garden communities.	The Promotional Document clearly sets out the design concept and vision behind the current masterplan, and this will evolve as the proposals develop further and as more detailed technical work is undertaken.

8. Innovative and integrated communities: How smart communities connect people to technology.	Rigby Estates will embrace any new technologies that can help connect and integrate the existing and future community in Dunston.
9. Infrastructure; Delivering infrastructure can unlock development of a garden community and provide some of the building blocks for a successful new community.	The proposals include a new train station, primary school and other supporting infrastructure which will create a self-sufficient and sustainable community in Dunston, which could require additional adjacent land to be allocated.
10. Legacy: Information about creating long-term maintenance and management arrangements for your garden community.	Rigby Estates are a committed long term landowner, with a genuine commitment to sustainable stewardship to deliver a lasting positive legacy and environmental benefits for the site and local area.
11. Assessing the viability of your garden community. Find out about government guidance on viability and how to manage it in your planning process.	Initial assessments have not flagged up any viability concerns, as this is a strong market area, with high demand for a range of uses, but this will be continually monitored as the scheme evolves.
12. Land value capture and funding delivery: The process of capturing some of the increase in land value which comes from policy decisions, the granting of planning permission by local authorities, or as a consequence of new or improved, publicly funded infrastructure projects.	Rigby Estates will work with all relevant stakeholders to ensure that land value uplift is distributed in an equitable way and fund the required infrastructure; whilst the fact that the site is in one large ownership should eliminate any equalisation issues.
13. Delivery mechanisms: At an early stage in your project, you should explore the mechanisms and options available for delivery of your garden community.	Rigby Estates will work with Brookbanks and engage with all relevant stakeholders to ensure that suitable delivery mechanisms, governance and project management process are put in place as these proposals develop.
14. Governance: Governance creates good collaborative working and effective decision-making among public and private sector partners and stakeholders.	
15. Project management: Strong project management is needed to deliver a complex garden community on time and to ensure it delivers on expectations.	

2.36 This demonstrates that Rigby Estates have already satisfied many of the steps set out in this toolkit with a commitment to work through the remaining, more detailed and delivery focused elements, as the plans evolve, alongside their partner Brookbanks; whether this is through the current Local Plan, future Local Plan reviews or a separate Garden Village DPD.



**3. LOCAL PLAN REVIEW EVIDENCE BASE**

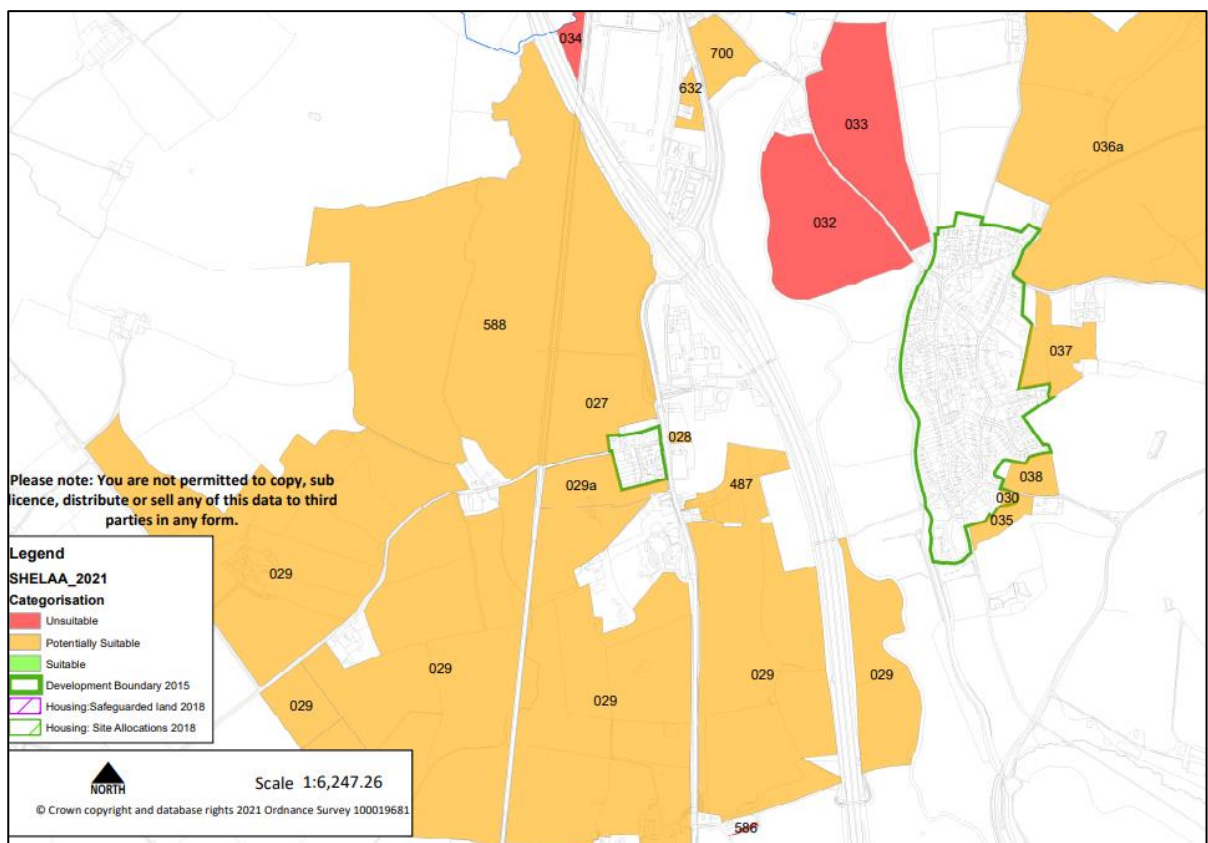
3.1 Within this section of the representations, we review the evidence based documents which have been published in support of the Local Plan Review. We provide comments on each of the documents of relevance to this site and proposal.

**Strategic Housing and Economic Land Availability Assessment 2021 – Assessment of Housing Land (SHELAA) (October 2021)**

3.2 The SHELAA is a study of the potential housing and employment sites in the district. It does not determine whether a site should be allocated however it is an important source of evidence in deciding where housing might be located.

3.3 As noted in Section 1 of these representations, this site was included within the 2018 SHELAA with the same site reference (Ref: 029). The SHELAA has been updated as part of the evidence base for the Local Plan Review and this site is still given an amber score and considered to be ‘*potentially suitable*’.

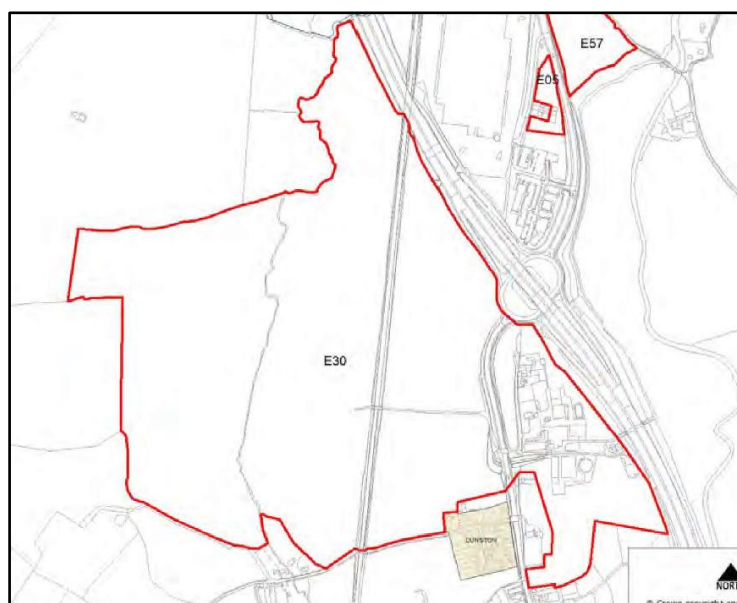
*Figure 3.1 – SHELAA 2021 Map*



3.4 Out of the total indicative capacity of 98,920 dwellings on sites included within the SHELAA, sites for just 293 dwellings were considered ‘*suitable for development*’, and these are either existing allocations as part of the Site Allocations Document 2018 or located within the existing urban area.

- 3.5 Sites with a capacity of 71,036 dwellings are given an amber/ 'potentially suitable' score within the SHELAA, for a range of reasons generally because they are 'not currently available' or are subject to 'policy constraints' (including open countryside, Green Belt etc). So there is limited differentiation in the scoring, even though there is significant variation in the status of these amber sites (with Green Belt being a much more significant constraint than open countryside for example). What's more, some of these have then been allocated with no real explanation as to why they were preferable to those that have been rejected.
- 3.6 As such the SHELAA assessment is considered overly broad brush and of limited relevance, and this site should be considered suitable given its availability and relative lack of constraints (especially with the level of Green Belt release proposed).
- 3.7 It is also pertinent that the land to the north and west of Dunston Garden Village site (SHELAA site refs: 588, 027 and 487), were also given an amber/ 'potentially suitable' score but not allocated. However they were also considered further as a consolidated site (Ref: E30) in the associated Employment Development Needs Assessment Stage 2 (December 2020) and the Employment Site Assessment Topic Paper (September 2021).

*Figure 3.2 - Adjacent employment site E30*



These assessments considered the site potentially suitable with the Topic Paper concluding:

*“The site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J13) and is not in the Green Belt. However the County highways team have expressed some initial concerns relating to site access. Given these points and that current evidence suggests local needs are being met and WMLs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.”*

- 3.8 This confirms that this is suitable location for distribution and logistics development, and it is possible that this site could be incorporated into the wider Garden Village proposals to deliver employment, as the proposals evolve (as we have discussed in section 2).

**South Staffordshire Housing Site Selection Topic Paper (September 2021)**

- 3.9 This paper sets out how the Council will assess and allocate housing site options to meet the proposed housing target set within the Local Plan Review 2018-2038. This paper provides a summary of why sites have/have not been chosen, and is therefore more informative than the SHELAA.

***Site Allocations in Dunston***

- 3.10 As confirmed within the report, there are no housing site allocations proposed in and around Dunston. As noted in paragraph 5.18.6, the Council's spatial strategy proposes to deliver 10% of its housing allocations on small sites in Tier 1 – 3 villages, without requiring additional allocations in less sustainable Tier 4 settlements and therefore none of the sites are considered to perform so well as to warrant an additional housing allocation.
- 3.11 Rigby Estates will provide comments on this separately in relation to their smaller landholdings in Dunston, but make no comments here in respect of the Garden Village.

***New Settlement Area of Search***

- 3.12 The site is located in an area of search for a new settlement. As highlighted in the earlier sections of this report, this site is considered to be a suitable location for a new settlement.
- 3.13 The Council's previous 2019 Spatial Housing Strategy consultation indicated that the Council would look for a freestanding new settlement along the transport corridor formed by the West Coast Mainline/A449. This site is located on this sustainable transport corridor and FWP's representations to this 2019 consultation highlighted the suitability of this site to deliver a freestanding settlement.
- 3.14 Neither the Spatial Housing Strategy consultation (2019) nor this Preferred Options consultation (2021) have identified a specific site within this area of search to deliver a new settlement. Instead, the Housing Topic Paper notes that a site to deliver a new settlement would be likely to come forward through future Local Plan Reviews. As set out in sections 2 and 5, it is our view that South Staffordshire need to be more proactive and prescriptive in the current plan, to ensure that the new settlement can deliver when it is required, with new paragraph 22 of the NPPF giving a clear steer on this point.

***New Settlement Option Sites***

- 3.15 Notwithstanding this, the Housing Site Selection Topic Paper (September 2021) provides reasoning as to why sites have and have not been allocated within the Preferred Options document. This document confirms that it is still necessary to test the potential deliverability of a new settlement proposal as an alternative location for housing growth in the District. The Housing Site Selection Topic

Paper sets out specific reasons why the Council have not allocated a specific site with the area of search to deliver the new settlement. Below, we address the reasons provided and provide comments specific to this site.

#### *Highways Issues*

- 3.16 Paragraph 5.28.4 of the Housing Topic Paper states that all of the 4 sites, within this broad location of search for a new settlement, are subject to Highways Authority concerns which would need to be addressed before the site could be taken forward. A Transport Strategy has been prepared in support of the allocation of this site to deliver a Garden Village, which confirms that Dunston Garden Village can be delivered from a highway's perspective. The scheme provides the opportunity to serve the development via improving the existing School Lane junction with the A449. At this stage, it is considered that the form of the improved junction would be a right turn lane ghost island junction. A second primary access would also be provided to serve the proposed new Garden Village at the A449 located circa 700 metres to the south. At this stage, it is considered that the form of this junction would be a four arm roundabout. Options will be explored to provide a new spine road and railway bridge that crosses the West Coast Mainline leading from the new roundabout junction to improve the permeability of the site. The Transport Strategy concludes that Dunston Garden Village can be accommodated in highways terms and therefore highways should not be reason to disregard this site as a location for future growth.

#### *Access to Services*

- 3.17 Furthermore, all 4 sites are considered to be poorly located in relation to existing services. As noted in the earlier sections of this report, we fully acknowledge that Dunston is currently a Tier 4 settlement, with limited access to services (it has a primary school, a village hall and a church). The nearest high tier settlement is Penkridge, which is located 3.5km to the south and includes a wide range of shops and services.
- 3.18 That said, as shown on the masterplan at Figure 2.1, this site will deliver a range of new services and facilities on site which would create a self-sufficient community, and therefore removing the need to be near existing services and facilities. This site proposes to deliver; employment land, a potential new railway station, a local centre, 2 neighbourhood centres and a primary school and therefore new residents living within the new settlement would not need to rely on existing services in other settlements.

#### *Rail Access*

- 3.19 The Housing Topic Paper states that despite the proximity of the 4 suggested new settlement options to the West Coast Main Line, none are in a location with a recognised rail opportunity, nor have any of the proposals submitted evidence to demonstrate that a new rail link would be feasible within their land control. We strongly dispute this comment, as have previously provided evidence to demonstrate

that this is not the case with this site. As part of FWP's representations to the Spatial Housing Strategy consultation (2019), a technical review of rail capacity was prepared by MDS Transmodal and submitted at Appendix 6. This investigated the feasibility of adding a station at Dunston to the existing network and its impact on the wider timetable and network. The review concludes that a new station, with two platforms and a shelter could be located anywhere along the section of track within the Rigby Estates landholding, as it is a straight section of track with sufficient stopping distances in both direction in relation to nearby stations at Stafford and Penkridge.

- 3.20 In terms of capacity, although this length of railway is congested with existing services, there is spare capacity. The revenue that could be achieved from the additional station would be sufficient to justify its construction and to fund the incremental additional rolling stock. The assessment confirms that this site does provide the opportunity to deliver a new railway station and Rigby Estates will work with Network Rail and other relevant stakeholders to explore the feasibility further.

#### *Scale*

- 3.21 The Housing Topic Paper goes further to note that a specific site for the new settlement has not been identified as none of the potential site options are of sufficient size to deliver the scale of growth envisaged by the GBHMA Strategic Growth Study in this corridor, which also means that no site is likely to accommodate significant on-site facilities beyond local retail centres and primary/first education facilities. Although these representations relate to the promotion of land within the ownership of Rigby Estates, with an indicative capacity of 3,000 dwellings, the Promotional Document and section 2 of these representations makes it clear that there is additional and potentially suitable land around the site (particularly to the north and west); which, when combined with increased densities could deliver up to 6,000 homes and additional infrastructure in this location, to help deliver the level of growth envisaged by the GBHMA Strategic Growth Study. As such, this site should not be discounted on the basis of scale. Instead the Council should work proactively with Rigby Estates and surrounding landowners to investigate the potential of assembling a larger site at Dunston.

#### *Conclusions*

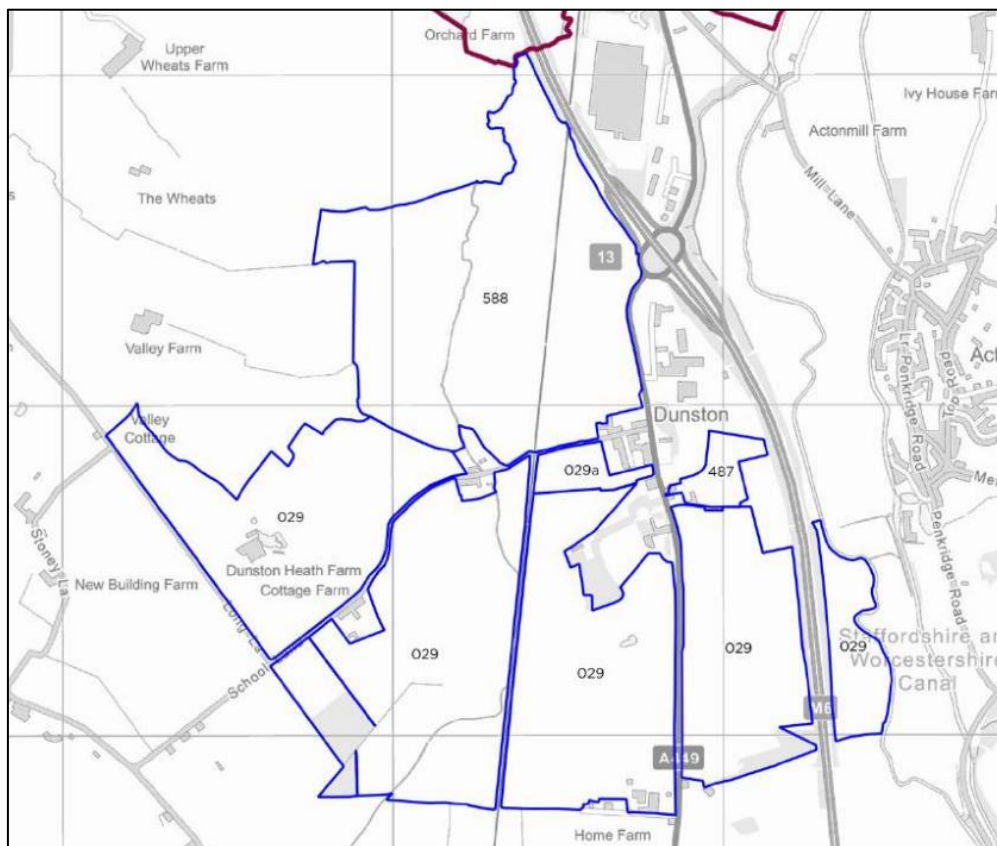
- 3.22 The Housing Topic Paper concludes that given the above factors no potential new settlement site is considered to perform so well as to change the Council's preferred spatial housing strategy. FWP don't believe that the Council need amend their spatial strategy, however it is our view that the Council should identify a site now which can be planned for in the emerging plan period (through an SPD/ Design Code) and then delivered beyond the plan period in line with NPPF paragraph 22, with a potential mechanism to allow it to come forward sooner if required, which should be achievable given it is not within the Green Belt. Rather than a change to the strategy this will simply provide additional flexibility within the current plan period and certainty for the next plan period.



**Sustainability Appraisal (Preferred Options Plan) Regulation (III) SA Report (August 2021)**

3.23 A Sustainability Appraisal (SA) has been prepared to inform the Local Plan Review and consider the social, economic and environmental performance of the development plan. The SA was initially prepared as part of the Issues and Options consultation in 2018, then updated as part of the Spatial Housing Strategy consultation in 2019 and has been updated again to support this Preferred Options consultation. As shown in Figure 3.2 below, the site comprises reference 029 and 029. Within our commentary on the SA, 029 and 029a are often rated the same and therefore we refer to both parcels as the site. In instances where 029 and 029a are rated differently, we note this.

*Figure 3.3 – Map to show SA sites assessed in Dunston*



3.24 The SA appraises 317 sites and evaluates the sustainability performance of each site against 12 different criterion. The table below is taken from the SA and sets out how the site scores against each of the criterion. Below, we provide commentary on each of the scores for the Dunston site.

Figure 3.4 – Matrix of SA Scoring for Dunston Site

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
029	+/-	--	-	-	-	-	+	-	-	-	-	--
029a	+/-	-	-	-	-	-	+	-	-	-	-	-

**SA Objective 1 – Climate Change Mitigation**

3.25 SA Objective 1 relates to climate change mitigation and the site is scored uncertain. It is worth noting that all sites within the SA have been scored the same as with all sites, it is entirely uncertain whether impacts would be positive or adverse. FWP do not dispute this rating.

**SA Objective 2 – Climate Change Adaptation**

3.26 SA Objective 2 relates to climate change adaption. As shown in Figure 3.2 above, site reference 029, which refers to the majority of the land holding, is considered to have a major negative impact. Parcel 029a, which forms a small parcel within the land holding, is considered to have a minor negative impact. As noted within the report (paragraph 4.5.1), the majority of the 317 sites assessed would be expected to have a minor positive impact due their location within Flood Zone 1, away from areas at risk of flooding.

3.27 In terms of parcel 029a, the SA considers the parcel to have a minor negative impact in terms of this objective. FWP disagree with this rating. This parcel is located within Flood Zone 1 and is not at risk of surface water flooding. As such, this parcel should be graded as ‘minor positive’ in line with the scoring criteria noted within the SA and the rating of other sites.

3.28 As shown in Figure 3.2 and 3.3, the majority of the site forms parcel 029 and is scored as having a major negative in terms of its contribution to this objective. Whilst FWP don’t necessarily disagree with this, as highlighted in the earlier sections of this report, the majority of the land holding forms parcel reference 029 is located within areas of Flood Zone 1, 2 and 3. A preliminary appraisal of the flood risk and drainage conditions has been prepared in support of the development of the site. This report confirms that although the site has areas of Flood Zone 1, 2 and 3, the Environment Agency has not undertaken any detailed modelling of the Pothooks Brook and the Flood Map for Planning is based on national generalised modelling. This therefore cannot be considered to be an accurate assessment of the flood risk of the site. To get an accurate assessment of the flood risk, detailed hydraulic modelling is required which would clearly confirm the flood risk zones within the site.

3.29 Even with the current flood risk zones, the scheme has been designed to take into account the areas which are at risk of flooding. As shown in the masterplan, development has been directed away from the areas at highest risk of flooding and no development is proposed within Flood Zone 3. With the inclusion of SUDs and flood risk measures, the site could be developed without causing an increase to the risk of flooding elsewhere and ensure that forthcoming development on site is not at risk of flooding. As such, this site should be rated as ‘minor negative’ as opposed to major negative.

***SA Objective 3 – Biodiversity and Geodiversity***

3.30 This objective considers the adverse impacts of the proposed development, focusing on an assessment of development on a network of designated and undesignated sites, wildlife corridors and individual habitats. Firstly, it is worth noting that there are no nationally or internationally designated wildlife sites within 1km of the site. One locally designated site lies within the site boundaries (Cockpit Plantation) which would be retained as part of the development of the site.

3.31 The impact from all 317 sites, bar one which has a major negative impact, are either ‘uncertain’ or a ‘minor negative’.

3.32 Both parcels 029 and 029a, which form this site, have been rated as having a minor negative impact. Although we don’t necessarily disagree with the rating of ‘minor negative’, it is worth noting that the development of the site will bring forward significant biodiversity benefits and new habitats. An ecological appraisal has been prepared in support of the site, which is reflected and accounted for in the masterplan. The masterplan highlights the opportunities to enhance biodiversity across the site through the additional planting and woodland management of key wildlife areas and corridors. The site will also create large recreational areas on site, along with pond and swales, other SUDS features woodland planting, scrub and grasslands to enhance wildlife. The site will also provide habitats and wildlife corridors through features such as native hedgerows and wildflower meadows.

3.33 The development of the site presents a significant opportunity to enhance the biodiversity within the site and provide a greater variety and quality of habitats and wildlife features than is currently present. As such, although there would be a loss of greenfield land, the improvement to biodiversity and habitats can only be seen as a positive to the development of the site.

***SA Objective 4 – Landscape and Townscape***

3.34 The level of impact on this objective has been assessed based on the nature, value of, and proximity to, the landscape receptor in question. The majority of the 317 sites assessed within the SA were considered to have a ‘major negative’ impact with a smaller number having a ‘minor negative’ impact and a small number of sites having a ‘negligible’ impact. No sites were considered to have a positive impact.



- 3.35 This site, both parcels 029 and 029a is considered to have a minor negative impact on this objective, which we must note, is better than a large proportion of sites which were assessed within the SA which are considered to have a major negative impact.
- 3.36 Although we don't disagree with the ratings of parcels 029 and 029a, which make up this site, we must make it clear that a new settlement or a large scale development will undoubtedly have some impact on the existing settlement and this will be the case irrespective of the site chosen. To accommodate the housing numbers and growth required in South Staffordshire, greenfield sites will need to be released and this will have some impact on the existing landscape and townscape. It is mitigating this impact and reducing the level of impact caused.
- 3.37 In terms of this site, it is not located within the Cannock Chase AONB which is a particularly sensitive location in landscape terms. Sites located to the north east of the district would be located within this area and therefore new development is less appropriate in this location.
- 3.38 This site is not Green Belt and therefore Green Belt boundaries would not need to be revised to accommodate the development of this site. The Green Belt covers over 80% of the District and therefore there are few places which are not Green Belt and which could accommodate a large scale development of this nature. This location is the most suitable location to accommodate a new settlement in South Staffordshire in Green Belt terms.
- 3.39 In terms of landscape, a landscape and visual statement has been prepared in support of the site. It concludes that although a development of this scale will inevitably have an impact on views, it is not within the Cannock Chase AONB or Green Belt. With the proposed mitigation measures in place, in terms of setting the scheme within a framework of mature trees and woodland, the potential impact on the surrounding landscape character and visual receptors would be reduced. Visually, the site is relatively well contained, with views to the east and south limited.
- 3.40 In terms of mitigation, a strong buffer of planting around the site boundaries will limit the effect of the development on the character of the immediate surroundings and on the range of visual receptors. Development is proposed to be set back from boundaries to allow space for a strong tree buffer, that in time will create a good visual screen.
- 3.41 In conclusion, all large development will have some impact in landscape terms. In terms of this site, although there would be an initial impact, this would reduce over the lifespan of the development with the proposed mitigation measures in place.

***SA Objective 5 – Pollution and Waste***

- 3.42 This objective assesses the impact on air pollution, water pollution and waste. The majority of the sites assessed are considered to have a 'minor negative impact' with a small portion of sites considered to have a negligible impact.

- 3.43 This site, parcels 029 and 029a are considered to have a minor negative impact on this objective. Although we would not disagree with the rating, several sites which have been allocated are considered to have a minor negative impact on this indicator and therefore this site is no worse in that regard.
- 3.44 Having said that, given the size, connectivity and level of services proposed within the development it is likely that a large proportion of journeys will be undertaken on foot. The scheme also proposes a train station which offers another credible alternative to the car. As such, this development will be a self-sufficient community of walkable neighbourhoods, thus reducing the need to travel by car, whilst electric vehicle charging points will be a priority. This will reduce the potential air pollution resulting from the future development of the site.
- 3.45 As such, although some air pollution and waste will be created, the development will create a sustainable self-sufficient community which will reduce levels of pollution and waste, in comparison to other smaller development and sites which can't deliver a rail station.

#### ***SA Objective 6 - Natural Resources***

- 3.46 Development at a large proportion of the sites assessed will result in the loss of greenfield land and best and most versatile agricultural land and therefore score 'minor negative'. A small proportion of the sites, which includes the majority of the gypsy and traveller sites, would be likely to result in a minor positive impact.
- 3.47 This site, which includes parcels 029 and 029a is considered to have a minor negative impact on this objective. Whilst FWP don't disagree with this rating, it is worth noting that to address the housing needs of the borough, large scale development is required, which cannot be accommodated on just brownfield land. As such, there needs to be an acceptance that there will be a loss of greenfield land and some of this will be best and most versatile agricultural land. This site scores the same as other sites which have been allocated and therefore is no worse in that regard.

#### ***SA Objective 7 - Housing***

- 3.48 The housing objective has been assessed as 'minor positive' for all residential-led sites, due to the fact that all sites would contribute towards meeting the housing demand.
- 3.49 This site, parcels 029 and 029a has also been rated as having a minor positive contribution to this objective. Whilst we don't disagree with this rating, FWP would like to reiterate the fact this site will deliver a very large housing scheme which would make a significant contribution to the housing supply within South Staffordshire and maintain a healthy housing land supply for a significant number of years, more so than other smaller scale housing sites, and as such should potentially be given a 'major positive' score to reflect this/ differentiate the site.

**SA Objective 8 – Health and Wellbeing**

- 3.50 All 317 sites assessed in the SA sites are considered to have a ‘minor negative’ impact with regards to this objective. Whilst we wouldn’t disagree with this rating, given that all sites have been rated in the same manner, we would like to highlight that this site would create a self-sufficient community, which prioritises health and well-being, where future residents can walk/cycle to work, home, local services and facilities. The scheme proposed at Dunston also proposed over 35 hectares of open space, providing an abundance of open space to facilitate healthy and active lifestyles. This will be to the benefit of future residents and promote health and well-being.

**SA Objective 9 – Cultural Heritage**

- 3.51 The majority of the 317 sites assessed in the SA are considered to have a ‘minor negative’ impact. A very small number of the sites assessed are considered to have a ‘negligible’ impact and a few sites are considered to have a ‘major impact’.
- 3.52 This site, parcels 029 and 029a, is considered to have a minor negative impact. FWP do not disagree with the rating but would like to highlight any heritage concerns can be appropriately addressed through the design of the proposed development. The masterplan has been designed with heritage in mind and ensures that there is a sufficient stand-off from the development to the closest heritage assets, with key views and vistas maintained.
- 3.53 A heritage assessment has been prepared in support of the site which confirms that there are no Conservation Areas within or adjacent to the site, which will impact upon the proposed development. There are a number of Listed Buildings in close proximity to the site along with 2 Scheduled Ancient Monuments however these have been considered as part of the design of this scheme. The location of the proposed residential/ employment/ commercial elements have been carefully planned and designed so that they do not impact on the setting of the nearby heritage assets. To prevent any impact arising, landscape buffers have been proposed to provide screening.
- 3.54 As such, although the site is considered to have a ‘minor negative’ impact, as per the majority of sites, the scheme will ensure that all historical assets are protected.

**SA Objective 10 – Transport and Accessibility**

- 3.55 The majority of the sites assessed are considered to have a ‘minor negative’ impact with a very small proportion of sites considered to have a ‘major positive’.
- 3.56 This site, both parcels 029 and 029a, is considered to have a minor negative impact on this objective. FWP would disagree with this rating as with the development proposed on this site, this site will become extremely accessible with good links to a variety of modes of transport.

- 3.57 The site benefits from existing transport links, including; bus stops along the A449, which provide hourly services to Wolverhampton, Stafford and Cannock. The site is located adjacent to junction 13 of the M6 and has strong links with the national road network. The A449 is one of the key north/south routes through the district linking to Wolverhampton. Furthermore, the site is located approx. 3.5km to the north of Penkrige, which has a rail station. Penkrige Rail Station is on the Birmingham branch of the West Coast Mainline, which links to Wolverhampton, Birmingham, Stafford, Crewe, Liverpool Lime Street and London Euston.
- 3.58 The proposed development will improve the sustainability of the site and access to sustainable modes of transport. As noted in the earlier paragraphs in this section, the proposed Garden Village at Dunston will bring forward a range of services and facilities which will mean the settlement is self-sufficient. This development proposes to deliver; residential, employment, primary schools, a local centre and a neighbourhood centre. As such, future residents will not need to travel to access key services and facilities.
- 3.59 The development proposes extensive pedestrian and cycle links, bus services and a new railway station. The development will improve the accessibility of this site/location and provide better access to transport infrastructure and services and therefore once the development is in place, the site would be extremely accessible, which would be a major positive, as opposed to a minor negative impact.

**SA Objective 11 – Education**

- 3.60 Over half of the 317 sites assessed in the SA are considered to have poor access to primary and secondary schools.
- 3.61 This site, parcels 029 and 029a, is rated as having a ‘minor negative’ however we would disagree with this rating for both parcels. There is an existing primary school located within the village of Dunston, which is in walking distance to the existing houses in this village and would be within walking distance of the proposed development. The nearest high school is located 3.6km to the north of the site (Stafford Manor High School).
- 3.62 Specific guidance on the distances that children will walk to school is found in the July 2014 document, published by the Department for Education (DfE) entitled ‘Home to School Travel and Transport’. This suggests that the maximum walking distance to schools is 2 miles (3.2km) for children under 8 and 3 miles (4.8 km) for children over the age of 8. On this basis, the proximity of the nearest High School is well within guideline distances and therefore we would disagree with the site being graded as ‘minor negative’ for this objective.

3.63 Furthermore, as well as the close proximity to existing education facilities, Dunston Garden Village proposes to deliver a one form entry primary school adjacent to the local centre which will further increase the accessibility of education facilities to new and existing residents. As such, we question the current rating and suggest that it would be more 'negligible' or 'minor positive'.

**SA Objective 12 – Economy and Employment**

3.64 Of all the 317 sites assessed, the employment-led sites would be likely to have a major positive on the local economy. A small proportion of sites assessed are considered to have a major negative on the local economy as the proposed development could potentially result in the loss of employment floorspace.

3.65 In terms of this site, parcel 029 is rated as having a 'major negative' and smaller parcel 029a is considered to have a 'minor negative'. FWP strongly disagrees with the rating of both parcels, which make up this site.

3.66 Firstly, both sites have access to three small employment sites to the east, south and north of the site. These provide existing residents in Dunston access to employment opportunities. Furthermore, and more importantly, Dunston Garden Village proposes to deliver 7.8 hectares of employment land in the south east corner of the site. Although this will be separate from the main residential area, it will have a direct connection to the A449. This employment area will have a major positive impact on the local economy and result in a net gain in employment floorspace across South Staffordshire. What's more it is possible that additional land to the north of the site could be brought forward for employment, with some of this land being identified as suitable in the SHELAA.

3.67 As noted within the SA document, residential-led sites have been assessed having a 'major negative' impact on the local economy, as proposed developments could feasibly result in the loss of employment floorspace. This is not the case with this site. The proposed development will result in a net gain in employment floorspace within the borough and therefore the site should be considered to have a positive impact for this objective and not a major negative.

3.68 Furthermore, Dunston is located on the western side of the A449 trunk road, in close proximity to Junction 13 of the M6 motorway. This provides links both north and south and therefore the site is well placed to become a new employment hub, with excellent access to existing employment sites.

**Conclusion**

3.69 We have set out our concerns with some of the scores which have been provided within the updated Sustainability Appraisal and ask that the Council reconsider sites 029 and 029a and how the parcels have been rated, in light of the comments provided and additional documents submitted alongside these and earlier representations.

**Rural Services and Facilities Audit 2021**

3.70 This study sets out the level of services and facilities within settlements in South Staffordshire to allow a revised settlement hierarchy. Appendix 4 of this document sets out each settlement within the borough and then provides a summary of the services and facilities within each of the settlements. Below, we provide an extract from the table regarding Dunston.

*Figure 3.5 – Extract from Rural Services and Facilities Audit – Dunston*

Settlement	Convenience shops/ supermarket	Non-convenience shops	Other community facilities and services present (list)	Primary / First schools present	Secondary schools/ sixth form colleges present	1 mile of village boundary on routes of sufficient walking to encourage walking	Facilities accessible within 1 mile of village boundary on routes of sufficient walking to encourage walking	Comments on facilities outside of village	Retail centres (2021 Retail Centres Study)	Employment access via public transport (Hansen)	PT access to Main Centres (weekday)	PT access to Main Centres (weekend)	PT access to Hospitals (weekday)	PT access to Supermarket (weekday)	PT access to Supermarket (weekend)
Dunston	0		1 Village Hall	1 first school	none			Small footpaths to facilities at Acton Gate	None	Low	10, 20 minutes	10, 20 minutes		10, 20 mins	10, 20 mins

3.71 We have reviewed the above table and noted that there are some omissions within the table which we note below.

3.72 Under the heading, ‘Other community facilities and services present’, the only services noted in Dunston is a village hall. Although it is strictly located outside the development boundary (70m to the south), Dunston St Leonard’s is considered to be part of the community facilities available in Dunston and therefore due to its close proximity to the development boundary and it being a focal point in the community, this facility should be included under this heading.

3.73 In terms of ‘facilities accessible within 1 mile of village boundary on routes of sufficient walking’, the table only includes 1 public house and 1 restaurant. These would be: Open restaurant and Catch Corner Pub and Grill. There are however other facilities within this 1 mile walking radius which have not been included within the table. These include:

- Taylor Tots Nursery;
- Holiday Inn Express;
- McDonalds Restaurant and Takeaway; and



- The Courtyard Bistro (in Dunston Business Village).

3.74 To ensure the table accurately reflects the existing facilities within 1 mile of the village boundary, the above facilities should be included within the table at Appendix 4.

3.75 That said, as noted previously the level of existing service provision is of limited relevant to the Dunston Garden Village proposals, given that this scheme will create a self-sufficient community by providing new services on site.

#### **Historic Environment Site Assessment (Updated Sites 2021)**

3.76 An initial Historic Environment Site Assessment II was prepared in December 2019, which included an assessment of site 029. Since this time, there have been two further updates, which include an assessment of both sites: 029 and 029a. The report confirms that the development of both sites would not result in substantial harm.

3.77 The assessment rates the risk of harm in terms of Red, Amber and Green and assesses the direct impact and the indirect impacts on the nearby heritage assets. If a site is rated 'green', this means that no concerns have been identified, on current evidence, although archaeological mitigation measures may be required. If the site is rated 'amber', this means there are no significant effects which cannot be mitigated against.

3.78 Sites 029 and 029a are rated amber both for direct and indirect impacts. As noted in the earlier sections of these representations, there are a number of Listed Buildings in close proximity to the site along with 2 Scheduled Ancient Monuments however as noted within the Historic Environment Site Assessment and within the Heritage Assessment prepared in support of this site, any impact can be mitigated against through sensitive design and landscape screening.

#### **South Staffordshire Landscape Sensitivity Assessment (July 2019)**

3.79 There have been no updates to this assessment as part of this consultation.

3.80 FWP provided comments on this assessment as part of our representations to the Local Plan Spatial Housing Strategy and Infrastructure Delivery Document (October 2019). As such, we ask that the Council refers back to these representations for comments on this document and the Landscape and Visual Assessment which was prepared and submitted as part of this assessment.

#### 4. HOUSING NEED (CHAPTER 4)

4.1 The total housing requirement is now 8,881 over the 20 year period from 2018 to 2038 which equates to 444 dwellings per annum. This total requirement has increased slightly since the 2019 Spatial Housing Strategy (when it was 8,845), albeit the Standard Method requirement has actually dropped from 254 to 243 dpa<sup>1</sup>, but with the addition of 750 completions between 2018 and 2021 and the 4,000 unmet need from the wider GBHMA.

*Figure 4.1 – Overall Housing Requirements*

South Staffordshire’s own housing need using the government’s standard method (2021-2038)	4,131
Completions in the District since the start of the plan period (2018-2021)	750
Additional housing to contribute towards the unmet needs of the GBHMA	4,000
<b>Total number of dwellings to be planned for</b>	<b>8,881</b>

**Table 7: Housing Target**

4.2 We believe that the proposed housing requirement figure of 8,881 is too low and that there are a number of factors at play in South Staffordshire, and the wider Greater Birmingham Region that would justify an increase to this figure, to ensure a positively prepared plan in line with paragraph 35 of the 2021 NPPF. We outline these factors below, with reference to the current national guidance.

#### **National Guidance on Housing Need**

4.3 In terms of national policy, NPPF Paragraph 61 confirms that the minimum number of homes required should be informed by the standard method, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

4.4 Paragraph 11 also notes that for plan-making, the presumption in favour of sustainable development means that *‘all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure...’*

4.5 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. This is supplemented with additional detail in the NPPG<sup>2</sup>, which states that the Local Housing Need (LHN) provides a minimum starting point in determining the number of homes needed, it also states that government is committed to ensuring that more homes are built and that government support ambitious authorities who want to plan for growth.

<sup>1</sup> As of March 2021, using the 2014 SNHP over the period 2021 – 2031 with 2020 affordability ratios

<sup>2</sup> Paragraph 2a-010-20201216



4.6 This paragraph then sets out the circumstances when it might be appropriate to plan for a higher housing need than the Standard Method indicates, including:

- where there are deliverable growth strategies for the area (e.g. Housing Deals),
- where there are strategic infrastructure improvements that are likely to drive an increase in the homes needed locally,
- where an authority has agreed to take on unmet need from neighbouring authorities, or
- where previous levels of housing delivery or assessments of need are significantly greater than the Standard Method.

4.7 In addition, paragraph 2a-015-20190220 confirms that *'Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the Standard Method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.'*

4.8 Whilst South Staffordshire are proposing an approach that exceeds the minimum requirement, it is our strong view that this doesn't reflect the circumstances in South Staffordshire and the wider Greater Birmingham area (as referenced in paragraph 10 of the PPG), or the demographic trends or market signals (as referenced in paragraph 15 of the PPG). As such, it is our strong view that a far greater uplift is required.

#### **Meeting South Staffordshire Needs**

4.9 In line with the guidance above, we set out the relevant circumstances that would support an uplift to the standard methodology for meeting South Staffordshire's own needs (before moving on to meeting unmet need in the wider region, and other market signals).

#### **Growth Strategies**

4.10 NPPG guidance notes how there may be justification to exceed the standard method figure if there are deliverable growth strategies in the area, where funding is in place to promote and facilitate additional growth. As summarised below, there are economic growth strategies in the South Staffordshire area which justify an uplift to the standard housing method.

4.11 Firstly, South Staffordshire is part of the Stoke-on-Trent and Staffordshire Growth Deal, which was agreed by Government in March 2014. The Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) has secured £82.3m to support economic growth in the area, with £14.1m of funding committed between 2016 and 2021. Furthermore, the substantial investment from Government is expected to generate at least £19m of additional investment from local partners and the private sector, creating a total new investment package of £101.3m for the Stoke-on-Trent and Staffordshire area.

- 4.12 In addition, the Stoke-on-Trent & Staffordshire Strategic Economic Plan (April 2018) outlines strategic employment sites that are identified as priorities in the LEP area, which includes the Bericote Four Ashes and Featherstone sites which are both located in South Staffordshire District. Both sites will clearly generate significant jobs in South Staffordshire, which will in turn increase housing demand in the area. Indeed, the Four Ashes site will provide 900,000 sq ft of industrial floor space and accommodate over 1,000 jobs, and has outline planning consent in place. Since then the West Midlands Interchange has gained consent through the DCO process, which will generate further jobs growth, which we come on to below.
- 4.13 Finally, the Stoke-on-Trent and Staffordshire LEP now has a Local Industrial Strategy in place, which was adopted in March 2020 (so since the last draft of the local plan). This aims to boost investment in the area by focussing on the following strengths, and needs to be taken into consideration when establishing the housing need requirement for the District:
- manufacturing and materials innovation;
  - energy innovation and low carbon adoption;
  - connectivity; and
  - a strong and growing visitor economy.
- 4.14 To conclude, the aforementioned economic growth strategies provide justification for exceeding the minimum standard method housing figure in the South Staffordshire context.

#### ***Strategic Infrastructure Improvements***

- 4.15 NPPG Guidance also outlines how strategic infrastructure improvements that are likely to drive an increase in the homes needed locally provide justification for an uplift to the standard housing method figure.
- 4.16 As part of the Preferred Options consultation, the Council has published an updated Infrastructure Delivery Plan (2021). Whilst a number of the infrastructure projects in the plan relate to education, additional car parking provision etc, others are transport related such as road infrastructure improvements to help deliver the ROF Featherstone Strategic Employment site, and upgrades to Gailey Island associated with WMI. We have already outlined the economic growth benefits that will arise from the strategic employment sites, with the planned highways infrastructure helping to unlock their potential.
- 4.17 At the higher level HS2, although not yet fully confirmed, is a key infrastructure project with a proposed new station in Stafford to the north. South Staffordshire District borders Stafford District to the north, therefore there will be evident economic growth benefits for South Staffordshire arising from the

proposals<sup>3</sup>. For example, spurred on by HS2 connectivity at Stafford, Stoke and Macclesfield, the Cheshire & Staffordshire HS2 Growth Strategy aims to deliver 100,000 new homes and 120,000 new jobs by 2040. HS2 also has more direct implications on the Dunston site in terms of the proposed railway station, as it will have a significant impact on capacity on the West Coast Mainline and wider network.

- 4.18 South Staffordshire is also likely to see significant benefits arising from the development of the West Midlands Interchange (WMI) which represents a strategic infrastructure project that achieved consent through the DCO process in May 2020. Once complete, the Interchange is expected to deliver up to 8 million sq ft of logistics floorspace and support around 8,500 jobs and given its location, it is reasonable to expect a good proportion of these to be taken by South Staffordshire residents, either existing residents or new people attracted to the area by new employment opportunities.
- 4.19 Finally, Highways England are at an advanced stage in the DCO process to secure a new Link Road between the M6 and M54, to reduce pressure on the A460, at an estimated cost of £779m, and this clearly represents a significant piece of strategic infrastructure that will support additional growth in the future. This has been through an examination with the Secretary of State for Transport due to provide a decision by April 2022.
- 4.20 Therefore, the above infrastructure improvements and projects need to be taken into consideration when establishing South Staffordshire's housing requirement.

#### ***Previous Delivery***

- 4.21 Previous delivery is broadly in line with the Standard Method figure of 243, averaging out at 252 dpa since 2001 and 249 over the Core Strategy period (2014/15-2018/2019/2)<sup>4</sup>. That said estimated delivery for the year 2020/21 was 413<sup>5</sup>, with projected delivery at an average 342 dpa from 2020 – 2025, according to the Council's 'Housing Monitoring and Five Year Housing Land Supply' document, dated April 2020; which, if realised, might support an uplift in the baseline requirement in the coming years (before considering the unmet need element).

#### ***Previous Assessments/SHMAs***

- 4.22 Whilst there is a May 2021 Strategic Housing Market Assessment (SHMA), prepared by HDH Planning & Development, published alongside the current Preferred Options, this does not seek to establish an objectively assessed housing need (OAN) figure instead it simply applies the standard method, which we acknowledge is in line with current PPG guidance. That said it actually applies the previous SM figure of 254 dpa, which was updated in March 2021 to 243 dpa.

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<sup>3</sup> <https://www.hs2.org.uk/why/connectivity/>

<sup>4</sup> According to government live table 122

- 4.23 The last assessment to fully consider need, beyond the standard method, was the March 2017 Black Country and South Staffordshire SHMA, prepared by Peter Brett Associates. Table 7.1 of the report states that the OAN requirement for South Staffordshire is 270 dpa. This OAN figure covers the time period 2014 to 2036, and was calculated taking into account market signal adjustments, economic growth etc. Paragraph 7.30 confirms that the OAN figure does not include meeting unmet housing needs from elsewhere in the Housing Market Area (HMA).
- 4.24 However, paragraph 7.31 of the 2017 SHMA notes how there is scope for South Staffordshire to offset some of the wider unmet cross-boundary need, because demand for new homes in this area is higher than other parts of the HMA. We fully agree with this assertion, as discussed in detail below.

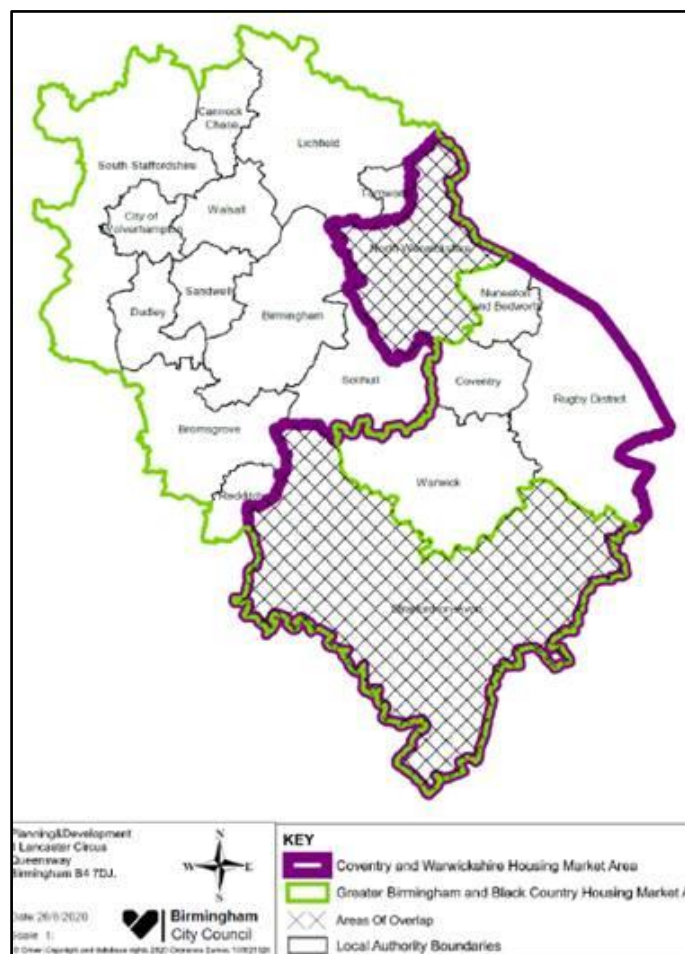
#### **Meeting Wider Unmet Needs within Greater Birmingham**

- 4.25 Paragraph 4.12/ Table 7 of the Preferred Options document confirms that South Staffordshire will accommodate up to 4,000 dwellings towards the unmet needs in the wider GBHMA, which is unchanged from the previous Spatial Growth Strategy consultation in November 2019, and the Issues and Options consultation in November 2018.
- 4.26 We repeat our previously raised concerns on this matter, namely that we do not consider that the 4,000-unit uplift goes far enough to meet the unmet needs in the wider GBHMA area, given the local plan position and land constraints in neighbouring authorities who are unable to sufficiently contribute to the wider Greater Birmingham needs. Whilst it is welcomed that South Staffordshire District Council is looking to contribute towards the delivery of unmet needs from the wider GBHMA, the 4,000 figure does not appear to be based on robust evidence of site capacity and constraints within the relevant local authorities.
- 4.27 Firstly however, it is important to note that the full extent of the shortfall/unmet need in the GBHMA is still unclear with no recent agreement or position statement from the 14 Local Planning Authorities of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 4.28 However, the Black Country Draft Local Plan (Regulation 18) and supporting evidence base, which consulted between August and October 2021, provided the most recent update covering 4 of the 14 authorities (since the last full position statement from 2018 which suggested a shortfall of 61,000 homes to 2036).
- 4.29 Indeed the Black Country draft plan suggested a shortfall of 28,239 homes by 2039 from the 4 Black Country authorities alone, which is still significant (and could well rise once Birmingham Solihull and others confirm their supply positions to 2039). This was calculated on the following basis:
- Housing need in the Black Country has increased from 3,150 dwellings per annum (or 63,000 total from 2006 - 2026) in the adopted plan, up to 4,004 dpa (or 76,076 from 2020-2039) in the

current draft plan, largely due to the government's new standard method applying an uplift of 35% to Wolverhampton as one of the 20 largest cities in the UK.

- Black Country have identified an urban capacity of 39,257 homes (and 205 Ha of employment land), which they think can be increased further to 40,117 with additional sites; however this could generate a shortfall of as much as 35,959 homes (and 300 Ha of employment land), which would need to be met through Green Belt release or by adjacent authorities through the duty to cooperate. Much of this shortfall is due to increased demand for employment land in the urban area (both in terms of competition for new sites and retention of existing ones – which had been expected to become available for residential development).
- It is suggested that adjacent authorities have agreed to take between 8,000 and 9,500 homes (including the 4,000 volunteered by South Staffordshire) and 102-173 Ha of employment land; whilst the Black Country Green Belt Review has suggested suitable Green Belt capacity of 7,720 homes and 47,8 Ha of employment; however this would still leave a residual shortfall/unmet need of 28,239 homes and 211 Ha of employment land up to 2039 from the Black Country alone.

Figure 4.1 – Map of Authorities in Greater Birmingham Housing Market Area



4.30 It is pertinent that this doesn't account for other unmet needs across Greater Birmingham, and we know that Birmingham itself had unmet needs of 38,000 back in 2018 (along with smaller shortfalls in Bromsgrove and Tamworth). The latest GBHMA position statement from July 2020 confirms that this wider shortfall is down to 2,597 dwellings by 2031 but acknowledges that unmet need beyond that has not been confirmed and is likely to be significant.

*6.3 It is, however, now apparent that there will be a HMA shortfall post 2031, with the Black Country alone estimating a shortfall of 29,260, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially other authorities, is not yet known, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated. It is evident, however, that a number of HMA local plan reviews (e.g. South Staffordshire, Lichfield and Cannock Chase) are considering levels of growth above local need, up to and beyond 2031. There may also be scope for contributions from local authorities outside the HMA but with a strong functional link to it, such as Shropshire, to help address the shortfall up to and beyond 2031.*

4.31 It suggests adjacent authorities are making a contribution, but this has already been factored into Black County's figures and there is still close to a 30,000 shortfall which will be inflated further by Birmingham's residual unmet need beyond 2031.

4.32 As such, this indicates the remaining 10 authorities in Greater Birmingham and other adjoining authorities (such as Shropshire and those in Coventry and Warwickshire HMA as shown in figure 3.2 above) will have to take considerably more in their emerging plans than they are currently proposing. Overall needs have also increased since July last year with the 35% uplifts for Birmingham and Wolverhampton.

4.33 It is also notable that the majority of the remaining authorities have either:

- Adopted or progressed plans in recent years that do not meet their own needs in full (Birmingham, Cannock Chase, Redditch, Tamworth and now Black Country); or
- Adopted or progressed plans that already include provision some of this unmet need (Lichfield, Solihull, North Warwickshire, Stratford on Avon and South Staffs).

4.34 Therefore this 30,000 is in addition to existing provision in plans (so on top of the 4,000 South Staffordshire have agreed to take) and will have to be met by those authorities that can meet their own needs.

4.35 If you were to divide this shortfall evenly among the 10 authorities (excluding the 4 Black Country authorities), then this would be a further 3,000 dwellings (taking South Staffordshire's total to 7,000). If you were to divide by the 6 authorities that have suggested they can meet their own needs then this would be a further 5,000 dwellings (taking South Staffordshire's total to 9,000).



- 4.36 Therefore, even with the evident uncertainty around the extent of housing shortfall, the 4,000 unmet need figure suggested by South Staffordshire is not clearly justified. We consider there to be significant scope to increase the proportion that South Staffordshire takes of the unmet GBBCHMA housing need. The District covers a significant geographical area that wraps around the Major Urban Area along the western and north western boundaries of the Black Country. The District is also free of significant physical and environmental constraints and has strong functional links with the Black Country and Birmingham. These opportunities for increasing housing growth are less prevalent in the majority of other LPAs across the HMA, including the Black Country Authorities, Birmingham City, Tamworth Borough and Redditch as noted above.
- 4.37 Therefore, there is a compelling case to increase the proportion that South Staffordshire takes of the unmet housing need above 4,000 dwellings. The apportionment of unmet need across the relevant LPAs should be based on a robust capacity study, as opposed to figures which do not appear to be justified or based on demonstrable evidence. It is a matter of strategic, cross-boundary importance that the housing needs of the GBBCHMA are met, based on robust capacity evidence.
- 4.38 On a final note, the strong economic and geographic links that South Staffordshire shares with the Black Country and Birmingham is crucial to meeting the housing needs of the wider HMA. As we explain throughout these representations, Dunston Garden Village and its proposed train station is well placed to meet these housing needs, benefiting from an excellent location in relation to the adjoining Black Country conurbation, and with direct rail connections to Birmingham City Centre.

### ***Market Signals and Employment Trends***

- 4.39 When considering the level of new housing provision required in South Staffordshire, it is helpful to look at past employment trends in the area, which are a relevant market signal in line with para 2a-015-20190220 of the NPPG, as housing need will be driven to a large extent by changes in the labour market. This section analyses the latest jobs data published by the Office for National Statistics (ONS). It focuses on South Staffordshire, along with the benchmark areas of the West Midlands and Great Britain.
- 4.40 ONS data allow for long-term analysis of past trends in employment going back to 1998. As a result of changes to the methodology used in producing the data, it is not possible to look at trends over a continuous period. The following timeframes have been analysed to allow for this fact:
- **1998-2008:** Jobs data published as part of the Annual Business Inquiry (ABI) by ONS.
  - **2009-2015:** Jobs data published as part of the Business Register & Employment Survey (BRES) by ONS.
  - **2015-2020:** Jobs data published by ONS as part of the BRES.

4.41 Figure 4.3 shows jobs in South Staffordshire between 1998 and 2008, along with the benchmark areas. The District saw total employment increase by around 3,000 from 1998-2008, equating to annual growth of 1.1%. This was above the annual increases in West Midlands and Great Britain of 0.3% and 0.9% per annum respectively.

*Figure 4.3 - Jobs Change, 1998-2008*

	1998	2008	Absolute Change	% Annual Change
South Staffordshire	27,000	30,000	3,000	1.1%
West Midlands	2,291,000	2,355,000	64,000	0.3%
Great Britain	24,355,000	26,677,000	2,322,000	0.9%

**Source:** Annual Business Inquiry

**Note:** Figures may not sum due to rounding

4.42 Figure 4.4 shows the jobs change in South Staffordshire and the selected benchmark areas between 2009 and 2015. The District experienced jobs growth of 2% p.a. over this timeframe, equating to around 4,000 more jobs. This was higher than the increases of 0.8% p.a. in the West Midlands and 1% p.a. in Great Britain over the same timeframe.

*Figure 4.4 - Jobs Change, 2009-2015*

	2009	2015	Absolute Change	% Annual Change
South Staffordshire	31,000	35,000	4,000	2.0%
West Midlands	2,403,000	2,523,000	120,000	0.8%
Great Britain	27,858,000	29,548,000	1,690,000	1.0%

**Source:** Business Register & Employment Survey

**Note:** Figures may not sum due to rounding

4.43 Figure 4.5 shows employment change between 2015 and 2020. South Staffordshire saw no employment growth over this period. By contrast, both the West Midlands (0.8% p.a.) and Great Britain (0.5% p.a.) saw job numbers increase.

*Figure 4.5 - Jobs Change, 2015-2020*

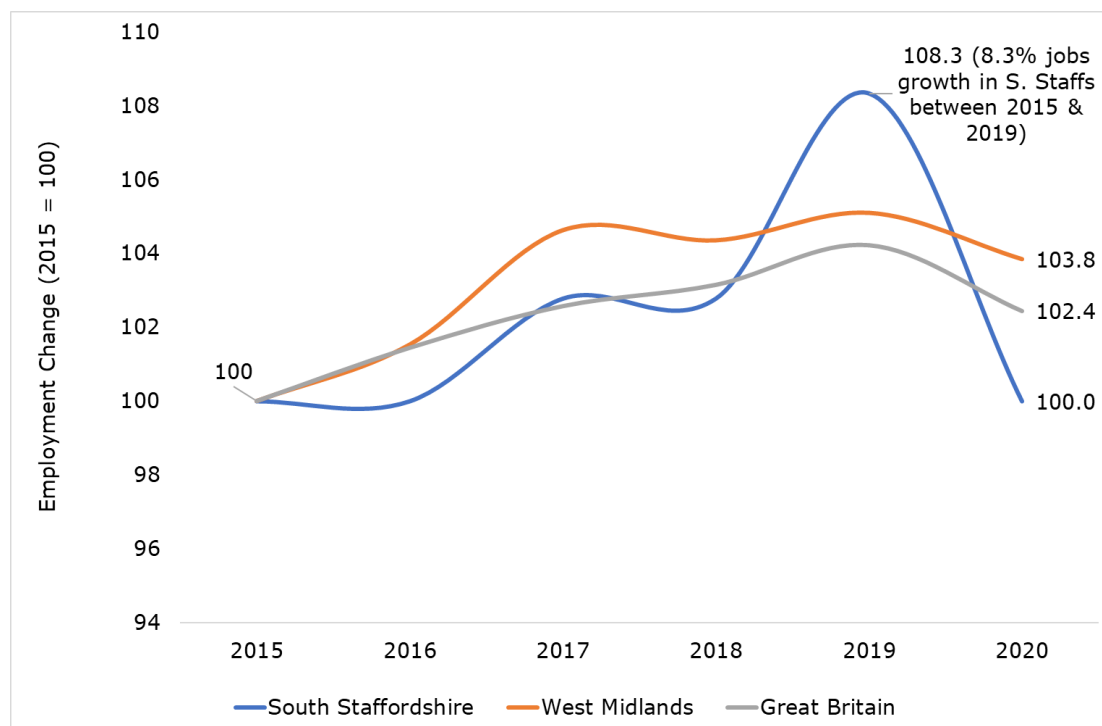
	2015	2020	Absolute Change	% Annual Change
South Staffordshire	36,000	36,000	-	-
West Midlands	2,547,000	2,645,000	98,000	0.8%
Great Britain	29,819,000	30,547,000	728,000	0.5%

**Source:** Business Register & Employment Survey

**Note:** Figures may not sum due to rounding

4.44 The main reason for South Staffordshire seeing no employment growth between 2015 and 2020 is because employment in the District fell by 3,000 (from 39,000 to 36,000) between 2019 and 2020, reflecting the impact of the Covid-19 pandemic. If the period covering 2015-19 is analysed, i.e. before the pandemic, South Staffordshire’s labour market experience growth of 8.3% (3,000 additional jobs). As shown in Figure 4.6, the District outperformed the region and Great Britain in terms of jobs growth over this timeframe.

*Figure 4.6 - Jobs Change, 2015-2020 (2015 = 100)*



**Source:** *Business Register & Employment Survey*

4.45 The ABI and BRES data indicate that South Staffordshire’s labour market performed strongly between 1998 and 2019, with the Covid-19 pandemic impacting on job numbers in 2020. At a national level the 2021 Budget highlighted that the UK economy is expected to return to pre-Covid levels by the end of 2021. This is based on independent forecasts produced by the Office for Budget Responsibility, with growth in 2021 expected to be 6.5% and then 6% in 2022. This puts the economy in a strong position to grow from 2022 onwards. Even accounting for the impact of the pandemic on South Staffordshire labour market, the historical trend data suggest the District’s economy is strong enough to see a good level of recovery in line with expected UK-wide trends.

4.46 As it stands, South Staffordshire is planning for delivery of 243 dwellings per annum, which is based on housing need derived from the standard method, which does not take into account economic growth aspirations, for example. This means the benefits associated with HS2 and WMFI are unlikely to be factored into the calculation. Given the expected benefits associated with the WMFI and HS2, along with South Staffordshire’s strong labour market performance up to 2019, it does not seem unreasonable to expect the District to see strong jobs growth over the next 10-15 years. This is likely

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to place further pressure on the housing market and lead to increased demand for homes in South Staffordshire. More sites could therefore be required in order to meet this increased demand, and the site on Land to the South of Holly Lane can help meet future housing need.

- 4.47 To conclude, all of the reasons outlined above provide justification for a higher housing requirement which exceeds the minimum starting point provided by the standard method (243 dpa), with a further uplift to deal with wider unmet need, in addition to what South Staffordshire have already agreed to accommodate (4,000 dwellings); with Dunston Garden Village offering an obvious location to meet this strategic need, given its scale, relative lack of constraints and connectivity with the national rail and road networks.

5. POLICY DS4 - LONGER TERM ASPIRATIONS FOR A NEW SETTLEMENT (CHAPTER 4)

***Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? If no, please explain how this policy should be amended.***

- 5.1 As covered briefly in sections 2 and 3, whilst we welcome the Council's aspiration for a new settlement, we have concerns with the policy as drafted.
- 5.2 Policy DS4 sets out a longer term aspiration for the Council to explore potential options for a sustainable independent settlement, which has the capacity to accommodate the future housing and economic needs of the district. The new settlement will not contribute to housing growth during the current plan period but will address the housing growth required post plan period, with the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford defined as an area of search for such a settlement.
- 5.3 We agree with the rationale for the chosen area of search, as the most sustainable location in the district for a strategic site of this scale (benefitting both from existing transport connections and the potential for a new station), and we also welcome the recognition that the long term growth aspirations of the borough need to be considered within this Local Plan period, even if they don't directly contribute to housing growth.
- 5.4 However, we feel this needs a bolder commitment from the Council to allocate a specific site to deliver the NPPF's aspiration and make this policy effective. Indeed, it follows that a site should be identified at the earliest opportunity to give the developer the confidence and time to invest to ensure the site can be delivered, as strategic sites such as this have extremely long lead in times (10 years or more from allocation/ identification, see indicative delivery timeline below).
- 5.5 By identifying a site now, the Council can help plan the development through emerging plan period (through an SPD/ DPD/ Design Code) then see it delivered beyond the plan period in line with NPPF paragraph 22, with a potential mechanism to allow it to come forward sooner if required. Rather than a change to the overall strategy this will simply provide additional flexibility within the current plan period and certainty for the next plan period.
- 5.6 Indeed, such flexibility in the future housing supply is hugely important in South Staffordshire as the plan does not propose to release any additional safeguarded land from the Green Belt; whilst the unmet need in the wider Birmingham area is shifting all the time.
- 5.7 In terms of the most suitable location to be identified in policy DS4, it is our strong view that the land at Dunston is the only credible candidate, as it is the only new settlement option site that is located outside the Green Belt, has a single willing landowner, and is the only option where a Masterplan and technical work has been progressed.

5.8 Indeed, Policy DS4 goes on to list a series of criteria and objectives that any new settlement would have to satisfy, and our submissions and Promotional Document categorically demonstrate that Dunston Garden Village will tick all these boxes, as it:

- is of a scale that is self-sustaining and enables a genuine mix of vibrant mixed communities that support a range of local employment types and premises, education, retail opportunities, recreational and community facilities with a wide range of housing to meet the needs of the community;
- is beautifully designed;
- provides mixed communities;
- is of a sustainable size and location;
- delivers a variety of transport modes;
- provides green infrastructure and the ability to live a healthy life;
- is future proofed and sustains our environment; and
- is infrastructure led.

5.9 So in summary, by identifying Dunston Garden Village as its preferred location South Staffordshire Council would:

- Satisfy the requirements of national planning policy tests that are required to be met when preparing a Local Plan;
- Demonstrate that the Council are positively planning for the future of its residents and workforce;
- Protect South Staffordshire's Green Belt in the long term and assist in stemming urban sprawl from the Greater Birmingham area;
- Reduce the future burden and pressures placed on existing settlements within South Staffordshire that will be subject to planned growth over the next 15 years; and
- Secure significant levels of future investment for the Borough in a strategic location that has very few environmental constraints.

5.10 To not do so could result in the proliferation of ad-hoc, unplanned development in the longer term which would not capture all of the benefits that the Dunston Garden Village proposals are able to achieve.

5.11 Finally, we provide an indicative delivery timeline to demonstrate the lead-in times for such a development and why it is so important to provide clarity and confidence now so the landowner can make the requisite investment:



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### Indicative Delivery Timeline

- **1. 2021-24:** Local Plan Allocation or sufficient status to progress an application.
- **2. 2025/26:** Community engagement through the preparation of a new settlement SPD/Development Framework to guide any forthcoming planning application.
- **3. 2024 – 2026:** Collation of application documents through to Outline Planning Submission supported by an Environmental Impact Assessment.
- **4. 2027:** Outline Planning Granted with S106.
- **5. 2028:** 1st Infrastructure Reserved Matters Planning Application submission
- **6. 2029:** Infrastructure Reserved Matters Planning Application Approval / Technical approvals (S278, S38, S104, S98) achieved.
- **7. 2030/31:** 1st planning permissions gained for initial residential phases.
- **8. 2030-2033:** Initial phases of onsite physical infrastructure work, including earthworks, spine roads and drainage areas.
- **9. 2033 Onwards:** Residential sales/completions with first residents moving into the development, rising up to circa 250 homes occupied per year.
- **10. 2033-2036:** Focused on early delivery of social infrastructure such as local centre, transport improvements and schools.
- **11. 2033-2045:** Subsequent reserved matters applications for new homes.
- **12. Circa 2050/55:** Completion of the Dunston Garden Village development.

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**6. DEVELOPMENT MANAGEMENT POLICIES (CHAPTER 6)**

- 6.1 Chapter 6 of the Preferred Options considers proposed Development Management Policies, albeit Paragraph confirms that at this stage, the preferred approaches set out in table form do not reflect the final policy wording that will be included in the Submission version of Local Plan Review.
- 6.2 Instead, they are intended to highlight key requirements, aims and measures that the final submitted policies will deliver, demonstrating the direction of travel.
- 6.3 Whilst we raise no outright objections or issues with any of the policies at this stage, we reserve the right to make further comments once the intended policy wording is confirmed.

## 7. CONCLUSIONS

- 7.1 These representations, alongside the supporting Promotional Document (and earlier Vision Document), have demonstrated that the land at Dunston is an available, suitable and developable site which forms a logical location for a new settlement given its large single ownership, location outside the Green Belt, connections with the national road and rail networks and relative lack of other environmental constraints.
- 7.2 Dunston is the only new settlement option within South Staffordshire which is not located within the Green Belt, and was identified within the GBHMA SGS as a location for the development of a new settlement. As far as we are aware it is the only new settlement option where a Masterplan and technical work has been progressed, as evidence in the attached Promotional Document (**Appendix 1**) and earlier Vision Document (**Appendix 2**).
- 7.3 The latest proposals suggest that the site is capable of accommodating between 3,000 and 6,000 homes, dependent on densities and whether adjacent land is allocated; along with 7.8 hectares of employment floorspace, 4 hectares of retail, leisure and community uses, a new school and a new railway station; within an attractive, walkable setting which generates real health and environmental benefits.
- 7.4 In respect of the housing requirement, it is our view that the baseline local housing need figure should be increased, above the standard method calculation, which should be viewed as a minimum starting point. Furthermore, the additional 4,000 dwellings proposed is lacking in justification and does not go far enough to meet the unmet needs in the wider GBHMA area, given the local plan position and land constraints in neighbouring authorities.
- 7.5 Indeed, these representations have identified several factors that inform the case for a higher housing land requirement e.g. economic growth and infrastructure improvement strategies, and an insufficient level of unmet need from the wider GBHMA. On the matter of unmet need, it is clear that there is yet to be agreement on the full extent of the shortfall, albeit there is a residual shortfall of at least 30,000 to be met by between 6 and 10 GBHMA authorities (including South Staffordshire), which would require South Staffordshire to take a further 3,000 – 5,000 homes, above the 4,000 already agreed, which would increase the total required supply by 30 – 50%. Dunston Garden Village and its proposed train station is well placed to meet these wider needs, benefiting from an excellent location in relation to the adjoining Black Country conurbation, and with direct rail connections to Birmingham City Centre.
- 7.6 Finally, we reiterate that the proposed development fully aligns with paragraph 73 of the NPPF and the latest government guidance on Garden Communities in that it:
- Is a purpose built new settlement;
  - Provides a community with a clear identity and attractive environment;

- Provides a mix of homes, including affordable, and the potential for self-build; and
- Has the opportunity to be planned over a long period by the local authority and Rigby Estates in genuine collaboration with the local community.

7.7 In addition to housing it will also provide:

- Job opportunities within a large employment area and local centre;
- Attractive green space and public realm areas throughout the site;
- Transport infrastructure, including roads, buses and cycle routes, and the potential train station;
- Community infrastructure, a school, with potential for other community, healthcare and energy uses; and
- A plan for long-term stewardship of community assets, and renewable energy generation, to be developed in consultation with the Council.

7.8 Rigby Estates LLP is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing and employment needs are met in a sensitive and sustainable manner, both within the existing Local Plan Review and any future review or additional DPD/SPD process required to deliver a new settlement.

7.9 We therefore respectfully request that the Council formally identify the Dunston site within the current plan, such that it can be planned through the emerging plan period, with supporting investment from the landowner, and delivered beyond in line with NPPF paragraph 22.

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APPENDIX 1 – DUNSTON GARDEN VILLAGE PROMOTIONAL DOCUMENT (DEC 2021)

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APPENDIX 2 – PREVIOUS DUNSTON GARDEN VILLAGE VISION DOCUMENT (DEC 2019)