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Via email: [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)

**Date:** 31<sup>st</sup> May 2024  
**Client:** Bradford Estates  
**Our Ref:** SA42846

Dear Sir/Madam,

**South Staffordshire Local Plan Review – Regulation 19 Publication Stage**

We are have been instructed by Bradford Estates to submit representations to the Regulation 19 Publication Stage consultation.

The client and agent details for this representation can be seen below.

	<b>Client</b>	<b>Agent</b>
<b>Organisation</b>	BRADFORD ESTATES	BERRYS
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This response should be read alongside previously submitted responses to the plan process by Bradford Estates. Our comments are as follows:

## Development Strategy: Policy DS5 – The Spatial Strategy to 2041

The spatial strategy for housing provides a very low level of growth to Tier 4 and Tier 5 settlements (at 0.3% and 2.6% of the total level of housing respectively).

Such a level of growth in Tier 4 and 5 settlements is considered to be inappropriate as it fails to recognise the sustainability of these settlements, their ability to accommodate growth or the need for growth in these settlements to meet the Plan's objectives of providing housing to meet the needs of different groups in the community or to protect and enhance sustainable village centres.

As highlighted in paragraph 4.3 of the Plan, there is a finite and diminishing supply of brownfield land and windfall sites within settlements. Therefore, failing to plan positively for growth in Tier 4 and Tier 5 settlements will result the need for housing arising from the local community being unmet and a failure to support and enhance community facilities and services in these settlements.

As detailed within the Rural Services and Facilities Audit (2021) Blymhill, Brineton and Weston under Lizard are all identified as Tier 5 settlements based on access to services and facilities. However, there are errors with the scoring of settlements in Appendix 4 of the Rural Services and Facilities Audit. For example:

- Weston-under-Lizard is identified as having no public transport access to employment, main centres, hospitals and supermarkets. However, the settlement is served by regular bus services (with travel times significantly less than 60 minutes) to surrounding local and regional centres including Cannock, Shifnal and Telford and the services and facilities these centres provide including supermarkets, hospitals and employment facilities (including those at Stafford Park 4, Telford); and
- Blymhill is identified as having a village hall, which acts as a community centre. However, the scoring fails to recognise the various uses of this hall including cinema, sport classes, events and pub. In addition, and significantly, the community have also recently opened a village shop within the hall. It is evident more residential development in the settlement, that would result in an increase in residents, would help to sustain and enhance these important community facilities.

In addition, no consideration has been given to the ability of settlements to accommodate growth when allocating settlements to tiers of the settlement hierarchy. This is considered to be a significant omission given that large areas of South Staffordshire are covered by Green Belt where the National Planning Policy Framework (NPPF) identifies that release of land from the Green Belt should only be proposed in exceptional circumstances.

The categorisation of settlements, such as Brineton, Blymhill and Weston-under-Lizard, should therefore be based on an accurate assessment of their access to services and facilities, their ability to accommodate growth and a recognition that directing growth to settlements such as these will support and enhance the provision of services and facilities in the settlements and decrease demand for the release of Green Belt land for development.

We would also stress enabling rural communities to become more sustainable and thrive as living and working communities requires investment from both public and private sources. Sensitively designed development that reflects the needs of the local community, and contributes towards much needed infrastructure and homes for local people has an important role to play in reinvigorating rural communities. With this in mind Bradford Estates have embarked on a programme of economic re-use and regeneration of a number of former farmsteads across the district. These will provide an important source of rural employment and help stimulate and invigorate the rural economy. Accordingly Policy DS5 should take a more permissive approach to rural housing to rebalance rural communities.

## **Development Strategy: Policy DS1 – Green Belt and Delivering the right homes: Policy HC2: Housing Density**

Policy DS1 makes no reference to limited infilling, this is not consistent with National Policy, specifically Paragraph 154. Policy DS1 should include limited infilling in villages which would enable tier 4 and tier 5 villages to receive some level of growth to support and enhance community facilities and services in these settlements. HC2 also omits infilling from tier 4 and 5, this is inconsistent with the rural maintain and enhance principles contained within the National Planning Policy Framework.

In order to ensure that the Plan is consistent with national policy requirements, a greater level of growth, and allocations, should be directed to lower tier (tier 4 and

5) settlements in need of growth where allocations would maintain and enhance the vitality of these communities but not give rise to the 'high' or 'very high' levels of harm to the Green Belt associated with the larger scale (S1-S3) housing sites.

Such a change will ensure that the Plan:

- plans positively for the provision of housing sites of less than one hectare through the allocation of land (in accordance with paragraph 70 of the NPPF);
- is effective in delivering the housing requirement over the Plan period (in accordance with paragraph 23 of the NPPF)
- meets housing needs of lower tier (i.e. tier 4 and 5) settlements (in accordance with paragraph 82 of the NPPF);
- maintains and enhances the vitality of rural communities and their local services (in accordance with paragraph 82 of the NPPF);
- can justify the release of land from the Green Belt having examined fully all other reasonable options for meeting its identified need for development (in accordance with paragraph 146 of the NPPF).

## **Building a strong local economy: Policy EC4 – Rural Economy**

Bradford Estates support this policy, it enables sustainable economic growth in rural areas whilst utilising buildings which would otherwise lie redundant. The policy fully acknowledges that certain businesses cannot be accommodated within village boundaries and therefore provides opportunity to rural businesses to thrive in existing buildings.

## **Building a strong local economy: Policy EC5 - Tourism**

Bradford Estates support this policy. The policy acknowledges that there can be a need for tourism outside of development boundaries and this fluidity, will allow for small-scale tourism to reach rural areas which it otherwise would not.

I trust the above comments will be duly considered as part of the consultation process. Should you require any further information please don't hesitate to contact me.

# BERRYS

Yours sincerely

A handwritten signature in black ink that reads "ABruce". The letters are cursive and somewhat stylized.

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