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Sent via email to: localplans@sstaffs.gov.uk

13th December 2021

Ref: TA/REPS/ACTON

RE: TERRA REPRESENTATIONS TO THE LOCAL PLAN REVIEW – PREFERRED OPTIONS (REGULATION 18)

This document comprises representations on behalf of Terra to the Preferred Options version of the Local Plan Review consultation process, in relation to our land interests at Land at Penkrige Road, Acton Trussell (hereafter “the site”). We therefore submit the following representations to the South Staffordshire Council (hereafter “South Staffs.”), Regulation 18 Submission Consultation, December 2021.

The Site – Land at Penkrige Road, Acton Trussell

The site is located to the south of Acton Trussell, and the full boundary extends to either side of Penkrige Road. It is outside of the settlement boundary, but directly adjacent.

Acton Trussell is located to the south of Stafford and has a direct link to Junction 13 of the M6. There is a bus service through the village (878) which provides a connection between Stafford Town Centre, Wolverhampton and Coven. The site is outside of the Green Belt and is not within a conservation area. **Figure 1** demonstrates the proposed development area at Land at Penkrige Road and **Figure 2** demonstrates the full land taking under Terra’s control.

Terra are promoting the site for residential development. Terra is affiliated with Hayfield Homes, a market house builder, and Living Space, an affordable homes builder, meaning that the site is available as well as deliverable within the proposed Plan period depending on the Council’s requirements. Figure 1 below demonstrates the full extent of the site boundary and the site context within Acton Trussell.

Figure 1: Indicative Areas Suitable for Development



Figure 2: Full Land Take at Penkridge Road, Acton Trussell



Local Plan Review

As required by Policy SAD1 in the adopted SAD, the Council have now commenced a Local Plan review. The Council previously consulted on an Issues and Options version of the Plan from October – November 2018. A further consultation on the Spatial Housing Strategy and Infrastructure Delivery was held in October 2019 in support of the Local Plan preparation. The Council are now consulting on a Preferred Option version which builds on the previous consultations. The Preferred Options document sets out the preferred strategy and the proposed site allocations required to support the strategy.

A series of questions have been posed throughout the document. These representations will answer the questions most relevant to Terra and our land interest in Acton Trussell, as well as commenting on the proposed Spatial Strategy.

Question 1:

Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

The Council have prepared a robust evidence base to support the Local Plan review. A Green Belt Study accompanies the review. As the majority of the district is covered in Green Belt, this is appropriate as it is likely that some release will be required to meet the demands. However, the Council should be prioritising areas for growth outside of the Green Belt to minimise the changes to the Green Belt boundary. Paragraph 141 of the National Planning Policy Framework (NPPF) clearly states that Local Authorities are required to fully examine all other reasonable options for meeting identified need before determining that exceptional circumstances exist¹. Land at Penkrige Road, Acton Trussell is outside of the Green Belt and is a reasonable option for meeting housing need.

Question 3:

a) Have the correct vision and strategic objectives been identified?

The Council have identified a total of 13 Strategic Objectives under 4 overarching principles of the Development Strategy; Homes and Communities; Economic Vibrancy; and the Natural and Built Environmental. The strategic objectives appropriately summarise the aims of the Local Plan.

Terra support that “meeting the housing needs of the district...” is featured as the second Strategic Objective. However, as South Staffordshire forms part of the Greater Birmingham Housing Market Area (HMA), it is also appropriate that South Staffs role in meeting unmet need for the HMA is established.

Strategic Objective 1 focuses on the protection of the Green Belt, clearly outlining South Staffs’ priority for protecting the Green Belt. Therefore, the Council should be open to exploring the allocation of sites outside of the Green Belt which are readily available for development, as per Paragraph 141 of

¹ Paragraph 141, National Planning Policy Framework (NPPF), page 42

the NPPF. Without thoroughly considering reasonable alternatives to Green Belt release, the Plan cannot be found sound as it is contrary to National Policy.

Question 4:

Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

If no, please explain how these policies should be amended?

The inclusion of a specific policy on the Green Belt is supported. The Policy follows the principles of Green Belt protection as set out in section 13 of the National Planning Policy Framework (NPPF). As 80% of the district is designated as Green Belt, it is the Council are required by the NPPF to explore all options available to them in order to justify any proposed amendments to the Green Belt boundary. There are a number of areas within the district, including Acton Trussell, which have not been considered for housing allocations. There Council should be considering these areas for allocation over Green Belt sites.

The policy on the *Open Countryside* also follows the principles of Paragraph 174 of the NPPF, which details that planning policies should contribute to and enhance the natural environment. Terra agree that it is necessary to amend the open countryside boundaries to accommodate the proposed Allocations.

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

If no, please explain how this policy should be amended?

Draft Policy DS3 *The Spatial Strategy to 2038* sets out that the Council will deliver a minimum of 4,881 dwellings plus a contribution of 4,000 dwellings towards meeting the Greater Birmingham HMA. Terra support the inclusion of a “minimum” figure, as this allows for suitable flexibility to the housing requirement.

The Policy also categorises the District’s settlements on at Tiered basis. Rural settlements are categorised within Tier 5 with the following description:

The district’s Tier 5 settlements are set out in the Rural Services and Facilities Audit 2021. These settlements are not intended to experience further housing or employment growth, owing to their poorer public transport links and lack of services and facilities relative to other settlements within the district. New development in these locations will be limited to the conversion and re-use of redundant rural buildings to appropriate uses, in accordance with other development plan policies. On a case-by-case basis, the very limited redevelopment of previously developed land for housing may also be supported within these settlements where this would not increase unsustainable transport movements from the settlement in question and would not conflict with other Local Plan policies.

Rural settlements play an important role in the District. Many of these settlements are in need of new housing, and a refreshed housing stock to improve the variety of housing available within the villages. Within the last 5 years, Acton Trussell has received planning permissions for circa 9 dwellings across two sites. At the time of writing, these permissions have yet to be delivered. This has meant

that the availability of new housing in the village has remained mostly unchanged for the past 5 years, as a minimum.

Therefore, these villages should not be badged as unsuitable for development. Instead, the Council should seek out ways to improve the resources in Rural Settlements to increase their sustainability for current and future residents. Settlements like Acton Trussell have a real need for new housing stock for both family housing and housing for older people. New development can also secure improvements to existing services and offer an opportunity to provide additional services. The Policy should include a mechanism where developments can come forward which offer community benefits as a minimum. This will allow for more appropriate development within villages, which will help improve sustainability.

Within the Rural Services and Facilities Audit, it was found that Acton Trussell has poor access to services and facilities. However, Terra believe that this is not an accurate representation of the village. It does not account for the size of the village. The village of Bednall, to the east, is a significantly smaller settlement, yet it is classed as Tier 4 due to the village having a primary school. Apart from this, it has no further services. The below compares the assessments of the two settlements in the Rural Services and Facilities Audit 2021:

Settlement	Access to stores/ supermarkets	Diversity of other facilities	Retail centres study	Access to employment locations	Access to primary school	Access to secondary school	Access to 6 th form / college	Public Transport access to higher order services
Bednall	Red	Red	Red	Red	Green	Red	Red	Black
Acton Trussell	Red	Red	Red	Yellow	Red	Red	Red	Yellow

Acton Trussell scores better than Bednall in access to employment locations, due to it's proximity to Acton Gate, Penkridge and Stafford. Furthermore, it scores better than Bednall on it's public transport link, as Bednall is only accessible by private car. The assessment notably stays silent on the size of village and, based on the size of Acton Trussell, Terra contend that it should be designated as a Tier 4 settlement as a minimum.

There is an opportunity through this Plan review to provide housing to support provide further services in villages. Acton Trussell has a need for a residential led allocation in the village with a service provision, which could be accommodated on Land at Penkridge Road. The site has the ability to provide residential development alongside uses which are of a different community benefit, such as additional parking for the church, a new shop, or recreational facilities.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4?

If no, please explain your reasons for this.

Terra agree with the principles of identifying strategic housing allocations that will be masterplanned and design focused. These allocations will be led by Supplementary Planning Documents (SPDs) to guide the design principles, which is supported as this will provide a clear framework and standards

for the allocations to follow. Furthermore, Terra agree that an aspect of community involvement is appropriate to ensure that the developments meet the needs of the current and future residents.

Allocating strategic housing sites offers the Council an opportunity to provide much needed housing whilst improving the existing areas and communities. However, strategic allocations often include long lead-in times. This will be particularly true if the sites involve multiple developers and the development of an overarching masterplan. Therefore, the Council should ensure that these sites are supported by smaller allocations to secure a continuous Housing Land Supply. The Council should consider allocating smaller sites, which still have the ability to improve local communities and the provision of services. Paragraph 69 of the NPPF details that smaller and medium sized sites are often built-out relatively quickly and make an important contribution to meeting housing requirements. The Paragraph clearly demonstrates that Councils should support the provision of smaller sites, with point (a) of the paragraph requiring that at least 10% of the housing requirement should be on sites no larger than 1ha. Therefore, the Council should be exploring allocating small-medium sites through this Local Plan to support the strategic policies.

Settlements like Acton Trussell would benefit from residential led allocations, which include a community benefit to improve the overall sustainability of the settlement. Acton Trussell is a large village which is in need of additional housing and services. An allocation within the village would help improve the housing stock and can provide community benefits. It is important that the Council do not stagnate the development of existing village communities by focusing on more strategic allocations.

b) Do you agree that given the scale of the 4 sites detailed in policies SAI-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

As these sites are allocated for a large number of dwellings, Terra agree that it is appropriate for individual detailed Policies. The updates to the National Planning Policy Framework (NPPF) 2021 placed significant emphasis on ensuring development is well-designed. Therefore, these policies follow the principles of National Policy.

Question 8:

Do you support the proposed housing allocations in Policy SA5?

Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

Policy SA5 proposes to allocate a number of sites in addition to the strategic developments. No allocations have been proposed in Tier 4 or 5 settlements. Acton Trussell is outside of the Green Belt and would be suitable to receive further growth. As per the requirements of the NPPF at paragraphs 69 and 141, the Council have an obligation to provide small-medium sites as well as exploring all options for housing delivery before considering Green Belt release. Action Trussell is a large village outside of the Green Belt, which is overlooked in the *Rural Services and Facilities Audit 2021*. The Council should encourage further growth in this location to improve the services within the village, and improve it's overall sustainability. As detailed above, Land at Penkridge Road would be suitable for a residential led allocation which can include a provision of services, such as a new shop, additional parking, a play area, to improve the offering of the village.

Question 11:

Do you agree with the proposed policy approaches set out in Chapter 6?

If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HCI - Housing Mix)

Proposed Policy HCI dictates that 75% of properties should have 3 bedrooms or less, with the breakdown to be determined by the latest Housing Market Assessment. The specific percentage applied within the policy does not allow for flexibility. The proposed housing mix of a scheme should be based on up-to-date evidence of demand to ensure that there is an appropriate housing stock. Therefore, the Council should build in flexibility through the policy wording. For example, this should be amended to:

- *Proposals for major residential development:*
 - *Market housing – schemes proposing 75% of properties to have 3 bedrooms or less will be supported, with specific breakdown to be determined with reference to latest Housing Market Assessment.*
- *Refusal of proposals that fail to make an efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes. The Council will only support a higher percentage of 4+ bedrooms in cases where the demand is clearly evidenced.*

Terra support the principles included in proposed Policy HC2 Housing Density. A higher housing density is appropriate in more established settlements. Overall, the Council should ensure that the proposed density is determined on a site-by-site basis.

Proposed Policy HC3 Affordable Housing detailed that the Council will support 30% affordable housing. Terra agree that this is appropriate.

Question 12a)

It is proposed that the fully drafted policies in this document (Policies DSI-DS4 and SAI-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies?

Terra agree that the policies as drafted constitute strategic policies. The NPPF requires the Council to set out their overall strategy for the district during the Local Plan period, and these policies appropriately address the pattern, scale, and quality of development pursuant to Paragraph 20 of the NPPF. However, Terra feel that the Council could go further to improve the sustainability of existing villages within the District. The Council have proposed large areas of Green Belt release, whilst there remain settlements outside of the Green Belt, like Acton Trussell, which will not receive any growth. In order to satisfy the requirements of Paragraph 141 of the NPPF, the Council need to explore all options for development before proposing Green Belt release. Therefore, the Council should be considering sites such as Land at Penkrige Road for development. The Local Plan review offers an opportunity to secure further community benefits for the existing villages, particularly for Acton Trussell which is a large village in need of additional services. Therefore, the Council should not miss this opportunity. Land at Penkrige Road would be appropriate for securing a residential led scheme which incorporates a community benefit. Terra would welcome discussions with the Council in order to discuss this opportunity.

Conclusion

We politely request that these representations are taken into account when reviewing the Preferred Options version of the Local Plan. The site proposed is adjacent to the existing built-up area, accessible by public transport and within walking distance of village services. Allocating this site for housing will ensure that there is a sufficient supply of suitable sites within Acton Trussell.

We trust that you will find the above acceptable, however, should you require any further information in relation to the site please do not hesitate to contact me or my colleague Richard Pitt.

Yours faithfully,

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