

Local Plan
Publication Stage
Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)



(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Objective 2 (para 4.1) and Page 193 (site specific proforma sheet)	Policy	DS1, DS2, DS4 DS5, HC1, HC2, HC3, HC4, HC8, HC10, HC12, HC14, HC15, HC17, HC18, EC11, EC12, NB1, NB2, NB4, NB6A, NB6C	Policies Map	
-----------	--	--------	---	--------------	--

4. Do you consider the Local Plan is:

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached representations.

With regards to the site specific proforma sheet at page 193 clarification is requested to reference that the immediate point of access will be from Kentmere Close, via Cherrybrook Drive.



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached representations

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 YES

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

In order to present oral evidence in support of the representations.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX

SOUTH STAFFORDSHIRE LOCAL PLAN
PUBLICATION PLAN APRIL 2024
REGULATION 19 CONSULTATION

LAND AT CHERRYBROOK DRIVE, PENKRIDGE
REPRESENTATION PREPARED ON BEHALF OF
PERSIMMON HOMES

P18-2532PL

LPA Local Plan Site Ref 005

Author: KF



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
01	15/05/24	KF	-	DRAFT
02	22/05/24	KF	-	DRAFT UPDATE
03	24/05/24	KF	-	FINAL/CLIENT APPROVAL



Contents.

1. Introduction.....	1
2. Planning Policy Context.....	3
3. Vision, Strategic Objectives and Priorities	4
4. Development Strategy	6
5. Site Allocations	9
6. Development Management Policies.....	15
7. Conclusion.....	27



1. Introduction

- 1.1. This representation responds to the South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('**the Plan**') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the second Regulation 19 Publication Plan published for consultation by SSDC and follows amendments made to the National Planning Policy Framework (**NPPF**) in 2023, resulting in a review of the Council's Spatial Strategy across the Plan Period.
- 1.2. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the NPPF.
- 1.3. This representation is made by Pegasus Group on behalf of **Persimmon Homes** who have a specific land interest in the proposed housing allocation in the Tier 1 settlement of Penkridge, identified at Policy SA5 as 'Site Ref No. 005 Land at Cherry Brook' with a minimum capacity of 88 homes ('**the Site**'). For accuracy, it should be noted that the name of the site/road name is Land at Cherrybrook Drive' and this should be amended throughout the Plan.
- 1.4. Persimmon Homes has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, as well as the earlier iteration of the Regulation 19 Publication Plan document consulted upon in 2022. These earlier representations included the production of a Vision Document to demonstrate how the site could be delivered; the Vision Document is attached again for ease at **Appendix 1**.
- 1.5. The site extends to some 4.2ha and is located in the highly sustainable settlement of Penkridge. It sits immediately north of the existing residential area and adjoining the current settlement boundary for Penkridge. The site was first removed from the Green Belt and safeguarded for future residential development in 1996 by SSDC. It is the last and only remaining of the 1996 safeguarded sites to be brought forward with a positive allocation, the others having all since been developed.
- 1.6. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The latest iteration of the NPPF (December 2023) sets out at Appendix 1, Paragraph 230 guidance on implementation and interim arrangements in relation to national policy. This sets out that where emerging local plans reach pre-submission consultation prior to 19th March 2024, plans will continue to be examined in the context of the previous September 2023 iteration of the Framework. Due to the publication of this round of consultation in April 2024, SSDC have prepared the Plan under the provisions of the latest NPPF December 2023 and these representations have been prepared accordingly having regard to this national policy context. To ensure the policies of the Plan are fully justified it is important that Plan policies are consistent throughout with this new national policy framework.
- 1.7. The tests of soundness are set out at NPPF Paragraph 35. For a Plan to be sound it must be:
 - a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the



area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.8. The representations also address the legal and procedural requirements associated with the plan-making process.

2. Planning Policy Context

- 2.1. Persimmon Homes support SSDC's review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the Council to comprehensively review the Vision, Strategic Objectives, development requirements, spatial development strategy and policies shaping detailed development proposals.
- 2.2. The Plan review also provides the opportunity for the Council to not only revisit its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham Housing Market Area, including from the Black Country ('GBBCHMA').

National Requirements for Plan-Making

- 2.3. NPPF 33 requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years. The proposed timescales, as set out in the Local Development Scheme (September 2023), will ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs across the Plan period.
- 2.4. The Publication Plan consultation follows previous consultations on the Local Plan review. This included representations in 2019 to the Spatial Housing Strategy & Infrastructure Delivery document, along with consultation on the Preferred Options Regulation 18 Plan in 2021 and previous Publication Plan in 2022. Amendments to the National Planning Policy Framework (NPPF) in December 2023 led to a review of the District's proposed spatial strategy across the Plan Period, resulting in the current version of the Publication Plan (2024). Persimmon Homes have engaged at each stage of the plan making process.
- 2.5. The current consultation document represents SSDC's final version of the Plan and is being made in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered representations previously made to the earlier Publication Plan in 2022, as well as further evidence.
- 2.6. NPPF Paragraph 24 also advises that local planning authorities "*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*" In the context of South Staffordshire, strategic matters include housing, employment, infrastructure and the Green Belt.
- 2.7. Persimmon Homes support SSDC's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the District to guide growth to 2041 and to ensure that development is genuinely plan-led but would like to make some representations on the soundness of some parts of the Plan.



3. Vision, Strategic Objectives and Priorities

- 3.1. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 3.2. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regards to the aspirations to protect and enhance the District's rural character, communities, and landscape. It is considered that it remains relevant and is broadly supported.
- 3.3. The Vision reflects the Council's declared climate emergency, with emphasis placed on providing homes which accord with the 'environmental objective' identified at NPPF Paragraph 8, that in order to achieve sustainable development, proposals should mitigate and adapt to climate change. It also seeks to '*protect and enhance*' the District as it currently exists, rather than thinking forward and considering how the growth proposed within the Plan can better the District as a whole.
- 3.4. Although the Vision is broadly supported it should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, with specific reference to meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The delivery to meet the housing requirements of the GBBCHMA is discussed further in this representation, however Persimmon Homes considers that it should be included in the Vision to clearly demonstrate commitment to the statutory Duty to Cooperate.
- 3.5. The Vision seeks to create '*beautiful and thriving*' new places, however as stipulated in earlier representations to the previous Regulation 19 Publication Plan, there also needs to be a greater emphasis placed on a Vision which is locally relevant and which picks up on the key issues and challenges identified for the District and how the Plan will seek to address these for the future of the District. Whilst the Vision is succinct, as currently written it is not considered to be relevant locally and contains no spatially specific elements, and this should therefore be reflected through further amendments to the Vision Statement.
- 3.6. Similarly to the earlier iteration of the Plan, it is recognised that the Strategic Objectives are refined versions of those presented in the adopted Core Strategy. This approach is broadly supported, and it is recognised that these remain relevant, particularly the recognition of the requirement to make a proportionate contribution towards the unmet needs of the GBBCHMA. The level of contribution to be made towards meeting this need has however been reduced significantly and should be reviewed to ensure an appropriate contribution across the Plan period to reflect the overwhelming unmet housing need across the wider HMA. This is however discussed further in these representations.



- 3.7. In relation to **Strategic Objective 2**, reference is made to meeting the housing and employment needs of the District. It is considered this could be strengthened in meeting the needs of both existing and new residents of the District. The overarching thrust that new housing should be focussed in sustainable locations in the District, and in particular the District's most sustainable Tier 1 settlements is supported.
- 3.8. The 'Issues and Challenges for South Staffordshire' as identified through community engagement are identified at Table 2 (page 13) of the Plan. Most notably this highlights the District's 'weaknesses' as
- demographic imbalance with a higher than average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision;
 - reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment;
 - and poor public transport connectivity in parts of the district.
- 3.9. Alongside this, it continues that 'threats' to the District include the increasing pressure for development on land within the Green Belt to meet District's housing needs and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district, along with the lack of available brownfield land.
- 3.10. The emerging Plan provides the opportunity to support sustainable growth and positive change for the future of the District. This can be achieved through carefully planned strategic development which embraces the opportunities the District offers through high quality landscape led housing developments, delivering a range of homes to meet a mix of needs as part of balanced communities, whilst also delivering much needed infrastructure improvements across the District.
- 3.11. Whilst the importance of brownfield sites is recognised, this balanced alongside strategic growth within open countryside and through Green Belt release is necessary to overcome those weaknesses identified by SSSC, ensuring the social and economic challenges of the District across the Plan period can be addressed in order to strengthen its future through the Plan period and beyond. In particular, it is important that emphasis is placed within the strategic objectives and through the Plan to the delivery of previously safeguarded sites, such as Land at Cherrybrook Drive, prior to the release of Green Belt sites in contributing towards the District's housing requirements across Plan period.

4. Development Strategy

Green Belt

- 4.1. **Policy DS1 (Green Belt)** remains broadly consistent with the provisions of the NPPF with regards to development within the Green Belt. It sets out that the Green Belt boundary has been altered through the emerging Plan to accommodate proposed development allocations, with the boundaries of the reviewed Green Belt sites identified at Appendices B–E of the Plan and on the policies map.
- 4.2. In reviewing the Green Belt however, the previous iteration of the Plan as consulted upon in 2022 accommodated a much larger number of allocations within the Green Belt to deliver both the District’s and the wider HMA’s housing needs across the Plan Period, with delivery of over 9,000 new homes in the Period up to 2041. The current Publication document however has significantly reduced the amount of Green Belt land released for housing allocation, alongside a more contained Spatial Strategy for the District, with housing numbers to be delivered across the Plan period based on a ‘bottom up’ approach to housing capacity to meet the District’s own need and a limited contribution towards the unmet need of the GBBCHMA. SDDC’s preferred spatial strategy option, Option I, as identified in the Spatial Strategy Topic Paper 2024, focuses growth to sustainable non Green Belt locations, including safeguarded land and Open Countryside sites, alongside additional Green Belt allocations made adjacent to Tier 1 settlements.
- 4.3. As identified further at Section 5 of these representations, having been previously removed from the Green Belt and allocated as ‘Safeguarded Land’ within the adopted Core Strategy and Site Allocations Document, the proposed allocation of Cherrybrook Drive, Penkridge for housing offers an excellent opportunity to deliver much need new homes along with infrastructure improvements for the benefit of the District.
- 4.4. It is important that emphasis is placed through the Plan on the delivery of previously safeguarded sites, such as Land at Cherrybrook Drive, prior to the release of Green Belt sites in contributing towards the District’s housing requirements across the Plan period.
- 4.5. **Policy DS2 (Green Belt Compensatory Improvements)** provides additional detail on expected compensatory improvements for Green Belt released sites. Despite representations set out as part of the earlier 2022 Publication Local Plan consultation, the policy still leaves elements of ambiguity and its practical application is unclear.
- 4.6. As previously highlighted the policy requires further clarification by identifying and naming which particular sites it is specifically intended to apply to, or alternatively, the individual site allocation proformas should identify when it is expected this policy would apply.
- 4.7. For the avoidance of doubt, Persimmon Homes interest at Cherrybrook Drive, Penkridge, is ‘Safeguarded Land’, which was removed from the Green Belt in 1996, and it is not expected to be subject to this policy.



Housing

- 4.8. Persimmon Homes previously supported recognition within the 2022 Publication Plan (Paragraph 5.8) that:

"A key part of the new Local Plan is to establish the role that South Staffordshire council can play in meeting both its own housing needs and those of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which contains local authorities with significant unmet housing needs (Birmingham and the Black Country)."

- 4.9. Within the revised Publication Plan however, whilst acknowledging the shortfall in housing supply across the wider Housing Market Area (paragraph 5.9), the Plan no longer goes as far as identifying a key role of the Plan as delivering homes to meet both its own housing needs and those of the wider GBBCHMA, but rather focuses on only meeting the District's own needs.

- 4.10. Persimmon Homes support the Council's strategy in Policy DS5 to distribute growth to sustainable locations, with a particular focus for housing growth within Tier 1 settlements such as Penkridge. The identification of Penkridge as a Tier 1 settlement to accommodate 24.8 % of the Council's housing growth, and the recognition that the village has a greater level of services and facilities thus endorsing its sustainability credentials, is welcomed. However, there is the ability for the Plan to go further to ensure greater flexibility in meeting the growing shortfalls in housing delivery across the GBBCHMA.

- 4.11. **Policy DS4** (Development Needs) and **Policy DS5** (The Spatial Strategy to 2041) set out that SSDC will deliver a minimum of 4,726 homes across the Plan period up to 2041, a significant drop from the 9,089 homes identified in the previous 2022 Publication Plan. This not only sees a reduction in the housing delivery to meet the District's own need but also a significant reduction in the 4,000 homes previously identified towards meeting the unmet needs of the HMA, with a contribution of only 640 homes now proposed towards this need.

- 4.12. Further to the Publication Plan 2022, the District's housing requirement has been revisited using the Standard Method. A reduction in the District's annual household growth baseline figure which is now 173 households (from 189 households in 2022), and an increase in the District's affordability ratio now 9.00 (down from 8.43 in 2022) has resulted in reduction in the annual housing requirement across the Plan period from 241 dpa to 227 dpa.

- 4.13. With regard to the District's own housing needs allocation therefore (4,086 homes across the plan period), the Council have allocated the minimum figure of housing required by the Standard methodology and as such, Persimmon Homes raises concerns regarding potential insufficient housing to meet the District's housing needs. The starting point for the identification of housing requirements is the 2014-based sub-national household forecasts as set out in National Planning Policy Guidance ('PPG') and the utilisation of the standard method of calculation. NPPF Paragraph 67 and the PPG is also clear that the figure produced by the Standard Method represents a minimum figure, rather than a requirement. PPG continues to provide a non-exhaustive list of examples whereby additional growth beyond the minimum requirement may be appropriate, including relevant growth strategies for the area, strategic infrastructure improvements or accommodating unmet need from neighbouring authorities.



- 4.14. Having regard to the unmet housing need across the wider GBBCHMA, with no clear cross boundary redistribution agreements in place, the approach previously adopted under the 2022 Publication Plan in meeting this unmet HMA housing shortfall was actively supported and encouraged. Whilst it is acknowledged that the District continue to contribute towards the unmet housing needs of the wider HMA, the District should go further in providing additional homes to address the significant growing need across the GBBCHMA and in turn address some of the key challenges the District also currently faces in addressing its future economic health.
- 4.15. In light of the extended Plan Period consideration must also be given to expected population growth up to 2041, along with the additional shortfall in housing across the GBBCHMA. Housing provision should therefore be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth across the District and in promoting sustainable communities consistent with the spatial strategy proposed across the Plan period.
- 4.16. It is essential therefore that the Plan provides flexibility above the minimum housing requirement to allow for a buffer to ensure sufficient homes will come forward to meet need. It is noted that the Plan currently provides a buffer of 10% which is welcomed however despite the significant reduction in housing numbers across the Plan period, this has also been reduced from 13% included within the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply from the 2022 version, rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and therefore a proportionally greater impact if sites don't come forward.
- 4.17. Although brownfield redevelopment is an important source of housing land supply, there are numerous constraints to the delivery of homes on previously developed land and a balanced approach must be taken to include sufficient greenfield land and the release of safeguarded sites to ensure delivery of homes at the rate required to meet housing need across the district, and wider HMA, both in the shorter and longer term.
- 4.18. The Housing Density Topic Paper at paragraph 6.1 is clear that *'Ensuring future housing growth provides for and sustains infrastructure is a key priority for the Council in its Local Plan review, emphasising the importance of new development providing more than just housing'*. It is important that further recognition is given in Policy DS5 to proposed housing allocations on delivering a balanced spatial strategy for the District and the opportunities such sites offer in meeting short term housing needs alongside the delivery of key strategic infrastructure for the District rather than merely accommodating the balance.
- 4.19. Land at Cherrybrook Drive, Penkridge offers the opportunity to deliver much needed market and affordable homes consistent with the Plan's proposed spatial strategy, of directing growth to the Tier 1 settlement of Penkridge and being within walking distance of Penkridge railway station to the southwest. The site will deliver infrastructure improvements through appropriate s106 contributions and on site open space and biodiversity enhancements for the benefit of the wider community.



5. Site Allocations

Housing Allocations

5.1. Policies SA1 and SA2 identify the proposed housing allocations of Land East of Bilbrook (SA1) and Land North of Penkridge (SA2). Alongside these strategic development locations Policy SA3 continues to identify the allocations which deliver the Spatial Strategy set out at DS5. As noted above, Persimmon Homes support the inclusion of Penkridge within the Tier 1 Settlements, and which has facilitated the identification of land at Cherrybrook Drive for allocation.

Penkridge 005 – Residential – Land at Cherrybrook – Min 88 homes

5.2. A Vision Document for Land at Cherrybrook Drive is submitted with this representation in support of the site, within **Appendix 1**.

5.3. A Tier 1 Settlement is categorised as providing a wide range of facilities, with access to employment and higher order services, with access to key rail corridors into the adjacent towns and cities. It is agreed that Penkridge is a sustainable and accessible settlement within South Staffordshire District, capable of supporting housing growth to meet housing need and accessible to public transport in line with the Plan's Spatial Strategy. The merits of Penkridge are discussed below in the context of draft allocation of Land at Cherrybrook Drive, Penkridge.

5.4. The recognition that Penkridge has sustainable qualities is long standing as evidenced in previous Local Plans. Core Strategy Policy 1 of the South Staffordshire Core Strategy (December 2012) categorised Penkridge as one of nine 'Main Service Villages' within the current settlement hierarchy.

5.5. Prior to that, the 1996 Local Plan (and the examining Inspector) recognised the role of Penkridge as a suitable location for new housing, with good services and access to public transport. The then allocation of land for the provision of 150 new homes at Penkridge was the largest residential allocation contained within that adopted 1996 Local Plan and Penkridge was the only settlement which included both a positive site allocation and an allocation for 'White Land' within the Plan (ie now Site 005).

5.6. It is recognised that Penkridge benefits from an excellent level of essential community services and access to a wide range of public transport and supporting infrastructure. Penkridge also benefits from the following community facilities:

- The Haling Dene Community Centre
- Library (Open Monday to Saturday with varying opening times)
- Two allotment sites (23 plots to the rear of Haling Dene Centre and 44 plots at Wolgarston Way)



- Four play areas and one skate park
- Burial ground
- St Michael and All Angels Church
- Leisure centre (with a swimming pool, gymnasium, 3G sports pitch and sports hall)
- Medical Practice
- Numerous shops and services

- 5.7. Penkridge is also supported by three first schools, with a campus of Staffordshire College situated 2km to the south of the settlement. Additional First School provision is proposed through Policy SA2 (Land North of Penkridge).
- 5.8. Policy DS5 seeks to direct growth to the most accessible and sustainable locations within the District, and Penkridge's identification at the top of this hierarchy rightfully recognises that the settlement has a wide range of services and is well connected, making it an ideal location for development.
- 5.9. Policy DS5 also details that this sustainable growth will be delivered through appropriate allocations made through the Local Plan. The allocation of Land at Cherrybrook Drive is supported. The site has been identified for development since the 1996 Local Plan and has featured consistently in SSDC planning policy thereafter. This is continued recognition that Penkridge is a sustainable settlement and that development at the Site is both achievable and deliverable.

Residential Use of the Land

- 5.10. The Cherrybrook Drive site is capable of early development in the first five years of the plan period and will complement the larger, strategic scale allocations within the Plan (including that at Policy SA4, North of Penkridge) which will take longer to deliver. In doing so, local housing needs can be met continuously throughout the plan period.
- 5.11. The use of this Site for residential purposes has been enshrined within local plan policy for over a quarter of a century since the adoption of the Local Plan in 1996. Within the Inspector's Report for that Plan, they assessed the Application Site's suitability for allocation as 'White Land', noting that it was within walking distance of facilities, as well as being well contained with the potential to create a strong northern boundary to the Site. That all remains the case today. It has, therefore, long been established in policy terms that the Site is sustainable, suitable, available and deliverable for residential development.
- 5.12. By its very nature, 'Safeguarded Land' is land located between the urban edge and the Green Belt which is also required to be well integrated with existing development. As part of the allocation process the 'Safeguarded Land' was rigorously assessed in terms of the impact of future development upon environmental and landscape quality. By virtue of its earlier identification as 'Safeguarded Land', the residential use of the Site was confirmed as



acceptable in principle by SSDC, and that confirmation is now endorsed by this Plan's positive allocation.

- 5.13. Previously, Core Strategy (2012) Policy GB2 retained the allocation of the Site as 'Safeguarded Land', and the Site remained outside of the Green Belt for the purposes of meeting future development needs in the District. Policy SAD3 of the Site Allocations Document continued to retain the Application Site as a 'Safeguarded Land' allocation, again strengthening the role of the Site in the future delivery of housing within the District.
- 5.14. The above historic context clearly evidences the Council's lengthy support of the Site's capabilities to meet the identified unmet housing need in a sustainable manner.

Sustainable Connectivity

- 5.15. Penkrudge is a highly sustainable and accessible settlement within South Staffordshire District, underpinned by its position as one of the nine 'Main Service Villages' at the top of the Settlement Hierarchy in the adopted Core Strategy and within the proposed 'Tier 1 Settlement' of the new settlement hierarchy proposed within the Plan.
- 5.16. The Site is well located and connected within the settlement of Penkrudge itself and is approximately 800 metres from the village centre, with its range of supermarkets, convenience stores, specialist shops, cafes and restaurants. In terms of access to other main services and facilities in Penkrudge, the Site is:
- 600 metres from the nearest first school (Princefield First School)
 - 500 metres from Wolgarston High School
 - 500 metres from Penkrudge Leisure Centre
 - 500 metres from Haling Dene Community Centre
 - 1.5 kilometres from Penkrudge Medical Centre
 - 800 metres from the nearest allotment site to the rear of the Haling Dene Centre
 - 1.7 kilometres to Penkrudge Railway Station
 - 200m from the nearest bus stop (located along Cannock Road)
- 5.17. Penkrudge is well served by frequent bus services running between Wolverhampton and Penkrudge along the A449. The bus stops nearest to the Site are located along Cannock Road and are served by bus numbers 813, 817, 875, and 878 which run between Cannock, Stafford and Coven.
- 5.18. Penkrudge also benefits from a mainline railway station on the Birmingham branch of the West Coast Mainline. The station is operated by West Midlands Trains, who also run the station's train services. There are two trains per hour southbound calling at stations to Birmingham New Street, including Wolverhampton. There are two trains per hour northbound to Stafford and Liverpool Lime Street Monday to Saturday peak times, and one train per hour at off peak times. On Sundays there is an hourly service each way.



- 5.19. When developed, the Site will encourage walking and cycling within the settlement, and also proposes to improve the connectivity to the east and west of the Canal. There is a footbridge across the Canal approximately 200 metres to the north of the northern boundary of the site. This footbridge provides a potential link to Penkridge Middle School located to the north west of the site.
- 5.20. It is considered that a 'Tier 1 Settlement' such as Penkridge is a highly appropriate location for the release of a previously safeguarded site to meet the current shortfall in housing delivery without requiring any release of Green Belt land. The scale of development proposed is proportionate to the size of Penkridge and the level of services and facilities available within the settlement, which is reflected in its long-standing allocation as a safeguarded residential site. The proposed development would accord with the three dimensions of sustainable development identified within paragraphs NPPF Paragraphs 8.

Technical Assessment

- 5.21. The Cherrybrook Drive site has previously been the subject of a planning application (ref: 18/00307/OUT) which was recommended for approval by planning officers at the Council. Members of the committee refused the application on grounds of prematurity only, the reason for refusal stating;

"The proposed development is contrary to the policies for the control of the development on 'Safeguarded Land' within the adopted Core Strategy and Site Allocations Document and is contrary to Policies GB2, EQ1, EQ4 and SAD3. Also the proposed development is contrary to NPPF Paragraphs 139 d), 170 d) and Paragraphs 193-202."

- 5.22. In preparing the application a suite of technical reports was prepared which illustrated that the site could be delivered without compromising those matters material to an application's determination. In summary, those consideration are addressed below. It has also been confirmed through the draft SoCG which Persimmon were invited to complete after the previous Reg 19 consultation.

Landscape and Visual Impact

- 5.23. A Landscape and Visual Impact Assessment was prepared in support of the site. It confirmed that the site was not located within any national or local statutory landscape designations, with the Cannock Chase Area of Outstanding Natural Beauty over 3.5 kilometres to the east. Residential development at the site would not adversely affect any highly sensitive landscape.
- 5.24. It further noted that the site is generally well enclosed with views into the site predominantly screened or filtered by the site boundary hedgerows, woodland and scrub. The LVIA concluded that the proposed development would not significantly alter the characteristics of the wider landscape, by virtue of its containment with existing vegetation and the enclosed



nature of the landscape. A residential development on the site would fit within the existing village and field pattern and would not be out of scale with the surrounding landscape.

Traffic and Transport

- 5.25. Vehicular access to the site is proposed to be taken from Kentmere Close, via Cherrybrook Drive. The Proforma sheet at page 193 of the Publication Plan, should be updated to reflect this for clarity, and not simply refer to Cherrybrook Drive. This was emphasised in 2022 following consultation on the previous iteration of the Publication Plan but remains unchanged. It has also been confirmed through the draft SOCG which Persimmon were invited to complete after the previous Regulation 19 consultation.
- 5.26. A significant and detailed assessment was undertaken as part of the earlier application to confirm the suitability of Kentmere Close to provide access. That work confirmed that the proposed access would be of sufficient width to accommodate traffic and it further provided supporting evidence that access from Kentmere Road is safe, and that sufficient highway capacity exists, and there are no ransom strips or land ownership issues which would prevent delivery.
- 5.27. It is also confirmed in reference to application 18/00307/OUT that the County Highways Department raised no objection to the use of Kentmere Close as an access point to the site, confirming both its safety, capacity and suitability for residential development.

Heritage Matters

- 5.28. The supporting Heritage Assessment considered the implications of the development on the historic environment, and specifically the potential archaeological significance of the Site, the impact upon the adjacent Staffordshire and Worcestershire Canal Conservation Area and the setting of the closest listed building Wolgarston Farmhouse, which is Grade II listed. It found that the archaeological significance of the allocation site allocation site was not sufficient to constrain any further development and overall, a residential development of the site would not result in any identified harm to the significance of designated heritage assets.

Ecology and Biodiversity

- 5.29. An Ecological Assessment prepared for the site concluded there are no significant ecological constraints to site development. It also recommended biodiversity enhancements, such as the incorporation of new planting comprising native and wildlife friendly species, particularly within the proposed areas of open space adjacent to the Canal and attenuation basin. This would help achieve net biodiversity gain.

Flood Risk and Drainage

- 5.30. As the site exceeds 1 hectare, a Flood Risk Assessment was prepared. The site is identified on the Environment's Agency's online flood map as being fully located within Flood Zone 1. A drainage strategy developed for the site proposed an attenuation basin within the north



western corner of the site, which would provide an opportunity for surface water treatment, having both ecological and amenity benefits. The FRA and Drainage Strategy confirmed that the site complies with the requirements of the NPPF to locate new development avoiding areas which are subject to flood risk (NPPF Paragraph 103) and would not have any adverse impact upon water quality.

- 5.31. A Sewage Capacity Assessment confirmed that both the existing foul water sewer running from east to west across the site and the Penkrudge sewage treatment works have sufficient capacity to accommodate flows from the site.

Noise

- 5.32. A noise assessment undertaken for the site demonstrated that suitable noise levels within habitable rooms could be achieved through appropriate glazing and ventilation systems. The Acoustic Report concluded that prevailing noise could be adequately controlled to meet with the requirements of the NPPF.

Air Quality

- 5.33. The Air Quality Assessment confirmed that the site is not located within or in close proximity to an Air Quality Management Area. The proposed residential development would not be considered to have any significant air quality effects once operational, and mitigation would therefore not be required. The development operational traffic emissions were assessed, and it was concluded that this would have an insignificant effect on local air quality.

Conclusions

- 5.34. From the technical work previously undertaken which remains valid, it has been demonstrated that the site has both the capacity and qualities to be suitable for residential development. Persimmon Homes supports the principle of the proposed allocation of Land at Cherrybrook Drive for development and also the allocation of Penkrudge as a Tier 1 settlement.

6. Development Management Policies

Policy HC1 – Housing Mix

- 6.1. Policy HC1 as currently drafted is overly prescriptive in relation to housing mix and pre-empted housing need through the Plan period rather than simply referring to the Strategic Housing Market Assessment as a means of deterring housing mix.
- 6.2. Whilst the emphasis has been placed on the delivery of 1-3 bedroom homes it is important to note that the supporting evidence within the Strategic Housing Market Assessment 2024 (Table 8.1) also shows a clear need for 4 bedroom market and affordable family homes. Whilst the existing housing stock across the District includes a larger proportion of larger family homes, the evidence also points to a large number of underoccupied homes as a result of an aging population and elderly residents not wishing to downsize. Therefore, whilst the existing housing stock across the District includes a large proportion of larger family homes these are not available to meet the needs of families in need of these homes. This therefore needs to be revisited within the provisions of Policy HC1 deleting specific reference to the delivery of 2 and 3 bedroom homes and instead simplified to read as follows:
- 'All new housing developments should provide a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council's latest Housing Market Assessment.'*
- 6.3. On major development sites a minimum of 70% of properties comprising of 3 bedrooms or less is restrictive and does not afford sufficient flexibility in order to meet the need to provide for a range of size, type, and tenure for different groups.
- 6.4. Emphasis within the policy to *'meeting the needs of the district's ageing population'* also does not take a balanced approach to meeting a range of needs, including first time buyers and family homes and should therefore be deleted. Furthermore, this is unnecessary given it is dealt with under Policy HC4.
- 6.5. The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks the precision and clarity needed for a Plan policy. It has been recognised by SSDC that the existing 4 bedroom housing stock is underoccupied with an ageing population and therefore if the delivery of 4 bedroom homes is limited through the Plan period as a result of Policy HC1, as currently drafted, then the need for these larger family homes will be further exacerbated. Housing mix should be guided by market signals as reflected in the most up to date assessment needs. Such assessments will need to be updated over the course of the Plan period.
- 6.6. Reference to *'any development that fails to make efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes compared with local housing need will be refused, in accordance with the requirements of this policy and Policy HC2'* should



therefore be deleted, with the focus of the policy on need on an area and site-by-site by site basis as reflected within an up to date SHMA.

- 6.7. In addition, the Plan acknowledges an increased need to accommodate for home working. It sets out at paragraph 8.5 that *'The council is committed to ensuring that homes are well designed and offer suitable living conditions to future occupiers. With increases in the amount of home working this is more important to achieve than ever before'*. Policy HC1 as currently drafted however will restrict the ability to meet these needs across the Plan period. The policy should recognise that needs and demand will vary from area to area and site to site, including individual settlements. Mix can also influence the viability of development and the policy should recognise this and identify that its requirements could be subject to a viability assessment, thus allowing for flexibility in its application.
- 6.8. The policy is considered unsound as currently drafted, as elements of the policy are considered unnecessary and *unjustified* and therefore *inconsistent with national policy* for the reasons set out above.

Policy HC2 – Housing Density

- 6.9. Policy HC2 sets out an aim to achieve a minimum net density of 35 dwellings per net developable hectare for all housing developments *'within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities'*.
- 6.10. The flexibility afforded to housing density and the recognition that although a minimum of 35dph across the wider site should be delivered, the density of development within a scheme may vary to take account of local character impacts and the provision of services and facilities across a development, is welcomed.
- 6.11. Whilst achieving an overall net density of 35dph across larger strategic sites may be achievable, including various character areas across a more extensive development site, this could prove more difficult across other allocation sites, and conflict with other policy provisions across the Plan, particularly having regard to the District's rural character.
- 6.12. The provisions of Policy HC10 (Design Requirements) whilst setting out that developments should use land efficiently also requires existing landscape and settlement character to be respected as well as requiring a variety of green infrastructure to be incorporated among other design requirements. Policy HC17 also requires a landscape led approach to provide a hierarchy of open spaces throughout development layouts, whilst Policy NB4 on Landscape Character, requires the intrinsic rural character and local distinctiveness of South Staffordshire landscape to be maintained and where possible enhanced. This, along with other policy and technical considerations across a development including delivery of SuDs, 10% BNG, NDSS and M4(2)/M4(3) compliant homes places increase pressure on sites and the ability to achieve higher densities without compromising landscape character and the amenities of existing residential areas.



- 6.13. The allocation of Land at Cherrybrook Drive, Penkrige would allow for the delivery of much needed homes balanced alongside a high quality residential environment which is sensitively integrated into its urban and landscape setting consistent with the provisions of proposed Policy HC10.

Policy HC3 – Affordable Housing

- 6.14. Policy HC3 requires proposals for major residential development to provide 30% of all dwellings as affordable housing. The use of the phrase '*major residential development*' in this context requires a definition to save confusion as to what size of development affordable housing becomes a requirement as defined within the NPPF.
- 6.15. The requirement for 30% affordable housing (along with proposed tenure split) appears to be supported by the Viability Study Stage 2 Report 2022 (VA) which confirms at paragraph 3.2.7 that the proposed affordable housing figure can be appropriate for South Staffordshire, but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this across the board.
- 6.16. Affordable housing mix is dealt with on a site specific basis under the provisions of Policy HC1 and has not been subject to viability testing and as such both policy HC3 and HC1 should introduce greater flexibility in this regard to allow for viability to be considered alongside the mix identified within an up to date SHMA.
- 6.17. The requirement to 'pepper pot' affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.
- 6.18. The frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more than clarify the Local Plan policy, and it is suggested that if the requirements for implementing the policy require explanation now, then these should either be included within the Plan Policy or set out within the explanatory text. The SPD is not the appropriate vehicle for setting new policy and/or establishing additional burdens on delivery which may not have been included in the Plan's Viability Appraisal, and the Plan should provide clarity at the point of adoption as to what it requires.
- 6.19. The policy is considered unsound as currently drafted, as it is neither justified nor consistent with national policy for the reasons set out above.

Policy HC4 – Homes for older people and others with special housing requirements

- 6.20. Policy HC4 notes major development should,

'...clearly contributes to meeting the needs of older and disabled people.'



- 6.21. The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.
- 6.22. It stipulates that all major development should provide bungalows, age restricted single storey accommodation, sheltered/retirement living and extra care housing. The Council do not define what ages will be restricted for single storey development and as such, the policy requires clarification on this matter. There is no evidence to suggest that the provisions of Policy HC4 have been subject to viability testing for major developments of 10+ homes, with the viability assumptions included within the Viability Study 2022 only taking account costs associated with M4(2) and not M4(3) compliance and/or inclusion of single storey accommodation/bungalows.
- 6.23. Such specialist housing, especially that related to extra care and retirement living, often needs a minimum critical mass to be viable (for example, extra care units typically require 60+ bedrooms to be viable). Taking the allocated site at Cherrybrook Drive as an example, proposed for circa 88 homes, this is simply not at a size or scale which could support all these forms of specialist housing.
- 6.24. The policy needs to provide much greater clarity on when such housing will be required as part of a major development, and to make clear that some (possibly not all) housing types may be required on any given site. This was raised in representations to the previous round of consultation to the 2022 Publication Plan, however continues to remain unchanged within the Publication Plan 2024 policy wording.
- 6.25. Despite concerns raised as part of the last round of consultation, it is also noted that the plan continues to require 100% of all housing to be M4(2) compliant following on from the 30% of all homes to be Building Regulation M4(2) compliant proposed under the Preferred Options consultation Plan. This brings with it issues of affordability, in a context where the accessibility and affordability of housing is an area of wider concern. Whilst the principle of provision of a percentage of M4(2) accessible is agreed, it is not a requirement of the whole population to have such provision. The ability to deliver all homes to M4(2) standards will inevitably severely impact viability and on the overall capacity of sites to deliver new homes.
- 6.26. The Council's Viability Study, Stage 2 (2022) acknowledges that at present Part M of the Building Regulations requires all dwellings to be built to a minimum of M4(1) with further enhanced requirements to M4(2) and M4(3) required through policy, subject to evidence of need as well as viability.
- 6.27. Currently, the requirement for M4(2) properties is optional within Building Regulations and are described as making "*reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users*". It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone would justify



adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

- 6.28. At the present time, the requirement for M4(2) dwellings is not mandatory and if the Council wish to pursue a policy requirement of 100% M4(2) dwellings then this needs to be justified, with reference to both need and cost.
- 6.29. The policy as currently drafted is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy HC8 – Self-build and Custom Housebuilding

- 6.30. Policy HC8 requires sites for major residential development to "... have regard to the need on the council's self-build register and make provision of self and custom build plots to reflect this".
- 6.31. Consistent with the supporting policy text at Paragraph 7.22, the second paragraph of the policy should be clear that in having regard to the Council's self-build register, it is only part 1 of the register which has statutory force. The policy should also recognise, that delivery of self-build housing on new residential sites, successfully occurs when there is a distinct phasing or grouping of plots secured for such delivery. On sites of limited scale, such as Cherrybrook Drive, this is unlikely to be a feasible delivery option, especially where there is a much larger allocation opportunity at Penkridge, where such sub-division is more capable of delivery.
- 6.32. Persimmon Homes supports the position that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type.
- 6.33. The policy is considered unsound as drafted, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy HC10 – Design Requirements

- 6.34. The provision of tree lined streets (item c) should be identified within policy as being subject to highway authority agreement, and where appropriate, their adoption within the highway.
- 6.35. Item l) regarding house types and tenures is a repetition of policy material discussed in Policies HC1 – Housing Mix and HC3 – Affordable Housing and is therefore unnecessary.
- 6.36. The provision of bespoke house types is onerous and unrealistic for commercial housebuilders who work with a portfolio of house types. This will be relevant for the majority of housing development sites. Housetype Portfolios go through rigorous audits, ensuring they meet with necessary Building Regulation requirements, materials are available via suppliers for the quantum of homes proposed as well as ensuring developments are commercially viable, whilst also meeting with demands of customers. The reference to



'bespoke homes' within the Policy is unjustified, jeopardising the delivery of homes within the District. The policy should therefore be amended to instead refer to 'a range of house types'.

- 6.37. The policy is considered unsound as drafted, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy HC12 – Space around dwellings and internal space

- 6.38. The Policy requirement to comply with the implementation of the Nationally Described Space Standards (NDSS) is generally supported. However, some flexibility must be allowed in its application as occasionally a small minority of homes on larger sites may require non-compliance with NDSS for sound urban design reasons. This flexibility should be applied to limited exceptions that are thoroughly reasoned; the policy should be amended to reflect this.

- 6.39. The policy is considered unsound as drafted, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

HC14 – Health Infrastructure

- 6.40. Further to the previous round of consultation on the Publication Plan 2022 version, the policy continues to refer to proposed development causing '*unacceptable impact*' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to a catchment area and may indeed already be registered by the local health care provider, thereby not creating a net additional burden.

- 6.41. Careful analysis is required therefore with regard to the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL Regulation 122 compliant financial request might be. The requirement for CIL Regulation compliance of any request should be clearly specified within policy.

- 6.42. The policy as drafted is considered unsound without amendment, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

HC15 – Education

- 6.43. With regards to the delivery of education infrastructure alongside new development the Policy text as currently drafted requires further clarification to ensure that any such provision to be delivered via a S106 agreement has regard to the tests of CIL Regulations rather than referring to the Staffordshire Education Infrastructure Contributions Policy. The policy should make this explicit. In this regard, the policy should also recognise new infrastructure will be required from new development, only where it can be demonstrated that existing capacity to accommodate growth does not currently exist.

- 6.44. In this regard, the policy should also recognise new infrastructure will be required from new development, only where it can be demonstrated that existing capacity to accommodate



growth does not currently exist. As highlighted earlier in these representations, in addition to three existing First schools, the Plan will deliver a new first school alongside the proposed strategic development north of Penkrudge.

- 6.45. Policy HC15 is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy HC17- Open Space

- 6.46. Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.
- 6.47. The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites opportunities and constraints. It is requested that the Council amend the policy to allow policy a more flexible approach to achieve the right design solution for each site.
- 6.48. The focus of Green Infrastructure provision should be based on quality rather than quantity or 'useability' and the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can be of a significant size and could clearly contribute towards open space provision on a site. They should therefore be included in these calculations where they are accessible. Planning Practice Guidance acknowledges that '*Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals, and other water bodies*' (Paragraph 004 – ref ID: 8-004-20190721).
- 6.49. The overly prescriptive wording of the policy should therefore be revisited to ensure the policy takes a more flexible approach to open space provision having regard to need in accordance with the CIL regulation tests to achieve the right design solution for each site. The policy should therefore be revisited and clarified, with clear reference to national guidance to ensure that open space and green infrastructure is properly and clearly defined and to recognise the contribution that a range of spaces and uses will bring to a development.
- 6.50. The policy as drafted is unsound as it is *inconsistent with national policy* and is *unjustified* for the reasons set out above.



Policy HC18 – Sports Facilities and Playing Pitches

- 6.51. Policy HC18 sets out that all new major developments will make a contribution towards sports facilities and playing pitches.
- 6.52. Although the policy continues that this will be *'secured through a S106 agreement and informed by the latest Sport Facilities and Playing Pitch Strategies'*, the emphasis should first be on establishing deficiencies in existing sports and playing pitch provision (in accordance with the latest evidence) and a requirement for any additional provision alongside the proposed development having regard to the tests of CIL Regulation 122, rather than making a blanket assumption that all major developments will be required to make a contribution towards sports facilities and playing pitches.
- 6.53. The wording of the policy as currently drafted should therefore be revisited to ensure this is made explicit. Regard will need to be given not only to evidence of provision included within the latest Sport Facilities and Playing Pitch Strategies but also have regard to the delivery of new facilities as part of the larger strategic allocations. For example, land north of Penkridge (Policy SA2: Strategic Development Location – land north of Penkridge), will provide a new community park, along with full size sports pitches and associated facilities to meet identified need within Penkridge.
- 6.54. It is noted that further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport, and Recreation SPD. However, the policy requires all new major residential development to contribute towards sports facilities and playing pitches, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan.
- 6.55. An SPD should not be the vehicle for unexpected costs with any specific requirements relating to the delivery of developer s106 obligations included within the provisions of the Local Plan itself.

Policy EC11 – Infrastructure

- 6.56. We note that the policy commits the Council to work with and support infrastructure providers and also offers policy support for this. Any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 compliant. The policy should be explicit that this is the case.
- 6.57. The policy is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

EC12 – Sustainable Transport

- 6.58. The Policy sets out a number of criteria that all new developments will be required to follow. Point b) requires *'safe access and an acceptable degree of impact on the local highway network'* to be demonstrated. The wording of the policy should however be revisited to ensure consistency with the NPPF Paragraph 115 which sets out that *'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*.
- 6.59. As currently written the wording of point e) is unclear and lacks clarity in the context of the policy which relates to transport and the delivery of sustainable travel and is currently open

to interpretation. In particular it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy should focus on transport related elements. A more appropriate form of wording is therefore suggested as follows:

'Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions where proportionate and CIL Regulation 122 compliant'.

- 6.60. As currently written the policy is therefore considered unsound as it is not consistent with national policy for the reasons set out above.

NB1 – Protecting, enhancing and expanding natural assets

- 6.61. The policy sets out that *'The developer must demonstrate through submission of documents that where a protected species mitigation licence is required from Natural England, that Natural England would be reasonably likely to grant this, and that the three tests under Regulation 55 sub-paragraphs (2)(e-g), and (9)(a-b) of the Conservation of Habitats and Species Regulations 2017 (as amended) would be met'.*
- 6.62. Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting policy text or the Natural Environment and Biodiversity SPD for information purposes only rather than under the provisions of planning policy. The requirement should therefore be deleted from Policy NB1.
- 6.63. The provisions of the policy, as currently written are reliant upon Natural England (NE) responding in relation to an initial licence application in advance of a formal application being submitted which is considered to be onerous and unnecessary given NE are not required to grant at this stage. It is likely that the details of the layout and associated mitigation may well evolve through the planning application process. Where appropriate, Natural England will have the opportunity to comment on a proposed development through the statutory application consultation process, whilst developers have the opportunity to seek advice in relation to the licence simultaneously alongside the planning application. To require this input 'upfront', has the potential to unnecessarily delay the submission of applications and in turn planning permissions.
- 6.64. In referring to the best and most versatile agricultural land the policy sets out that it will be protected and enhanced. The NPPF (at paragraph 180) however recognises the economic and other benefits of agricultural land which should be considered in the overall planning balance alongside the provision of much needed homes to meet the District and the wider GBBCHMA. The policy as currently drafted should be amended to accurately reflect the provisions of national policy.
- 6.65. The policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

NB2 – Biodiversity

- 6.66. Persimmon Homes are supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver an overall net gain. The Council's policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to. However, given the 10% BNG is a mandatory requirement for all



developments (subject to some exemptions) the detailed provisions included in Policy NB2 in relation to BNG are considered unnecessary and a duplication of national policy requirements (Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021)).

- 6.67. The Policy should therefore be simplified with clauses a)-c) deleted so as to avoid the potential for misinterpretation within the wording of the policy and confusion when read alongside the requirements of the Act and any associated guidance. Clause a) requires existing habitats on site to be maintained and enhanced as a priority. However, the Act requires the provision of 10% net gain having regard to the pre development biodiversity value of the site. This may involve the loss of existing habitats and replacing with new having regard to outputs of the statutory biodiversity Metric. At clause c) the policy also sets out a requirement to secure the habitat in perpetuity and where it is demonstrated this is not possible to secure the habitat for 30 years. This however exceeds the mandatory requirements set out at Schedule 7A of the T&C Planning Act 1990, which specifies that a habitat is to be secured for *'at least 30years after the development is completed'*
- 6.68. The Natural Environment and Biodiversity SPD provides the opportunity to expand upon the requirements of BNG at a national level where considered necessary and of assistance to the reader at a local level, including biodiversity enhancement projects where offsite net gains could be delivered in lieu of on site provision. The SPD should not seek any additional policy provisions to that identified under Policy NB2.

Policy NB4- Landscape Character

- 6.69. Policy NB4, would benefit to an amendment in the text, which reflects the comments made on Policy NB2 above. As drafted, the second paragraph states:

"All trees, woodland, and hedgerows should be protected and retained"

- 6.70. Whilst it is appreciated that the following sentence identified that should a loss be required, appropriate mitigation measure must be delivered by the developer, the above sentence should be amended to the following:

"All trees, woodland and hedgerows should be protected and retained wherever possible."

- 6.71. It should also be noted within the policy however that despite the protection of trees and hedgerow wherever possible, in particular trees which contribute positively/are particularly important to the character and amenity value of the site, some loss of trees and hedgerows is likely to be inevitable as it almost always necessary to remove hedgerows to accommodate a vehicular access into the site for example.

NB6A: Net zero new build residential development (operational energy) Sustainable Construction

- 6.72. NB6A requires all new residential developments to achieve net zero regulated and unregulated carbon emissions through the application of a number of requirements.
- 6.73. Although a move towards delivering greater energy efficiency is supported, it is important that the Development Plan's response to climate change is realistic and consistent with



national legislation and policy provisions, setting standards within a timetable which is collectively understood and deliverable across the development industry.

- 6.74. Energy efficiency and the need to make significant improvements towards the pathway to net zero has been addressed at a national level through increasingly stringent Building Regulation requirements. In addition, from 2025 the Future Homes Standard will also require new homes to produce at least 75% lower CO2 emissions than current energy efficiency requirements. The recent Ministerial Statement on Local Energy Efficiency Standards dated 13th December 2023 was clear that Local Plans should not be placing onerous requirements on *developers which exceed the requirements of national Building Regulations setting out that 'Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework' ...'*
- 6.75. It is noted that the Council have not undertaken an updated viability study to support the 2024 Publication Plan with both the Sustainable Construction Policy NB6 Task A Report (2023) and Sustainable Construction Policy NB6 – Addendum Report (2024) post dating the most up to date Viability Report 2022. The Addendum Report sets out that the 63% reduction on the Part L 2021 TER (regulated carbon emissions) was the most carbon effective option that remained within the 7% cost uplift that the viability had previously tested. There is the risk however of making various assumptions here without rigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments and whilst the policy incorporates the ability to demonstrate a site specific viability case a thorough and up to date assessment should be undertaken to assess the implications of Policy NB6A alongside the other policy requirements set out in the 2024 Publication Plan. As there is no evidence on viability the policy conflicts with government advice and should therefore be deleted.
- 6.76. Concern is identified in relation to some of the technical detail included at Policy NB6.A Clause A7 in relation to post occupancy evaluation with the policy stating that;
- Large-scale development (over 50 homes) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.*
- 6.77. This raises similar concerns as identified within representations made by Persimmon to the previous round of consultation in relation to Policy NB6 and post completion monitoring. Firstly, once sold the properties will be owned by the purchasers and their mortgagees. There are issues of data protection and consent surrounding the recording and sharing of data by Persimmon, with a third party, and/ or the reliance on the cooperation of private homeowners to share data in order to meet with the requirements of any monitoring condition associated with Policy NB6A.
- 6.78. Secondly, a question arises as to the purpose of such widespread collation of such data. It will not be possible to post factum make alterations to the constructed buildings, so what is the benefit or purpose of such a significant amount of data collation? If the purpose is to inform and advise as to future construction methods, then this could be equally achieved by an informed and targeted research exercise by organisations such as the BRE in advising



Government and through amendments to building regulations. Extracting, what is in effect lifestyle data, from private individuals, is neither considered desirable nor practical in this regard.

- 6.79. There is no evidence to suggest that the Council have considered or addressed the GDPR implications of this requirement, its effect on 'mortgage-ability', or indeed its effect on sales values. Presumably properties which are wired to share private individual's lifestyle data, would be less attractive in the market place, and that would be reflected in reduced sales values. This element of the policy is not practical to be delivered in the form proposed, and is therefore considered unsound, on the grounds of being neither justified nor consistent with national policy for the reasons set out above.

NB6C: Embodied carbon and waste

- 6.80. Persimmon fully appreciate the value of Whole Life-Cycle Carbon assessments and the need for some post construction, pre-occupation assessment. Whilst it is noted that the requirements in relation to embodied carbon have been revisited since the earlier 2022 iteration of the Publication Plan document, which now 'encourages' (at Clause C1) rather than requires all new residential development to complete a whole life carbon assessment there remains concern over the inclusion of the policy, in particular when read alongside paragraph 13.15 which sets out that the submission of information will be required at the post-completion stage via condition *'to verify that as built embodied carbon quantities remain compliant'*.
- 6.81. Similarly to representations made in relation to provisions under Policy NB6A, Policy NB6C Clause C2 is also considered unnecessary with Building Regulations instead providing the basis on which the construction of buildings should adhere to. There should be no expectation placed on housebuilders and builders to exceed national standards which have already been through vigorous viability testing and provide certainty for both housebuilders and developers.
- 6.82. Clause 3 in relation to *'easy material re-use and disassembly'* and *'end of life demolition'* is ambiguous and lacks clarity, placing reliance on further detail within an SPD. The SPD should do no more than clarify the Local Plan policy, and it is suggested that if the requirements for implementing the policy require explanation now, then these should either be included within the Plan Policy or set out within the explanatory text.
- 6.83. The requirement for an Energy Statement to accompany applications is referenced only within the supporting text at Paragraph 13.15. To ensure clarity to the reader reference to the provision of an Energy Statement if deemed necessary to deliver the requirements of Policy NB6C should be explicitly set out within the Policy itself rather than an afterthought. The purpose of an Energy Statement at the planning stages is however questioned given the requirements under Building Regulations to meet specific standards of construction in relation to energy efficiency with housebuilders housing portfolios designed to address these requirements.
- 6.84. As currently drafted the Policy EB6C is not considered to be adequately justified or consistent with national policy for the reasons set out above.



7. Conclusion

- 7.1. This representation is made by Pegasus Group on behalf of Persimmon Homes to the South Staffordshire Local Plan Publication Plan (Regulation 19) consultation. The representation relates to their promotion for residential development of the draft allocation 005 site at Cherrybrook Drive, Penkridge.
- 7.2. Persimmon Homes is supportive of the Local Plan overall, including the decision to include land at Cherrybrook Drive as an allocation, which contributes positively in line with the Plan's spatial strategy in delivering much needed homes to meet the needs of the District and the wider HMA.
- 7.3. The information contained within this representation, read in conjunction with the appended Vision Document, demonstrates that the Site is a suitable and deliverable site for residential development, subject to its allocation.
- 7.4. Subject to concerns on soundness relating to the clarification of Strategic Objective 2, Policy DS1, DS2, DS4 and DS5 and the objections on grounds of soundness to specific detail within Policies, HC1, HC2, HC3, HC4, HC8, HC10, HC12, HC14, HC15, HC17, HC18, EC11, EC12, NB1, NB2, NB4 NB6A, NB6C and an update to reference Kentmere Close, as the immediate point of access on the pro-forma at Local Plan page 193.
- 7.5. Persimmon would wish to be represented at any Hearing session covering these policies against which objection is raised.



APPENDIX 1

VISION DOCUMENT

Persimmon Homes

Land at

Cherrybrook Drive

Penkrige

Vision Document

February 2021

Contents

Introduction and Site context/Location:

- The Cherrybrook Drive Site

1.0 Planning Policy:

- A Brief Review

2.0 Understanding the Constraints:

- Site Constraints
- Constraints Plan

3.0 Understanding the Opportunities:

- Site Opportunities
- Design Concept

4.0 Vision & Capacity:

- Vision
- Proposals for land at Cherrybrook Drive

Next Steps...

This document is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd.

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com). Aerial imagery © 2020 Bluesky, DigitalGlobe, Getmapping plc, Infoterra Ltd and Bluesky. Map data © 2020 Google

Rev	Issue Status	Prepared / Date	Approved / Date
B	Final	SGL / 19 Feb 2021	SGL / 19 Feb 2021
A	Final	DB / SGL / 03 Feb 2021	SGL / 03 Feb 2021
-	Draft	SGL / 14 Aug 2020	SGL / 14 Aug 2020

FPCR Environment and Design Ltd, Lockington Hall, Lockington, Derby, DE74 2RH ■ t: 01509 672772 ■ e: mail@fpcr.co.uk ■ w: www.fpcr.co.uk
masterplanning ■ environmental assessment ■ landscape design ■ urban design ■ ecology ■ architecture ■ arboriculture ■ graphic design

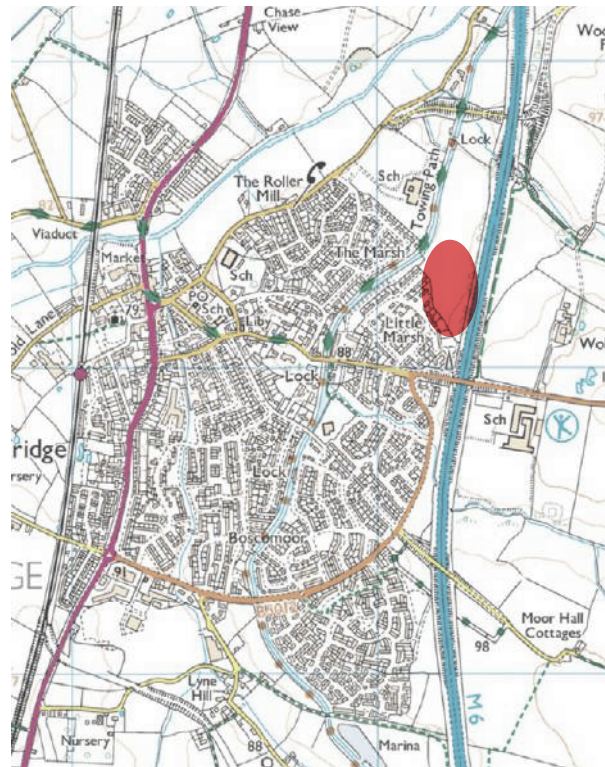


Introduction

This Vision Document has been prepared to demonstrate to South Staffordshire Council and wider stakeholders the suitability and potential capacity of the land east of Penkridge for residential development uses.

The document has been prepared on behalf of Persimmon Homes who control the land at Cherrybrook Drive, as shown below. It outlines the guiding principles for a high-quality development that could accommodate up to 100 new homes.

Persimmon are experienced land promoters and house builders, skilled at bringing forward high-quality housing schemes to meet the needs of local authorities across the country and can demonstrate to the council as well as other stakeholders, their ability to deliver.



Site Location

 **Figure 1: Site Context**
N.T.S.

This document outlines the vision for residential development to the east of Penkrige on land at Cherrybrook Drive.

New housing on the site will provide sustainable growth and deliver green, publicly accessible open space for the enjoyment of both new and existing communities.



Figure 2: Site Location and Relationship with Penkrige

N.T.S



The 4.2ha development site is located east of the village centre and is well served by existing facilities.

The site is safeguarded land released from the Green Belt by South Staffordshire Council. It is bounded by the established settlement edge of Penkridge to its southern and western boundaries. The Staffordshire and Worcestershire Canal (Conservation Area) abuts the north-west edge of the site. To the northern boundary features a hedgerow with agricultural land beyond. The M6 passes along the eastern boundary, beyond a belt of tree planting and existing acoustic fence.



Penkridge Middle School



Cherrybrook Drive Development Site



M6

Kentmere Close

Cherrybrook Drive

Cannock Road

1.0 Planning Policy

A Brief Review

The development site has been safeguarded for future development by South Staffordshire Council and removed from the Green Belt. Penkridge is high within the settlement hierarchy for the District and the site is suitable and ready for development should the supply of deliverable land for housing need to be reinforced in the near future.

South Staffordshire Core Strategy (CS) (2012)

Core Policy 1 of the 2012 CS sets out a spatial strategy and settlement hierarchy. This identifies Penkridge as a “*Main Service Village*,” a first tier settlement and “*the main focus for housing growth, employment development and service provision.*”

Policy GB2 relates to ‘Land Safeguarded for Longer Term Needs’ at Main and Local Service Villages. This policy retains the development site as ‘Safeguarded Land’, remaining outside the Green Belt for the purposes of meeting future housing needs. Part a) of policy GB2 identifies a sequential approach for site selection purposes. The site falls within the second most sequentially preferable category for the selection of sites for housing development.

Site Allocations Document (SAD) (2018)

This document is the second part of the Development Plan and sets out specific policies and proposals for future development and use of land.

Penkridge saw no further allocations through the adopted SAD in 2018 because it had already exceeded its minimum housing requirement figure in the adopted Core Strategy.

Policy SAD1 identifies the requirement for an early Local Plan review to be undertaken, in response to evidence of unmet housing need across the Greater Birmingham Housing Market Area, and in accordance with the Duty to Co-operate. The policy states that the reviewed Local Plan will be in place by 2022.

The development site at Cherrybrook Drive is allocated as ‘Safeguarded Land for Longer Term Development Needs’ under Policy SAD3.

Local Plan Review

Consultation on the Issues and Options for the emerging local plan has concluded, consultation on the Preferred Options has been pushed back to Summer 2021.

The review, required by Policy SAD1, requires the status of safeguarded sites and development options discussed in the 'Spatial Housing Strategy & Infrastructure Delivery' document (Oct 2019) to be carefully considered and the potential of safeguarded land to be released for development.

Five Year Housing Land Supply

The Council produced its latest 5YHLS update in April 2019 covering the period 1st April 2019 to 31st March 2024.

The housing requirement in the strategic plan is more than 5 years old. Under paragraph 73 of the NPPF the 5yr requirement must be based against local housing need (LHN). The LHN figure for SSC is 254 dwellings per annum compared to 174 dpa under the adopted CS.

Including a 5% buffer this places the 5yr requirement at 1,334 against a total claimed supply of 1,535 which equates to 5.75 years.

Rolling the 5YHLS window forward by one year (April 20/March 21 to April 25/March 26) the deliverable supply increases to 1,602 which equates to 6 year housing land supply.

Rolling forward another year the deliverable supply falls to 1,313 which is a 4.9 year supply.

Rolling forward another year the deliverable supply falls to 1,059 which equates to a 3.9 year supply.

The 5YHLS will be fine April 20 to March 21 but after this point the supply will start becoming marginal before reducing significantly in Spring 2022. New sources of supply will be required to prevent increasing deterioration.

The site at Cherrybrook Drive is available and readily deliverable. It could contribute meaningfully to the delivery of housing in the short term.

The site was subject to a planning application in 2018, which was ultimately refused at planning committee but received officer support and was subject to a range of technical work that informs this document and will guide future steps.

2.0 Understanding the Constraints

Site Constraints

The environmental and technical constraints of the site have been investigated and are illustrated at figure 3 and summarised as follows:-

- **Trees** are limited to scattered specimens along the south-western and western boundary with the existing residential edge and canal margins. **Woodland** planting is limited to a narrow belt alongside the northbound M6. None of the trees within the site or along its perimeter are protected by a Tree Preservation Order (TPO). The development proposals provide an opportunity to introduce new trees and blocks of tree planting to enhance the existing vegetation cover and biodiversity on site. The retention of existing tree cover, combined with new planting will create an attractive setting for new homes.
- The **boundary hedgerow** to the north of the site will be retained, reinforced and utilised to create a firm northern edge to development. Hedgerow gapping up and reinforcement will help to deliver a bio-diversity net gain.
- The **landform** of the site gently falls to the west where it meets the canal. The level change is slight and representative of the wider area. The fall provides an opportunity to deliver a gravity-based sustainable drainage scheme.
- The site is located within National Character Area '61: Shropshire, Cheshire and Staffordshire Plain' and is **not covered by any landscape designations**.
- **Views of the site are relatively minimal** and the site has a strong sense of enclosure given the tall hedgerow to the north, mature woodland belt to the east and scrub and settlement edge to the western and south-western boundaries. A short section of the Staffordshire Way passes along the Canal to the north-west of the site. The development proposals will respond to the potential for views from this route and surrounding residences.
- No **public rights of way** cross the site.
- **No ecological statutory or local designations cover the site**, or lie in close proximity to the site. The site falls within the Cannock Chase SAC zone of influence. The development can be carefully designed to provide sufficient mitigation to deal with any adverse impacts.
- **Limited flood risk**; the site falls within flood zone 1. The proposals will protect downstream areas of flood risk with new built development served by a sustainable drainage scheme.
- **No listed buildings fall** within the immediate context site. The Staffordshire and Worcestershire Canal, falling adjacent to the north-western edge of the site, is a Conservation Area and, as such, the development proposals will respond sensitively to this edge.
- A heritage assessment in 2018 established that the site has a low to moderate potential for **archaeological remains**, which is not considered to be sufficient to preclude or constrain development.
- An **underground foul water sewer and surface water sewer** pass through the site. These Severn Trent Water assets and easements can be readily accommodated.
- Environmental **noise** impact assessments have determined that suitable internal noise levels within habitable rooms and external amenity spaces could be achieved by appropriate site layout, building massing and appropriate mitigation where necessary. An existing 3m high noise attenuation fence and woodland belt are located against the M6.
- **Air quality** assessment confirm that the site is not located within or in close proximity to an Air Quality Management Area and that air quality will not have an adverse effect upon the amenity of existing or future residents.



- Site Boundary

- Potential Access
- Views from existing residential properties
- Noise and movement associated with M6
- Route of the Staffordshire Way
- Existing 3m Noise Attenuation Fence
- Existing Vegetation
- Staffordshire and Worcestershire Canal and Conservation Area
- Landform within the Site
- Underground Sewer and Easement

N Figure 3: Constraints Plan
N.T.S

3.0 Understanding the Opportunities

Natural Environment

Landscape character of the site is relatively simple, being in pastoral use, with limited landscape features. The containing **green framework** of existing hedgerows, trees and woodland belt will be reinforced by new planting along with enhanced areas of grassland and new wetland habitats. The enhancement of **ecological habitats** will allow the development to deliver a net-gain in biodiversity.

Landform within the site is low-lying and predominantly flat, providing an opportunity for the arrangement of development to respond to its setting.

Visibility is limited to close range views from residential properties to the south and west of the site, and a short section of canal towpath (Staffordshire Way) to the north-west. The development will feature a landscaped buffer to the Canal and a considered arrangement of built form that positively addresses this edge.

Climate change will be a key consideration through the design development. Positive measures will be afforded by the Green Infrastructure (GI) proposals together with other elements, from building materials and construction practices to the way buildings are powered and heated once complete. Persimmon are committed to minimising the carbon footprint of new homes and will seek to maximise its contribution towards positive climate change locally.

Social and Recreational Infrastructure

The development site will feature an **equipped area for children's play**, catering for children of all ages and responding to the setting.

The GI proposals on the site will deliver amenity green space, recreational walking routes and place a strong emphasis on biodiversity enhancement.

Permeability and Movement

The site is sustainably located and allows convenient **pedestrian and cycle access** with existing schools, the town centre, mainline station and other facilities and amenities.

Public transport will be readily available to all. Existing bus stops are located off Cannock Road, a 400m walking distance from the site. The station, just west of the town centre, offers regular services between Birmingham New Street and Liverpool Lime Street.

Vehicular access will be facilitated via Kentmere Close and a descending hierarchy of streets. Footways, associated with the street network, will connect to traffic free footpaths.

Placemaking

The **architectural theme** for the new **neighbourhood** will be to combine the best examples of locally distinctive materials and techniques within a range of contemporary house designs that are appropriate for modern living.



Nodes will be created within the development, such as at vehicular junctions and intersections with open green space. These nodes can be framed by variations in architectural character and/or distinctive landscape treatment using specimen trees or creating small 'village greens'.







Greenways and areas of public open space will be directly overlooked by frontage development to ensure high levels of passive supervision and community involvement.


Analysis and understanding of the constraints and opportunities informs the emerging concept set out in the following section.



- Site Boundary

-  Potential Access Point
-  Potential Development Area

-  Existing Green Corridor
-  Potential Green Corridor/ Area for Habitat Improvement
-  Potential Green Link through Development Area
-  Zone for Rear Gardens or Soft Frontage to Existing Edge
-  Zone for High-Quality Frontage to Conservation Area
-  Low Point for Sustainable Drainage

 **Figure 4: Opportunities Plan**
N.T.S

4.0 Vision & Capacity



- **Liveability** – integrating new and existing communities through the provision of new green spaces for the enjoyment of all.
- **Placemaking** – creating an attractive new canal-side development on the edge of Penkrigde.
- **Vitality** – helping to support local businesses by bringing new residents into Penkrigde.
- **Social Opportunity** – delivering attractive new homes, including affordable housing and a mix of market homes.
- **Embracing our Natural Environment** – establishing new green assets through efficient and sensitive use of land.

The overall Vision is to create a distinctive and high-quality place, which respects and enhances the character and assets of the site while ensuring connectivity with Penkridge.



Proposals for land at Cherrybrook Drive

The following pages illustrate how our vision could be delivered in order to deliver a high-quality place with clear and tangible social, economic and environmental benefits for the community.

Social

- Establishes a new canal-side residential development of up to 100 dwellings that is logical and sustainable.
- Attractive new homes would include a mix of affordable and market homes, all set within a landscaped public realm.
- The public realm will offer opportunities for informal recreation along new footpath routes with benches/picnic areas for rest and an equipped children's play area. Part of the eastern bank of the Staffordshire and Worcestershire Canal would become freely accessible for the community to enjoy. With an open, green and relaxed setting, the eastern bank would contrast with the linear formality of the existing towpath to the west of the canal.

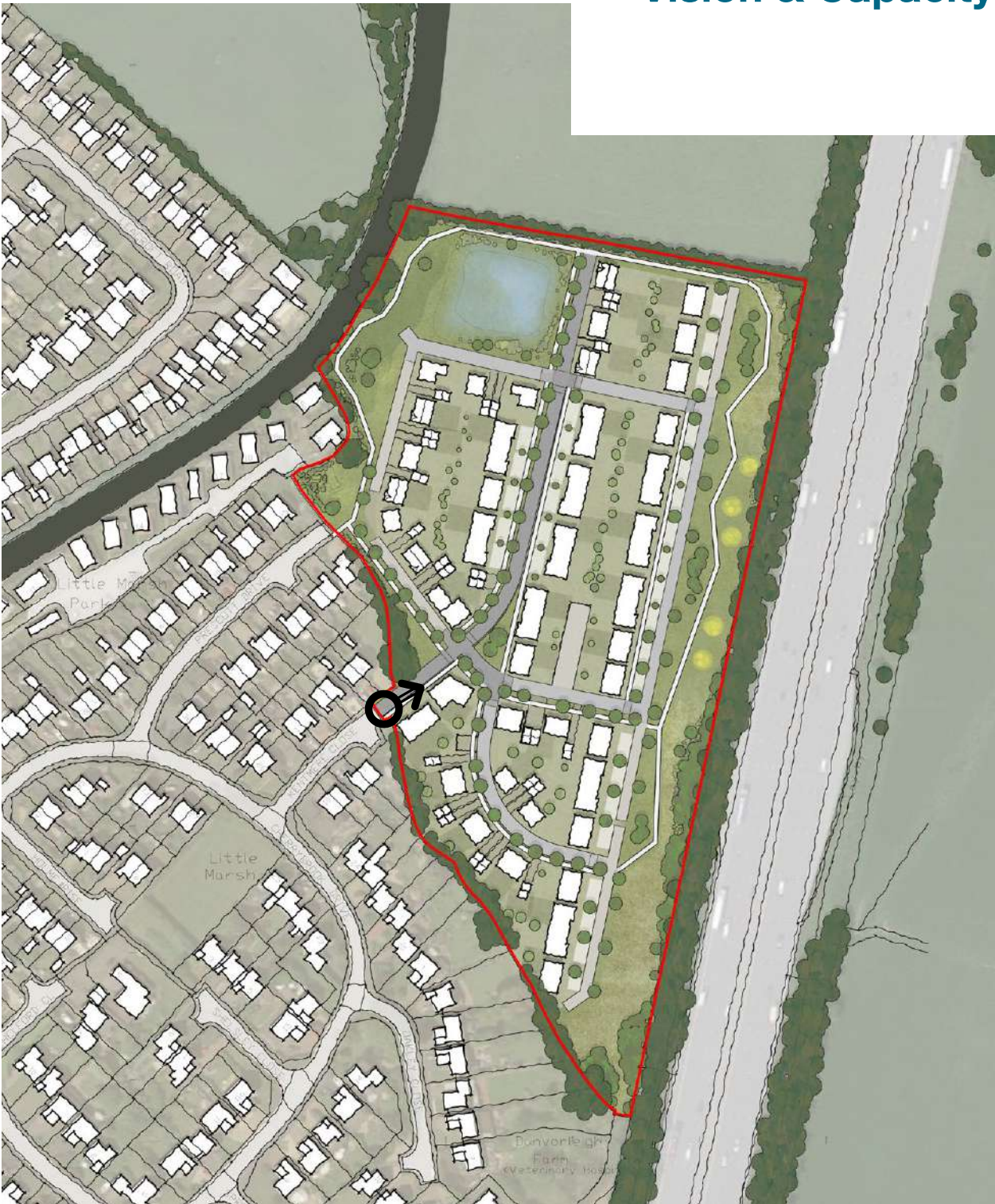
Economic

- Provides much needed housing for the area, with the potential to bring new residents and potentially a wider demographic to the area, which in turn will aid the viability of existing businesses and facilities in Penkridge.
- Easily accessed by sustainable travel modes, such as on foot and cycle and using nearby bus and rail connections.
- The site's edge of settlement location makes it convenient for Cannock to the east.



Environmental








- Retains existing vegetation; trees, hedgerows and formalise existing drainage patterns as part of a new sustainable drainage network.
- The Cherrybrook Drive development would create a notable area of landscaped and publicly accessible green space, which is mostly absent from the existing adjoining settlement area.
- Development would protect and improve existing wildlife habitats as well as create new features to improve the overall local biodiversity. Enhancing and reinforcing existing features would deliver a bio-diversity net gain across the site.
- The 2018 planning application, covering the Cherrybrook Drive site, demonstrated that any adverse impacts on the Cannock Chase SAC can be readily mitigated.






- Cherrybrook Drive Site Boundary

-  Potential Access Point
-  Potential Development Area (up to 100 new homes)

-  Existing Vegetation
-  Green Corridor with Areas for Play and Habitat Improvement
-  Potential Green Verge and Trees through Development Area
-  Low Point for Sustainable Drainage
-  Looped Recreational Walking Route
-  New Tree, Shrub and Amenity Planting
-  Focal Greenspace

 **Figure 5: Cherrybrook Drive Masterplan**
N.T.S

Next Steps...

Consultation

Persimmon intend to engage and consult with the Council, key stakeholders and existing community and will participate in the emerging local plan process.

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



[Pegasus_Group](#)



[pegasusgroup](#)



[Pegasus_Group](#)

PEGASUSGROUP.CO.UK