

### **Lower Penn Parish and the Green Belt.**

As it stands the Parish has just over 400 dwellings and for various reasons can not sustain housing developments proposed at site 582.

- Until recently Lower Penn was designated a Tier 5 village and therefore not to be considered for housing development. It would now appear that Planning has managed to cast 2 concentric circles over Lower Penn such that the inner circle of the village conservation area in planning terms is seen as different from the outer circle. But if the village is the heart of the Parish, the outer circle is the lungs which are vital for its very existence. Lungs provide breathing just as the Green Belt provides breathing. The notion that you can destroy the breathing without killing the heart is nonsensical but this is what is happening with the proposed development.
- Just because Lower Penn borders the urban area of Wolverhampton to the east, it is considered fair game by developers without any consideration to the fact that the outer circle of the Parish acts as a vital buffer to the conservation of Lower Penn. The whole integrity of Lower Penn will be affected.
- The NPPF is mindful of the need to prevent urban sprawl which is exactly what this site will bring. The Wolverhampton boundary is quite defined with development beyond it into Lower Penn only consisting of 'ribbon housing' along Langley Road, Springhill Lane and Radford Lane. To think that housing 'estates' can be inserted into this situation without spoiling vital Green Belt is wrong. Housing estates which will in themselves provide no defined boundaries so the potential for even more sprawl exists.
- The Green Belt not only serves to combat climate change but also provides much needed leisure pursuits. A most noticeable outcome of the Covid pandemic is the increase in people using Lower Penn for exercise. Residents for example from Penn, Merry Hill and Castlecroft are walking the fields and lanes of Lower Penn. To have these areas built on and most importantly made more unsafe because of extra traffic on single track lanes with no footpaths, will deny people a quality of life afforded to them at present.

### **Traffic**

- Increased traffic will be a huge problem – hundreds of extra cars constantly using unsuitable roads. Access to Wolverhampton to the east will immediately meet problems at the 5 way island in Merry Hill at the start of Langley Road which is already a pinchpoint. To the west along Langley Road you are soon into roads which are single track, with huge potholed verges, no pavements and not built for modern day traffic in size and volume.
- Any Highways survey must take into account not only access into the proposed site but also all the roads leading out towards Lower Penn village and onwards to Wombourne; to Seisdon; to the Bridgnorth Road via the Roughs and the Trescott Ford; to Radford Lane and on to Windmill Lane which can not cope with traffic as it is.

- These roads lead to main employment areas such as Telford, Stafford, Cannock either on M54/M6/minor roads as well as supermarket centres on Perton, larger shopping outlets in towns mentioned and Garden Centres of which there are 3 alone along the Bridgnorth Road not far away.
- To the west lies not only Staffordshire but the lovely Shropshire county with its own draw for leisure such as the river at Bridgnorth and numerous country pubs. All these will be accessed by unsuitable roads with no prospect of improvement.
- The added factor is the effect of increased traffic on air pollution at a time when there is huge concern over climate change. The major development in Lower Penn of the Sandhills Day Nursery building on Springhill Lane has brought about a large increase in traffic and traffic incidents through the village itself. These will be added to as commuters, leisure seekers and service businesses inevitably use the country lanes as rabbit runs.

### **Housing need**

- The mantra constantly given out by Planning is that South Staffs is being forced to build houses by Central Govt, backed up by having to take overspill housing needs from Birmingham and West Midlands Boroughs. In order to do this South Staffs is having to swallow up Green Belt because the county has so few brownfield sites. Yet where is the desire and will to fight back against Govt demands and at least ask for a more extended timescale so that important factors can be explored before it is too late.
- The West Midlands Mayor, Andy Street, is continually stating that there are enough brownfield sites within the West Midlands to cover housing needs. If this is so, what talks are being held with the Mayor to see how this affects potential overspill needs and whether housing numbers can be dropped.
- £120m is being spent in Wolverhampton on the National Brownfield Institute specifically to educate people in the skills to regenerate brownfield sites. What is the point of this if Planners are bypassing such sites as building on Green Belt is easier and cheaper for developers? But time is needed for this Institute to have success.
- No one knows at the moment what long term effect the Covid pandemic will have on businesses and their buildings requirements. There may well be scores of brownfield sites becoming vacant or underused in the next couple of years so why aren't Planners asking for this situation to become clearer before plunging into using Green Belt sites. Such brownfield sites will probably already be in areas with better access and will be better focal points for housing and regeneration.
- As reported in the Wolverhampton Chronicle, December 2<sup>nd</sup> 2021, Govt data shows there are 11,193 empty properties in the Black Country and Staffordshire. Of these, Wolverhampton had 2,495 empty houses, 1327 of which had been empty for 6 months plus and 436 for more than 2 yrs. Dudley figures were just as large. What efforts are being made to support developers bring this housing stock into use before attacking Green Belt?
- Politicians and the general public should be supporting Planners in making vociferous demands for a 'stay of execution' in the timescale for Local Plans to be submitted as well as demands for

Green Belt to be sacrosanct.

## **Infrastructure**

The Local Plan seems to have a huge element of “cart before the horse”. Langley Road site has been chosen for its contiguity with an urban area yet all the essential requirements for a housing estate have yet to be investigated and how neighbouring authorities will be able to supply these physically and financially. Where are the studies which have been undertaken to back up the choice of this site in terms of:

- a) Highways – problems already mentioned above.
- b) Schooling, both primary and secondary – the educational needs of families from the proposed site can not be met by local South Staffs schools which are already oversubscribed or a long distance away. Wolverhampton schools are also unable to take in pupils from S Staffs.
  - c) Access to doctors and dentists, none of which are in Lower Penn, would require transport to reach and are oversubscribed anyway
- d) Shopping - no supermarkets exist locally to support the needs/wants of a housing estate.

This is by no means a comprehensive list and no doubt other objectors will have put facts and figures to some of these issues. The main thrust of my objection here is that any proposed housing estate could require huge amounts of capital investment by either South Staffs, Wolverhampton or a combination of both as no developer will see it as their responsibility to provide these basic services. Capital investment which in itself may require even more building in the Green Belt, thus adding to urban sprawl and climate change. Discussions and arguments with Wolverhampton Council could take months/years yet need to be resolved BEFORE any decision is taken on this Langley Road site.

As part of the Planning Process, major consultees have to be given the chance to make professional, evidence based comments on proposed building developments. Major consultees such as Staffs Highways, Severn Trent, Environmental/Biodiversity experts any of whom could produce evidence which would lead to the site being unsuitable. Yet as it stands, none of these have been asked for major studies to assess suitability. Highways can not cope as it is with the upkeep of roads in Lower Penn, never mind the congestion problems which will be caused by this site. The site itself lies on a flood plain and a Severn Trent study should highlight the issues which a large building development will have on the water table and water drainage. Ecological studies will highlight the existence of many species of birds and animals as well as mature trees and shrubs of importance for habitats as well as oxygen.

To use a real life analogy, no one would plan a final journey destination before considering all the stages needed to get there. Yet here we have a final destination – a housing estate on site 582 – where no one, not even Planning, has any idea of any of the stages in the journey to get there and whether the pitfalls or obstacles on the way are insurmountable. It is my contention that the planning obstacles are so great, the journey should be aborted now and I object strongly.

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