



23 December 2022

South Staffordshire Council  
Council Offices  
Codsall  
South Staffordshire

Dear Sirs

South Staffordshire Council - Local Plan Review Consultation - December 2022

Please my response to the above.

Following the Michael Gove statement to the House of Commons detailing proposed changes to the planning system, Local Government Local Plan reviews, protective measures for the Green Belt, as well as amendments to the authority of the Planning Inspectorate to override planning decisions.

And further to the letter from Lower Penn.

Are South Staffordshire Council considering following the example set by the 23 District Councils nationally and delay submission to the Secretary of State and revise the Local Plan, specifically addressing total housing and duty to cooperate numbers based on these updates?

However in the meantime here are my comments based on current Gov guidelines and NPPF policies and the documents contained in the Local Plan Review (LPR) consultation.

#### Housing comments – the history

The housing growth of Penkridge over the last 40 years has been focused toward the east and southeast. There has been only a small inclusion of a school and a corner shop - as any community facilities. It has also coincided with the removal of at least equipped 4 play areas throughout the village maintained by SSC.

The Local Plan was published 2012 and the Site Allocation Document approved in 2018 showing NO housing developments planned for Penkridge until after 2028.

The land to the north of Penkridge was shown in the SAD 2018 as possible allocated sites for housing and development at a future date after 2028.

The Government's subsequent Guidance then required a Review of the Local Plan, in which SSC have now proposed approximately 1129 new homes and development on the land to the North of Penkridge. With in addition, two 'infill' sites within Penkridge, 005 and 006 are proposed for development growth of the village.

005 Cherrybrook is contentious with concerns regarding high density, inadequate access, flooding and overdevelopment in view of its close proximity to the M6.

006 site is in the green belt and is now an obvious choice for consideration for infill housing growth – with its obvious charm as a canal side location.

#### Housing - the current consultation

After the approval of the Lyne hill development the SAD showed NO further housing proposed until after 2028.

However the Developments within the land previously identified for possible growth of Penkridge to the North, the Bloor Homes and Cameron Homes sites were subsequently approved for 224 dwellings, mainly due to SSC not having a 5 year land bank supply – and without the benefit of a masterplan.

In the present Review of the Local Plan it is proposed that some future housing growth may be inevitable/acceptable for the next period 2028 to 2038 - in a reasonable and well planned manner – and as described (in the LPR) and in accordance with the benefit of a masterplan to include cohesion with the rest of the village.

This future growth should include these 224 dwellings (stated above) and the possibility of up to approximately 160 dwellings from sites 005 and 006 making a total of 380 dwellings, which may be considered acceptable to the community - as growth up to 2038.

However unfortunately the Bloor and the Cameron sites are an example of piecemeal development and have not been designed or approved with the benefit of a Masterplan to incorporate the developments in an appropriate manner to fit in with existing Community and services of Penkridge. **This leads to concerns about the possibility of allowing piecemeal development of any future land.**

Therefore it is important that the design of a Masterplan should include the centre of the village at its core.

**Any future housing developments around Penkridge should be designed to provide safe access pedestrian and vehicular - with adequate cohesion with the Village Centre.**

The SHELAA and 5 year land housing bank supply report, also includes land to the west and south of Penkridge which may be available and suitable, and should be considered for development in the future for the growth of Penkridge up to 2038 and beyond.

#### Infrastructure, Highways and Footpath/Cycleways

There is a proposal by a landowner (SCC) to promote land for future housing to the west of Penkridge, some of this land is in the SHELAA report, and apparently, contained in their response to the Local Plan Review consultation.

This land may include **a Spine Road running from the South with a connection from the A449 near Gailey - to connect back to the A449 near Lower Drayton Lane** to the North of Penkridge.

The site 010 may be affected by this proposed route. **Therefore, it is important that the design of any Masterplan for this area should reserve this part of the route.**

Although it is suggested that traffic from the proposed WMI may be constrained from using the A449 as a route through Penkrige, this will be of little effect should the M6 be shut and all traffic is diverted through Penkrige, which is a very regular occurrence. **A new spine road would give an alternative relief for the centre of Penkrige.**

Any new housing should connect with the village with alternative routes for roads, if possible, or at least alternative routes and links for footpaths and cycleways being designed and provided.

There is a possible route for an alternative link from land to the north of Penkrige via a **new bridge across the River Penk and the flood plains** to the east toward the Teddesley Road and to connect to the schools and the Village Centre.

There are concerns that any development on the west side of the A449, to the north of the village, will not have adequate and safe crossings and safe routes for pedestrians and cyclists to the Village centre, without following in close proximity to the busy and potentially dangerous A449 highway. The A449 dominates and divides the village and the community. **It is important that consideration be given to deliver a solution for the safe use of routes in the village centre.**

There are concerns that increased traffic from the new sites may not be able find parking in the village centre for shopping and at the Rail Station, which is now a major user in the region, mainly by non- residents of Penkrige to commute to work elsewhere. **Therefore a provision for extra car parking near the rail station and the village centre should be considered.**

#### Economy and Services

The WMI is identified as a major employment site. This in turn will create major traffic movements in and through Penkrige - and for users of the existing village centre services.

The Local Plan review does not show any other small scale sites for commercial development in Penkrige, although the availability for such sites may also be possible on land to the west of Penkrige.

There are also concerns about the provision of adequate Doctors' services with the growth of the population – which may not have been addressed in the (LPR).

The Local Plan review does not show any justifiable and sustainable development for retail or development for community use – **a new Community Hub is not the answer and will only deflect from the use of the existing services and existing amenities in the village centre.**

The LPR shows a school site which is unjustifiable and unsustainable at this time.

**Should the existing retail and school provisions be extended? There is capacity and land for an extension to the Middle school or even space for another first school at this site.**

**The design of any masterplan will need to show more detail before acceptance by the community.**

#### Open space

The Neighbourhood Plan review policy for the provision has been changed. The open space requirements have been **reduced to 0.006ha from 0.01ha per dwelling**.

This effectively **nearly halves the required provision** of amenity and usable open space and green spaces throughout all the new estates.

It will also have the potential of **the increase the density of the proposed housing delivery.**

It will certainly have the effect of **reducing the openness** of the future housing estates.

I do not agree with the policy which gives a free choice to developers to burden the home owners with the future maintenance liability of public open spaces and play areas. When this should be a collective community responsibility shared by the provision of the Council tax.

The Local Plan review does not take seriously the opportunity to allocate the river flood plain areas – **both sides of the river connected by a new river bridge** - as new open space/ parkland from the north – toward the Village centre connecting the previous River Park on the Teddesley Road/The Roller Mill in 2001. And to the west to Cuttlestone Bridge on Pinfold Lane.

#### Environment

Wind turbines and the Anaerobic Digester are established. There now appears to be the opportunity to preserve the countryside with the proposals for Solar energy.

#### Travellers Site A449

There are concerns that the site is to made permanent this has already been rejected since 2009 and should continue to be part of the Green Belt.

Appendix G – possible new settlements. (also included in the SHELAA report)

**The Local Plan Review does not include consideration of land to the west.**

The land to the west - beyond the Railway, already has some development. The medical practice for 1 major service. There are services already available within close reach of the village centre.

Therefore there appears to be land available for future growth of the village to the west which should be considered for growth after 2038, **without the need to set up new communities or settlements at Dunston or Gailey.**

#### Land South of Stafford A34 Acton Hill – site 582

This land is for Stafford Borough Council overspill **and it is an unsuitable intrusion into the Open Countryside.**

It is **not connected** to the villages of Penkridge or Acton Trussell and an unsuitable addition for future growth.

**The opportunity to discuss the bigger picture of how and what should be available for delivery in the future growth of Penkridge should not be missed at this time.**

Your faithfully

C Stonehouse