

Part B – Please use a separate sheet for each representation

Name or Organisation: **CPRE Staffordshire**

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

Paragraph	Table Below 5.21 and others- see pages list	Policy	Spatial Strategy SA1,SA2, Sa3, SA4	Policies Map	Page 244 Page 176 Pages 60 to 76
-----------	---	--------	------------------------------------	--------------	----------------------------------

4. Do you consider the Local Plan is :

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

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.

CPRE Representation Number 7

Strategic Master Plan Locations

This representation has two key elements:

1. It appears that the Council is seeking an excessive area of land for new housing development in the Strategic Masterplan Locations.
2. The plan does not provide all relevant information for the proper consideration of the proposals in the Strategic Masterplan Locations.

Areas and density

- The gross site areas shown are at unduly low densities for new housing.
- No detail is given of net areas for new housing and their assumed densities.
- No maximum number of dwellings is indicated.

- No indication is given for land requirements for the other uses referred to in the Plan regarding the Strategic Master Plan Locations.

Relevant information currently omitted

- No detail is given for the areas required for other uses on the site, including community hubs – nor what is to be included in the hub, for example dentists and doctors’ surgeries and other forms of health provision, as well as community rooms and childcare facilities.
- No detail is given of infrastructure needs such as new highways and off-site requirements for improvement, or whether drainage /sewerage and adequate water reclamation facilities are available.
- Information is lacking on the area of playing fields to be provided on site and whether associated facilities such as changing rooms, lighting and hard courts are to be provided as part of the development.
- No information is provided on funding, phasing or thresholds for provision of facilities and services

Land at Cross Green

Land at Cross Green - Extracts from the Plan (our underlining for emphasis)

6.12 A strategic site has been identified just north of the Black Country’s urban area at Cross Green, reflecting the area’s proximity to employment opportunities and the Black Country urban area as well as the potential for the longer-term delivery of a railbased parkway station to be supported by development in this location. Policy SA2 and the Vision and Objectives for the site aim to respond to the site’s context and key requirements to ensure a high quality, sustainable new village is created.

Well Served and Thriving

- The provision of a new neighbourhood centre will be provided centrally to the development to accommodate relevant facilities/services for the new settlement and existing nearby communities to include local retail, flexible community space and local employment.
- Provide new residents with excellent active travel links to key strategic employment sites (ROF Featherstone, I54)
- A new primary school will also be provided at the heart of the development to ensure it is accessible by all.
- The new neighbourhood centre will form a positive relationship with the new rail station in respect of mutual services, amenities and parking.

In addition, the council will continue to work with partners to seek opportunities to deliver a rail-based parkway on land safeguarded for this use through the Land at Cross Green development

- Described as ‘employment led growth’.
- Reference is made to the area being treated as a high quality, sustainable new village and, elsewhere, as a new settlement.
- The plans show two sites separated, Site 646a and Site 646b with Green Belt between them (See Inset Plan 51)
- The concept plan shows a single development with a “development area or sports pitches” in the Green Belt between the two strategic sites.
- Housing, a school, a Community Hub, a Parkway Rail Station and carpark are shown in the southerly area. No neighbourhood centre is shown. With the exception of the primary school, no indication of land requirements has been given.
- No indication is given in relation to what is to be included in the community hub, for example a GP or dental surgery, nursery, or a community centre, or how it will be funded.
- It is implied that the two sites are to be linked. The total area of the two sites is given as 54.3 ha. (the hectarages of the two areas are not quoted separately).
- At the Council’s minimum density of 35 dph and the number of dwelling quoted of 1200 the housing development area of 34.3ha would be required. This leaves an area for other uses of 20ha.
- The proposal includes a primary school, but a three-tier system operates in this area of Staffordshire. This leaves the question of where secondary age children would be educated - the closest schools in Wolverhampton, or bussed to more distant schools in Staffordshire such as Codsall or Penkridge? Staffordshire operates a three-tier system in this area (first school, middle school, upper school), whereas Woverhampton uses two tiers (primary and secondary schools).
- Under the Duty to Co-operate, have the Education Authorities in Wolverhampton and Staffordshire agreed education provision and funding with South Staffordshire Council?
- Significant areas for “development areas or sports pitches” are shown on the Concept Plan but no explanation is given. Why?
- There is a conflict inherent in the Neighbourhood Centre provided ‘centrally’ and the new rail station - which is far from a central location.
- Only Site 646b has a frontage to the A449 - which is dual carriageway with an unbroken central reservation.
- Site 646a takes access from Old Stafford Road New Road and Dark Lane. Access would be considered to be seriously unsatisfactory. Has the Highways Authority been consulted and, if so what has been said?
- Both sites are shown with access to Brinsford Lane.
- A new station and a 500-space carpark is proposed in the plan but we have found no evidence of Network Rail agreement to a new station on this part of the West Coast Main Line, no feasibility or viability assessments seem to have been carried out - or other relevant information such as who is to pay for car park, the station and associated facilities.
- It is unclear how the station will be ‘supported’ by the development.

- No indication is given of how the settlement is to be served by public transport (buses).
- It is particularly unclear whether the new road crossing the railway shown on Page 176 and in the Concept Plan is a proposal of the plan and whether this is a requirement to be provided and funded by the housing development, the station development or 'another'; such as the major employment proposal to the east of the railway. How has the Duty to Cooperate been met in relation to this proposal?

Land at Linthouse Lane

Site 486c Capacity quoted 1976 dwellings Area 94.1ha

- At the Council's minimum density of 35dph the area required for housing development would be 56ha.
- Proposal is described as housing-led mixed use.
- New park shown in Green Belt to the north-east of the site described as green infrastructure.
- Feels more like a new suburb rather than a new village, although the number of houses envisaged is more than 50% greater than at Cross Green and it would have a population of more than 4000.
- Concept plan shows a school, community hub and central green space
- The proposal includes a school but in this area of Staffordshire a three-tier system operates. Where are secondary age children to be educated - the closest schools in Wolverhampton or bussed to more distant schools in Staffordshire such as Cheslyn Hay, Codsall or Penkridge? In this case it makes more sense for secondary age children to go to school in Wolverhampton.
- Under the Duty to Co-operate, have the education authorities in Wolverhampton and Staffordshire agreed education provision and funding with the South Staffordshire Council?

Land at Penkridge

Sites 420, 584 and 010 Capacity quoted 1129 dwellings Area 51ha

- At the Council's minimum density of 35dph the area required for housing development would be 32.3ha.
- Includes school, Community Hub and area of green space and a large 'Potential development area or location for sports pitches'.
- Use described as housing-led mixed use.

East of Bilbrook

Site 519 Capacity quoted 848 dwellings, area 39.6ha.

- At the Council's minimum density of 35dph the area required for housing development would be 24.2ha.

- Includes school, Community Hub and Central Green Space.

(Continue on a separate sheet /expand box if necessary)

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.

Modifications.

1. Re-think the Strategic Master Plan Locations.
2. Justify removal from Green Belt, at this stage.
3. Provide adequate information on hectarage for housing and other uses.
4. Give target net densities for housing.
5. Provide the missing detail of the proposals.
6. Give evidence of meeting the Duty to Co-operate on relevant issues.
7. Indicate proposed phasing, thresholds and funding of all elements of the proposals.

Each of these would help to test soundness and to make the proposals in the plan clearer.

Additional for Cross Green

Indicate how the northern part of the site (646a) is to be linked to the southern area (646b) as the two are separated by a wide Green Belt 'gap' and are not contiguous anywhere.

Indicate how access for the northern site is to be gained to and from the A449.

Clarify the status of the new station and car park, including whether a similar status is to be given in the plan to land to the east of the West Coast Main Line for a southbound platform.

Clarify the status of the proposed road across the West Coast Main Line and its funding.*

** Since writing this representation we have found that outline planning permission [20/01131/OUT](#) has been given for an employment site to the east of the railway which shows a major link road across the strategic site and a new roundabout junction to the A449 to the west of the Strategic Housing Allocation.*

The application is for

- i. Full proposals for a new access road from the A449 to a proposed roundabout on Cat and Kittens Lane and site accesses to land either side of this road, internal site roads, along with drainage infrastructure and landscaping; and*
- ii. Outline proposals for the employment uses (E, B2 and B8) with floorspace up to 158,121 sq.m. G.I.A., support hub uses (E and sui generis) with floorspace up to 511 sq.m. GIA, proposed buildings with ridge heights ranging between 6m and 24.5m, parking, drainage infrastructure and strategic landscaping. All other matters are reserved.*

The decision was amended in November 2022.

The Outline Planning Permission site is larger than the Regulation 19 Publication allocation Site Reference E18 on Page 237.

We consider that this is of direct relevance to consideration of the two strategic sites identified at Cross Green.

(Continue on a separate sheet /expand box if necessary)

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

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:

To hear the LPA response and participate in any Inspector-led discussion.

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.