

Lower Penn Parish Council Local Plan Response May 2024

We find that the South Staffordshire Local Plan Regulation 19 document does pass the test for soundness. The Local Plan was reviewed in light of the updated NPPF publication in December 2023 which updated national policy relating to Greenbelt. SSDC have amended their Local Plan accordingly to take onboard this change of policy. As South Staffs is predominantly a Greenbelt County it was important to reflect this policy change in the plan. This effectively removed some greenbelt site allocations that had been allocated against the housing need in the wider Black Country Authorities. As a Parish Council we are and were against building on strategically important greenbelt land that helps protect against climate change and we wish this to be preserved for future generations to enjoy and have the benefit of it. (1.17)

We also agree with the capacity led approach (Spatial Option I) focusing growth to sustainable non-greenbelt sites and limited greenbelt development in tier 1 settlements well served by public transport. (5.14)

Greenbelt

The NPPF gives fundamental protection of the Green Belt and its updated guidelines state:

145. Once established there is no requirement for greenbelt boundaries to be reviewed or changed when plans are being prepared or updated.

Lower Penn is in essence the purpose of what greenbelt was set up to do. It checks the unrestricted sprawl of large built up areas, mainly Wolverhampton. It helps prevent neighbouring towns merging and it assists in safeguarding the countryside from encroachment.

The particular area of Lower Penn Greenbelt is of vital importance in preventing urban sprawl and the retention of Greenbelt status in this area which has three borders with the development area of Wolverhampton. In other locations, Greenbelt delivers important benefits, but in **Lower Penn in particular, all five functions of the Greenbelt are delivered.** Green belt in Lower Penn therefore holds significant value and land here should be retained as green belt in every possible circumstance

LPPC agree that our small hamlet and the surrounding countryside should not be included in the Local Plan because of the above reasons. (5.1,5.2,5.3,5.4)

Lower Penn

Lower Penn has been classed as a tier 5 village in the SSDC key evidence document The Rural Services and Facilities Audit 2021. This is because of poor sustainability and infrastructure issues. SSDC have now identified that these tier 5 villages do not fulfil the criteria set out in the NPPF for sustainable development and have decided to

concentrate on delivering houses in areas where sustainability and infrastructure issues can be met or mitigated. Lower Penn Parish Council agrees with this strategy and finds it sound as it aligns with NPPF guidelines. (2.8) This also applies to employment land (6.42)

Duty to Co-operate

LPPC do not consider that having to accommodate neighbouring authorities' unmet housing need, due to the Duty to Cooperate, amounts to the 'Exceptional Circumstances' required to justify development in the Green Belt. The NPPF now supports this, stating there is no need for greenbelt boundaries to be reviewed or changed when plans are being prepared.

We would also like to state that we do not think that the Black Country Authorities have demonstrated that they have examined fully all other reasonable options for meeting its identified need. The Black Country Authorities, in particular Wolverhampton, our neighbour, have not even assessed their city centre where many derelict and disused buildings lie empty. All neighbouring counties' brownfield sites need to be utilised before greenbelt land is released both in their own areas and in South Staffs. The CPRE brownfield report identified 99,600 dwellings that could be built in the West Midlands on brownfield sites in 2021. (3.6,3.7)

Climate Change

Whilst LPPC support the commitment to delivering Net Zero homes, and support policy NB6 which sets out how the DC's approach, there is no significant update to the climate strategy that reflects the vanishingly small likelihood of limiting global warming to 1.5c.

In general, there are too many caveats throughout the policy to ensure that Strategic Objective 12 is met.

While there is some ambition to deliver better cycling and walking routes, the emphasis, in the absence of any comprehensive public transport network, is still on private car use. Cycling and walking appear to be treated as leisure activities and there is little to support or encourage the use of active travel to commute to main employment sites. Focusing development in what are considered the most sustainable locations is certainly the best approach, and will go some way to minimise the impact of ever increasing car use, however, this depends on new residents being able to utilise the transport options that are available, and the capacity of these options being suitable to the increased need in those locations. Currently, train and bus services in Bilbrook and Codsall are regular but infrequent, and users report that trains in particular are very busy at peak times. In addition, whilst there is a plan to deliver increased car parking at Codsall, bicycle storage at both locations remains very limited and rather poor (not in line with policy HC13) We hope these shortcomings will be addressed.

In addition to the short-sighted approach to active travel and limited commitment to moving away from a reliance on car use, topography is often not taken into consideration. Cycling and walking as transport must allow the individual to take the shortest, most accessible route - in Wombourne the scheme to deliver a new cycle route expects the user to choose between a longer muddy route along the railway walk (although Sustrans are working to improve this route for commuters, it remains an unlit path) or a very steep incline to the village.

Our council fully support the introduction of BNG and hope that this will make a real difference to the sites that have come forward in the updated local plan. We hope that the DC will take seriously the need to deliver biodiversity gain on every site, and that developers take this obligation seriously, using it as an opportunity to plant native species and create genuinely rich sites.

Travellers' Sites

LPPC agree that this need will be met on or as extensions to existing sites (6.39)

We do not agree that greenbelt should be used for any new traveller sites as it would impact upon the openness of the greenbelt and we do not feel there are exceptional circumstances to justify the release of green belt. We feel that SSDC has researched all potential options on both public and private land that could be made available and no site identified is viable. (6.41)

Consultation Community Engagement

An ongoing observation regarding all of the public consultations undertaken in this cycle of the Local Plan has been the lack of direct community engagement and poor accessibility of information and/or documents. Too much reliance has been placed on using the council's own website and social media (requiring login) to promote the local plan. This is unsuitable for residents unfamiliar with digital resources. We feel that paper communication received by residents annually ie Council Tax Bills, could have also contained information regarding the Local Plan and subsequent consultations.

Kind regards

Jan Footman – Clerk

Lower Penn Parish Council