

Part B – Please use a separate sheet for each representation

Name or Organisation: Staffordshire County Council

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

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.

The Plan has not been positively prepared in taking into account the unmet housing need from the Greater Birmingham and Black Country Housing Market area in the longer term. The Plan sets out in paragraph 5.12 that recent evidence suggested the shortfall across the HMA will be in the order of 106,654 dwellings. Previous iterations of the SSDC Local Plan have tested a contribution of 4,000 units towards the shortfall based on a 2018 study for the HMA. The Plan further goes on to state that the 2018 study is now out of date and new evidence is to be prepared, with SSDC being committed to participating and considering finding through future Plan making. It is in this context we find the Plan unsound by lacking vision and forward thinking to provide insight into future long term growth options. Further, the Spatial Housing Strategy Topic paper and Exceptional circumstances topic paper do not consider properly all the options presented to the Council during the preparation of the Plan.

Earlier iterations of the Local Plan included policy provision for a New Settlement and set out an area of search aligned with the A449 between Featherstone and Dunston. The County Council made representations to

the earlier public consultation phases that the Policy proposals for a new settlement should also take into account expanded settlements within the area of search as there appeared to be limited scope for a wholly standalone new settlement. To that end the County Council also made SSDC aware through call for sites and direct engagement that the County own substantial tracts of land as part of the County Farm estate that could be made available for housing growth. Since 2021 the County Council has commissioned extensive technical work and Masterplanning, including transport, viability and environmental studies that underpin the David Lock Associates and AECOM Growth Scenario Report, which was submitted through the Plan making process. This body of work explores what a western urban extension could look like and deliver and can be viewed at www.penkridge2050.co.uk

SCC have been in dialogue with the Parish Council for an extended period of time in relation to their Neighbourhood Plan and the scenarios presented by public land holdings to the west of the village. There is an increased sense of frustration that the 'West of Penkridge' proposal has not been properly communicated/articulated and considered by the LPA so the community can understand the options and benefits. We are also concerned over long term impacts of further piecemeal development to the north of Penkridge in a non-sustainable linear fashion without any infrastructure improvements (as opposed to just mitigation) – i.e. not using planning as a tool to improve the community through strategic planning. For example the proposals for the West of Penkridge include provision for re-routing of the A449 through the new development on a road designed to accommodate high vehicle flows and HGVs given the A449 is the signed diversion route for M6 closures. The A449 also experiences high volumes of traffic during periods of congestion on the M6 that do not necessitate a closure. The proposal to re-route the A449 will allow the historic centre of the village to be returned to a local street and provide more of a Place function, with active travel options and alternate uses to land previously dedicated to motor vehicles.

Whilst it is accepted that the detailed proposals for West of Penkridge came to the table mid-way through the Plan making process they were not that for removed from the options considered for there have been opportunities for the proposals to be reviewed during the Plan. The pause in Plan making following the 2022 Regulation 19 consultation afforded opportunity for West of Penkridge to be considered in the 2024 Spatial Housing Strategy Paper, which added new options and refreshed those previously considered. However, this was not undertaken.

The council's preferred approach to housing is Spatial Option I - a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. However, at paragraph 5.16 the Plan states '*Spatial*



Option I does not avoid Green Belt release...Spatial Option I does propose to limit Green Belt allocations to suitable sites in areas of the district best served by public transport... Local evidence shows the district's Tier 1 settlements are the areas best served by public transport in the district, particularly where these transport links offer sustainable commuting patterns into the neighbouring Black Country and Birmingham conurbation...This is expanded on further in the council's Green Belt Exceptional Circumstances Topic Paper 2024.'

Whilst this approach only provides for a relatively small contribution to the GBHMA unmet need it does show alignment with the West of Penkrudge proposal at a strategic level. Penkrudge is a Tier 1 settlement; it includes a railway station and regular bus services; and 'the council has also proposed an additional amount of limited Green Belt release to the south of the village, recognising Penkrudge's status as a Tier 1 settlement and the sustainability of this location compared to other areas of the district.' The West of Penkrudge proposal is adjacent to the Village, potentially offers improvements to the railway station, and could therefore be seen to align with the SSDC strategic approach and offer opportunity to consider the longer term housing growth of the District and wider HMA unmet need.

(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.

Re-insert the section and policy for Longer Term Growth Aspirations for a New Settlement that was included within the 2022 Publication Plan, but amended such that it also allows for the consideration of expanded settlements in the area of search. This will allow for full and proper consideration of the West of Penkrudge proposal with the District Council, community and Parish Council, with provision for a scheme to come forward via a Plan review. The site benefits from availability of existing infrastructure in Penkrudge such as the railway station and education facilities across all phases of education (first, middle & High school) and also provides the opportunity to provide new and/or expanded school



provision; GP surgery; sports and leisure facilities; and enhancements to the Railway station access. The proposal also affords the opportunity to re-route the A449 and return the centre of the existing village to more local use rather than acting as a through route.

(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:

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