



Staffordshire Local Plan Review

Examination in Public

Hearing Statement for Matter 6

On behalf of Persimmon Homes

Author: KF



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1. INTRODUCTION

- 1.1. Pegasus Group is instructed by Persimmon Homes (Persimmon) to respond to the South Staffordshire Local Plan Examination: Matters, Issues and Questions produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan Review 2023–2041 (the Plan).
- 1.2. This Statement relates to Matter 6 and it's respective MIQ's as identified by the Inspectors. Separate Statements have been prepared and submitted in relation to Matters 3, 4, 5, 7, and 8, and this Introduction has been duplicated across all Statements.
- 1.3. Persimmon are promoting land at Cherrybrook Drive, Penkridge, which is identified as a proposed allocation in the Plan at Policy SA5 as 'Site Ref 005 Land at Cherry Brook' with a minimum capacity of 88 homes. For accuracy, it should be noted that the name of the site/road is 'Land at Cherrybrook Drive', and this should be amended throughout the Plan.
- 1.4. Persimmon Homes has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, as well as the earlier iteration of the Regulation 19 Publication Plan document consulted upon in 2022. These earlier representations included the production of a Vision Document to demonstrate how the site could be delivered; the Vision Document is attached again for ease at Appendix 1, to the Matter 7 Hearing Statement.
- 1.5. The site extends to some 4.2ha and is located in the highly sustainable settlement of Penkridge. It sits immediately north of the existing residential area and adjoining the current settlement boundary for Penkridge.
- 1.6. The Site is subject of a long-standing allocation as 'Safeguarded Land' under Policy GB4 of the South Staffordshire Local Plan 1996. This was subsequently replaced by Policy GB2 of the Core Strategy upon its adoption in December 2012. Policy SAD3 of the Site Allocations Document (2018) retained the Site's 'Safeguarded Land' status. It is the last and only remaining of the 1996 safeguarded sites to be brought forward with a positive allocation, the others having all since been developed.
- 1.7. The site is also now the subject of a live full planning application for 88 homes under LPA ref 25/00004/FULM, as illustrated below.



- 1.8. Persimmon's previous submissions to the Regulation 19 consultation, remain before the Examination. This Hearing Statement though, necessarily reflects the current position in relation to the relevant MIQs, having regard to the SoCG agreement reached with the Council and signed by them on 10th June 2024, and the Inspectors' specific questions.
- 1.9. This Plan has been brought forward under the December version of the NPPF, and references throughout this Hearing Statement are to that NPPF unless expressly indicated otherwise.

2. MATTER 6: GREEN BELT

Issue: Whether the Plan's approach to Green Belt is positively prepared, justified, effective and consistent with national policy.

MIQ's 2, 10 & 12

- 2.1. With regard to Persimmon's interest at Penkridge, their concern on the approach of the Plan to Green Belt is focussed to, and relates solely to, their site as a Safeguarded site held over from the 1996 Local Plan, and as now positively allocated.
- 2.2. In this regard, it is of note, that has been safeguarded for nearly 30 years, and as such is not a site being removed from Green Belt through this Local Plan – the site has been outside of the Green Belt, since 1996.
- 2.3. The identification of safeguarded land, to be released for development as a sequentially preferable strategic choice to the identification of identifying Exceptional Circumstances to release existing Green Belt sites is therefore supported, and is consistent with NPPF §§ 145, 146 and 147. Specifically that the Council has considered other reasonable options to the release of Green Belt in meeting its housing need (§146) on under utilised land outside the Green Belt, that it has sought to channel development toward sustainable locations towards urban areas (§147) and that the delivery of and prioritisation to safeguarded land, is the correct plan led consequence, of having identified safeguarded land when setting existing Green Belt boundaries, to endure beyond a plan period (**MIQ2**). Indeed, in line with §148, the Plan should continue to identify new Safeguarded sites, in the event that any amendment to Green Belt boundaries, is demonstrated as necessary through this Local Plan. (**MIQ 10**)
- 2.4. The sustainability of Penkridge as Tier 1 Settlement is explored further under Issue 7 below, suffice to note here, that Penkridge has long been identified as a highly sustainable town, catering for a significant range of services and facilities, including access to a rail station, the subject site is well related to access those facilities (**Local Plan ref 5.26**, and SA Appendix I, Table I.1.1)
- 2.5. **Policy DS2** (Green Belt Compensatory Improvements) provides additional detail on expected compensatory improvements for Green Belt released sites. Despite representations set out as part of the earlier 2022 Publication Local Plan consultation, the policy still leaves elements of ambiguity, and its practical application is unclear.

- 2.6. As previously highlighted the policy requires further clarification by identifying and naming which particular sites it is specifically intended to apply to, or alternatively, the individual site allocation proformas should identify when it is expected this policy would apply.
- 2.7. For the avoidance of doubt, Persimmon Homes interest at Cherrybrook Drive, Penkridge, is 'Safeguarded Land', which was removed from the Green Belt in 1996, and it is not expected to be subject to this policy.
- 2.8. In response to Persimmon's submission to this policy at Regulation 19 stage (**CD5, page 82**), the Council declined to make any further adjustment or clarification to how the policy would be applied to existing safeguarded land. This was on the basis that it was already clear from the policy, which sites it refers to. Persimmon remain concerned that the policy is ambiguous and would benefit from clarification. They wish for the policy to be explicit that a previously safeguarded site from the 1996 Local Plan, which is not being removed from the Green Belt through this Local Plan Review, would not fall within the remit of DS2. Given that the response to the representation was explicit that *'it is already clear from the policy'* how it should be applied, then a simple confirmation that Site 005 is not subject to its criteria ought to have been easily provided in CD5. Persimmon, continue to seek this clarity, now through the Hearing process (**MIQ 12**).
- 2.9. NPPF §147 discusses 'compensatory improvements to the environmental quality and accessibility of remaining Green Belt, similar provisions are referenced as part of the 'Golden Rules' in the December 2024 NPPF (v2 Feb 2025) at §§157, 159. Whilst the proposed DS2 is consistent with the thrust of NPPF policy therefore, it does little to add any detail as to what would be required locally to demonstrate compliance.
- 2.10. In these circumstances, and absent any additional detail having been provided further to the several representations made at Regulation 19 stage as to what or how compensatory measures would be delivered and assessed in South Staffordshire, it is considered that the policy fails to materially add to the policy of the NPPF and should be deleted.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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