

CODSALL PARISH COUNCIL

Parishes of Codsall, Oaken and Codsall Wood

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SSDC Local Plan

Sent by email & hand delivered

10th December 2021

Dear Sir/Madam

Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) Regulations 2012
South Staffordshire Council Local Plan Preferred Options, November 2021

This is the consultation response prepared by Codsall Parish Council to respond to the proposed Local Plan Preferred Options, November 2021.

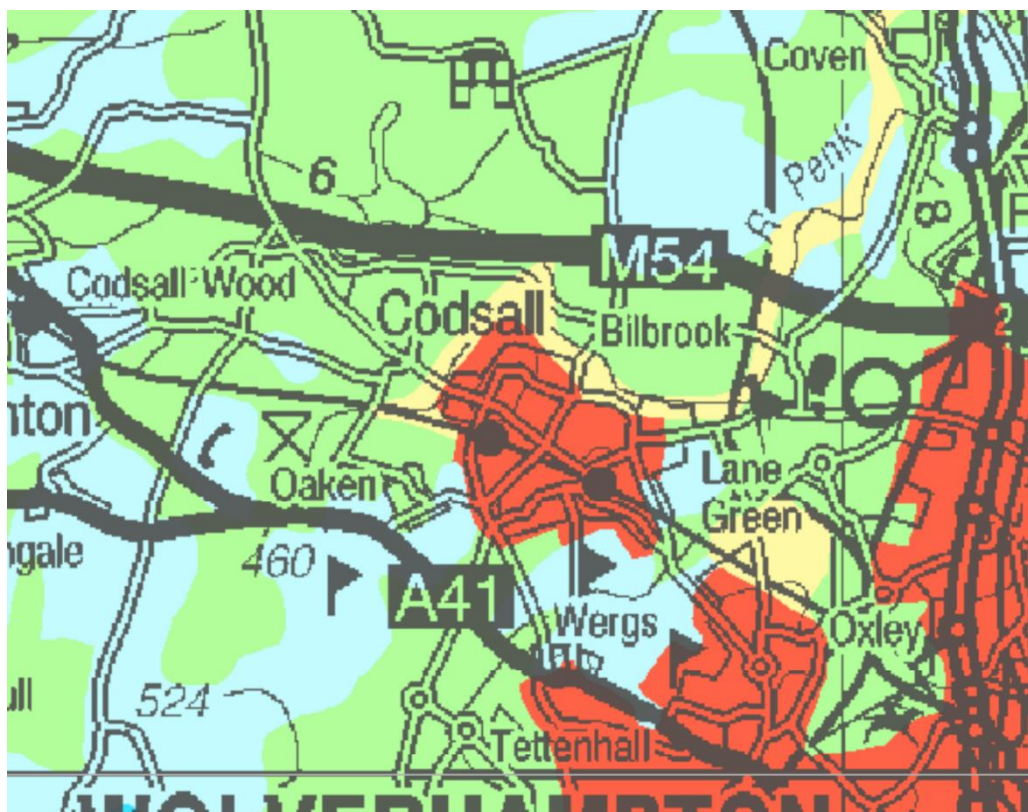
In general, the preferred options strategy is welcomed. It sets out a clear strategic framework for the entire district. However, there are concerns over some of the proposed details. For the purpose of this response, we have dealt with each relevant point in turn.






1. Settlement Hierarchy and Boundaries

- *“Tier 1 villages are assessed as having the greatest access to services and facilities relative to other settlements.”* However, this does not take into account the current capacity of these services and facilities. We are able to demonstrate from our evidence base the current capacity of each key Tier 1 Criteria:



Tier 1 Criteria	Current Capacity November 2021
High School	At capacity of school
Leisure Centre	Well, used important community sports facility although access is limited during school hours due to its location within the grounds of the High School and limited on-site parking
Railway Station	<ul style="list-style-type: none">• There are only 8 car park spaces on site• The rail network provides an hourly service. Although the train does not always stop due to the train being at capacity on arrival• There are only 2 coaches in each train and these are reported to be over capacity with no standing room remaining at peak travel times
Shops	<ul style="list-style-type: none">• Car parks in the village are already at full capacity between 11.00am -2.00pm• Recently some shop unit on becoming vacant are not being taken up by new tenants which the village could be seeing the result in the national decline of the High Street

- Categorising Codsall as a tier one settlement because of the railway station does not reflect the level of growth to what is in reality a branch line with limited services and facilities including parking. The station is in-line with a rural service as opposed to railways in urban locations and this should be taken into account in both plan-making and decision-making as per the NPPF.
- Codsall P.C support sustainable travel within the parish. Being able to reduce independent car journeys would be welcomed. However, the capacity of the transport network to facilitate this is limited. There is no assessment available in the evidence base to support the growth of Codsall applying the criteria of a rail station for the reasons previously identified.
- As the stations have no parking provision has resulted on street parking issues and the proposed development of a 30-space car park would not be adequate to accommodate/resolve present parking issues of on street parking.
- Codsall has a distinct character, providing much of the green buffer that separates the built form from the villages of Bilbrook and Codsall. Natural England Agricultural Grade Classification Map defines the land surrounding the south, west and north of Codsall village settlement as grades 1, 2 and 3. The NPPF makes clear that development should not be enabled on 'best and most versatile land', which comprises of grades 1-3. In addition to this land being covered by green belt, there is no material reason to depart from national planning policy and facilitate the release of green belt in such highly important green space that is previously undeveloped. The proposed site allocations within this locality (4) would erode the natural landscape character and degree of separation between a large urban conurbation and two villages. In effect this would result in Codsall and Bilbrook becoming a suburb of Wolverhampton.



<u>Grade</u>	<u>Description</u>
1	 Excellent
2	 Very Good
3	 Good to Moderate
4	 Poor
5	 Very Poor

Non-Agricultural Land

-  Other land primarily in non-agricultural use
-  Land predominantly in urban use

<http://publications.naturalengland.org.uk/publication/130044>

Chapter 15 of the NPPF July 2021 ‘Conserving and enhancing the natural environment’ makes clear in paragraph 174 that decisions should contribute and enhance the natural environment by:

“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

2. Impact on rural areas

- The development in the villages of Codsall & Bilbrook does not meet the Government's fundamental aim of preventing urban sprawl by permanently keeping the land permanently open.
- In concentrating the developments predominantly in tier 1 settlements and little or no development in tier 4 settlements, is detrimental to the sustainability of tier 4 settlements in accordance to the NPPF

3. Landscape settlement setting

- The land outside of the settlement is classified by Natural England as Grades 1-3 agricultural land. The NPPF defines grades 1-3 as the ‘best and most versatile’. The proposal to develop this previously undeveloped land would result in the loss of an important green space and natural capital with no defensible boundaries, encroaching into the open countryside

4. Removal of Green Belt:

- Eroding the defensible and policy boundaries (such as green belt to prevent against urban sprawl) has a detrimental impact on the wider area.
- Do all the proposed strategic allocations that necessitate green belt release fail to meet the 5 purposes of green belt set in the NPF. The evidence base does not make clear how the sites to be released fail part or all of the purposes.

5. Infrastructure capacity

- No evidence has been provided on traffic capacity, with regards to patterns of movement, streets & parking also environmental impacts.
- There is no evidence base for the highway assessment to demonstrate the modelling scenarios of the proposed development impacting on the existing highway network. Predominantly, north-south through the parish from the A5 to the A449 a network of narrow country lanes are already being eroded due to the over capacity of vehicles commuting as they find alternative routes to travel, avoiding congestion in other areas. This has created a severe impact with particular reference to the following junctions: Histons Hill Traffic Lights, A449, and all junctions in Codsall/Oaken joining the A41.

In conclusion, it would be more sustainable to concentrate on the proposed significant larger new settlements at Dunston and Cross Green, where the associated infrastructure could also be delivered to make more sustainable future settlements.

Bilbrook is an existing village, any extension should be regarded as such and not to reclassify as a new settlement, the reclassification into SA1 will limit coherence with Bilbrook.

What Codsall Parish Council would like to see the Local Plan develop - concentrating on new larger settlement(s) in Dunston and Cross Green and/or some of the employment land which South Staffordshire has already earmarked (earmarked land for employment would span the life of at least three Local plans) releasing some of this land into housing development land would integrate employment, shopping, leisure, education and other activities in accordance with NPPF.

Where the dph is proposed at 35 to ensure that the rural character and the edge of new settlements has a softer transition into the open countryside, these should be accompanied by a design brief that loosens the urban grain towards the edge and provides that softer transition through natural landscaping.

Yours faithfully,



Maxine Baker
Clerk to Codsall Parish Council