



Local Plan
Publication Stage
Representation Form

Ref:

**(For official
use only)**

**Name of the Local Plan to which this
representation relates:**

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Mr

First Name

Mark

Last Name

Krassowski

Job Title

(where relevant)

Director

Organisation

(where relevant)

Walsingham Planning

Address Line 1

Brandon House

Line 2

King Street

Line 3

Knutsford

Line 4

Cheshire

Post Code

WA16 6DX

Telephone
Number

01565 757500

E-mail Address

Mark.krassowski@walsingpla
n.co.uk



(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph
h

Policy

EC8

Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant

Yes

☒

No

☐

(2) Sound

Yes

☐

No

☒

(3) Complies with the
Duty to co-operate

Yes

☒

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.

The National Planning Policy Framework (NPPF) advises at paragraph 90 that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

In particular, planning policies should:

‘(d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;

(e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations as a well connected to the town centre.’

The Publication Plan through Policy EC8 does not reflect this positive and flexible approach to plan-making and so is inconsistent with national policy. Policy EC8 states that proposals will maintain and enhance the vitality and viability of South Staffordshire's network of centres in line with national policy, but in practice the draft policy does nothing to enhance the vitality and viability of town centres.

The evidence base to the Publication Plan includes the South Staffordshire Retail Centres Study - April 2021 (SSRCS), which is informed by a Household Shopping Survey. The study notes that the rural nature of much of South Staffordshire District is such that much of its residents' shopping will be done outside of the district and this is demonstrated through empirical research undertaken in summer 2019.

These representations, on behalf of Lidl GB Ltd, are concerned specifically with Penkridge, a large village at the top of the retail hierarchy and falling within Zone 29 of the Household Shopping Survey. The survey indicates that despite having a vital and viable village centre, less than 17% of convenience retail expenditure from households within the Penkridge sub-zone is actually spent in Penkridge itself (see table A3.12C). Moreover, some 68% of resident's convenience expenditure is actually spent outside of the district altogether, particularly in towns such as Stafford and Cannock and large superstores. This is unsustainable as it encourages unnecessary travel.

Penkridge centre itself has about 43 retail units, of which only 6 are in convenience use. Of these, there are only two shops that could be described as supermarkets (a small Co-op store and Premier) and a handful of other convenience units. This is supplemented by a twice weekly market. It is therefore perhaps not surprising that residents of Penkridge have to travel elsewhere to undertake their main food shopping.

In our opinion, such an approach should be reversed rather than maintaining the status quo advocated by the SSRCS (see paragraphs 4.34 and 4.35) or Policy EC8 itself. The approach does not comply with paragraph 90 of the NPPF and represents a lost opportunity. The new Local Plan should address this issue head on.

Strategic Allocation 2, involving over 1,000 new houses on land to the north of Penkridge, will compound this existing problem. SA2, which we support in principle, includes the requirement for a 'Community Hub' focussed around community uses / provision, which should include 'local convenience retail to serve the new neighbourhood.' No level of

floorspace is identified within the policy or concept plan contained at Appendix F, but based on the current (undetermined) planning application by St Philips for a large part of the SA2 area it seems likely that the convenience element will be no more than a neighbourhood convenience shop mirroring what is already in Penkridge village centre and providing a 'top-up' facility for residents of the new development.

In our view, there is a need for a larger convenience store to serve Penkridge which can help address the existing convenience deficiency within the settlement and also cater for the planned new housing. Policy EC8 fails to recognise the current deficiency and the need to make provision through a site allocation in the Publication Plan.

It is considered that there are no opportunities of sufficient size that are suitable, available or viable for a supermarket to be provided within or on the edge of Penkridge centre, but an opportunity does exist within Policy SA2- land North of Penkridge, to provide such a supermarket. That opportunity is identified as land parcel / allocation 420, at the southern end of the strategic allocation, immediately adjoining the existing settlement boundary. The parcel has a main road frontage and is highly accessible to the village centre being only 400m away.

The site is immediately available and is not constrained by the need for other housing to come forward first, and could be delivered within the next two years. A Lidl supermarket on the site will cater for the day-to-day convenience shopping needs of existing Penkridge residents, as well as catering for new residents of the Strategic Development Area as new houses are delivered. This would be a sustainable solution for convenience retail provision within Penkridge, which would address an existing deficiency currently ignored by the Publication Plan. It would not harm the vitality and viability of Penkridge village centre as it would have the effect of reducing shopping trips outside of the village and the wider district, leading to increased usage of shops and services within the village itself.

Such an allocation would not prejudice the proposed Community Hub required by Policy SA2 for the north Penkridge housing development, which would continue to provide a more localised facility through a range of uses.

In summary, by failing to address the existing shortfall in convenience retail provision within the District, and particularly in Penkridge, draft Policy EC8 is not sound because it has not been positively prepared, it does not represent an appropriate and justified strategy, the

policy will not be effective and it is not consistent with the approach to planning for town centres that is set out in the NPPF.

(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.

To address this issue and make the Local Plan sound, Policy EC8 should be amended to recognise the need for new convenience provision within Penkridge, and it should allocate Site 420 for a supermarket of approximately 2,500sq.m (GEA) to cater for the convenience retail needs of Penkridge and its growing population. This can be addressed in the policy itself and also through Policy SA2.

(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:

Given the arguments set out in these representations it is considered that oral evidence will assist the appointed Examiner to understand the scale of the issue and the best means to address it.

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