



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*		2. Agent's Details (if applicable)	
*If an agent is appoin	ted, please complete only the Title, Name a plete the full contact details of the agent in	and Organisation (if applicable)	
Title		Mr	
First Name		Jon	
Last Name		Kirby	
Job Title (where relevant)		Senior Director	
Organisation (where relevant)	Lichfields c/o S Philips Land Limited	Lichfields	
Address Line 1		Cornerblock	
Line 2		2 Cornwall Street	
Line 3		Birmingham	
Line 4			
Post Code		B3 2DX	
Telephone Number		0121 713 1530	
E-mail Address (where relevant)		jon.kirby@lichfields.uk	



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	Policy DS5	Policies	з Мар	
4. Do you consider the Loc	al Plan is :		1	
(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.

Please refer to attached representations.	
(C	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.



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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.

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Part B – Please use a separate sheet for each representation

Name or Organisation:

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Name or Organisation:

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Representation to South Staffordshire Local Plan Regulation 19 Consultation

St Philips Land Limited

St Philips Land Limited 31 May 2024

LICHFIELDS

LICHFIELDS

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Appendix 1 Strategic Masterplan

Introduction

- ^{1.1} These representations to the South Staffordshire Publication Plan ("the PP 2024") consultation have been prepared by Lichfields on behalf of St Philips Land Limited.
- ^{1.1} We focus on the strategic matters that are contained within the PP consultation document and relate specifically to St Philips' site entitled North Penkridge or Site 010 (land at Lower Drayton Farm) ("the Site").
- 1.2 St Philips seeks to work constructively with South Staffordshire Council ("the Council") as it progresses towards the adoption of the Local Plan Review and trusts that the comments contained within this document will assist Officers in this regard.

Plan-making to Date

- 1.3To date, the Council has consulted on an 'Issues and Options Consultation' ("IOC") between
8 October and 30 November 2018, followed by the South Staffordshire Spatial Housing
Strategy & Infrastructure Delivery ("the SHSID") and the Infrastructure Delivery Plan 2019
[IDP] between 17 October until 12 December 2019.
- 1.4 The IOC did not define the Council's preferred approach, but rather considered a range of five potential future spatial strategies to meet the Council's preferred level of housing growth for the District up to 2037. Consequently, the SHSID sought views on how the Council's housing target could be best planned for through a variety of Spatial Housing Options to distribute housing growth across the district.
- 1.5 This was followed by the Preferred Options consultation from November to December 2021, which set out an infrastructure-led strategy, and proposed site allocations to meet the district's (inter alia) housing needs. The Council then proceeded to undertake a consultation on the PP 2022 between November to December 2022. This consultation asked for views on the legal soundness of the Council's PP 2022 and the policies within it.
- 1.6 The Council is now proceeding with a new PP 2024 consultation. The Local Development scheme sets out the reasoning for this, stating:

"The Council paused work on the emerging Local Plan Review between January and July 2023 while waiting for the outcome of the government changes to the NPPF that were published in December 2022. There is still currently no clear indication of when the government will publish its response to the consultation, the Council has therefore now resumed work on the Plan. This delay had several implications for the Local Plan including the Plan period needing to be extended to 2041 which has required several updates to evidence base documents, and a need to undertake a further Regulation 19 consultation." (paragraph 3.4).

- 1.7 The Local Development Scheme sets out the following timescales for the progression of the Local Plan Review:
 - Evidence Base compilation ongoing notification as elements of the evidence base are produced.
 - Issues and Options Consultation November 2018;

- **Preferred Options** November -December 2021;
- Spatial Housing Strategy & Infrastructure Delivery Consultation October December 2019;
- **Publication (1)** November December 2022;
- Publication (2) spring 2024;
- Submission of Local Plan winter 2024/25;
- Local Plan Examination 2025;
- Adoption of Local Plan Winter 2025/26.

Structure

- 1.8 These representations are structured around the policies set out within the PP 2024 consultation, these being:
 - Policy DS5 (The Spatial Strategy to 2041);
 - Policy MA1 (Masterplanning Strategic Sites);
 - Policy SA2 (Land North of Penkridge).

2.0 Areas of Response

2.1 St Philips' response to the PP 2024 is set out below, using the draft policies contained within the PP 2024 document for continuity.

Policy DS5 (The Spatial Strategy to 2041)

2.2 Draft Policy DS5 (The Spatial Strategy to 2041) of the new PP 2024 sets out a revised spatial strategy to address the district's housing requirements for the plan period. Paragraph 5.61 of the PP 2024 states that:

"The spatial strategy and distribution the growth outlined in Policy DS4 is based upon a capacity led approach that focuses the majority of growth on the district's most sustainable settlements, with Green Belt release limited to these Tier 1 settlements."

2.3 The PP 2022 had previously set out the following spatial strategy for South Staffordshire:

"The spatial strategy and distribution of growth is based upon an infrastructure led approach. This can mean different things for different locations. For larger strategic sites, this may mean on site delivery of new infrastructure such as a new school or local centre. For smaller villages it may be about smaller scale infrastructure, such as delivering a local play space, or about planning for limited new development that will help sustain existing infrastructure (e.g. local school) over the longer term." (Paragraph 5.65).

- 2.4 The revised spatial strategy (as set out within the PP 2024) is identified as 'Option I' within the 'Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041)' (March 20204) ["SA 2024"]. The SA states that Option I makes a limited contribution towards the Greater Birmingham and Black Country Housing Market (GBBCHMA) needs and limited Green Belt development to Tier 1 settlements.
- 2.5 Option I, alongside Option H (Limited Green Belt development only to meet existing critical infrastructure needs), were additional spatial strategy options which were identified by the Council in the context of the publication of the updated NPPF in December 2023. These two options were not appraised alongside spatial strategy options A, B, C, D, E, F and G within the previous Sustainability Appraisal ('Sustainability Appraisal of the South Staffordshire Local Plan Review (October 2022)) ["SA 2022"], which was prepared to inform the PP 2022.

The Preferred Spatial Strategy

2.6 Policy DS5 (The Spatial Strategy to 2041) sets out that a minimum of 4,726 dwellings will be delivered over the plan period and states that growth will be distributed to the district's most sustainable locations. The policy also sets out a settlement hierarchy, with Penkridge identified within Locality 1 and as a Tier 1 settlement (first in the hierarchy). The Policy DS5 2024 states that:

> "The district's Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan,

consisting of sustainable and deliverable non Green Belt land and suitable Green Belt site allocations.."

- 2.7 The PP 2024 spatial strategy does not propose any new allocations at Tier 2, Tier 3, Tier 4 or Tier 5 Villages (PP 2024, Table 8). Instead, the Council is relying upon safeguarded land and existing planning permissions and allocations to deliver growth in these locations. Notwithstanding one allocation made at 'Areas adjacent to neighbouring towns and cities' (South of Stafford at Land at Weeping Cross), new allocations are only made at Tier 1 settlements.
- 2.8 St Philips is generally supportive of the Council's approach whereby growth is distributed to the Borough's most sustainable settlements.
- 2.9 In this regard, St Philips notes that Paragraph 83 of the NPPF states that:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."

Recommended amendments to ensure soundness?

2.10 In this respect, St Philips consider that whilst the Spatial Strategy set out under Policy DS5 is appropriate, that there should also be a proportionate distribution of growth to smaller settlements to ensure the delivery of sufficient housing to meet local circumstances and to ensure that new housing can be delivered to assist in addressing local affordability issues.

Policy MA1 (Masterplanning Strategic Sites)

2.11 St Philips Land Ltd welcome the intention of Policy MA1 to bring forward site-wide Strategic Masterplans (SMPs) for the District's strategic allocation sites to ensure the delivery of comprehensive development. It is considered however that Policy MA1 requires some further clarification and amendments to ensure that it is sound with regard to the tests set out at paragraph 35 of the NPPF.

SMP Approval Process

- 2.12 St Philips have no objections in principle to the preparation of those SMPs, the general scope of the objectives set out in Policy MA1, or the intention for the SMPs to be prepared in consultation with South Staffordshire Council and other key stakeholders. The process is essential to ensure that technically justified Masterplans come forward that realise the aspirations for the development of the strategic sites.
- 2.13 However, some amendments are required to Policy MA1 to ensure that it is "*clearly written and unambiguous*" (in accordance with NPPF paragraph 16d) and that it enables the timely delivery of the strategic allocation sites.
- The policy as currently drafted suggests that the SMPs will be prepared in conjunction with and approved by the Council, with the scope and contents confirmed during the pre-application stage. The policy text states that the SMP will be approved by the Council's Corporate Director of Place and Communities. Paragraph 6.6 also states that the SMP's

would be approved through consultation with the relevant Cabinet Member and Chairman of Planning Committee.

2.15 Paragraph 6.6 or the policy text should be amended to ensure that the approval process for the SMP is unambiguous.

SMP Requirements

- 2.16 Clause E of the policy requires the SMP to incorporate a Green Infrastructure (GI) Framework including "a clear hierarchy of public open space throughout the site including indicative roles and functions of different spaces (e.g. play, biodiversity/natural capital, SuDS, recreation)..."
- 2.17 St Philips is supportive of the policy intention to ensure that the SMP facilitates the process of placemaking. It is critical, however, that the policy is clear in stating that the provision of public open space / GI should be driven by the relevant standards and any evidence of need / demand at the time. That should be specified in Clause (E) to ensure clarity with regard to the policy requirements and to ensure that the policy is sound.
- 2.18 The wording of the Clauses H (Development Phasing and Planning and Infrastructure Delivery Strategy) should also be reviewed in relation to the timing of the submission and approval of the SMP relative to the planning application process. It should reflect that the SMP should be submitted alongside a planning application, consulted on during the wider consultation process, and approved at the point of determination.
- 2.19 Clause I requires the SMPs to incorporate a "*strategy for site wide Design Coding*." Whilst the principle of that requirement is accepted, it is noted that the clause requires developers to set out their approach to formulating "*provably popular*" design coding. Whilst it is understood that this wording is derived from the Department for Levelling Up, Housing and Communities, it is unspecific terminology that is difficult to measure and, therefore, enforce at the development management stage. Rather, the focus should be on ensuring a high-quality of design, rather than 'popular' design. That reference should, therefore, be removed.

Recommended amendments to ensure soundness?

- 2.20 St Philips request that paragraph 6.6 and parallel policy text is amended to ensure that the approval process for the SMP's is unambiguous and clear.
- 2.21 St Philips recommend that Paragraphs 2 and 4 of Policy MA1 should be amalgamated and revised to read as follows:

"A comprehensive and deliverable site-wide Strategic Masterplan (SMP) for each of the strategic sites as set out in Policies SA1-SA2 will be prepared by the landowners / promoters, informed by engagement with the Council and key stakeholders. The scope and contents of the SMPs will align with the requirements of both Policy MA1 and the relevant strategic allocation policy. To ensure that development for the whole site is delivered in a comprehensive and co-ordinated manner and is of a high quality, the SMPs will be informed by technical site assessments, community and stakeholder engagement and the relevant site-specific vision and objectives. The SMPs should be submitted alongside planning applications relating to the strategic allocations and approved in the

determination of those applications. The site-wide Master Plans will be a material consideration in the determination of future planning applications related to the relevant site(s) and adherence to it/them will be secured through relevant planning conditions and/or legal agreement."

- 2.22 In relation to the requirements for SMPs, the following modifications should be made:
- 2.23 Clause E should be amended to require;

"open space typologies in accordance with the most up-to-date evidence and standards, and informed by engagement with local community/Parish Council (including allotments/community gardens/forest schools etc, if justified by evidence)."

- 2.24 Clause H should be amended to make it explicit that the SMP should be submitted alongside planning applications and approved at the point of determination.
- 2.25 Clause I should be amended to remove the wording "provably popular site wide and area" in order to remove ambiguity.

Policy SA2 (Land North of Penkridge)

- 2.26 St Philips very much support the allocation of the land to the north of Penkridge as a strategic residential allocation. St Philips control parcel 010 as shown in Appendix B, (and Bloor Homes Ltd have control of parcel 584) and are committed to bringing forward a comprehensive scheme for the site's development. The emerging Masterplan set out in the submitted Vision Document (Ref. DE236 Masterplan Document) at Appendix 1 demonstrates how a comprehensive scheme can be achieved.
- 2.27 Furthermore, the site benefits from an excellent relationship with Penkridge, the village centre and the services and facilities contained therein (as set out above) and Penkridge Train Station, and therefore forms a logical extension to the built form that would be very well related with it. Indeed, the Housing Site Selection Topic Paper (HSSTP) recognises that the delivery of the site would achieve a development that is consistent with the Council's Preferred Spatial Strategy as well as the recommendations of the GBHMA Strategic Growth Study.
- 2.28 Moreover, the proposed allocation site is not environmentally sensitive and is not subject to any insurmountable constraints.

Transport and Accessibility

- 2.29 A Strategic Transport Assessment (STA) has been prepared in relation to the site and forms part of the plan's evidence base. It reiterates that the site is well-located for growth and that safe and appropriate access can be provided (as shown on the emerging Masterplan). The HSSTP refers to the position of Staffordshire County Council Highways that the site's development is acceptable in principle subject to significant highways improvements, including the provision of new junctions off the A449, public transport provision, and improvements in terms of the connectivity to the village's facilities.
- 2.30 The STA highlights how those improvements can be incorporated, including improvements to pedestrian / cycle links along the Stafford Road towards the village and other facilities, highway improvements, and associated urban realm enhancements. It also sets out Active

Travel and Public Transport strategies for the site, which would be aided by those improvements. Thus, it concludes that the allocation can deliver wider benefits without a severe impact on the highway network.

2.31 The above improvements would improve accessibility between the site and the services and facilities in the village centre and would, therefore, promote active and sustainable movements between the two. In addition, the site itself will incorporate a community hub containing a new primary school and nursery, localised retail provision, a mobility hub and (if required) flexible community space. This would facilitate excellent connectivity between the new community and the key services and facilities that are required to meet day-to-day needs. The HSSTP correctly identifies, therefore, that whilst the SA predicts major negative impacts in relation to education, this can be remedied through the delivery of new education provision on-site, as proposed.

Flood Risk and Drainage

- 2.32 The vast majority of the site falls within Flood Zone 1 and is therefore, at low risk of flooding. The eastern margins of the site are located in Flood Zone 3 and act as the functional floodplain for the River Penk that runs to the east of the site. Likewise, the vast majority of the site is at very low risk of surface water flooding, aside from the River Penk's functional floodplain at the site's east and some limited areas related to the watercourses that run through the site.
- 2.33 Detailed consideration has been given to the site's drainage strategy in evolving the emerging Masterplan for the site's development. The plan demonstrates that the areas of flood risk can be accommodated within the proposed Country Park and that the scheme can appropriately respond to the other areas of flood risk by channelling surface water through the green / blue corridors that will run through the site (including along the existing watercourses). This is reflected in the LLFA's comments that any concerns in relation to drainage are "*mitigable*."

Landscape and Visual Impact

- 2.34 The Council's Landscape Sensitivity Assessment suggests that the south-eastern part of the site has moderate sensitivity to residential development, and that the remainder has moderate-high sensitivity. Informed by that, the Sustainability Appraisal suggests the southern parcel would have a minor negative landscape effect, whilst the remaining area would have a major negative effect. Whilst it is recognised that the HSSTP states that such areas should be considered further and ultimately finds the parcels as suitable, thus resulting in their allocation, St Philips do not agree with the findings of the Landscape Sensitivity Assessment.
- 2.35 The Landscape Sensitivity Assessment did not consider the committed development to the north of Penkridge that is now being delivered, and also included an area of more sensitive land to the west of the railway line. As such, it did not accurately assess the allocation site's actual sensitivity to development. The site is not subject to any landscape designations and does not constitute a valued landscape. The land is largely reflective of its landscape character type and is in a landscape policy zone of low quality, and, as a result, the potential landscape harm from the site's development can be effectively managed through a landscape-led scheme.

2.36 As such, even whilst the overall assessment of the site resulted in it being identified as a suitable location for growth, it is noted that the conclusions in relation to landscape impact have been overstated.

Ecology and Arboriculture

2.37 The HSSTP does not raise any particular concerns in relation to ecology or arboriculture. This reflects the site's limited ecological and arboricultural interest, as confirmed by the assessments of the site that have been carried out to date. The site and its surrounds are not subject to statutory ecological designations or local planning designations. The emerging Masterplan has evolved to take account of the small areas of higher ecological interest (relative to the overall low baseline) and also limit tree loss to only areas that are necessary to facilitate access to the site.

Cultural Heritage and Archaeology

2.38 The Council's Historic Environment Site Assessment confirms that, following stage 2 assessment, the historic impact for the site has been revised to 'low.' This reflects that the site is not subject to any heritage designations, that the parcels have 'at worst limited' intervisibility with nearby Conservation Areas that, in any case, can be appropriately mitigated, and that the parcels are of limited archaeological interest.

Overall Suitability

2.39 It is clear from both the Council's evidence base and the site assessments undertaken on behalf of St Philips Land Ltd that the site is an inherently suitable location for growth.

The Concept Plan and the Site-Wide Strategic Masterplans (SMPs):

- 2.40 St Philips support the Council's vision of creating a "sustainable extension and new neighbourhood to the village, delivering high quality, distinctive development integrated within a strong landscape setting." The vision and objectives for the development are entirely appropriate and the role of the Concept Plan that sets out the broad principles for the development of the site is recognised.
- 2.41 However, as set out in response to Policy MA1, it is important that the Council recognise that those plans, by their very nature, only illustrate a vision. Unlike the SMP that is to be prepared and the eventual detailed design, they have not been informed by detailed technical assessments of the site and do not, therefore, incorporate the primary mitigation that those assessments will identify as being necessary in due course. It is critical that policies recognise that when referring to the Concept Plans, and are sufficiently flexible to allow for SMPs / detailed design schemes to depart from the Concept Plans in some places where the technical assessments indicate that the approach taken in the Concept Plan is not feasible.

The emerging Masterplan:

2.42 The emerging Masterplan included as Appendix 1 demonstrates how a residential-led mixed use community can be delivered. A community hub will sit at the heart of the new community and provide for the day-to-day needs of new and existing residents. As required by clause b of the policy, that area will be centrally located so as to have a strong

relationship with the primary movement routes along the A449, and will also be well-served by the active travel links that will permeate through the scheme. As required, the community hub will accommodate a new first school and nursery, local convenience retail, a mobility hub, and (if required and desirable) flexible community space.

- 2.43 The residential development areas will be structured by key green / blue corridors in a landscape-led scheme. The green corridors will incorporate tree and hedgerow planting, as well as pedestrian and cycle links to promote active and sustainable movements, as required by clauses f and g.
- 2.44 Access will be provided along the Stafford Road and will include appropriate gateway features to define the entrance to the village from the north. The scheme will deliver a simple and legible internal road layout with a clear internal hierarchy that will aid legibility and promote active travel both between different parts of the site and between the site, its surrounding uses, Penkridge village centre and the services and facilities that are contained within it.
- 2.45 In developing a landscape-led scheme, the emerging Masterplan proposes a number of generous areas of public open space that will be well distributed across the site, provide for a range of uses and functions and incorporate significant tree planting.
- East of the A449, a focal green space is proposed that will contain playing pitches (in accordance with clause e), a play area, a Multi-use Games Area, and an area for food growing that could potentially include allotments / community and social enterprise / education areas. To the east of the site, a significant Community Park will be provided in accordance with clause c of the policy. That area will be a key benefit of the development, and will provide a substantial area of ecological interest that will also act as an appropriate offset from the functional floodplain of the River Penk.

Policy Requirements:

- 2.47 The policy sets out a number of specific requirements for the development of the site. They are largely appropriate, except for the following clauses where some revisions are required to ensure the soundness of the policy:
 - Clause A will need to be amended to take account of the above comments in relation to the capacity of the site.
 - Clause E requires "the provision of full-size sports pitches to national standard along with associated facilities to meet identified need." A review of the existing evidence in relation to the need / demand for sports pitches is not conclusive in relation to the exact type of pitches that should be provided, but certainly does not establish a particular need or demand for full-sized pitches. Thus, clause E should be amended to seek "the provision of sports pitches of a type and size determined by up-to-date evidence and engagement with the local community."
 - Clause G requires an *"integrated and connected network of green and blue infrastructure consistent with the indicative layout on the Concept Plan."* As above, however, the Concept Plan is not based on a technical consideration of the drainage strategy, and therefore elements of the Concept Plan (i.e. the location and form of some

green / blue infrastructure corridors) may well not be technically feasible. Therefore, the specific reference to the Concept Plan should be removed.

- Clause G also makes reference to the provision of a *"large central green space at the heart of the development."* There is, however, no justification for that, and the provision of open space should be driven by the relevant POS standards, and evidence in relation to existing supply and demand. To require a large central green space, in addition to the Country Park, would be likely to limit the site's capacity. Thus, reference to that should be removed.
- Clause H requires the development to deliver "*any necessary historic environment mitigation*" that is set out in the HESA. However, in the context that the HESA only identifies that limited mitigation is required (relating to potential archaeological works and planting), it is not clear why this document has been given elevated status. Clause H should, therefore, be removed and the requirement for mitigatory planting could be subsumed into Clause G.
- Clause I should be amended to refer to how necessary contributions should be provided towards "offsite infrastructure, including highways and active travel mitigation measures, education, leisure, health and potentially community facilities (if not provided on-site)."
- The policy should also refer to the Infrastructure Delivery Plan (IDP) and clarify that contributions must be demonstrated as being CIL Regulation 122 compliant. In that regard, it is noted that the IDP makes reference to junction reconfigurations at the Cross Green junction, which appears to have been mistakenly duplicated from the Cross Green strategic allocation.
- 2.48 The comments raised above should be taken into account to ensure that the policy is sound.

Recommended amendments to ensure soundness?

- 2.49 The policy should make clear that the Concept Plan is only a concept, and should not seek full compliance with it given that technical assessments may identify that the Concept Plan is not feasible. Policy SA4 should be clear that the technical assessments of the site are determinative, in that regard.
- 2.50 The policy requirements should be amended as follows:
 - Clause A will need to be amended to take account of the above comments in relation to the capacity of the site.
 - Clause B should be amended to require *"flexible community space (either on-site or contributions, as appropriate)."*
 - Clause E should be amended to seek *"the provision of sports pitches of a type and size determined by up-to-date evidence and engagement with the local community."*
 - Reference to the Concept Plan should be removed from Clause G.
 - Reference to the delivery of a large central green space should be removed from Clause G.
 - Clause H should be removed and the requirement for mitigatory planting could be subsumed into Clause G.

- Clause I should be amended to refer to how necessary contributions should be provided towards "offsite infrastructure, including highways and active travel mitigation measures, education, leisure, health and potentially community facilities (if not provided on-site)."
- The policy should also refer to the Infrastructure Delivery Plan (IDP) and clarify that contributions must be demonstrated as being CIL Regulation 122 compliant.

Appendix 1 Strategic Masterplan



Define.



1:5,000 @ A3 Scale Date 19/09/23 Drawn MJF Revision K

LEGEND

Red Line Area Residential School + Nursery Site Community Hub Later Living Primary Street Secondary Street Tertiary Street Cycle Route Combined Cycle / Footpath Route C Leisure Route Strategic Bridleway Route Public Footpath Re-aligned Severn Trent Water Access Green Infrastructure / Public Open Space Blue Infrastructure / Indicative Drainage Sports Pitches Sports Pavilion/Car Park Multi Use Games Area Riverside Community Park Allotments Orchard Existing Vegetation Indicative Proposed Vegetation Wildlife / Ecology Buffer Proposed Hedgerow (informed by the alignment of historic field boundaries) Indicative Swale Existing Pond/Ditch

Play Area

Feature Nodal Space



Clien	Bloor Homes Ltd & St Philips
Projec	Land North of Penkridge
Title	Strategic Masterplan
Ret	DE_236_003

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