

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
---	--	--

Name of the Local Plan to which this representation relates:

South Staffordshire Council Local Plan 2018 - 2039

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

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	<input type="text"/>	Mr	<input type="text"/>
First Name	<input type="text"/>	Michael	<input type="text"/>
Last Name	<input type="text"/>	Davies	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	Planning Director	<input type="text"/>
Organisation (where relevant)	CWC Group - Clowes Developments	Savills	<input type="text"/>
Address Line 1	<input type="text"/>	55 Colmore Row	<input type="text"/>
Line 2	<input type="text"/>	Birmingham	<input type="text"/>
Line 3	<input type="text"/>		<input type="text"/>
Line 4	<input type="text"/>		<input type="text"/>
Post Code	<input type="text"/>	B3 3AA	<input type="text"/>
Telephone Number	<input type="text"/>	07967 555 548	<input type="text"/>
E-mail Address	<input type="text"/>	mpdavies@savills.com	<input type="text"/>



(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: **Savills (on behalf of CWC Group - Clowes Developments)**

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

Paragraph h	<input type="text"/>	Policy	DS5:Spatial Strategy to 2039	Policies Map	<input type="text"/>
----------------	----------------------	--------	------------------------------------	--------------	----------------------

4. Do you consider the Local Plan is :

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

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.

Clowes object to policy DS5 as written. The Policy states that "an integral part of the Strategy will be to ensure that growth is distributed to the district's most sustainable locations, avoiding a disproportionate level of growth in the district's less sustainable settlements".

Greater consideration should be given to the sustainability credentials of directing development towards the edge of the Black Country. Such development should be assessed from a sustainability perspective in the same way that it is considered positive to develop adjacent to existing settlements such as Wordsley. Without consideration of LPA boundaries, the Black Country conurbation is in effect a collection of individual settlements, with a range of infrastructure such as shops and services already in existence.

Lawnswood is classed as a tier 5 settlement. The Council's strategy, as set out in Policy DS5 is that these settlements are not intended to experience further housing growth. If the site was only adjoining Lawnswood and isolated from other areas, it may be considered appropriate to rule out development of the site. However the site at Lawnswood Road is not in this position. It adjoins the urban area of Wordsley which is linked to the wider Black Country conurbation. The adopted Dudley Borough Development Strategy states that Wordsley is a local centre (Tier 3). The edge of the Local Centre itself is approximately 1 mile from the centre of the site, with the wider

Wordsley settlement bordering the site. A number of shops and services are also located closer to the site, outside of the local centre.

As is elaborated on below, we consider that greater consideration should be given for the spatial context surrounding the site which includes connections to sustainable settlements in the Black Country such as Wordsley, and should support extensions to sustainable settlements such as this.

Desktop research undertaken by Savills indicates that 8 shops / newsagents are within 1.5 miles of the centre of the site. Two dental surgeries and a doctors surgery (which is accepting new patients) are also located in the same range, in addition to a pharmacy and opticians. These services are located in Wordsley. It is important to consider this when looking to plan for the unmet need of the wider Black Country conurbation. The existing urban area contains plenty of services such as those in Wordsley which can be supported by development in neighbouring authorities such as South Staffordshire. The below shows plans of facilities located within a 1.5 miles radius of the Lawnswood Road site. A schedule of facilities is included at appendix 1.

Figure 1: Plan of Local Shops and services within 1.5 mile radius of the Lawnswood Road Site



Figure 2: Plan of Local Shops and services within Wordsley Local Centre



(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.

We consider that greater consideration should be given for the spatial context surrounding the site which includes connections to sustainable settlements in the Black Country such as Wordsley, and should support extensions to sustainable settlements such as this.

The spatial strategy of the Plan should be modified to take greater account of the shops and services located in the Black Country which can serve South Staffordshire and support sustainable development.

(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:

To provide oral evidence and engage in the Examination discussions on this matter.

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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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