	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b>  <b>(For official use only)</b></p>
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**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
First Name	<input type="text"/>	Michael
Last Name	<input type="text"/>	Davies
Job Title (where relevant)	<input type="text"/>	Planning Director
Organisation (where relevant)	CWC Group - Clowes Developments	Savills
Address Line 1	<input type="text"/>	55 Colmore Row
Line 2	<input type="text"/>	Birmingham
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	B3 3AA
Telephone Number	<input type="text"/>	07967 555 548
E-mail Address (where relevant)	<input type="text"/>	mpdavies@savills.com



## 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	<input type="text"/>	Policy	<input type="text" value="SA5: Housing Allocations"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

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

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.

We object to the housing allocations in policy SA5, because it is not justified, and therefore does not meet the tests of soundness at paragraph 35 of the NPPF. We consider that this policy should be amended to include land at Lawnswood Road (site 654). Evidence is set out in our answer to question 2, which critiqued the Council's evidence base position and reviewed this against a new evidence base which provides a more detailed assessment of the site specific position. We also consider that the comparable locations such as land off Langley Road (Site 582) perform similarly to the proposed allocation at Lawnswood Road.

### Green Belt

We do not agree with the findings presented by the Green Belt Review (2019), The table below compares our client's site land at Lawnswood Road (site 654) against the purposes of Green Belt. We have compared this against the assessment of land off Langley Road (site 582):

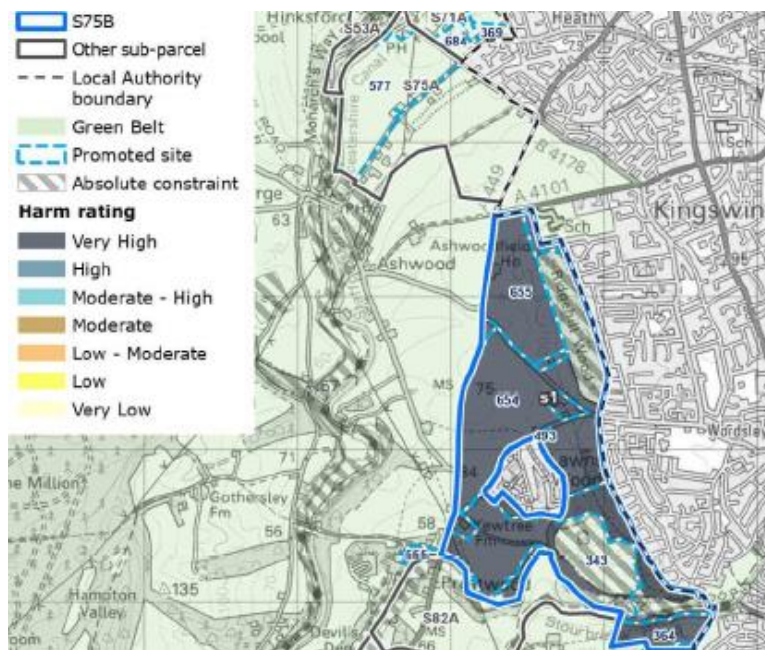


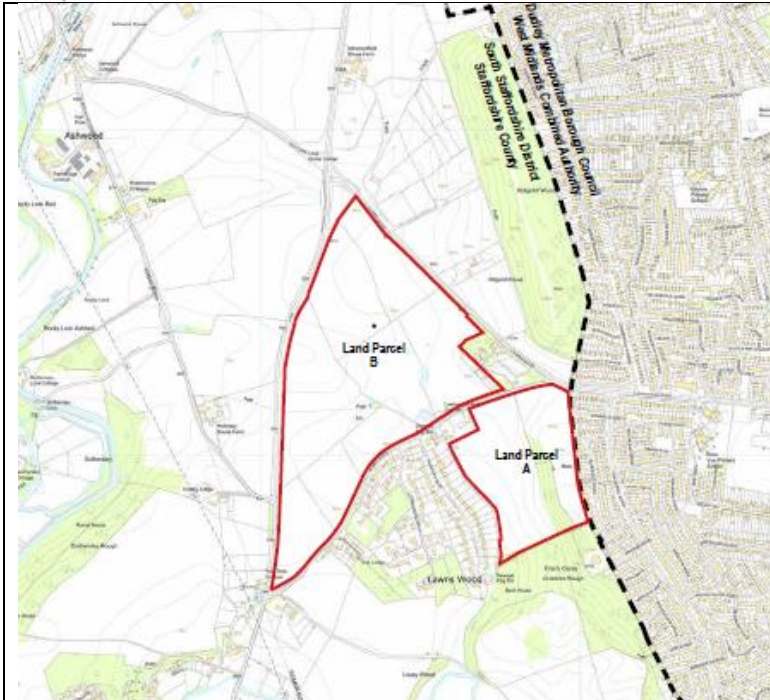
Site	Parcel	1 – Checking unrestricted sprawl	2 – Preventing merging towns	3 – safeguarding countryside from encroachment	4 – preserving setting and special character of historic towns
654	S75B	Strong	Weak / no contribution	Strong	Weak / no contribution
582	S59B	Strong	Weak / no contribution	Strong	Weak / no contribution

This demonstrates that the assessment against Green Belt purposes is identical for the two sites, however site 582 is the only site allocated within the “western edge of the Black Country” area. We question why this is the case if Green Belt purposes are identical. As set out below in our review of the findings of other evidence base, including the sustainability appraisal, this is one of the key assessment criteria against which site 582 and 654 are scored relatively comparable in terms of suitability to be allocated. Our assessment suggests there is no reason that the site cannot be taken forward as a draft allocation alongside land off Langley Road. Furthermore, the Council appear to have not considered the opportunities afforded by the existing facilities and services available in neighbouring authorities.

Land at Lanwswood Road has been analysed in studies produced by LUC on behalf of South Staffordshire Council in July 2019.

As highlighted in our representations to the previous Housing Strategy and IDP consultation in December 2019, it is the case that the Green Belt study has produced conclusions based on wider parcels of land, and assessments were not undertaken at a site specific level. The plans below demonstrate the contrast between the overall parcel assessed by LUC and the specific parcel covered in FPCR’s assessment:





Within LUC's report, the site formed part of an area of land described as Parcel S75B. The study concluded a "very high" harm rating, for removal of the parcel from the Green Belt. A more detailed analysis has been undertaken by FPCR and concluded that parcel B, north of Lawnswood Road, would have a "moderate" harm rating for removal from the Green Belt. parcel A, south of Lawnswood Road, would have a "low/moderate" harm rating for removal from Green Belt. The table below shows the contrasting harm assessments:

Report Author	Parcel A – South of Lawnswood Road	Parcel B – North of Lawnswood Road
LUC (on behalf of SSDC)	Very High	Very High
FPCR	Low / Moderate	Moderate

The LUC report sets out a range of potential measures to mitigate harm, depending on the circumstances.

These measures include:

- Using landscaping to help integrate a new Green Belt boundary
- Enhancing access within the Green Belt.

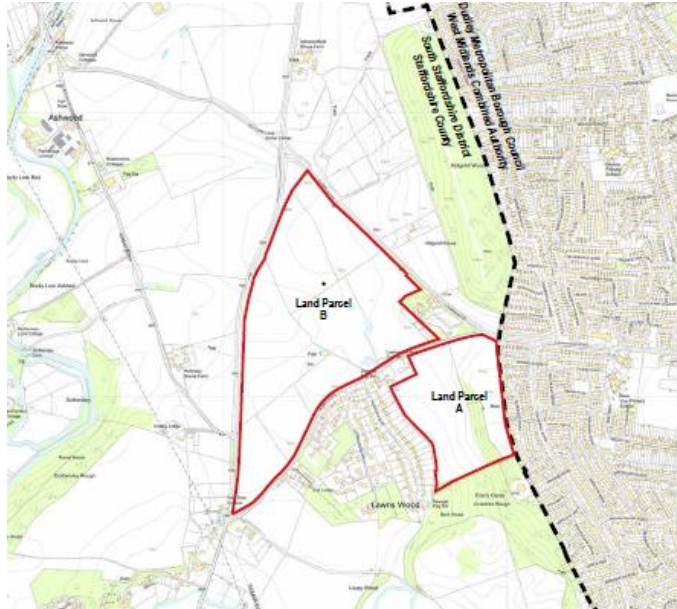
It should therefore be considered that if a site specific approach to the value of Green Belt, along with consideration of potential enhancements that development of the parcels for residential development should be supported.

Furthermore, we agree with para 7.10 of the Green Belt assessment which makes the point that Green Belt harm is not the only factor to be considered when weighing up whether to release land for development. This approach is supported by paragraph 142 of the NPPF which states that the need to promote sustainable development should be considered when reviewing Green Belt Boundaries. It states that the consequences of channelling development towards areas outside the Green Belt should be considered when reviewing Green Belt boundaries.

## Landscape Assessment

In the Council's Landscape Sensitivity Study report, produced by LUC, land at Lawnswood Road was considered as part of a wider area described as Area SL7. The overall assessment concluded that the parcel has a "high" landscape sensitivity.

A Landscape & Green Belt Appraisal has been produced by FPCR, and submitted with these representations. The plan below shows the site separated into Parcels A and B:



Using the same criteria, in relation to parcel A, FPCR concludes that this parcel would have a "Low/Moderate" landscape sensitivity rating. Parcel B is described as having a "moderate" sensitivity rating.

The Staffordshire "Planning for Landscape change" document highlights woodland planting as appropriate in this area. A strong new woodland belt could be provided, following established landscape guidance.

FPCR consider that the sites contained in this appraisal could provide these measures. A broad new area of Green Infrastructure could be provided within parcel B and wrap around potential development forming a strong new Green Belt Boundary along the A449.

## Education

The Sustainability Appraisal for site 654 categorises it as "double negative" in terms of education. This is because the site is outside of the target distance for a primary and secondary schools. This assessment should be re-run considering that a site of such a size would reach the critical mass of residents that would ensure the viability of delivery of a primary school on site. This should be considered, in tandem with the proximity of the site to secondary schools.

Rather than being inward looking and considering education facilities close to Lawnswood Road that is located in South Staffordshire, it should be considered that of the 4 primary schools within 1.5 miles of the centre of the site, 2 are under capacity. Summerhill Secondary School, which is approximately 1 mile away from the centre of the Lawnswood Road site, and is also under capacity. When such information is taken





into account, it is difficult to see how the Council can justify a “double negative” score for the site in relation to education.

A plan of a walking route between the school and the site is shown as a white line on the plan below:



## Heritage

A Heritage Statement produced by Node in 2021 and the masterplan submitted to previous stages of consultation is resubmitted with these representations. This is supplemented by a review of the current Historic Environment Site Assessment (2022) undertaken by SSDC and reviewed by Node.

The 2022 Historic Environment Site Assessment includes no further reassessment of the site at Lawnswood Road. Therefore the only assessment of the site is within the high level stage 1 assessment. This assessment is high level and lacks the detailed understanding of the Site, and has not taken a research and integrated heritage-led design approach that is considered to be appropriate by Node.

Node conclude that the heritage led design principles means that heritage impacts can be successfully mitigated to a large degree. Where residual adverse impacts may remain, the development offers significant opportunities to provide public benefits to outweigh that harm, as required by the NPPF paragraphs 201 & 202. This includes the enabling of public amenity to be created from the historically private pleasure grounds, markedly enhancing the ability to experience its landscape and heritage value.

## Ecology

A supporting statement in respect of ecology has been produced by FPCR. This sets out the results of a desktop assessment of the site, and considers likely ecological constraints and opportunities relevant to development of the site. The key conclusions in relation to species on the site are:

- Bats: Site is not considered likely to be of high strategic significance to bats locally
- Birds: Site is not considered likely to be of high strategic significance to birds locally
- Great Crested Newts (GCN): Should GCN be present, the habitats present within the site offer limited potential to be used by GCN.
- Reptiles: Arable areas of the site (which will likely form the key developable areas) are likely to have very limited suitability for reptiles.
- Badger: The site is likely to provide foraging and sett building habitat potential

Appendix 2 maps the ecological importance of habitats and thus the importance for retention and enhancement within the site design. The key conclusions are:

- The priority for retention is the areas of woodland. These habitats are of "medium" distinctiveness.
- Grassland, ponds and hedgerows are recommended for retention wherever possible. These are medium distinctiveness habitat that should be retained, albeit none of these habitats are likely to be irreplaceable habitats that which cannot be mitigated in the open space of the site.
- The arable land has low biodiversity value. It is recommended that the development footprint be kept to these areas for minimal biodiversity loss, and maximum scope for biodiversity enhancement.
- Sealed surface and vegetated garden areas have minimal biodiversity value such that development in these areas will have no biodiversity loss.

It is concluded that due to the low-quality habitats currently present at the Site, development at the site has the potential to provide and enhance overall biodiversity within the green infrastructure.

## Flood Risk and Drainage

Previous representations in respect of Lawnswood Road were supported by a Flood Risk Assessment produced by WSP in 2019. A technical note has been prepared by PJA to supplement this assessment, taking account of current guidance and the Council's latest evidence base.

The report concludes the following:

Initial review of geological and hydrological context suggests infiltration led surface water drainage system may be suitable.

The previously submitted FRA meets the recommendations set out in the South Staffordshire Level 2 Strategic Flood Risk Assessment (November 2022). The SuDS proposal outlined in the WSP FRA commits to attenuating surface water flows to the existing greenfield runoff rates up to the 1 in 100 year plus 40% climate change event.

PJA have reviewed the proposal for the site against Policy NB7 of the emerging Local Plan, and concluded that it meets the policy requirements.

Flood risk from fluvial sources, surface water and groundwater is considered to be low

PJA conclude that the surface water strategy produced by WSP in 2019 is considered largely acceptable and remains policy compliant at this stage. The preliminary assessment carried out by PJA considers that development of the site can be delivered sustainably without increasing flood risk or having a detrimental effect on water quality.

### Access to Shops and Services

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, and shown on the plans at figure 1 and 2 below. The numbering of the schedule in appendix 1 correlates with the services and facilities labelled on figures 1 & 2 below. The locations are colour coded by type of services and each pin is numbered.

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





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



A schedule of the facilities mapped above is included at appendix 2, which is attached to these representations. It is important to consider this when looking to plan for the delivery of housing to meet the unmet need of the wider Black Conurbation that these services sit within.

### **Development Proposals**

An illustrative masterplan has previously been submitted to reflect the unique physical site characteristics and also relate sensitively to its existing built and landscape surroundings. This has been updated to reflect the revised technical work submitted and is available on request.

The development could provide up to 600 homes at 30dph or 700 homes at 35 dph. It is envisaged that this would provide a mix of market and affordable family homes, including 2, 3, 4 and 5 bedroom properties to foster the creation of a mixed community. A conservative estimate of the capacity for development is provided at this point, which could be significantly increased once further detailed technical work and masterplanning has been undertaken. Family housing could be provided as part of the scheme, ensuring



that housing responds to the projected economic growth of South Staffordshire and the Black Country.

The development could create significant areas of new public open space, including the potential to create a new woodland link between Ridgehill Woods and Friars Gorse. This would provide major community benefits to local group Friends of Ridgehill Woods, that Clowes are keen to engage with. Clowes have actively engaged with the recent Kinver Neighbourhood Plan Regulation 14 consultation and have made approaches to engage with the Parish Council. Clowes would welcome direct engagement with the Parish Council and other community organisations in the area.

As freehold owner of Ridgehill Woods, Clowes Developments are willing to explore opportunities to increase public access to Ridgehill Woods in tandem with development of site 654. Children's play could be provided within these areas to be readily accessible from all areas of the site. There is also potential for areas of the woods to be improved and provide opportunities for biodiversity net gain, and a management plan developed in association with the Friends of Ridgehill Woods. Clowes are also prepared to dedicate part of the land to the District or Parish Council as part of a wider development proposal.

Access to the southern plot could be taken from a single point along Lawnswood Road, with two points of access to the northern plot, allowing the creation of a new connection through the site. This connection could be vehicular or pedestrian/cycle only.

New woodland planting will strengthen the existing woodland, providing a continuous link from north to south. Beyond this woodland, a second cluster could provide a different character area which relates more closely to the adjacent residential development in terms of its scale, density and character. An area of open space could provide children's play and a drainage area.

Taking all of this evidence into consideration, we conclude that land at Lawnswood Road is a suitable site to allocate and should be done so as it performs as well as other sites in the locality such as land off Langley Road (site 582) and its allocation would allow for South Staffordshire to release more land for housing development in order to assist with the current and projected HMA shortfall.

### **Review of SA Scoring**

Below we have set out the post mitigation scoring of site 654, as set out in the Regulation 19 version Sustainability Appraisal. We have added comments critiquing this scoring, taking into account conclusions of the technical work that has been undertaken to inform these representations.



	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
SSDC Assessment	+/-	+	0	-	-	-	+	-	0	-	-	-
Savills Comments			We disagree with this rating. FPCR conclude that the site has the ability to deliver an improvement to biodiversity.	We disagree with this rating. FPCR conclude that the two parcels which form the site have a: "low/moderate" and "moderate" landscape sensitivity rating.						We disagree with this rating. An initial assessment undertaken by WSP concludes that the site is accessible.	We disagree with this rating. Research by Savills suggests that 4 primary schools are within 1.5 miles of the centre of the site, 2 of which are under capacity.  Summerhill Secondary School is approximately 1 mile away from the centre of the Lawnswood Road site, and is also under capacity.	

We therefore consider that the site should be reassessed taking into account this evidence, which we assert would show the site in an improved position in terms of sustainability and provide adequate evidence for it to be considered as a draft allocation for residential development.

(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.

In the above answer to question 5, we have set out the post mitigation scoring of site 654, as set out in the Regulation 19 version Sustainability Appraisal. We have added comments critiquing this scoring, taking into account conclusions of the technical work that has been undertaken to inform these representations.

We consider that there is suitable evidence to justify the reassessment of site 654 at Lawnswood. The site should be reassessed taking into account this evidence, which we assert shows the site in an improved position in terms of sustainability and provides adequate evidence for it to be considered as a draft allocation for residential 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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX





**Appendix 1: Shops and Services within 1.5 miles of the site**

<b>Lawnswood Road</b>		
<b>Service</b>	<b>Walking distance in miles</b>	<b>Average walking speed in minutes (based on 3mph average walking speed)</b>
<b>Schools/ Nurseries</b>		
1 Belle Vue Primary School	0.6	12
2 Fairhaven Primary School	1.1	22
3 Glynne Primary School	1.2	24
4 Summerhill Secondary School	1.5	30
5 Rainbow Nursery	1.4	28
6 Fairhaven Under Fives Centre	1.1	22
7 Phoenix Centre Specialist Preschool	1.1	22
8 Ashwood Park Primary School	1.3	26
9 Little Owls Nursery	1.3	26
<b>Community Facilities</b>		
1 Richardson Hall	1.1	22
2 Wordsley Community Centre	1.1	22
<b>Public Houses</b>		
1 The Roe Deer	0.3	6
2 Lawnswood	0.6	12
3 The Queens Head	1.2	24
4 The Old Cat	1.1	22
5 Mount Pleasant	1.2	24
6 Park Tavern	1.4	28
7 Glasscutters Arms	1	20
8 New Inn	1.3	26
9 The Ashwood	1.2	24
<b>Cafés/ Restaurants</b>		
1 Little Taste of Heaven (Café)	1.1	22
2 Wordsley Green Café	1.1	22
3 Shakes and Kakes (Café)	1.3	26
4 Hollie's Tearoom (Café)	1.2	24
5 Mount Café/ Bar	1.2	24
6 Sommai Thai (Restaurant)	1.1	22
7 Wordsley Tandoori (Restaurant)	1.1	22
8 Oh-So Coffee (Café)	1.2	24
<b>Dental/GP/Pharmacy/ Opticians</b>		
1 Wordsley Dental Practice	1.1	22
2 Wordsley Green GP and Health Centre	1.1	22
3 John Hamer Opticians	1.1	22
4 County Pharmacy	1.1	22
5 Mydentist	1.1	22
<b>Church</b>		
1 Wordsley Team Parish	1.1	22
2 Wordsley Methodist Church	1.2	24
3 Holy Trinity Church Wordsley	1.2	24
<b>Shops/ Newsagents/ Post Office</b>		
1 SPAR Lawnswood	0.6	12
2 SPAR Wordsley	1.1	22
3 Sainsbury's Local	1	20
4 The Shop	1.1	22
5 Roberts Farm Shop	1.1	22



<b>6</b> Worsley Post Office	1.1	22
<b>7</b> Barnett Lane Store	1.2	24
<b>8</b> Co-op Food	1.2	24
<b>Takeaways</b>		
<b>1</b> Sir Winston Fish and Chips	0.6	12
<b>2</b> Wordsley Chinese Takeaway	1.1	22
<b>3</b> Wordsley Chippy	1.1	22
<b>4</b> Subway	1.1	22
<b>Libraries/ Banks</b>		
<b>1</b> Wordsley Library	1.1	22

## Appendix 2: Ecological “Heat Map” Biodiversity Baseline








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
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### Key

-  Site Boundary
-  Very low biodiversity baseline - no impact if lost
-  Low biodiversity baseline - minimal impact if lost
-  Retain if at all possible
-  Highly recommended for retention

FPCR Environment and Design Ltd, Lockington Hall, Lockington, Derby, DE74 2RH | t: 01509 672 772 | e: [mail@fpcr.co.uk](mailto:mail@fpcr.co.uk) | w: [www.fpcr.co.uk](http://www.fpcr.co.uk)  
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0 50 100 m



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for  
**Clowes Development Ltd.**  
 Lawnswood Road,  
 Wordsley

Project No  
**HEAT MAP**  
**Figure 4**



Scale 1:5,000  
 Date 07/03/2022  
 Version 16/12/2022