

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<p>Ref:</p> <p>(For official use only)</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	Mr	Title	Mr
First Name	Paul	First Name	Fred
Last Name	Tomlinson	Last Name	Davies
Job Title (where relevant)	Finance Director and Company Secretary	Job Title (where relevant)	Consultant
Organisation (where relevant)	Folkes Holdings Ltd	Organisation (where relevant)	Harris Lamb
Address Line 1	Forge House	Address Line 1	Grosvenor House
Line 2	Dudley Road	Line 2	75-76 Francis Road
Line 3	Stourbridge	Line 3	Edgbaston
Line 4		Line 4	Birmingham
Post Code	DY9 8EL	Post Code	B16 8SP
Telephone Number	01384 424242	Telephone Number	0121 455 9455
E-mail Address	p.tomlinson@folkesholdings.com	E-mail Address	fred.davies@harrislamb.com



(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	Appendix x B	Policy	New SA5; Appendix B	Policies Map	Housing Omission – Land to East of A449, Lawnswood CFS 343
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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 type="checkbox"/>	No	<input checked="" 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.

The Objector considers the proposed Local Plan to be both unsound and not complying with the provision of the Duty to Cooperate by not allocating the land, to the east of the A449 at Lawnswood for housing (please see site map at Appendix 1).

Regarding the tests of soundness (National Planning Policy Framework 2021, paragraph 35 refers) the Objector does not consider the plan is either "positively prepared", "justified", "effective" nor "considered with National Policy" for the two fundamental reasons:

1. The plan does not meet the District's objectively assessed need for housing.
2. The plan does not set out nor provide enough housing to meet the substantive and significant unmet needs of the Black Country conurbation (in a planning context where Birmingham City has an even greater unmet housing need, approximately 79,000) which is also a failing in respect of the statutory Duty to Cooperate.

Here the Inspector is instructed to look at the Objector's other representations on the plan's proposed housing requirement/supply and on the Green Belt as they are both considered to be positive material factors in the case for allocating the Objection Site for housing. The site should be included as new SA5, and included in Appendix B.

The planning merits of the Objection Site are set out below.

It is considered pertinent here that the Council's preferred Spatial Housing Strategy as set out in the Council's Local Plan Review – Publication Plan consultation (Regulation 19) seeks to deliver an urban extension in the Green Belt along the Black Country's western edge. At a strategic level, this approach recognises this area's proximity to the Black Country conurbation (which generates much of the Greater Birmingham Housing Market Area's unmet needs) and the recommendations of the GBHMA Strategic Growth Study (2018). The Council considers that relative to the northern edge of the Black Country, the western edge combines greater areas of land that would cause both higher harm to the Green Belt and are of higher landscape sensitivity and has poorer access to employment via sustainable transport measures.

The Objector considers that this may generally be the case at a very large scale. However it is evident as the Objection Site's Vision Document (please see Appendix 2) demonstrates that within this very broad area there are sites which can deliver sustainable development.

It is important to point out that the Objection Site (Call for Sites reference 343) was discounted/ruled out of the Strategic Housing and Employment Land Availability Assessment because it lies adjacent to a "Tier 5 Settlement" i.e. Lawnswood. The Objector considers that completely ignores the Objection Site's potential to meet the significant unmet housing needs of the Black Country conurbation which abuts CFS 343.

The Vision Document for "Land at Lawnswood (December 2019)" is underpinned by a comprehensive evidence base prepared by a team of consultants covering the following topics:

- Planning
- Landscape and Masterplanning
- Highways and Transport
- Flood Risk and Drainage
- Environmental/Ecology

The technical evidence demonstrates that a sustainable development of approximately 475 dwellings, along with community facilities, generous quantum of Green Infrastructure and Biodiversity Net Gain can be delivered on the land which extends to approximately 50 hectares. Primarily, the Objection Site will serve the substantive and significant unmet housing need of the Black Country conurbation. The Objection Site lies immediately adjacent to the Black Country conurbation, specifically Wordsley, with a pedestrian access (capable of solving connectivity) onto Bells Lane.

The Vision document considers the principal planning constraint i.e. Green Belt. Suffice to say the Objector considers that the proposed development of the Objection Site would not compromise the functioning of the Green Belt in the broad area. Of course that is in a planning context where the significant unmet housing needs of the Black Country (and Birmingham City) have to be delivered somewhere and the location will need to be relatively accessible, ideally by walking, cycling and public transport to services and employment opportunities in the Greater Birmingham and Black Country Housing Market Area. In short, given the juxtaposition of the Green Belt and the conurbation, substantial areas of the Green Belt will need to be removed and allocated for development. Please refer to the Objector's separate representation on the Green Belt and the plan's housing requirement and supply.



A main attribute of the Objection Site is that it is well contained in the landscape and can deliver a new, more robust western boundary for a revised Green Belt area.

Regarding more detailed planning matters, these are dealt with in more detail in the Vision Document. Suffice to say here that regarding ecology, flood risk and drainage, landscape and visual impact, services and utilities, there are no planning constraint "showstoppers" and the Masterplan (Page 41 refers of the Vision Document) can be readily delivered (see **Appendix 2** for Vision Document).

(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 cooperate 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.

The Objector considers that the Objection Site (CFS 343 refers) should be allocated for approximately 475 dwellings in the replacement South Staffordshire Local Plan in order to make the plan, specifically policy SA5, and **Appendix 1**, sound and satisfy the Duty to Cooperate requirement. By allocating the Objection Site the plan would be making a substantive contribution to the significant and unresolved unmet housing needs of the Black Country conurbation. In doing so it can then be said that the plan was effective, justified, positively prepared and consistent with the National Planning Policy Framework (2021) specifically the need to boost the supply of housing (paragraph 60 refers) and the meeting of social objectives (paragraph 8b refers). Please see red line plan at **Appendix 1** for area to be allocated.

(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:

The Objector considers that the plan's need to make a more meaningful contribution to the significant and enduring unmet housing (and employment) needs of the Black Country warrants one or more hearing sessions for interested parties to participate in.

***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