



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Michael
Last Name		Davies
E-mail Address		mpdavies@savills.com
Job Title (if applicable)		Planning Director
Organisation (if applicable)	CWC Group - Clowes Developments	Savills
Address		55 Colmore Row Birmingham
Post Code		B3 3AA
Telephone Number		07967 555 548

The South Staffordshire Local Plan review **Preferred Options** document is being consulted on for a period of 6 weeks from Monday 1 November until 5pm Monday 13 December 2021. For advice on how to respond to the consultation form please email localplans@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Monday 13 December 2021**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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 However your contact details will not be published.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Michael Davies

Organisation: Savills (on behalf of CWC Group – Clowes Developments)

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	1
Other document eg SA, HRA	

2. Please set out your comments below

Firstly, a general comment that we consider applies to all evidence base documents is that the Council should review the documents to ensure that they have been produced in line with, and make appropriate reference to NPPF (2021). This plan will be submitted against NPPF (2021), so the evidence base should demonstrate it is fully compliant with the document.

Below we set out comments on a number of evidence base documents, under a heading of each document reviewed.

Duty to Cooperate Paper (2021)

We include comments below in respect of the Duty to Cooperate Paper submitted as part of the Council's evidence base and more generally comment on the Council's approach to Duty to Cooperate.

As identified within the consultation document, a key consideration for South Staffordshire in the context of Duty to cooperate is the unmet need from the Black Country and wider Housing Market Area. The Black Country Regulation 18 draft plan (published August 2021) sets out how the Black Country intend to meet its housing requirement of 76,076 dwellings in the period 2020 – 2039. This is planned to be delivered as follows:

- Total new homes proposed: 47,837 (62.88% of total requirement)
- To be exported through Duty to Cooperate: 28,239 (37.12% of total requirement)

This means that over a third of the Black Country's housing requirement will need to be met outside of its boundaries. At present there is no definitive conclusion on how the 28,239 dwellings are to be accommodated, notwithstanding the potential need for a buffer in addition to this total. This means that South Staffordshire's proposed contribution of 4,000 dwellings is only 14% of the Black Country's overall unmet need to be exported to other LPAs through Duty to Cooperate. The proposed 4,000 housing contribution that has been put forward by South Staffordshire appears to be a unilateral offer and not one which forms an output from the Duty to Cooperate or an agreed Memorandum of Understanding that comprehensively addresses the Black Country shortfall. Furthermore, South Staffordshire's plan is emphatically unclear as to which shortfall its offer of 4,000 dwellings is seeking to contribute to – the Black Country shortfall or the greater Birmingham and Solihull shortfall. This matter requires a comprehensive and collaborative review which involves all Local Planning Authorities in the greater Birmingham and Black Country Housing Market Area.

We consider that in order to fully address the identified shortfalls in the greater Birmingham and Black Country, LPAs with the greatest geographical and functional relationship with the Black Country should be making the greatest contribution towards this unmet need. Our analysis below shows that South

Staffordshire is the LPA with the greatest geographical connection to the Black Country, sharing 44% of the Black Country boundary. 44% of the Black Country's current shortfall would equate to 12,425 dwellings which is over three times greater than the Council's current contribution. Even taking a mid-point between these two figures would lead to a contribution of 8,212 – over double the Council's current contribution.

Functionally, the LPAs are connected by proximity and key connections such as the M54 and M5 motorways and the Shrewsbury to Birmingham railway line.

We also consider a functional relationship to exist in the form of the Dudley Travel to Work Area (TTWA). Clowes Development's site at Lawnswood Road, South Staffordshire is located within the Dudley Travel to Work area, along with areas of the Black Country including Stourbridge, Kingswinford and Brierley Hill. TTWAs have been developed by ONS to provide approximate self-contained labour market areas. These are the areas where most people both live and work. They are based on statistical analysis rather than administrative boundaries. We consider that such measures should also be used when determining the weight given to functional relationships with other Local Authorities. As noted within the PPG, functional relationships should be considered when determining the geographical area of statements of common ground (SoCG) produced in respect of Duty to Cooperate (Paragraph: 015 Reference ID: 61-015-20190315).

In this context, South Staffordshire should be providing a much higher number of residential dwellings towards Greater Birmingham and the Black country's need, particularly considering Birmingham's inability to contribute to remedying the Black Country's shortfall due to having a shortfall themselves.

We note at paragraph 3.7 of the consultation document that there is reference to an intention to draft and agree SoCGs with relevant authorities and publish them at the publication stage of the Local Plan. However, for this process to be more transparent and easily understood by those participating in the Local Plan process, we consider that details on significant strategic matters relating to housing and employment land delivery across the Greater Birmingham and Black Country HMA should be made available during the Regulation 18 and 19 stages.

We understand that the PPG only advises that Statements of Common Ground (SoCGs) are published when a Local Plan is submitted. However, we question why these SoCGs are not being drafted and regularly updated now, as recommended by the PPG (PPG Paragraph: 020 Reference ID: 61-020-20190315). The Duty to Cooperate is a legal requirement that if the Council is found lacking in some regard, it cannot be remedied once the Local Plan has been submitted.

We note that at the recent Solihull Local Plan examination matter 3 hearing it was discussed that Solihull and other LPAs were not able to confirm "offers" towards meeting unmet need until the Black Country shortfall has been confirmed through examination. We disagree with this position, as it has been tested elsewhere, notably in Aylesbury Vale, where a Local Plan was adopted taking on board the shortfall of another LPA without that shortfall having been confirmed. At Aylesbury Vale, 8,000 dwellings were committed to Wycombe / South Buckinghamshire without their Local Plan being adopted to confirm this figure. It should not be the case that plan progression is paused, although ultimately this leads to a situation in which the supply of housing is restricted and the HMA's overall shortfall increases.

A key issue not discussed within the consultation document is the likelihood of the Greater Birmingham HMA shortfall being larger than the 2,597 dwelling figures identified in the HMA position statement 3. Significantly, a consortium of housebuilders and promoters have recently commissioned a review of the HMA shortfall. They have concluded that up to 2031, the shortfall is around 19,000 dwellings and up to 2036 this could range between 50,000 and 60,000 homes. This report was submitted by others at the Solihull Local Plan examination.

Several issues exist with the greater Birmingham HMA shortfall calculations, which are based on position statement 3, including:

- It covers the period 2011 to 2031, whereas the Local Plan runs until 2039.
- It does not reflect the standard method, particularly including the 35% uplifts required of Birmingham and Wolverhampton.

- Raw data has not been made readily accessible alongside the latest position statement, making it difficult to scrutinise the statement properly.

There is therefore compelling evidence for the existence of a higher level of unmet need from across the HMA LPAs, including the Black Country Authorities.

We consider that in order to fully address the identified shortfall, LPAs with the greatest geographical and functional relationship with Birmingham and the Black Country should be making the greatest contribution towards its unmet need. Our analysis shows that South Staffordshire is the LPA with the greatest geographical connection to the Black Country of the HMA LPAs and is partly within the Dudley TTWA, demonstrating a clear functional relationship for the part of the district within the TTWA. Taking this conclusion forward, the Council should be allocating more land for housing to accommodate a much greater proportion of the Black Country's unmet housing need.

Green Belt Review

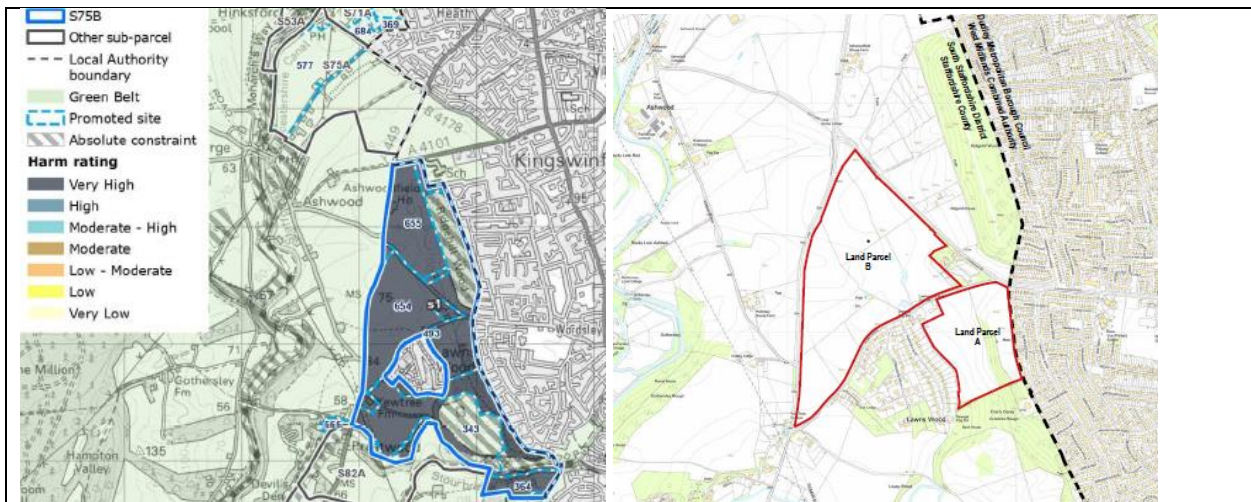
We do not agree with the findings presented by the Green Belt Review (2019), The table below compares our client's site land at Lawnswood Road (site 654) against the purposes of Green Belt. We have compared this against the assessment of site 582 – land off Langley Road:

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 discussion 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.

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 overall 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
FPCR	Low / Moderate	Moderate
LUC	Very High	Very High

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.

In any case, 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. The plan below shows the site separated into Parcel A and B:



Using the same criteria, in relation to parcel A, this states 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.

Biodiversity Network Recovery Mapping

This assessment suggests that the Lawnswood Road site has low biodiversity distinctiveness. This contrasts with land off Langley Road (ref: 582), which is listed as having medium biodiversity distinctiveness on parts of the site. This is something that is not highlighted in the sustainability appraisal review of the sites which states that both sites score the same in terms of biodiversity.

Sustainability Appraisal

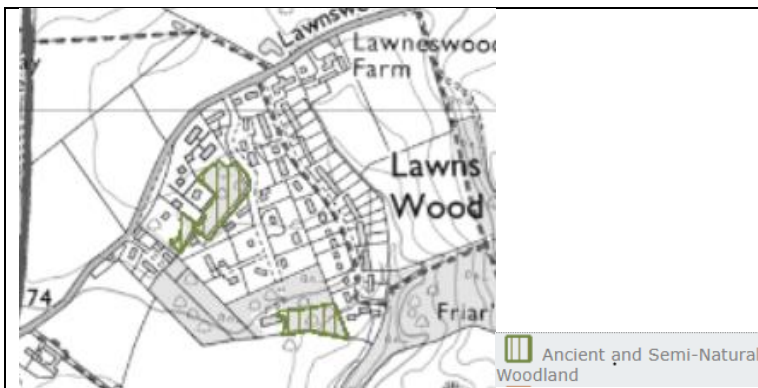
Lawnswood Road is site 654 in the sustainability appraisal and has a “double negative” against landscape and Townscape. It has been demonstrated above why this rating should be changed, as advice we have obtained from FPCR suggests that the site has been incorrectly assessed and would therefore not be assessed as “double negatives” as set out in the sustainability appraisal.

The site is also categorised as a “double negative” in terms of education. This is because the site is outside of the target distance for a primary and secondary school. 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.

Ancient Woodland

It is stated at B.27.3.3 of the Sustainability Appraisal that the proposed site is located 80m from ancient woodland, and that the proposed development at this site could potentially have a minor negative impact, due to an increased risk of disturbance. We disagree that this is an issue, as buffers required by Natural England standing advice would be put in place.

Furthermore, the ancient woodland in question is buffered from the proposed development site by existing development that in places is located right up to the current development, as the figure below demonstrates:



Priority Woodland

The sustainability appraisal concludes that site 654 contains deciduous woodland priority habitat. It goes on to state that the proposed development at this site could potentially result in the loss of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

Part of the site contains deciduous woodland priority habitat (Approximately 1ha, i.e., around 2% of the whole site). However, this is not an irreplaceable habitat like ancient woodland. The woodland could be suitably incorporated into any future development as part of the open space strategy, and appropriate buffers provided.

Public Rights of Way (PRoW)

The sustainability appraisal expects a minor negative impact on the local landscape in relation to impact of views across the site from public rights of way.

We accept that development of the site will impact on the views experienced from PRoW. However, development of land at Lawnswood Road would open up opportunities for increased public access to the Green Belt through the provision of a number of specifically created footpaths. At present there are two PRoW across the site, representing a very small proportion of the overall site being able to be utilised by the public.

Housing Site Selection Topic Paper

Land at Lawnswood Road is listed as site 654 and classed as an “alternative shortlisted site”. The site is within the area called: “Western edge of the Black Country”. Only Site 582, land off Langley Road is selected as a draft allocation from this area.

As set out above in review of the evidence base, there are many instances in which the proposed allocation site is comparable or worse performing than site 582. Additional technical work and our critique of the Council’s base available makes it clear that land at Lawnswood Road should be released for development.

Heritage Assessment

A phase 1 report was produced in response to the submission of sites to the Local Plan, which utilised a colour coded system to RAG rate the submitted sites. This identified the Lawnswood Road site as 'red':

'Red: Significant effects predicted. Mitigation unlikely to be possible.'

This assessment is based on the fact that although there are no designated assets located on the site itself, but the boundary surrounds two Grade II listed buildings associated with Lawnswood House, a non-designated villa. The Staffordshire Historic Environment Record records a contemporary landscaped park and pleasure garden across the central part of the site. A third unrelated Grade II listed building, Holland House stands to the immediate south of the site.

The submitted heritage assessment, produce by Node concludes that through a sensitive approach to design as advocated by the heritage led design principles and illustrated by the resultant masterplan, these issues 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.

Moreover, the heritage-led design approach will create such benefits, notably enabling a new public amenity to be created from the historically private pleasure grounds, markedly enhancing the ability to experience its landscape and heritage value, as well as that of associated heritage assets (e.g. Lawnswood House). A masterplan detailing how this is achieved is included within the submitted heritage assessment and masterplan documents.

Consideration of the comments raised by the Historic Environment Site Assessment and an alternative assessment of heritage impacts is provided by the Heritage Assessment produced by Node. This document is submitted with these representations.

(Continue on a separate sheet and attach if necessary)

**All comments should be made in writing
no later than 5pm Monday 13 December 2021**

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplans@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Michael
Last Name		Davies
E-mail Address		mpdavies@savills.com
Job Title (if applicable)		Planning Director
Organisation (if applicable)	CWC Group - Clowes Developments	Savills
Address		55 Colmore Row Birmingham
Post Code		B3 3AA
Telephone Number		07967 555 548

The South Staffordshire Local Plan review **Preferred Options** document is being consulted on for a period of 6 weeks from Monday 1 November until 5pm Monday 13 December 2021. For advice on how to respond to the consultation form please email localplans@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Monday 13 December 2021**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Michael Davies

Organisation: Savills (on behalf of CWC Group – Clowes Developments)

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	2b
Other document eg SA, HRA	

2. Please set out your comments below

Reference is made on page 12 of the IDP to the need for the Council to set out Green Belt loss compensatory measures including improvements to the environmental quality and accessibility of remaining Green Belt land. To provide certainty to developers the scope of requirements for compensatory enhancements should be set out clearly in the Infrastructure Delivery Plan and viability appraisal.

(Continue on a separate sheet and attach if necessary)

**All comments should be made in writing
no later than 5pm Monday 13 December 2021**

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplans@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Michael
Last Name		Davies
E-mail Address		mpdavies@savills.com
Job Title (if applicable)		Planning Director
Organisation (if applicable)	CWC Group - Clowes Developments	Savills
Address		55 Colmore Row Birmingham
Post Code		B3 3AA
Telephone Number		07967 555 548

The South Staffordshire Local Plan review **Preferred Options** document is being consulted on for a period of 6 weeks from Monday 1 November until 5pm Monday 13 December 2021. For advice on how to respond to the consultation form please email localplans@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Monday 13 December 2021**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Michael Davies

Organisation: Savills (on behalf of CWC Group – Clowes Developments)

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	4
Other document eg SA, HRA	

2. Please set out your comments below

We **do not** support policy DS1 – Green Belt and in particular reference is made in the supporting text at paragraph 4.4 of the Local Plan to securing compensatory improvements following Green Belt release which relate to environmental quality and accessibility of remaining Green Belt.

PPG (Reference ID: 64-002-20190722) states that where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

The facilities should be identified and planned for and then included in an Infrastructure Delivery Plan. By providing a range of examples, the PPG is clear that these improvements could be wide ranging, and as such do not all need to relate to both environmental quality and accessibility of remaining Green Belt.

(Continue on a separate sheet and attach if necessary)

**All comments should be made in writing
no later than 5pm Monday 13 December 2021**

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplans@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Michael
Last Name		Davies
E-mail Address		mpdavies@savills.com
Job Title (if applicable)		Planning Director
Organisation (if applicable)	CWC Group - Clowes Developments	Savills
Address		55 Colmore Row Birmingham
Post Code		B3 3AA
Telephone Number		07967 555 548

The South Staffordshire Local Plan review **Preferred Options** document is being consulted on for a period of 6 weeks from Monday 1 November until 5pm Monday 13 December 2021. For advice on how to respond to the consultation form please email localplans@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Monday 13 December 2021**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Michael Davies

Organisation: Savills (on behalf of CWC Group – Clowes Developments)

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	5
Other document eg SA, HRA	

2. Please set out your comments below

No we **do not** support the policy approach in Policy DS3. Paragraph 4.16 of the supporting text to policy DS3 states that the spatial strategy has been amended since the last consultation in December 2019 to reduce the amount of growth allocated to the western edge of the Black Country, reflecting the relatively limited unmet need arising from Dudley.

As set out in our responses to question 1 in relation to Duty to Cooperate, there is a strong geographical link between the Black Country (including Dudley) and South Staffordshire that should be considered when determining the level of the Black Country's unmet housing need to be met in South Staffordshire.

We note that the consultation document at paragraph 4.16 refers to Dudley having significant Green Belt options in its own administrative area, as evidence for why release of Green Belt near Dudley should be limited.

However, having reviewed the Black Country Local Plan evidence base, it is clear that the majority of Dudley's Green Belt that is not proposed to be released for development has constraints present on it that prevents development, such as historic landscape designations.

If we take forward the Council's logic that dwellings that are being delivered for the Black Country should be delivered next to the LPA that it is serving, we can see there is shortfall between the 4,000 figure stated to be provided to the GBHMA (which we assume will mostly be attributed to Black Country need), and the 2,958 dwellings that are planned to be located adjacent to the Black Country. The allocation of more sites adjoining the Black Country, such as Lawnswood Road (site 654) would aid this.

The spatial strategy should therefore be amended to place more emphasis on the delivery of dwellings adjoining the Black country to deliver at a minimum the 4,000 dwelling contribution to the Black Country shortfall proposed by the Council and more over the 12,425 dwellings figure calculated by Savills as being apportioned to South Staffordshire.

(Continue on a separate sheet and attach if necessary)

**All comments should be made in writing
no later than 5pm Monday 13 December 2021**

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplans@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Michael
Last Name		Davies
E-mail Address		mpdavies@savills.com
Job Title (if applicable)		Planning Director
Organisation (if applicable)	CWC Group - Clowes Developments	Savills
Address		55 Colmore Row Birmingham
Post Code		B3 3AA
Telephone Number		07967 555 548

The South Staffordshire Local Plan review **Preferred Options** document is being consulted on for a period of 6 weeks from Monday 1 November until 5pm Monday 13 December 2021. For advice on how to respond to the consultation form please email localplans@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Monday 13 December 2021**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Michael Davies

Organisation: Savills (on behalf of CWC Group – Clowes Developments)

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	8
Other document eg SA, HRA	

2. Please set out your comments below

No, we **do not** support the housing allocations in policy SA5 and consider that this policy should be amended to include land at Lawnswood Road (site 654). Evidence was set out in our answer to question 2, which critiqued the Council's evidence base position and reviewed this against new evidence base which provides a more nuanced view at a site specific level. It is also the case that comparable locations such as land off Langley Road (Site 582) perform similarly to the proposed allocation at Lawnswood Road.

In Green Belt terms we consider that the Council's assessment is flawed and scoring of Lawnswood Road (site 654) as assessed by FPCR is comparable to the allocated site at land off Langley Road (site 582). The FPCR report concluded that Lawnswood Road, would have a "moderate" to "low / moderate" harm rating for removal from Green Belt.

Similarly, landscape work has been undertaken and concludes that, in relation to the Lawnswood Road site, that that the site would have a "moderate" to "low / moderate" landscape sensitivity rating.

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 school. 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.

It should also be noted that technical work has been undertaken by Node which has informed a heritage led masterplan submitted with these representations. Node's heritage assessment concludes 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.

An illustrative masterplan has been submitted to reflect the unique physical site characteristics and also relate sensitively to its existing built and landscape surroundings.

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 informed by further detailed technical work. Executive 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. 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.

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 will 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.

Other matters are also discussed in relation to question 1. 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 comparably 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 HMA shortfall.

(Continue on a separate sheet and attach if necessary)

**All comments should be made in writing
no later than 5pm Monday 13 December 2021**

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplans@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title		Mr
First Name		Michael
Last Name		Davies
E-mail Address		mpdavies@savills.com
Job Title (if applicable)		Planning Director
Organisation (if applicable)	CWC Group - Clowes Developments	Savills
Address		55 Colmore Row Birmingham
Post Code		B3 3AA
Telephone Number		07967 555 548

The South Staffordshire Local Plan review **Preferred Options** document is being consulted on for a period of 6 weeks from Monday 1 November until 5pm Monday 13 December 2021. For advice on how to respond to the consultation form please email localplans@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Monday 13 December 2021**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

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.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Michael Davies

Organisation: Savills (on behalf of CWC Group – Clowes Developments)

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	11
Other document eg SA, HRA	

2. Please set out your comments below

We **do not** support all of the proposed policy approaches set out in chapter 6. We have set out comments in respect of the proposed policy wordings below:

HC1 - Housing Mix

We agree with the policy direction text that states any housing mix should be determined with reference to the latest housing market assessment. Any figures for housing mixes should be quoted in supporting text only, and not within the policy. The findings of the latest SHMA should be considered as indicative only, and housing mix considered on a site-by-site basis.

HC3 - Affordable Housing

We disagree with the proposed requirement for 50% of the affordable housing to be delivered in the form of social rent. Paragraph 8.11 of the SHMA, clearly sets out a 50% requirement of the affordable housing provision to be both affordable rented and social rented. A distinction needs to be made between affordable and social rent, and this should be reflected in the policy.

However, we reserve our position on commenting on what the actual affordable housing requirement should be for the district until a full viability review of the final Local Plan proposals is published. The Local Plan policies should not impose such a burden on developers that the result is to make development proposals unviable.

HC7 - Self & Custom Build Housing

In general, we support the Council's approach to self & custom build housing. As set out in our responses to previous consultation stages, we do not support self and custom build housing being required on allocated sites as a proportion of overall housing requirement. We agree with the consultation document wording at page 68 which suggests that sites for major residential development should have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis.

HC9 - Design requirements

We disagree with the proposed requirement of Policy HC9 for all developments to incorporate tree lined streets. The wording should be that tree lined streets **should** be provided, unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate. This would allow the policy to be in conformity with paragraph 131 of the NPPF.

We also note that the proposed direction of travel for the policy refers to there being a requirement to: “integrate with any adjacent future planned development in the local area” and for: “adjacent or closely related sites with similar delivery timescales to prepare a framework plan to show how a comprehensive and integrated layout could be achieved”. We agree that both approaches represent best practice and should be encouraged by the Council. However, requiring such an approach is unduly onerous if it is the case that one landowner is not forthcoming in cooperating with another, and this leads to a ransom situation. The council should be clear how they will define and enforce this requirement.

HC13 - Health and Wellbeing

The consultation document refers to requiring developments of 150+ dwellings to demonstrate how specific measures have been designed into the development to have a positive impact on the health and wellbeing of residents. To ensure that this requirement is not unduly onerous the Council should be clear what the basis of this requirement is, in particular the requirement for 150+ dwellings specifically to be required evidence compliance with this requirement.

HC17 - Open Space

In relation to policy HC17, the consultation document propose to make it clear that small incidental green infrastructure will not be counted towards on-site open space. This may be justified, but the Council should not overlook the benefits of such areas if appropriately planted and maintained can have for biodiversity.

EC10 - Developer contributions

Any contribution requests should be open to negotiation and based on CIL reg 122 (2) tests.

NB1 - Protecting, enhancing and expanding natural assets

The direction of travel summary of this policy states that the policy will “Protect and enhance areas of high habitat distinctiveness and support the creation of strategic linkages and stepping stones, using the most up-to-date Nature Recovery Network mapping prepared by the Staffordshire Wildlife Trust.”

It is not clear if there are willing landowners to facilitate this, which is a prerequisite for a requirement like to be successful. There should be a clear hierarchy of land that the Council will consider for such uses. Land in the ownership of a willing landowner should be considered before other land where ownership issues are unresolved.

NB2 – Biodiversity

The Environment Act (2021) requires a Biodiversity Net Gain of at least 10% to be produced by development. For the purposes of the new Local Plan this should be the requirement. However until this requirement is formally enacted through secondary legislation, the chosen target would need to be appropriately evidenced. The consideration of any higher biodiversity targets through the Local Plan process would need to be justified, including in relation to viability testing.

We consider that there is merit in the identification of sites within SSDC for receiving ecological enhancements in conjunction with the national 10% Biodiversity Net Gain (BNG) requirement, in recognition that some developments may not be able to accommodate this within the development site boundaries. If sites identified for receiving enhancements are located within areas of low or degraded ecological value then this would also facilitate the enhancement of the ecological networks and habitats in these locations.

NB6 - Energy and water efficiency, energy and heat hierarchies and renewable energy in new development

The proposed direction of travel for this policy makes reference to exceeding the carbon emission targets set by current Building Regulations and delivering optional water efficiency standards. The PPG states that Local Plans “can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building Regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes” (Reference ID: 6-012-20190315).

However, any requirements above the Building Regulation standard would need to be robustly justified.

We consider that it would be appropriate for the choice of suitable energy / carbon reduction solutions to be considered on a site-by-site basis, including recognising the opportunity for proposals to be designed to be adaptable to incorporate new technology as it comes forward and becomes established.

(Continue on a separate sheet and attach if necessary)

**All comments should be made in writing
no later than 5pm Monday 13 December 2021**

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplans@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

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>