

Local Plan
Publication Stage
Representation Form

Ref:

(For
official
use only)

Name of the Local Plan to which this
representation relates:

South Staffordshire Council
Local Plan 2023 - 2041

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation
you wish to make.

Part A

1. Personal
Details*

**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

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address
(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	<input type="text"/>	Policy	Policy DS5: Spatial Strategy to 2041	Policies Map	<input type="text"/>
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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 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.

We object to Policy DS5. Paragraph 5.13 of the draft plan states that as a result of the changes to the National Planning Policy Framework ('NPPF'), South Staffordshire District Council ('SSDC') has tested further spatial strategy options for the distribution of housing growth across the District. The chosen strategy is Option I which is "a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport".

Option I was not previously consulted on or identified as a preferred option in the 2022 Publication Plan.

The Planning Practice Guidance requires a Sustainability Appraisal to "provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of alternatives" (Reference ID: 11-018-20140306). We do not consider that sufficient justification has been provided for pursuing Option I.

From our review, it appears that Option I has been 'created' by the Council in order to achieve their interpretation of the amended NPPF 2023 and support the reduction in housing to meet local and wider housing market area needs, which we have objected to in our separate response to Draft Policy DS4.

SSDC claim that the chosen Spatial Strategy (Option I) directs growth towards sustainable non-Green Belt development sites and limited Green Belt development in Tier 1 settlements that are well-served by public transport. The 640 dwellings towards the HMA shortfall seems to have been calculated by the number of dwellings SSDC considers are deliverable on sites around Tier 1

settlements, but the Council has not provided justification on the reasonable alternatives assessed around these settlements and why the proposed capacity is limited to 640 dwellings. It is considered that without further evidence, this approach is unjustified and unsound.

There are sites allocated for residential development which are in the Green Belt and not in Tier 1 settlements including site reference number 617 (Land off Four Ashes Road) which is allocated in Brewood a Tier 2 settlement, and 082 (Land between A449 Stafford Road and School Lane) in Coven a Tier 3 settlement. There is therefore an inconsistency with how the Spatial Strategy Option I has been applied to Green Belt sites, and a lack of justification of how the figure of a 640 home contribution to the unmet needs of the GBBCHMA has been derived. The plan is therefore not justified (NPPF paragraph 35).

Land at Lawnswood Road

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 further 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.

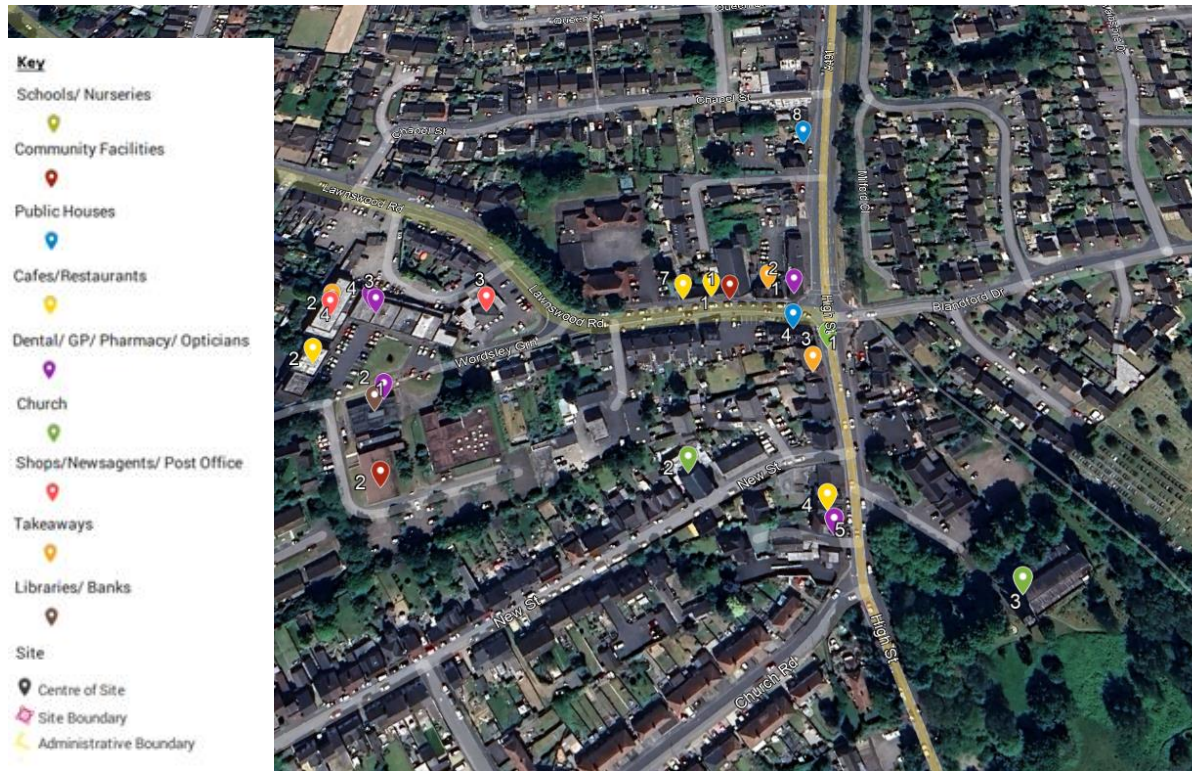
Desktop research undertaken by Savills indicates that six shops / newsagents are within 1.5 miles of the centre of the site. Two dental surgeries and a doctors surgery are also located in the same range, in addition to a pharmacy and opticians. These services are located in Wordsley. It is important 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



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)

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.

The Spatial Strategy should be amended to reflect a strategy which is positively prepared and fully justified. The Council needs to provide evidence to demonstrate that the proposed strategy is truly 'capacity-led' despite other sites being assessed as performing similarly to those allocated.

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.

(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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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

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

Lawnswood Road		
Service	Walking distance in miles	Average walking speed in minutes (based on 3mph average walking speed)
Schools/ Nurseries		
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
Community Facilities		
1 Richardson Hall	1.1	22
2 Wordsley Community Centre	1.1	22
Public Houses		
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
Cafés/ Restaurants		
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
Dental/GP/Pharmacy/ Opticians		
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
Church		
1 Wordsley Team Parish	1.1	22
2 Wordsley Methodist Church	1.2	24
3 Holy Trinity Church Wordsley	1.2	24
Shops/ Newsagents/ Post Office		
1 SPAR Lawnswood	0.6	12
2 SPAR Wordsley	1.1	22
3 Sainsbury's Local	1	20
4 Roberts Farm Shop	1.1	22
5 Barnett Lane Store	1.2	24
6 Co-op Food	1.2	24



Takeaways		
1 Sir Winston Fish and Chips	0.6	12
2 Wordsley Chinese Takeaway	1.1	22
3 Wordsley Chippy	1.1	22
4 Subway	1.1	22
Libraries/ Banks		
1 Wordsley Library	1.1	22

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