



South Staffordshire Local Plan Review

Response to Inspector's Matters Issues and Questions (MIQs) on behalf of Clowes Developments

Representor ID: AGT24-037-02

Matter 7: Site Allocations

Issue 1: Site Allocations

Whether the preferred site allocations are positively prepared, justified, effective and consistent with national policy.

1. In terms of the proposed planned housing and employment developments:

a. Is the spatial distribution of the allocations across the South Staffordshire area justified and is it consistent with the Spatial Strategy?

b. Has the identification and selection of the proposed site allocations been robustly evidenced and subject to robust, consistent and transparent methodologies, including in relation to the approach to existing committed sites?

There has been an inconsistent approach taken to the spatial distribution of sites and why the selected sites have been pursued above other reasonable alternatives. SSDC claims to be pursuing a strategy of growth around Tier 1 settlements but allocations are still proposed adjacent to less sustainable settlements.

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

Clowes set out site specific comments on their land interest at Lawnswood in their Regulation 19 response to Policy SA3 which we have not repeated here.

The Spatial Strategy should be amended to reflect a strategy which is positively prepared and fully justified. 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.