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15<sup>th</sup> December 2022

South Staffordshire Council  
Community Hub  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 1PX

Sent via email only: [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)

Dear Sir/Madam,

## **REPRESENTATIONS TO SOUTH STAFFORDSHIRE LOCAL PLAN PUBLICATION STAGE, REGULATION 19, CONSULTATION**

CarneySweeney have been retained by St Francis Group (Featherstone 2) Ltd, referred to as our client hereafter, to submit representations to the current Regulation 19 Consultation on the South Staffordshire Local Plan Review Publication Plan. As you will be aware from previous discussions and representations, our client is a landowner and developer of the former Royal Ordnance Factory (ROF) site at Featherstone which was granted planning permission (planning reference: 20/01131/OUT) for redevelopment for employment uses (Use Classes E, B2 and B8) on 14th October 2022. This allows for up to circa 159,000 sq.m. of mixed employment floorspace to be developed on an allocated site within the currently adopted Core Strategy and Site Allocations Document (SAD).

Overall, our client remains fully supportive of the general approach to the employment strategy in the Publication Stage of the emerging Local Plan and the continued policy support for the former ROF site as an employment allocation (Employment Site Allocation E18 and Policy SA7) and is preparing Reserved Matters for submission early 2023 in order to deliver the Link Road and the commercial development consented

We are writing to inform the authority of a discrepancy regarding the extent of the 'Green Infrastructure' boundary, shown with a purple line, in relation to the ROF site on Inset Plan 53 "ROF Featherstone" for this Regulation 19 consultation.

We have reviewed the proposed policies map against the planning approval (reference: 20/01131/OUT) and there is a discrepancy with regards to the area of 'Green Infrastructure'. As part of the planning approval, an Illustrative Masterplan (drawing reference: 15-062-PL-200D) and Parameters Plan (drawing reference: 15-062-PL-400C) were approved under Condition 3. The extent of the employment allocation appears to be based on what would be the area of built form under the outline planning approval. However, the purple 'Green Infrastructure' line extends beyond the approval and also includes land which is shown on the approved Illustrative Masterplan to include 'built development'. For ease of reference, appended to this letter is a copy of the approved Illustrative Masterplan (drawing reference: 15-062-PL-200D) and Parameters Plan (drawing reference: 15-062-PL-400C) (please see appendix 1).

Therefore, to ensure consistency, we request that the authority amend the draft Policies Map so that the boundary of the employment allocation and any 'Green Infrastructure' reflects the extent of the outline planning approval (reference: 20/01131/OUT) for the ROF site at Featherstone, as shown on the overlay plan included at Appendix 2 of these representations.



We trust that our representation will be taken into account as part of the ongoing preparation of an emerging Local Plan and would be happy to discuss our concern regarding the proposed policy map if this would be helpful.

Yours faithfully,



**Kam Saini**  
**Director**  
**CarneySweeney**

**Appendix 1:** Copy of approved Illustrative Masterplan (drawing reference: 15-062-PL-200D) and Parameters Plan (drawing reference: 15-062-PL-400C) under planning approval reference: 20/01131/OUT).

**Appendix 2:** Proposed amendment to the draft policies map.



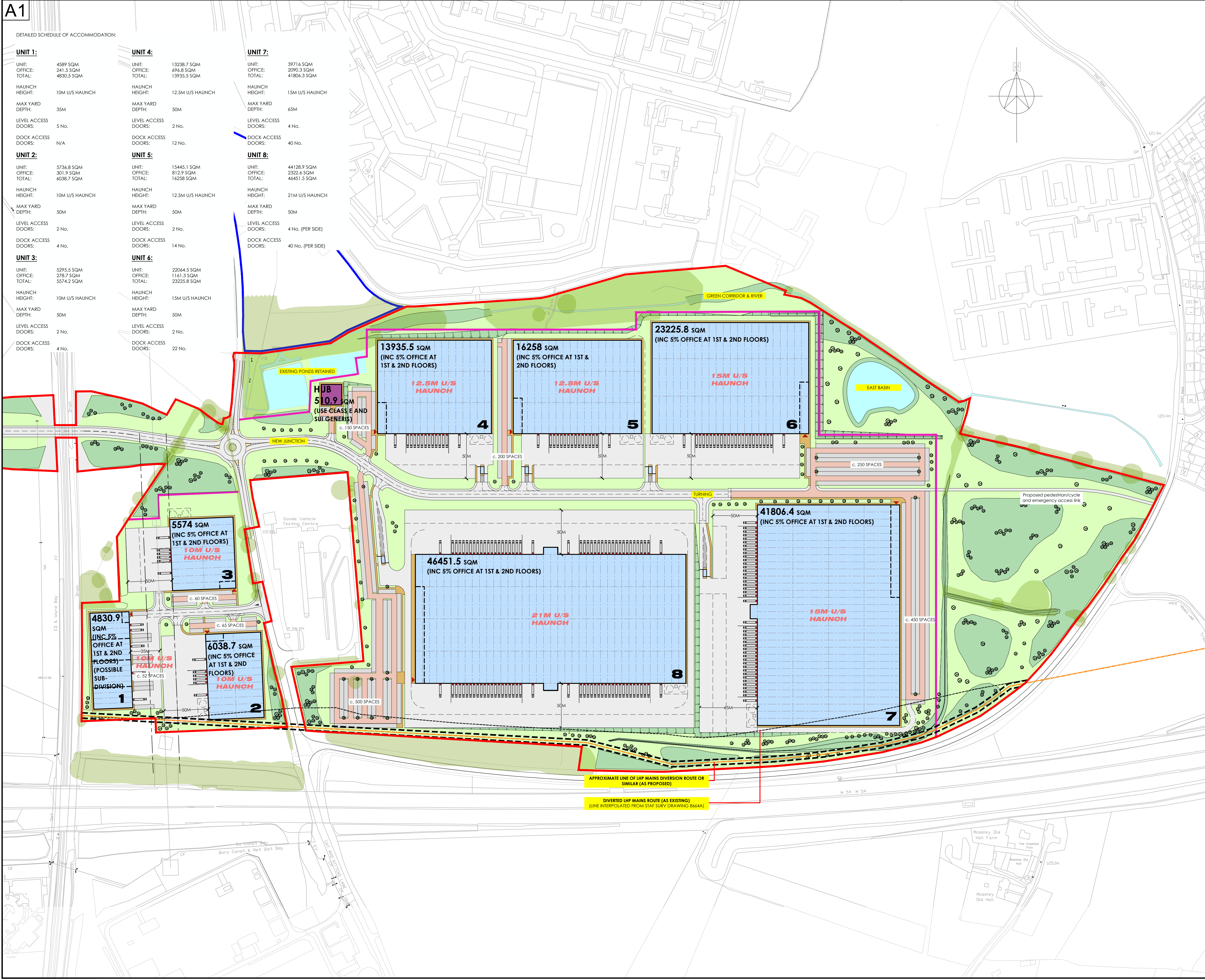
## Appendix 1





DETAILED SCHEDULE OF ACCOMMODATION:

UNIT 1:	UNIT 2:	UNIT 3:	UNIT 4:	UNIT 5:	UNIT 6:	UNIT 7:	UNIT 8:
UNIT: 4589 SQM OFFICE: 241.5 SQM TOTAL: 4830.5 SQM	UNIT: 5736.8 SQM OFFICE: 301.9 SQM TOTAL: 6038.7 SQM	UNIT: 5295.5 SQM OFFICE: 278.7 SQM TOTAL: 5574.2 SQM	UNIT: 13238.7 SQM OFFICE: 696.8 SQM TOTAL: 13935.5 SQM	UNIT: 15445.1 SQM OFFICE: 812.9 SQM TOTAL: 16258 SQM	UNIT: 22064.5 SQM OFFICE: 1161.3 SQM TOTAL: 23225.8 SQM	UNIT: 39716.5 SQM OFFICE: 2090.3 SQM TOTAL: 41806.4 SQM	UNIT: 44128.9 SQM OFFICE: 2322.6 SQM TOTAL: 46451.5 SQM
HAUNCH HEIGHT: 10M U/S HAUNCH	HAUNCH HEIGHT: 10M U/S HAUNCH	HAUNCH HEIGHT: 10M U/S HAUNCH	HAUNCH HEIGHT: 12.5M U/S HAUNCH	HAUNCH HEIGHT: 12.5M U/S HAUNCH	HAUNCH HEIGHT: 15M U/S HAUNCH	HAUNCH HEIGHT: 15M U/S HAUNCH	HAUNCH HEIGHT: 21M U/S HAUNCH
MAX YARD DEPTH: 35M	MAX YARD DEPTH: 50M	MAX YARD DEPTH: 50M	MAX YARD DEPTH: 50M	MAX YARD DEPTH: 50M	MAX YARD DEPTH: 50M	MAX YARD DEPTH: 65M	MAX YARD DEPTH: 50M
LEVEL ACCESS DOORS: 5 No.	LEVEL ACCESS DOORS: 2 No.	LEVEL ACCESS DOORS: 2 No.	LEVEL ACCESS DOORS: 2 No.	LEVEL ACCESS DOORS: 2 No.	LEVEL ACCESS DOORS: 2 No.	LEVEL ACCESS DOORS: 4 No.	LEVEL ACCESS DOORS: 4 No. (PER SIDE)
DOCK ACCESS DOORS: N/A	DOCK ACCESS DOORS: 4 No.	DOCK ACCESS DOORS: 4 No.	DOCK ACCESS DOORS: 12 No.	DOCK ACCESS DOORS: 14 No.	DOCK ACCESS DOORS: 22 No.	DOCK ACCESS DOORS: 40 No.	DOCK ACCESS DOORS: 40 No. (PER SIDE)



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The Contractor is to check and verify all building and site dimensions, levels and sewer invert levels at connection points before work starts. The Contractor is to comply in all respects with current Building Regulations, British Standard Specifications, Building Regulations, Construction (Design & Management) Regulations, Party Wall Act, etc. whether or not specifically stated on this drawing. This drawing must be read with and checked against any structural, geotechnical or other specialist documentation provided.

This drawing is not intended to show details of foundations, ground conditions or ground contaminants. Each area of ground relied upon to support any structure depicted (including drainage) must be investigated by the Contractor. A suitable method of foundation should be provided allowing for existing ground conditions. Any suspect or fluid ground, contaminants on or within the ground, should be further investigated by a suitable expert. Any earthwork constructions shown indicate typical slopes for guidance only & should be further investigated by a suitable expert.

Where existing trees are to be retained they should be subject to a full Arboricultural Inspection for safety. All trees are to be planted so as to ensure they are a minimum of 6 metres from buildings and 2 metres from drainage and services. A suitable method of foundation is to be provided to accommodate the proposed tree planting.

Sketch proposals are for illustrative purposes only & as such are subject to detailed site investigation including ground conditions/contaminants, drainage, design & planning/density negotiations. Sketch proposals may be based upon enlargements of OS sheets & visual estimations of existing site features, accuracy will therefore need to be verified by survey. Sketch proposals have not been considered in respect of CDM Regulations.

Notes:

GENERAL SCHEDULE OF ACCOMMODATION:	
UNIT 1:	4830.9 SQM GIA
UNIT 2:	6038.7 SQM GIA
UNIT 3:	5574 SQM GIA
UNIT 4:	13935.5 SQM GIA
UNIT 5:	16258 SQM GIA
UNIT 6:	23225.8 SQM GIA
UNIT 7:	41806.4 SQM GIA
UNIT 8:	46451.5 SQM GIA
HUB:	510.9 SQM GIA
<b>TOTAL:</b>	<b>158631.9 SQM GIA*</b>

\*ALL FIGURES ABOVE FOR UNITS 1-8 INCLUDE 5% OFFICE CONTENT AT FIRST AND SECOND FLOOR LEVELS ONLY.

DRAWING BASED ON TOPOGRAPHICAL SURVEY UNDERTOOK BY STAF SURVS LAND SURVEYORS. DRAWING REF 8546a JUNE 2016

RED LINE UPDATED AS PER CLIENTS REQUEST. 11.12.20 JC  
 USE CLASS UPDATED TO HUB AS PER CLIENT REQUEST. 04.12.20 AJ  
 USE CLASS UPDATED TO HUB AS PER CLIENT REQUEST. 26.11.20 JC  
 RED LINE UPDATED TO INCLUDE NEW ROUNDABOUT DESIGN. 23.01.20 JC

Revisions: Amendment: Date: Name:

For guidance only. Do not scale off this drawing

1:20 0 100mm 200mm 300mm 400mm 500mm 600mm 700mm 800mm 900mm 1000mm  
 1:100 0 0.5m 1m 1.5m 2m 2.5m 3m 3.5m 4m 4.5m 5m  
 1:50 0 0.5m 1m 1.5m 2m 2.5m 3m 3.5m 4m 4.5m 5m  
 1:5 0 50mm 100mm 150mm 200mm 250mm

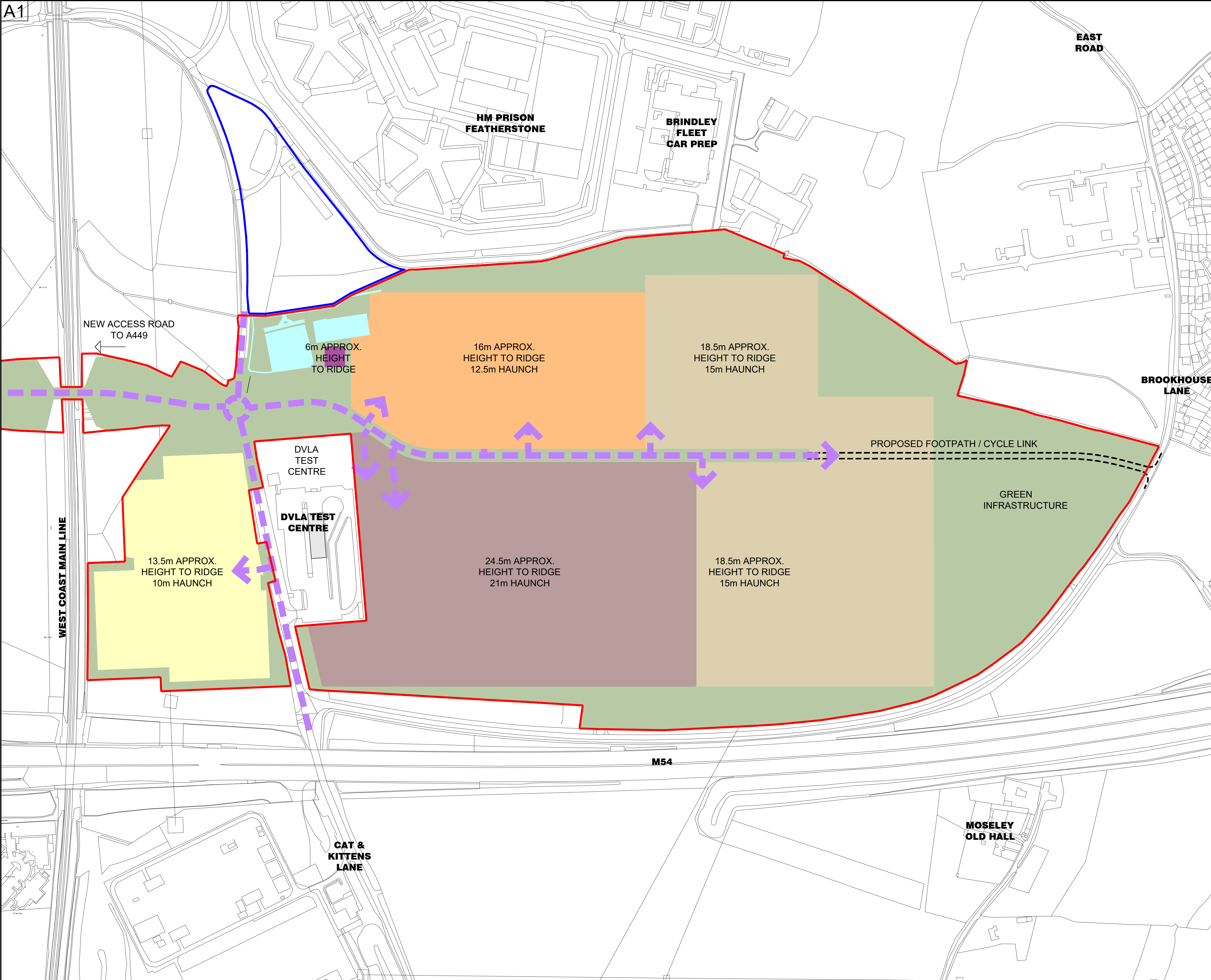
St. Paul's Place, 40 St. Paul's Square, Birmingham, B3 1FQ, United Kingdom  
 t. +44(0)121 314 6618 e. info@bhp-design.co.uk

CLIENT: ST FRANCIS GROUP (FEATHERSTONE 2) LIMITED AND PEVERIL SECURITIES LTD  
 PROJECT: LAND OFF J1 M54 FEATHERSTONE WOLVERHAMPTON  
 TITLE: ILLUSTRATIVE DEVELOPMENT MASTER PLAN

Scale: 1:2000@A1	Date: JAN '20
Design: DB	Drawn: JC
Drw No: 15-062-PL-200	Revision: D



A1



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Where existing trees are to be retained they should be subject to a full Arboricultural Inspection for safety. All trees are to be planted so as to ensure they are a minimum of 5 metres from buildings and 3 metres from drainage and services. A suitable method of foundation is to be provided to accommodate the proposed tree planting.

Sketch proposals are for illustrative purposes only & as such are subject to detailed site investigation including ground conditions/contaminants, drainage, design & planning/conservation regulations. Sketch proposals may be based upon enlargements of OS sheets & visual estimations of existing site features, accuracy will therefore need to be verified by survey. Sketch proposals have not been considered in respect of CDM Regulations.

**Notes:**

- THIS DRAWING HAS BEEN PRODUCED USING INFORMATION TO BE FOUND ON RPS TOPOGRAPHICAL SURVEY DRAWING UAK 3031 REV B SHEETS 1 TO 18 DATED MARCH 2017

**LEGEND**

- 24.5m APPROX. HEIGHT TO RIDGE  
21m HAUNCH
- 18.5m APPROX. HEIGHT TO RIDGE  
15m HAUNCH
- 16m APPROX. HEIGHT TO RIDGE  
12.5m HAUNCH
- 13.5m APPROX. HEIGHT TO RIDGE  
10m HAUNCH
- 6m APPROX. HEIGHT TO RIDGE
- GREEN INFRASTRUCTURE
- PRIMARY ACCESS ROUTE

**Revisions:**

C	RED LINE UPDATED AS PER CLIENTS REQUEST.	11.12.20	JC
B	HEIGHT INFORMATION REMOVED AS PER CLIENTS REQUEST.	03.12.20	JC
A	RED LINE UPDATED TO INCLUDE NEW ROUNDABOUT DESIGN.	23.01.20	JC

Amendment: \_\_\_\_\_ Date: \_\_\_\_\_ Name: \_\_\_\_\_

For guidance only. Do not scale off this drawing

1:20 - 0	100mm	200mm	300mm	400mm	500mm	600mm	700mm	800mm	900mm	1000mm
1:100 - 0	0.5m	1m	1.5m	2m	2.5m	3m	3.5m	4m	4.5m	5m
1:50 - 0	0.5m	1m	1.5m	2m	2.5m	3m	3.5m	4m	4.5m	5m
1:5 - 0	50mm	100mm	150mm	200mm	250mm	300mm	350mm	400mm	450mm	500mm

**st francis group**  
**bhpdesign**

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t. +44(0)121 314 6618 e : info@bhp-design.co.uk

**CLIENT:** ST FRANCIS GROUP (FEATHERSTONE 2) LIMITED AND PEVERIL SECURITIES LIMITED

**PROJECT:** LAND OFF J1 M54 FEATHERSTONE WOLVERHAMPTON

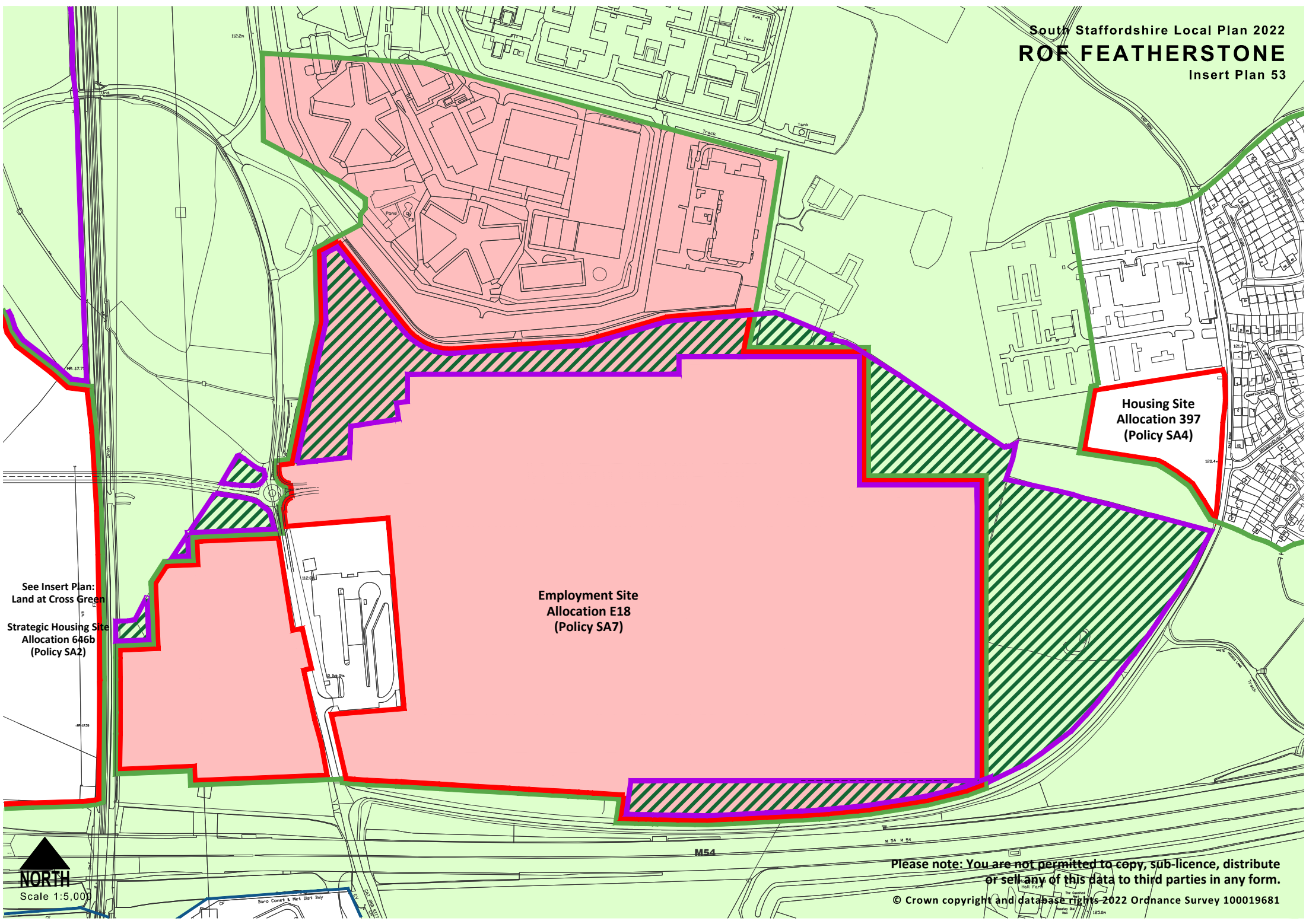
**TITLE:** SITE PARAMETERS PLAN

Scale:	1:2000 @ A3	Date:	JAN 2020
Drawn:	D.N.	Checked By:	DB
Drw No:	15-062-PL-400	Revision:	C

## **Appendix 2**







See Insert Plan:  
Land at Cross Green  
Strategic Housing Site  
Allocation 646b  
(Policy SA2)

Employment Site  
Allocation E18  
(Policy SA7)

Housing Site  
Allocation 397  
(Policy SA4)

**NORTH**  
Scale 1:5,000