

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></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	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	Amadis Holdings Limited	<input type="text"/>
Address Line 1	C/O RN Williams and Co	<input type="text"/>
Line 2	53 Waterloo Road	<input type="text"/>
Line 3	Wolverhampton	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	WV1 4QQ	<input type="text"/>
Telephone	01902 429051	<input type="text"/>
E-mail Address (where relevant)	rnw@rnwilliams.com	<input type="text"/>

## 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  Policy  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="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.

Policy SA5 identifies a list of sites which are proposed allocations for development. Elsewhere in these representations we have made the case that the number of homes which are planned for the district is inadequate and should be increased (see Response Form 4). We have also highlighted the issues relating to the omission of Safeguarded land to accommodate future housing needs without making further changes to Green Belt boundaries (see Response Form 3).

For the reasons which are set out in those representations, it is our view that two parcels of land to the west of Yew Tree Lane should be removed from the Green Belt and allocated for residential development. The allocation would deliver a number of benefits, including the provision of much needed market and affordable housing and new public open space immediately adjacent to the built-up edge of Wolverhampton. The site is a logical location for development with strong defensible Green Belt boundaries in the form of well-established hedgerows. The extent of the land, which totals 5.41 Ha, is shown on the Development Framework Plan (DF01-A) which is attached to these representations.

A significant area of public open space could be created on the site's western edge. It is envisaged that the open space area would be 1.38 ha, as such over a quarter of the site area would be public open space. This would create public access to land that is currently within the Green Belt. Paragraph 142 of the Framework advises that when removing land from the Green Belt, Local Authorities should consider how this can be offset through compensatory improves, including improving the accessibility of the Green Belt. This is achieved through the design principles which are set out by the Development Framework.



It is envisaged that the Site could be developed at a density of 30 to 35 dph, reflecting the character of the wider area and making the best use of land. The Site is therefore capable of delivering 120-140 dwellings and would make a significant contribution to the district's overall housing requirement.

The land at Yew Tree Lane has been previously reviewed by South Staffordshire Council through its SHELAA. It was identified as SHELAA sites 243 and 504. Both land parcels are identified as being 'potentially suitable' for development but are subject to Green Belt policy. The Green Belt is not, however, an overriding constraint to development in this instance because Green Belt land release is required to meet the housing target. No further constraints to the development of these land parcels are identified by the SHELAA. The SHELAA refers to TPO'd trees on the boundary of site 243, but these can be retained. The SHELAA does not suggest that the site should not be allocated for development.

The sites is in a sustainable location for development. It immediately adjoins the built-up edge of Wolverhampton within a short distance of a number of services and facilities including:

- The King's Church of England School
- Tettenhall Wood School
- Perton Middle School
- A Sainsburys supermarket (the site is within walking distance of Perton town centre).
- Public houses
- Fast foot takeaways
- A dentist
- A doctors surgery
- Playing fields
- Areas of Public Open Space.

Development on the site would result in a natural extension to Wolverhampton. There is already housing development to the north of the sites fronting onto Yew Tree Lane. Its development would not extend the existing pattern of development further west.

(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.

Policy SA5 should be amended to include the additional land which is identified by these representations within the list of allocated sites for a minimum capacity of 120 homes.

The Plan is presently unsound because of its failure to identify Safeguarded Land to meet the district's longer term housing needs without the need for further reviews of



the district's Green Belt boundaries. If this site is not included as an allocation, it should be identified as Safeguarded Land within a new policy.

(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 Inspector will find it helpful to receive evidence on the need to increase the housing requirement.

**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>



## South Staffordshire Council

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Please return the form via email to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX