



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 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		Mr
First Name		John
Last Name		Williams
Job Title (where relevant)		Director
Organisation (where relevant)	Messrs Jenks and Letts	PlanIt Planning and Development
Address Line 1		The Studio
Line 2		White Cottage
Line 3		Astley, nr Shrawley
Line 4		Worcestershire
Post Code		DY13 0RS
Telephone Number		01299 828084
E-mail Address		john@planit- planningdevelopment.co.uk

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="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input 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.

The proposed plan period is 2018 to 2039. Paragraph 22 of the Framework requires Local Plans to have a "minimum" 15 year plan period from the point of adoption. As a consequence, the South Staffordshire Local Plan must be adopted in 2024 at the latest in order for this requirement is to be met.

Table 1 – Stages of Plan Making, of the consultation draft Plan advises that it is expected that the Plan will be adopted in "winter 2023/24". There is, therefore, no scope for the plan making process to slip. In our experience the plan making process is often delayed, and there is a real danger that the emerging Plan will not have a minimum 15 year plan period.

In order for the Council's timetable to be met, if the Plan is submitted for examination in "spring 2023" there will be approximately 9 months for:

- an Inspector to be appointed
- hearing sessions to be timetabled and completed
- the Inspector to produce their report
- the completion of Main Modification consultation
- any further amendments to the Plan required following Main Modification consultation and Inspector to report back following the completion of the Main Modification consultation; and
- the Plan to be formally adopted by the Council.

From our experience with other Local Plan examinations, the proposed timetable for the adoption of the Local Plan may be unrealistic. Whilst the Council's LDS envisages that the Plan will be adopted in 2023 this programme may slip and the plan period should therefore be kept under review.

If the Plan period does need to be extended to account for any slippage in its adoption date, the Council could explore the potential for allocating additional land on suitable sites such as our client's land at Keepers Lane, Codsall. The extent of that site and an explanation of its suitability for development is explained through our response form 8.

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.

On this issue, we are satisfied that the Plan period presently meets the test of soundness. However, if there are delays in the adoption of the Plan then it may be necessary to extend the plan period. In that scenario, the Council should explore the potential to increase the capacity of the allocated sites to address any increase in the housing requirement.

(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:

We have significant concerns that the Plan period is too short, and this will result in insufficient housing allocations being made in the Plan in order to ensure the delivery of housing and employment land. This is a fundamental issue, and we request the opportunity to discuss it during the Hearing sessions.

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>

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