

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p>  <p><b>(For official use only)</b></p>
---	--	---

**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)

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text" value="Sarah"/></p> <p>Last Name <input style="width: 90%;" type="text" value="Milward"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text" value="Planning Director"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="IM Land"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address (where relevant) <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="Paul"/></p> <p><input style="width: 90%;" type="text" value="Hill"/></p> <p><input style="width: 90%;" type="text" value="Senior Director"/></p> <p><input style="width: 90%;" type="text" value="RPS"/></p> <p><input style="width: 90%;" type="text" value="1 Newhall Street"/></p> <p><input style="width: 90%;" type="text" value="Birmingham"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="B3 3NH"/></p> <p><input style="width: 90%;" type="text" value="0121 622 8520"/></p> <p><input style="width: 90%;" type="text" value="paul.hill@rpsgroup.com"/></p>
--	---



## 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 type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input 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 DS5 Spatial Development Strategy** proposes a revised spatial strategy for the distribution of growth up to 2039. It states, amongst other things, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy. Perton is identified as a 'Tier 2 settlement' in the hierarchy. As a Tier 2 settlement, Perton holds a wider range of services and facilities than other smaller settlements in the district's rural area. However, paragraph 5.43 of the SSLP explains that the strategy proposed for Perton, as a larger rural settlement, will support delivery of 376 dwellings (or 3.7% of the total target) comprising existing commitments, previously safeguarded land and windfalls to meet the housing growth assigned to the settlement. The supply breakdown is summarised in Table 8 of the SSLP.

The strategy for Perton therefore does not support the identification of any new allocations at the settlement. The Council highlights 'significant constraints', including highways concerns, proximity to education and Green Belt/landscape sensitivities as reasons for limiting future growth in this location. However, this ignores the fact that Perton is virtually contiguous with Wolverhampton, with only a thin sliver of land separating these two built-up areas, and therefore acts as an effective suburb to the city. This makes Perton a highly accessible location to Wolverhampton, which offers potential of residents to access services and jobs in the city, but also enjoy the benefits of living of an accessible village location. The SSLP has established in the supporting evidence (notably, the Exceptional Circumstances Topic Paper 2022) that exceptional circumstances exist to justify the significant release of large amounts of land in locations accessible to the Black Country to meet the (which RPS supports in principle). Given its proximity to the



conurbation Perton is no different in this context and is ideally placed to make a contribution to meeting a proportion of this unmet need, as well accommodating need stemming from within the district.

RPS therefore does not accept the Council's assertion (in paragraph 5.43) that exceptional circumstances does not justify identifying more land for housing development at Perton in this plan.

On this basis, the SSLP is applying an unduly restrictive strategy for Perton, which treats the settlement in isolation and ignores the wider context and location of the settlement and its relationship to the West Midlands, and ignores the opportunities to focus additional growth on suitable sites on the edge of the village, notably Land at Perton Golf course (ref. 705). The SSLP is therefore not positively prepared or justified and so is not soundly-based.

(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.

Release Land at Perton Gold Club (ref. 705) from the Green Belt and allocate it for housing in the SSLP.

As an alternative, the Council should identify additional safeguarded land at Perton to replace the site that is now allocated for development in the SSLP. This would ensure that future needs can be met in an orderly and timely manner, consistent with the current approach established in the adopted Site Allocations development plan, and is also consistent with national 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

**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 address the concerns raised through these representations and test the Councils approach.

***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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX