

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<p>Ref:</p> <p>(For official use only)</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" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Gregory"/>	<input type="text" value="Simon"/>
Last Name	<input type="text" value="Mann"/>	<input type="text" value="Hawley"/>
Job Title (where relevant)	<input type="text" value="Senior Land Manager"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Redrow"/>	<input type="text" value="Harris Lamb"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="Grosvenor House"/>
Line 2	<input type="text"/>	<input type="text" value="75-76 Francis Road"/>
Line 3	<input type="text"/>	<input type="text" value="Edgbaston"/>
Line 4	<input type="text"/>	<input type="text" value="Birmingham"/>
Post Code	<input type="text"/>	<input type="text" value="B16 8SP"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 455 9455"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="simon.hawley@harrislamb.com"/>



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 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 Spatial Housing Strategy identified in Table 8 is flawed. Whilst we have no particular concern with the majority of development being directed to the larger settlements, a significant increase to the overall housing requirement is required, as detailed elsewhere in our representations. Additional development is required across the settlements to meet the increased housing target.

As detailed in our representations in respect of the housing target, is our view that the 4,000 dwellings proposed to meet the growth requirement of the conurbation is inadequate. The figure should be increased significantly. In any event, Table 8 of the draft Plan advises that only 2,958 dwellings are proposed adjacent to the edge of the conurbation.

The housing allocations included within the Plan to support the growth of the conurbation should be directed to locations close to where the need arises. The Plan's spatial strategy for housing should be predicated on making allocations adjacent to the conurbation to meet its need, or within a sustainable commuting distance, to help reduce the need to travel. The housing requirement should be increased and redistributed so that further allocations are made adjacent to the built-up edge of the Black Country.

Proposed Policy DS5 advises that development will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy included within the policy. The land adjacent to the Black Country provides some of the most sustainable locations for development within South Staffordshire. The Black Country provides a wide variety of services and facilities and directing new development to



these locations would fulfil the emerging Plans objective of delivering development in the most sustainable of locations.

Furthermore, it is noted that paragraph 5.23 of the Draft Plan refers to the GBHMA Strategic Growth Study 2018 as being an evidence based document that has been used to inform the settlement hierarchy and the distribution of growth. The Strategic Growth Study advises at paragraph 1.38 that given the strategic nature of the study it does not consider development options of less than 1,500 dwellings. There are no allocations of this size included within the Draft Plan. The GBHMA Strategic Growth Study is not a relevant evidence base against which to assess the suitability of sites or formulate a housing distribution strategy.

Our representations propose that Redrow site adjacent to the Castlecroft area of Wolverhampton is removed from the Green Belt and allocated for residential led development. As detailed in these Representations, there are a number of significant benefits to the proposed allocation of the site.

(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.

The distribution of development set out in Table 8 should be revised. Additional development should be directed to the built up edge of the conurbation. Land at Castlecroft should be removed from the Green Belt and allocated for development.

(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 Plan fails to make sufficient provision for development at a number of key sustainable locations. We would like to attend the examination to inform the Inspector of the significant problems this causes in terms of sustainable housing delivery in the Plan area and the changes that are required to the Plan in order for it to be made sound.

***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