

	<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 2023 - 2041**

**Please return to South Staffordshire Council by 12 noon Friday 31 May 2024**

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.*

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

### 2. Agent's Details (if applicable)



(where relevant)

## 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	<input type="text"/>	Policy	<input type="text" value="SA2"/>	Policies Map	<input type="text" value="Appendix F"/>
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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.

We support the principle of Policy SA2 which seeks a housing led mixed-use development on land to the North of Penkridge, comprising approximately 1000 new homes. Our concern however is that the strategic allocation misses an opportunity to address an existing deficiency within the wider settlement by failing to include within the policy the allocation of land for a supermarket.

Separate representations have been submitted in relation to Policy EC8, which highlight the need for a larger convenience store to serve Penkridge, which can help address an existing major convenience deficiency within the settlement, and also cater for the planned new housing within the SA2 allocation. While Policy SA2 includes a requirement for a 'Community Hub' focussed around community uses / provision, the retail element of this is limited to 'local convenience retail to serve the new neighbourhood'. No level of floorspace is identified within the policy or concept plan contained at Appendix F, but based on the current (undetermined) planning application by St Philips for a large part of the SA2



allocation, it seems likely that the convenience element will be no more than a neighbourhood convenience shop providing a 'top-up' facility for residents of the new development.

Land parcel 420 located at the southern end of the strategic allocation, immediately adjoining the existing settlement boundary, provides an opportunity to not only provide a larger supermarket to serve the convenience shopping needs of the new residents of the development area, but also to address the existing deficiency in convenience retail provision within Penkridge, which is forcing residents to travel some distance to supermarkets and convenience stores outside of the District. Land parcel 420 has a main road frontage and is highly accessible to both the village centre, being only 400m away, and the rest of the SA2 allocation.

The allocation of a specific site through Policy SA2 and the concept plan at Appendix F would not prejudice the proposed Community Hub already required by Policy SA2, which would continue to provide a more localised facility through a range of uses. The proposal site though has the benefit of being immediately deliverable, rather than needing to wait for new houses to be delivered first.

In summary, we consider that Policy SA2 at present is not sound because it has not been positively prepared, fails to consider existing and future needs of Penkridge, and is not therefore effective.

(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.



To address this issue and make the policy sound, Policy SA2 should include a site specific requirement for a supermarket of approximately 2,500sq.m (GEA) to cater for the convenience retail needs of Penkridge and its growing population.

The concept plan in Appendix F should be amended to specifically identify site 420 for a supermarket.

(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:



Given the arguments set out in these representations it is considered that oral evidence will assist the appointed Examiner to understand the scale of the issue and the best means to address it.

***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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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