

	<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.*

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

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="UKPI (Featherstone) Ltd"/></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" value="Ms"/></p> <p><input style="width: 90%;" type="text" value="Chontell"/></p> <p><input style="width: 90%;" type="text" value="Buchanan"/></p> <p><input style="width: 90%;" type="text" value="Planning Consultant"/></p> <p><input style="width: 90%;" type="text" value="First City Limited"/></p> <p><input style="width: 90%;" type="text" value="19 Waterloo Road"/></p> <p><input style="width: 90%;" type="text" value="Wolverhampton"/></p> <p><input style="width: 90%;" type="text" value="West Midlands"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="WV1 4DY"/></p> <p><input style="width: 90%;" type="text" value="01902 710 999"/></p> <p><input style="width: 90%;" type="text" value="chontell@firstcity.co.uk"/></p>
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## 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 type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input 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.

Paragraphs 147 of the NPPF makes comments about reviewing Green Belt boundaries and promoting substantive patterns of development. The paragraph states, *"They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land"*.

No further guidance is provided as to what this would entail or how this should be provided/maintained and determined if there is a threshold/quantity that should be provided.

Policy DS2 advises on compensatory improvements being incorporated into Section 106 agreements and sets out a hierarchy of where this can be accommodated. There is also reference to a commuted sum being suggested in some instances.

However, there is no indication as to what the amount of compensation either monetary or otherwise would be.

We consider this should not apply to previous safeguarded land allocated for future development from previous plans brought forward to the emerging Local Plan. We have received confirmation of this following a conversation with Policy officers however, we consider this should be made clear within the text of the Local Plan.

All sites which this applies to should be notified and the compensatory provision set out in Appendix B – F of the local plan as part of the key requirements.



Further guidance at this stage should also be set out how the compensatory improvements to the environmental quality and accessibility to remain Green Belt related to biodiversity net gain and the duplication of compensation.

(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.

Further guidance is required in connection to the quantum of compensation required and how that will be calculated. Appendix B- F should be amended to make clear which sites this proposed policy could potentially apply to.

(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 are representing an allocated site and consider it is important for us to be present to support the proposed allocation.

**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