

	<p>Local Plan Publication Stage Representation Form</p>	<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*

2. Agent's Details (if applicable)

**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	<input type="text"/>	<input type="text"/>	
First Name	<input type="text"/>	<input type="text"/>	
Last Name	<input type="text"/>	<input type="text"/>	
Job Title (where relevant)	<input type="text"/>	<input type="text"/>	
Organisation (where relevant)	<input type="text"/>	<input type="text"/>	
Address Line 1	<input type="text"/>	<input type="text"/>	
Line 2	<input type="text"/>	<input type="text"/>	
Line 3	<input type="text"/>	<input type="text"/>	
Line 4	<input type="text"/>	<input type="text"/>	
Post Code	<input type="text"/>	<input type="text"/>	
Telephone Number	<input type="text"/>	<input type="text"/>	
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>	

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 SA5: Site Allocations

Paragraph 5.47 of the Regulation 19 Plan states that the council has reduced the level of growth proposed in this location since the previous Local Plan review consultation, removing the recommendation for a new land allocation in this area. This is because of significant constraints identified in the site assessment process affecting new site options around the village, including highways concerns, proximity to education and Green Belt/landscape sensitivities. Due to these issues and the need to only release Green Belt in exceptional circumstances, housing growth in Perton will be limited to existing planning permissions, sites within the existing development boundaries of the villages and the delivery of the safeguarded land adjacent to Perton.

RPS also notes that the Housing Site Selection Topic Paper (HSSTP) assessment of the site concludes that:

"Highways authority raise initial concerns with site access and impact on surrounding junctions"

Comments are also made regarding concerns regarding cumulative impacts on junctions to north and south of Perton and walking distance to secondary education.

At the preferred options consultation stage, held during November to December 2021, IM Land submitted details of the latest modelling work undertaken by DTA



which shows how the potential highway constraints can be resolved in relation development on the site. In addition, discussions that have been ongoing between the site promoter and the County Highways Authority (Staffordshire County Council) on matters relating to the potential traffic impact of proposals for the Land at Perton Golf Course site and other residential development coming forward in the vicinity. Following those discussions, and based on further transport modelling carried out by DTA (**Appendix 1**), an agreement has been reached between the two parties that the proposed improvements at the A41-Wrottesley Park Road junction would mitigate the additional forecast traffic generated by the proposals. In addition, the transport modelling shows both the golf course access and Wrottesley Park Road/ The Parkway roundabout are demonstrated to operate within capacity in the future with the cumulative development traffic associated with the site and adjacent residential schemes. In addition, a proportional contribution towards the necessary scheme would be provided by the developer. This position has also been agreed with SCC as the Local Highway Authority. Due to the distance of the site from the nearest secondary school the developer would need to provide financial contributions in accordance with the Council's school transport contribution policy.

However, there is no reference in the latest (and final) version of the Plan, or the evidence base, which refers or even acknowledges that this information has been considered by the Council. It therefore remains the case that there are no transport and highway reasons why the site should not be allocated for residential development. The Council's assessment and eventually decision to exclude the site on highway ground is not 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.

Revise the evidence base and site assessment of Land at Perton Golf Club to properly reflect the evidence on highway issues prepared by DTA on behalf of IM Land and allocate the site.



(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 or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX