

	<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)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Ian"/>	<input type="text" value="Paul"/>
Last Name	<input type="text" value="Deverell"/>	<input type="text" value="Hill"/>
Job Title (where relevant)	<input type="text" value="Senior Planning Manager"/>	<input type="text" value="Senior Planning Director"/>
Organisation (where relevant)	<input type="text" value="IM Land"/>	<input type="text" value="RPS"/>
Address Line 1	<input type="text"/>	<input type="text" value="1 Newhall Street"/>
Line 2	<input type="text"/>	<input type="text" value="Birmingham"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="B3 3NH"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 622 8520"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="Paul.hill@rps.tetrattech.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 **SA1, SA2, SA3** 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 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 SA3 (Housing Allocations)** provides a schedule of proposed site allocations identified at the Tier 1 – 3 settlements. In addition, **Policy SA1 (Land east of Bilbrook; 750 dwellings)** and **Policy SA2 (Land north of Penkrige; 1,029 dwellings)** propose two strategic residential sites with their own specific policy criteria. A site has been proposed for allocation at Huntington (Land at Pear Tree Farm) for 39 dwellings, which represents the only new allocation in the northeastern part of the district.

As highlighted in separate submissions to Policy DS5 (Spatial Strategy), RPS has raised concerns with the housing trajectory proposed in the second Reg 19 Plan, specifically the substantial reduction in housing delivery planned for in the early years of the plan period, notably during years 2 to 5 (2024/25 to 2027/2028). Rates of delivery are expected to fall below 100 dwellings in year 5. The Council assumes that delivery after these years will increase substantially between years 6 to 8 (2028/29 to 2030/31) and thus counteract the shortfall in homes in the previous years.

At a strategic level, paragraph 20 of the NPPF makes clear that planning policies should make sufficient provision for housing, including affordable housing. RPS does not consider the approach to effectively restrict housing growth in the early of the plan aligns with this objective. This also contradicts recent growth rates seen in the district, which have exceeded 400 dwellings per annum over the last couple of years<sup>1</sup>. RPS sees no reason to follow such a strategy. Furthermore, by restricting the annual delivery of housing risks undermining the requirement, in

<sup>1</sup> South Staffordshire AMR 2022/23



paragraph 69 of the NPPF, to establish a five-year supply of deliverable land on adoption of the plan. It also further undermines the delivery of affordable housing, which the Council accepts is a '*significant issues across the district*' (Second Reg 19 Plan, paragraph 7.16).

At the site level, the trajectory is heavily dependent on the delivery of the two strategic sites at Bilbrook and Penkridge. RPS is aware that some progress is being made in bringing forward these sites, with two outline applications currently pending determination. However, these only equate to 885 out of the 1,779 dwellings proposed on these sites. There is no timetable as to when either of these applications are likely to be determined or whether they will be supported. The Council provides no evidence to substantiate their position that delivery rates will increase as much as suggested as a result of these sites coming forward.

A recent review of housing delivery across the country indicates that sites in the region of 500-999 (Bilbrook) and 1,000-1,900 dwellings (Penkridge) could take between 5 to 6 years respectively to move from submission of an outline to first completion on site<sup>2</sup>. On this basis, this would suggest that delivery on the two strategic sites won't deliver any homes until 2029 at the earliest (near the end of year 6 of the plan). However, the Council expects a significant ramping of delivery during 2028 (with commencement preceding that date). In our view, this raises further concerns that housing delivery in the first five years of the plan period, and maybe beyond that, could be severely restricted if the current strategy is taken forward. This will undermine the plan objectives to deliver the homes the local population need, as well as undermine the needs of those from the wider housing market area where housing growth is already falling short of need.

None of these factors have been accounted in the redrafting of the Reg 19 Plan. Taken together, the current strategy is not justified, will not be effective in its intended outcome, and is not consistent with national policy. It is not soundly-based.

An appropriate remedy that could be taken forward relatively swiftly is for additional land to be identified at the most sustainable settlements where growth is not already identified or where it is currently restricted. A particular settlement where growth is restricted is at Huntington. A suitable and deliverable site in this location is 'Land north of Limepit Lane' (site 591). This site was previously proposed for allocation at the draft Plan (Regulation 18) stage consulted on in 2021<sup>3</sup>. This would help increase supply in the short-term during the early years of the plan, helping to increase delivery overall but also to assist in the delivery of affordable housing.

(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.

<sup>2</sup> Start to Finish How quickly do large-scale housing sites deliver? Third edition, March 2024

<sup>3</sup> South Staffordshire Local Plan 2018-2038 Regulation 18 Consultation (under draft policy SA5, and Appendix B)



Modify Policy SA3 to include the allocation of Land north of Limepit Lane, Huntington (site 591).

(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:

To properly represent our client's interests and contribute towards the oral discussions and issues raised at the examination

**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