

	<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 2. Agent's Details (if Details* 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	Mr	No agent
First Name	Nicholas	
Last Name	Greenwood	
Job Title	N/a	
Organisation	N/A	
Address Line 1	████████████████████	
Line 2	██████████	
Line 3	██████	
Line 4		
Post Code		
Telephone Number	██████████████	



Email Address	<div style="background-color: black; width: 100%; height: 15px;"></div>	
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:

5. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

6. Do you consider the Local Plan is :

(4) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(5) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(6) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="✓"/>

Please tick as appropriate

9. 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 Housing White Paper of Feb 2017 says can only build in the green-belt if all other options exhausted. This reflects what the original Act of Parliament says.

The Council's argument in favour of Green Belt construction over Open Countryside is perverse. Reading through policy DS2 it puts conditions on development.

"The Open Countryside contains many sensitive areas, including its landscapes and areas of ecological, historic, archaeological, agricultural and recreational value."

This applies equally to the Green Belt.

The policy lists a tiny number of exemptions to the effective policy of the council not to build in Open Countryside but to build in Green Belt (or to be pedantic, in land taken out of Green Belt)

Taking just a single example

"A. A new or extended building, provided it is for:

a) purposes directly related to agriculture or forestry; or "

Thses conditions are not being applied to the Green Belt, even though the chosen sites involve building on agricultural land.

The whole policy, starting from the Green Belt search for sites has an in-built bias in favour of building in the Green Belt (which is supposed to be the last resort) as opposed to Open Countryside.



This paragraph from the 'South Staffordshire Green Belt Review Final Report v3, appears to say there is a risk of building somewhere we are allowed to build, if we don't cram all of our development in the place we are only supposed to develop in as a last resort.

2.20 With 20% of the District's land not designated as Green Belt, the District is at risk from development 'leapfrogging' to sites immediately beyond the Green Belt boundary.

The original intention of the Green Belt act was to build in Open Countryside rather than Green Belt – to preserve a ring around the conurbation.

(Continue on a separate sheet /expand box if necessary)

10. 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 plan should bring forward the search for a garden village to within the plan period

(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.

11. 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.

12. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I would like to understand the Council's logic.

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