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**To:** [External Email for Local Plans](#)  
**Subject:** South Staffordshire Local Plan Consultation Regulation 19 response  
**Date:** 22 December 2022 12:31:57

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From:

Mrs Susan Readshaw

[REDACTED]

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[REDACTED]

22 December 2022

Dear Sir or Madam

**Re: South Staffordshire Local Plan Regulation 19 Response**

Thank you for this opportunity to comment on the South Staffordshire Local Plan. My comments, although they apply to the Plan as a whole, are largely centred on Site 582 (Langley Road). I am a resident of Wolverhampton, but my property is immediately adjacent to Site 582, as are a number of properties on Orchard Crescent, Bhylls Lane and Bellencroft Gardens.

My comments on the soundness of the Plan are as follows:-

1. For the plan to be considered sound, the District Council is legally obliged to actively engage with all members of the community. Although I am not a Wolverhampton resident, my quality of life will be profoundly affected by the suggested development of 390 houses on site 582, so I consider myself very much a member of the community affected by the Plan. I can safely say that I received no communication from SSDC regarding the Local Plan. My awareness of it is entirely due to the Save the Seven Cornfields and Save the Lower Penn Greenbelt Facebook pages, and it is solely due to them that I was able to comment on the Plan during the previous consultation. My only contact from SSDC has been an acknowledgement of my comments, submitted via email as the portal proved difficult to operate, and a notification of this current stage of the process. Had it not been for the activity of the above groups, I would probably still be unaware of the South Staffordshire Local Plan. It is not clear to me that residents who do not use social media have had any way of being informed. This is in breach of the Council's own Statement of Community Involvement, which refers to keeping 'everyone involved' informed. Although not a resident of South Staffordshire, and therefore not included in SSDC's distribution of information, the effect on my property of any development on Site 582 means that I am very much involved, as are people both within and outside South Staffordshire without access to the internet or social media.

In addition, once I was directed to the website by the Save the Lower Penn Greenbelt group, I found it confusing and difficult to negotiate, as did many others.

Numerous representations were made to SSDC during the previous consultation that the portal for responses was confusing, complicated and unreliable, but no action was taken to mitigate this. I have a Masters degree and am well used to IT, and if I found it difficult, many less experienced people would find it impossible.

2. The Council states that the Plan has been prepared in conjunction with those of neighbouring Councils, including that of the Black Country, prepared jointly by Wolverhampton, Walsall, Dudley and Sandwell Councils. Upon the withdrawal of Dudley Council, on the grounds that it believes it can meet its own requirements and does not wish to sacrifice green belt, the Black Country Plan has now collapsed and all the councils involved are working on individual Plans. This means that a crucial part of the basis of the South Staffordshire Plan no longer exists, seriously undermining its soundness. In addition, Wolverhampton Council has received funding to explore the potential use of more existing brownfield sites, and this may reduce still further the need for SSDC to co-operate. In view of these changed circumstances it does not seem sensible to go ahead with releasing green belt land for housing that is likely to prove not to be needed.
3. Several sites proposed in the South Staffordshire Plan border on Wolverhampton. All the infrastructure issues arising from these will fall on Wolverhampton Council and local residents to deal with. In particular, a development of 390 houses on Site 582 will cause a huge increase in traffic and heavy pressure on already stretched medical and education services. There is no capacity in nearby secondary schools in Wolverhampton to accommodate additional students from South Staffordshire, and all local GP services are already under heavy pressure. In addition, to the best of my knowledge no flood risk or air quality assessments have been completed. In view of this Wolverhampton Council has asked SSDC for a Masterplan and a Supplementary Planning Document with reference to Site 582 showing that the heavy additional demand on infrastructure is supportable. These documents have not been provided, although interestingly it appears that they have been provided for the other sites that border Wolverhampton. This violates the principle laid out in Paragraph 35 of the National Planning Policy Framework that the Plan should meet the area's needs and be agreed with other authorities.

The failure to consider transport issues, in a location where public transport links are poor and so any development would be heavily reliant on cars, infringes the principle in Chapter 104 of the NPPF that transport issues should be taken into account from the beginning. It also appears to infringe Chapter 105, which states that development should be focused on sustainable areas. In light of the fact that SSDC itself declared a climate emergency in 2019, the proposal for a development that will be almost entirely reliant on cars is at the very least incongruous, particularly since no assessment of increased CO2 emissions has been carried out.

4. Planning permission has recently been granted, on appeal, for a Battery Energy Storage System (BESS) adjacent to site 582. Given the fairly recent development of these units, it is not yet clear whether they give rise to any potential safety issues. This permission had not been granted when the Plan was prepared, and therefore has not been taken into account. Should this unit be built, it will change the nature

of the site. At the very least, the proximity of such a unit will considerably reduce the attractiveness of the site to potential house buyers. There is no point in building houses on a site where people may not want to live.

5. Paragraph 31 of the NPPF states that the Plan should be underpinned by relevant and up to date evidence. In fact the Plan has been prepared using projected population figures from 2014. More recent figures are available showing declining birth rates and a reduction in the predicted number of new dwellings needed, but no account has been taken of these in the Plan. It has therefore been prepared using out of date evidence. I understand that use of the 2014 figures is a government requirement, but even on these figures it is difficult to see that an extra 4,000 houses in South Staffordshire are necessary, particularly given the potential changes in the requirements of neighbouring Councils (see section 2 above). The existence of the new figures merely underlines this.

Furthermore, the Levelling Up and Regeneration Bill currently going through Parliament is expected to radically change the principles on which housing need is assessed, including the ending of centralised housing targets. In light of this over 20 councils nationwide have paused their Local Plans until the full implications of these proposed changes become clear. South Staffordshire however still asserts that it is impossible to do so.

All the above calls into question SSDC's assertion that the 'very special circumstances' necessary to release green belt land, particularly moderate to high-harm land such as Site 582, for development actually exist. In view of the number of breaches of the NPPF, including lack of communication and failure to provide key documents, in addition to the failure to take into account fundamentally changed circumstances, it is difficult to suggest modifications that would improve the soundness of the Plan. My only suggestion would be a complete overhaul of the entire Plan, taking into account up to date evidence, the changed position of neighbouring councils and the effect of any new legislation.

Yours faithfully

Susan Readshaw (postal and email address above)

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