



**Local Plan
Publication Stage
Representation Form**

Ref:

**(For
official
use only)**

**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

First Name

Last Name

Job Title
(where relevant)

Organisation

(where relevant)
Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone
Number



E-mail Address
(where relevant)

dunstonlpdcommittee@gmail.com

Part B – Please use a separate sheet for each representation

Name or Organisation: **Dunston Local Plan Development Committee + Residents**

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

Paragraph h	6.43 – 6.48	Policy	SA5	Policies Map	E30
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> NO
(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> NO
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> NO

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.

Proposed employment allocation at Dunston M6 Junction 13

1) 6.43 EDNA identified 62.4ha employment land required. At present Table 9 states there is 102.7ha (not counting WMI). This is an excess of 40.3ha.
Table includes M6, Junction 13, Dunston at 17.6ha and states that the pipeline supply of employment land over the plan period is sufficient. J13 land is subject to several planning restrictions regarding flooding and major infrastructure advancements and would be restricted with its employment usage and therefore should not be allocated as "Surplus" available land giving a false target

6.46 states this site is not required to increase the district's supply of employment land

A concluding statement from the West Midlands Rail Freight Interchange Order (Applicant's Response to Examining Authority's First Written Questions Document 10.1) identifies the site as unsuitable, Dunston was identified as potentially suitable for a SRFI development. This was assessed as a two-stage process and concluded that 'the combined impacts on Dunston's rural character, as well as the effects on the local amenity, make the site unsuitable. This was submitted in 2019 and the area has the same character and local amenities

There is no justification for the newly proposed Dunston allocation which raise fundamental issues of Soundness

2) NPPF 16(b) states plans should be deliverable. Use of this land is not a deliverable or viable option. South Staffs Council is currently considering a planning application Ref. 23/01080/OUTMEI



There are currently concerns from Network Rail (d), Highways Agency (there would be an unacceptable impact on safety), Severn Trent (there is a pressurised sewer which can't be built over by Law running through the middle of the land) and Staffordshire County Council Flood Risk Management Team (although the land is Flood Zone 1 it is adjacent to residential land in Flood zone 3 – this area floods regularly!)

NPPF (165) and NPPF (173) state inappropriate development in areas of risk should be avoided and when developing land flood risks should not be increased elsewhere.

The infrastructure of local roads (A449, School Lane, M6) would find it a challenge to accommodate a development on this site.

Car parking would be an issue space to provide necessary parking for the allocated employment site

The land should therefore be removed from the New Local Plan as it is not viable for development.

- 3) NPPF (180) States the natural environment should be conserved, recognise the intrinsic beauty of the countryside, and minimise the impacts on biodiversity. This site is currently interspersed with bridleways & public footpaths and teeming with all natural habitats which will be lost if the land is developed

It will significantly intrude into the local countryside and does not offer any improvements for our current nature and wildlife.

Greenhouse gases would be caused by the proposed development both during its construction and in operation. The noise, dirt and disturbance will clearly affect learning at St Leonard's First School which is 50 yards away from the development site.

HGV transport is a major cause of air pollution. The Climate Change Act 2008 refers to reducing greenhouse gas emissions by 2050.

The proposed development application would in fact see our local area concreted with large industrial units built instead.

NPPF states new development should not increase pollution of soil, air and noise.

No amount of mitigation will protect these small children from this pollution.

The land should therefore be removed from the New Local Plan as it goes against the NPPF and The Climate Change Act 2008

- 4) The site is entirely Greenfield in agricultural use. The site consists of a mix of Grade 2 and Grade 3 agricultural land. It is classed as the Best and Most Versatile agricultural land. Any development on this site would see our local area concreted with large industrial units thus losing the small countryside village & heritage forever.

The emphasis on protecting the best and most versatile land is a longstanding commitment of Central Government

<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

In the recent Farm to Fork Summit 2024 at Downing Street the Prime Minister unveiled a major package of measures to support farmers and grow the UK's farming & food sector.

Allocating this very good agricultural land to development for warehouses is completely against the Government's policies.

- 5) Cannock Chase is an AONB for the natural beauty of its elevated heaths, forests and historic parklands, presenting an unspoilt wilderness that contrasts with the surrounding built-up conurbations of the West Midlands. Dunston can be seen from the Brocton and Milford designated viewpoints. A warehouse development would affect this.
It is not in keeping with other developments in the area: Southan Antique village, Dunston Business Village. These are low level office and small retail buildings
- 6) This site was not considered for inclusion in the December 2022 Regulation 19 Plan. South Staffs Council state the Plan is supported by a robust Evidence Base which has been published at each stage of the process. However there has not been an opportunity to comment on the inclusion of this site for development other than the soundness, legal compliance & duty to co-operate.

(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.

Deletion of the proposed site for development in Dunston

(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 have the chance to ask any questions or answer any queries that the Inspector may wish to make to our committee.

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