



#### **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 B – Please use a separate sheet for each representation

Name or Organisation: Glyn & Mary Clewley						
3. To which part of the Local Plan does this representation relate?						
Paragrap 5.7 h	Policy DS3	Policies M	036c			
4. Do you consider the Local Plan is :						
(1) Legally compliant	Yes		No	x		
(2) Sound	Yes		No			
(3) Complies with the Duty to co-operate	Yes		No	X		

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.



## (1) Legal compliance (assuming the plan is legally obliged to observe the National Planning Policy

#### NPPF, section 15. Conserving and enhancing the natural environment

Paragraph **180.** Planning policies and decisions should contribute to and enhance the natural and local environment by: (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

The tenant farmer confirms the land is very productive, anticipated to be Grade 3a. Consequently, the plan is contrary to NPFF, 15, 180, a) & b).

#### (2) Sound SSDC Plan Policy DS3

The council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals

a) Assist in delivering diverse and sustainable farming enterprises.

The plan is not assisting in delivering sustainable farming, it is diminishing farming.

Recent world events have heightened awareness of the need for food self-sufficiency, so building on sustainable farm land is self-defeating.

Consequently, the plan is not sound and contravenes its own policy.

(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 cooperate 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.

plan will not make it legally comp plan should be denied.	pliant or sound.
	(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)?						
X participate in	<b>Yes</b> , 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:						