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To: [REDACTED] [External Email for Local Plans](#)
Subject: Ssdc local plan consultation
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**Joint Representation
of
Save the Seven Cornfields Campaign Group and Penn Residents'
Association CIC(residential action groups)**
c/o 10 Red Lion Street,
Wolverhampton,
WV1 4HL
(Registered PRA CIC address)

**Representations to South Staffordshire District
Council's emerging Local Plan Review: Publication Plan (Regulation
19) (April 2024) public consultation.**

The *Save the Seven Cornfields Campaign Group* and *Penn Residents' Association* jointly and severally wish to participate in this representation.

The ***Save the Seven Cornfields Campaign Group*** (SSCCG) and ***Penn Residents' Association Community Interest Company*** (PRA) are two community residential groups who work very closely together.

Each has a primary objective amongst a set to save the *Seven Cornfields Green Belt* and other local Green Belt sites like Lower Penn.

Both groups work closely with the *South Staffordshire and Black Country Green Belt Alliance* and especially the neighbouring *Lower Penn Green Belt Group*.

The two group's membership include residents both within the Penn and the surrounding area.

The *Chair of SSCCG* is the *Vice Chair of PRA*.

Each uses their mailing list of hundreds and local Facebook sites of thousands to campaign and raise issues of concern.

This document is our Joint Response to object to the *South Staffordshire District Council's Local Plan Review: Publication Plan (Regulation 19 Consultation) (April 2024)*.

This Joint Representation from *PRA* and *S SCCG* should be considered alongside the *Save the Seven Cornfields Campaign Group's* several representations submitted to South Staffordshire District Council.

Representations to the South Staffordshire District Council's Local Plan Review – Publication Plan (Regulation 19) (April 2024) public consultation - Comment Form

Part A – Personal Details

South Staffordshire District Council's emerging Local Plan Review – Publication Plan Stage Public Consultation Report (Regulation 19) (April 2024)		
	1 Personal details	2. Agent's details (if applicable)
Title	Dr	Not Applicable
First name	Arko	As above
Last name	Sen	-
Job Title (where relevant)	Chair SSSCG & Vice Chair PRA	-
Organisation (where relevant)	Save The Seven Cornfields Campaign Group & Penn Residents' Association CIC	-
House No./Street/ Town	c/o 10 Red Lion Street Wolverhampton	-
Post code	WV1 4HL	-
Telephone number	[REDACTED]	-
E-mail addresses	[REDACTED]	-

Please indicate which of these best describes you / your role in responding to this consultation	
Resident or Individual	<input type="checkbox"/>
Planning Agent or Consultant	<input type="checkbox"/>
Developer or Investor	<input type="checkbox"/>
Landowner	<input type="checkbox"/>
Local Business	<input type="checkbox"/>
Land and Property Agent or Surveyor	<input type="checkbox"/>
Local Authority	<input type="checkbox"/>

Public service provider. e.g. education establishment, health, etc	
Public agency / organisation	
Community or other Organisation	X
Local Resident	
Statutory Consultee	
Charity	
Other (please specify in space below):	

Type of Representation: Is this Representation supporting or objecting to South Staffordshire District Council's emerging Local Plan Review Publication Plan Stage "Public Consultation" Report (Regulation 19) (April 2024)?			
Supporting		Objecting	X

Date **30thMay2024**

Part B – Please use a separate sheet for each representation

Name of organisation submitting representation	Save the Seven Cornfields Campaign Group & Penn Residents' Association
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3. To which part of the Local Plan relate?	
Paragraph	
Policy	
Policies Map	

4. Do you consider the Plan is:			
(1) Legally compliant	Yes	No	X
(2) Sound	Yes	No	X
(3) Complies with the duty to co-operate	Yes	No	X

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.

See the Save the Seven Cornfields Campaign Group's and Penn Residents' Association's joint representation below.

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.

See the Save the Seven Cornfields Campaign Group's and Penn Residents' Association's joint representation below.

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)?

Yes, we the Save the Seven Cornfields Campaign Group and Penn Residents' Association jointly and severally wish to participate in examination 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:

Many of the objections and comments made previously were limited by space and require a much more comprehensive exposition especially when specialist knowledge and expertise on topics such as participation and inequalities etc are unlikely to be available to the reader.

The Save the Seven Cornfields Campaign Group (SSCCG) and Penn Resident's Association (PRA) have many concerns that the South Staffs Council's Publication Plan (Regulation 19) (April 2024) public consultation report is an unsound plan.

It is insufficiently robust.

It fails the various tests of 'Soundness' for Local Plan preparation as reinforced within paragraph 35 (a to d) of the Revised NPPF (December 2023).

SSCCG & PRA object to the continued poor quality and lack of universal objectivity of the evidence and forecasting base.

The lack of presentation of assumption and testing of assumptions is another concern.

Furthermore, given the overall evidence and success of a 'brownfield first' strategy in the West Midlands Combined Authority and the Black Country areas, we are compelled to raise the issue about the lack of monitoring and review of brownfield developments in the West Midlands Combined Authority and Black Country and the form and scope of data and information presentation of the Plan being used by the Local Planning Authority to support Local Plan preparation.

During the Local Plan preparation period from beginning to present time, the Brownfield site reclamation for housing has been significantly different. This in itself reduces the extent of the Duty to Co-operate.

In addition the build high storey option in Wolverhampton City Centre has gained significance on the basis of the application of this strategy in Manchester and Birmingham. This type of development best suits first time buyers who normally can ill afford the luxury of a car to commute to employment or public transport hubs. Green Belt development is very rarely suitable for first time buyers.

The model for consultation is flawed and a more participative model with an emphasis on a bottom-up approach would have captured more of the desires, perspective and problems of residents and other key stakeholders.

There are grave concerns that SSDC is far too strident in pushing and proposing large and unnecessary levels of unsustainable and environmentally damaging new sites for housing development, employment land plus gypsy and traveller pitches development across the South Staffordshire District.

The plan is, therefore, not promoting the most environmentally sustainable and inclusive perspective. It conflicts with the 'Sustainability' test of 'Soundness' for Local Plan preparation as stated within paragraph 35 (d) of the Revised NPPF (December 2023).

In summary the South Staffordshire Local Plan:

1. Has not been Positively Prepared.
2. The Housing forecast aggregate numbers are questionable. These are presented as Objective, unquestionably valid and foundational. In fact, these are highly subjective and, therefore, the release of the Green Belt is

Not Justified as reasonable and logically proved.

The SSLP is inconsistent with National Policy.

More on these issues can be found in the See the Save the Seven Cornfields Campaign Group's and Penn Residents' Association's joint representation below.

It is considered an important benefit that the SSDC's amendment to the Local Plan reflects the change of National policy: SSDC Local Plan was reviewed alongside the Revised National Planning Policy Framework (NPPF) in December 2023. The NPPF updated national policy relating to the Green Belt.

The South Staffs area consists of significant Green Belt land. It was, therefore, very important that the SSDC Local Plan complies and reflects this policy change in their plan.

Both the *SSCCG & PRA* (as well as the *SS& BC Green Belt Alliance*) welcomes and appreciates South Staffordshire District Councils removal of several key Green Belt site allocations for housing from the plan. (Many of these had previously been allocated against the housing need of the wider Black Country authorities from the April 2024 Local Plan.)

The capacity led approach as defined in Spatial Option I of SSDC Local Plan is welcomed. This is reasonable. It is the best fit option.

It places a priority on focusing growth on sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements which are those well-served by a public transport infrastructure (paragraph 5.14).

The reduction in housing numbers and the consequential reduction of use of so much Greenbelt land is welcomed.

However, much less welcomed are the remaining risks to Green Belt associated with development within the South Staffordshire.

The proposed Publication Stage Report (April 2024) is failing the 'Sustainability' test of Soundness as set out in paragraph 35 (d) of the Revised NPPF (December 2023). This is largely due to SSDC's continued failure to promote the most sustainable patterns of new housing development across the district.

Housing Forecasts and Target

The South Staffordshire's own housing forecasted need of 4086 dwellings over the 2023-2041 period (paragraph 5.21) might be justified within a range based on the work undertaken prior to our previous November 2022 objections.

The assumptions and model of housing forecasting are not felt to be

robust. They very much over state demand when compared to an independently commissioned forecast.

There is a very negative response and objection from Penn communities, families and residents to the 'Exceptional Circumstances' required to justify development in the Green Belt - as defined by the updated NPPF - to build a further 640 dwellings towards the unmet needs of the GBBCHMA.

The additional 640 dwellings proposed under the 'Duty to Cooperate' have not been fully or reasonably justified either by SSDC or the GBBCHMA.

The assumptions and modelling of forecast must have changed during the planning period as there was significant economic and social change during that period.

Quite clearly, the South Staffs Planning Authority is taking forward an insufficiently robust plan.

It is an unsound Local Plan Review.

This directly conflicts with tests of 'Soundness' for Local Plan preparation: see, for example, paragraph 35 (b). The plan is not based on proportionate evidence)

Greenbelt Sites and Status

The NPPF unquestionably gives fundamental protection of the Green Belt.

Since the NPPF publication, the value of Green Belt has become greater in the minds and heart of communities.

Covid lockdown taught many more people that Green Belt is more than the sum of its parts eg recreation, places for contemplation and relaxation etc.

The updated guidelines (para145) states: 'Once established there is no requirement for greenbelt boundaries to be reviewed or changed when plans are being prepared or updated.'

It is evident even to the most casual observer that the land surrounding Penn prevents the unrestricted sprawl of the Wolverhampton conurbation.

The Green Belt sites assist in the economic and physical regeneration of Wolverhampton 'by encouraging the recycling of derelict and other urban land'.

The Green Belt 'does what it says on the can', it prevents 'neighbouring towns merging'.

It assists with 'safeguarding the countryside from encroachment'.

These statements all serve and fulfil the NPPF defined purpose of the Greenbelt.

The Greenbelt in Penn and Lower Penn presents significant benefit and value to residents and neighbours by addressing the basic and most fundamental aim of the Green Belt.

The Plan must be mindful of these facts and Green Belts sites must be retained.

The *Save the Seven Cornfields Campaign Group* and *Penn Residents' Association* support South Staffs District Councils removing the Seven Cornfields and Lower Penn from the Local Plan housing site allocations.

Seven Cornfields

The communities around the Seven Cornfields remain adamant that the site should be retained as Green Belt.

Within the area on Pennwood Farm, retrospective planning permission for storage containers on the land drew a considerable amount of objections months ago. The local Facebook sites captured the mood of the communities well. The Seven Cornfields remains an important Green Belt site to many communities, groups and families.

Lower Penn

Lower Penn is classified as a Tier 5 village in the SSDC document *The Rural Services and Facilities Audit 2021*.

Tier 5 villages obtain their classification due to their poorer sustainability prospects.

It is because they suffer from poor public transport infrastructure they enjoy the classification.

They lack services and facilities relative to other settlements within the district.

SSCCG and PRA approves this strategy. It considered sound because it aligns with NPPF guidelines.

There remains a concern because of a lack of clarity regarding a definition of what land falls within the curtilage of Lower Penn.

PRA and SSCCG expects that Lower Penn be classified as being within the postcode boundary of Lower Penn.

SSCCG and PRA supports the SSDC removal of Local of Tier 5 villages from the plan (para 2.8)

Neighbourhood Planning

The point has already been made about the approach adopted by South Staffordshire to consultation.

The model favoured by SSCCG and PRA is a more participative and inclusive approach working from bottom up.

Consultation is a weak approach when democracy requires and demands more participation.

With a mantra 'no decision about me without me' participation can generate more creative options and better anticipate community's desired outcomes.

At the present, there is only one adopted Neighbourhood Plan in South Staffordshire. There are several other neighbourhood plans being considered which could benefit from much better participation.

PRA has adopted a model of involvement where problems are defined and redefined by communities and residents. Many of the Green Belt groups have presented at our bimonthly meetings where 100 people attend. Most political parties are present at the meetings. The most senior executives of the council and health system have been called to account at these meetings. Critical planning matters are also addressed at these meetings. This approach is based on practical participation and inclusive decision-making.

South Staffordshire should encourage and support similar residential models in the Parishes.

Assistance from SSCDC could be supportive, facilitative, technical and financial, to help communities and residents create and adopt their own neighbourhood plan to design their futures.

Local people should have a stronger say in public service delivery and its improvement especially when relating to planning policy within their local community. This would promote stronger community affiliation and identity leading to a shared vision within their local area.

*More consideration needs to be given to **planning** the way planning policy is undertaken and developed.* There are different models to be examined.

The Duty to Co-operate

SSCCG and PRA strongly oppose the idea to accommodate neighbouring authorities' unmet housing need. This is due in part to a 'Duty to Cooperate'.

It results and amounts to the 'Exceptional Circumstances' required to justify development within the Green Belt.

The NPPF supports this perspective concluding there is no need for greenbelt boundaries to be reviewed or changed when plans are being prepared.

The inclusion of these 640 houses on the basis of a Duty to Cooperate conflicts with the tests of 'Soundness' for Local Plan preparation as reinforced within para 35 (b – the plan is not based on proportionate evidence) and paragraph 35 (d) – the plan's continued failure to promote the most sustainable patterns of development) of the Revised NPPF (December 2023).

Gypsy and Travellers Sites

South Staffs Local Plan intention to deliver the exceptionally large number of 162 new gypsy and traveller pitches right up to 2042 is excessive and unsustainable.

The implications for small rural village settlements and communities are worrying.

Many areas lack the capacity in the range of services, facilities and highway infrastructure necessary and sufficient to accommodate this proposed scale of growth in pitch numbers.

The residential amenity impact of these additional sites on the existing settled population will be considerable. These additional pitches would be best cited within an urban environment.

SSCCG and PRA very much agree that future Gypsy and Traveller sites within this district should be met wherever possible by extensions or site layout changes to existing gypsy and traveller sites (paragraph 6.40).

SSDC having researched all potential options on both public and private land that could be made available for gypsy and traveller sites (paragraph 6.41).

However, SSCCG and PRA do not consider that the 'Exceptional Circumstances' required to satisfy development in the Green Belt, as defined by the updated NPPF, have been met to justify any new traveller sites.

Any new green field traveller sites would have a negative impact upon the openness and ambience of the greenbelt.

Consultation Community Engagement and Participation

We have concerns that the communication of the Local Plan is failing residents, families, groups and communities within South Staffordshire and the relevant neighbouring area.

Whilst it may be acknowledged that the planners working on the Local Plan have been professional and hardworking, all would have benefitted from considering what type of documentation works best to communicate and ensure understanding and comprehension.

The red top newspapers communicate in a style that anticipates a wide base of readers. It is a real gift to write or rewrite technical information in way that is easily understood by all.

Too often professionals fall back on jargon to imply expertise but in reality all that happens is that the language and style act as barriers to better inclusion.

Many have commented on how difficult the Local Plan is to navigate to points of interest.

A reader should not need a 'satellite navigator' to arrive at passages of interest or concern.

Penn has a predominantly less young population. It has the lowest proportion of WiFi access in the City of Wolverhampton (a pattern similar to areas in South Staffs).

Elderly are a protected characteristic in Equality Legislation and must not be discriminated in any way through service provision that relies too heavily on social media. Digital Poverty is a real issue.

Far too much reliance has been placed by South Staffs on the cheap option of using social media and the council's own website to promote the Local Plan.

Many elderly residents and people with learning difficulties have complained on the inaccessibility of the general planning portal and the Consultation Portal (Opus Consult) Local Plan consultation system. This is being used by the Council's Planning Policy Team to support Local Plan preparation.

SSCCG and PRA maintain that the Local Plans Consultation Portal (Opus Consult) is unclear and highly confusing for members of the public.

The Consultation Portal is not fit-for-purpose. It fails to deliver an "effective" public consultation approach.

There was no direct consultation to each householder by way of written communication, this is important to those without WiFi access.

There is no one best way to communicate but always and another way.

The public consultation and engagement has been poor and has placed the public and stakeholders at a real disadvantage when trying to understand and engage with the Local Plan.

Many groups that have Protected Characteristics have been discriminated against.

SSDC have failed in their consultation approach.

Documents have been difficult to find.

Many members of the community have not been adequately engaged.

The approach that SSDC has taken does not comply with the NPPF guidelines reinforced within paragraph 16 (indent c) of the Revised National Planning Policy Framework (NPPF) (December 2023) "Plans should (c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees."

West Midlands Freight Interchange (para 2.3)

SSCCG & PRA are concerned about the mass and location of the West Midlands Freight Interchange (WMI).

The concerns relate to the adverse environmental impact of this major transportation infrastructure scheme within rural county.

There are concerns relating to the impact on the landscape, wildlife habitat and air quality from the large number of heavy goods vehicles generated.

There are also concerns about the increased congestion on local roads and the damage that the increase in heavy goods traffic will do to our already poor quality road surfaces.

The West Midlands Freight Interchange proposals conflict with South Staffordshire District Council's Climate Change Strategy (2020).

The proposal demonstrates a lack of joint planning and management on behalf South Staffordshire District Council when they promote inappropriate, highly damaging and unsustainable patterns of major new development across the district, contrary to paragraphs 7, 8, 10, 11, 16 (a), 35 (d), 38, and 157 - 159 of the Revised NPPF (December 2023).

Battery storage facilities

The growth and density of planning applications for Lithium Battery Storage facilities is a problem that will not go away.

Battery storage within Green Belt land is not for housing nor employment.

There is insignificant research and publication of the results on the chemical, genetical and environmental hazards and risks of Lithium Batteries. It is clear there are risks.

It is, therefore, foolish to rush forward without due and diligent consideration of the location of these facilities.

When included within the Local Plan, the NPPF (December 2023) expects LPA's to: "use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area".

SSCCG and PRA request that additional open consultations to a wide geographical base should take place when such applications are made.

End. 30th May 2024

Yours

Dr Arko Sen

on behalf of Save the Seven Cornfields Campaign Group (Chair) and Penn Residents' Association CIC (Vice Chair).

Sent from my iPhone
Sent from my iPad