

From: [REDACTED]
To: [External Email for Local Plans](#); [External Email for Local Plans](#)
Subject: Fwd: Ssdc local plan consultation
Date: 31 May 2024 11:35:36

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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 *SSCCG* 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 SSCCG & 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	<input type="checkbox"/>
	<input type="checkbox"/>

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 SSCDC 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.