

Part B – Please use a separate sheet for each representation

Name or Organisation: **JOHN DAVIES FARMS LTD**

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

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

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.

Policy DS6 provides a longer-term growth aspiration for a new settlement that relates not to the current Plan period, but to future Plan periods. As such it is considered premature to include a policy which seeks to set out the criteria for such a settlement when the justification for that settlement, in terms of housing and employment growth, has yet to be fully established and the potential options for accommodating that growth fully explored.

It is noted that the proposed policy recognises that a new settlement is only one key option amongst a number to be considered by the Council in future Plan making. Nonetheless, alternative options for accommodating housing and employment growth in future plan periods include directing growth to lower tier settlements, such as Seisdon, where growth will meet the needs arising in those settlements and surrounding areas whilst also helping to maintain and enhance the vitality of rural communities and their local services (in accordance with paragraph 79 of the NPPF).

The inclusion of policy DS6 is considered to be unsound as it is not justified (based on evidence and appropriate having taken into account all reasonable alternatives) or effective (deliverable over the Plan period).

(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.

As previously detailed, the inclusion of policy DS6 is considered to be unsound as it is not justified (based on evidence and appropriate having taken into account all reasonable alternatives) or effective (deliverable over the Plan period).

It is therefore concluded that policy DS6 should be omitted from the Plan. It's omission will also help to ensure that this option does not prejudice the future consideration of alternative options for accommodating growth in the District in subsequent Plan periods.

(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)?

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)
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<input checked="" type="checkbox"/>	Yes , I wish to participate in hearing session(s)
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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:

In order to contribute to discussions on how the inclusion of policy DS6 adversely affects the soundness of the Plan and the future consideration of alternative options for accommodating growth in the District in subsequent Plan periods.

(Continue on a separate sheet /expand box if necessary)

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.



South Staffordshire Council

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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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