

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

South Staffordshire Council Local Plan 2018 - 2039

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

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*		2. Agent's Details (if applicable)
<p><i>*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.</i></p>		
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(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text" value="SA"/>	Poli cy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

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

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.

Sustainability Appraisal

This submission provides a response on the sustainability appraisal of 'Land at Brookhouse Lane, Featherstone' (SHELAA site ref. 170) being promoted by Persimmon Homes West Midlands. RPS notes that the Regulation 19 version of the Sustainability Appraisal ('Reg 19 SA') does not include any specific appraisal of Site 170. Therefore, the soundness objections raised here are made in response to the Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report, August 2021 ('SAPOP'), which does include the site-specific appraisal of the site.

Summary of Council's sustainability appraisal of Site 170

Set out below is a summary table showing the appraisal summaries for the site taken from Appendix G (Table G.4.1) of the Reg 19 SA. This shows the 'pre- and 'post-mitigation' appraisals of the site. For reference, the pre-mitigation summary is set out in Table 4.4 of the SAPOP, whilst the post-mitigation summary is set out in Table 6.1 of the SAPOP.

The Council considers that site 170 has a number of significant negative effects for residential development, even after mitigation measures are taken into account. RPS has reviewed the evidence presented by the Council in the SAPOP, and does not consider

the findings against a number of SA objectives to be soundly-based. This is set out below.

LPA Reg 19 SA summaries for Site 170

Site Reference 170	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
Featherstone												
Post-mitigation	+/-	+ 0	-	-	-	-	+	-	0	-	-	-
Pre-mitigation	+/-	--	-	-	-	-	+	-	-	-	-	-

RPS response to the Council’s assessment of significant effects – Site 170

The Council’s detailed findings with respect to significant effects on site 170 are presented in Appendix B (Section B.12) of the SAPOP, alongside all the other reasonable alternative sites identified at Featherstone.

For clarification, the analysis set out here relates to the ‘post-mitigation’ appraisal for the site.

SA Objective 4 - Landscape and Townscape

The Council has determined that site 170 would have a ‘minor negative’ effect in relation to both Green Belt harm (see paragraph B12.4.2) and landscape impact (see paragraph B.12.4.5). RPS does not consider the findings of effects against this objective to be soundly-based.

With respect to Green Belt, RPS would question the relevance of including consideration of Green Belt under this objective, given the fact that Green Belt is a strategic designation based on five purposes, none of which relate to landscape factors. In any event, based on evidence set out in the Vision Document submitted in support of the Site (Appendix A, page 30-31), RPS does not consider the Council’s conclusion that development on this site would cause ‘moderate harm’ to the Green Belt purposes soundly-based (see separate submission to the Green Belt Policy DS4 for further details).

In relation to landscape sensitivity, RPS would highlight the point that previous proposals submitted on this site (under planning application ref. 06/00638/OUT) would not have led to significant landscape impact, as summarised in the Vision Document (**Appendix A, page 3**). In particular, the Secretary of State agreed with the Inspector (at paragraph 27 of his final report) that the site is very well contained within firmly defined boundaries and that the scheme would not have a materially harmful effect on the landscape character of the area.

In addition, the revised proposals for the site are supported by a Landscape and Visual Impact Appraisal, which has informed the illustrative masterplan for the site (Appendix A, page 4). The masterplan shows that a significant portion of the site would remain as



open land with improvements to landscaping within and along the boundary of the site. This would further reduce any potential landscape impact from new development in this location.

On this basis, RPS the Council's findings are not soundly-based (not justified) and would recommend that the score for the site should be amended to 'negligible'.

SA Objective 5 – Pollution and Waste

The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. In relation to air and noise, the reason given is due to the proximity of the site to the M54, which could potentially expose some site end users to higher levels of transport associated air and noise pollution. Also, the Council claims that traffic using the A460, M54 and A449 would be expected to have a minor negative impact on air quality and noise at the Site. In relation to watercourses, the reason given for the minor negative score is that a proportion of the site is located within 200m of a minor watercourse and that, because of this, development at the Site could potentially increase the risk of contamination of this watercourse.

RPS contends that these effects are over-stated when taking into account the potential for mitigation. On the potential for negative air and noise effects from the M54, the Vision Document (page 40) highlights that the issue of noise was considered as part of the earlier planning application and appeal at the site (referred to above) and both the Planning Inspector and the Secretary of State concluded that this would not represent a barrier to development and that the detailed design stage would be the appropriate time to consider suitable mitigation. The Illustrative Masterplan (Appendix) shows that the proposed dwellings would be a minimum of 100m from the M54, but parts of the built development would be over 200 metres from the motorway. Notably, there would be more than sufficient space to provide any necessary noise mitigation measures within the proposed linear country park. Furthermore, it is noted that under SA Objective 8 (Health and Well-being) that the site is located more than 200 metres from an Air Quality Management Area (AQMA). This is clear sign that air pollution is unlikely to lead to significant effects as a result of development being located on the site, and would score the Site as 'negligible' under this objective.

RPS also notes that pollution effects has not been identified by the Council as reasons to reject the site as a potential allocation (see Housing Site Selection Topic Paper Appendix 3 – Site Proformas). Similarly, air quality issues can be satisfactorily addressed at the detailed design stage and does not preclude development from coming forward on the Site. Furthermore, as highlighted under separate submissions, the Reg 19 SA has not taken into account recent events, notably the decision made the Government in April 2022 to allow the construction of a new M54/M6/M6 Toll/ A460 link road. This will significantly reduce vehicle traffic flows along the A460 and also the M54 slip road onto the A460, thus leading to a reduction in pollution levels in the vicinity of the Site, which in turn will reduce the significance of these effects in sustainability terms.

For water, RPS highlights that the illustrative masterplan shows that any built development would set back from existing watercourses in the vicinity and within the site and, notably, a sustainable urban drainage system will be designed and installed as

part of development on the site. These measures would mitigate the potential negative effects identified in the SAPOP.

For these reasons, RPS contends that the appraisal of the Site under this objective has ignored some factors that are clearly relevant to the appraisal of the likely significant pollution effects from development on the Site. RPS contends the findings under this objective are not soundly-based (not justified) and that the overall score under this objective should be altered to 'negligible'.

SA Objective 6 - Natural Resources

The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is due to the site being deemed 'previously undeveloped' and that development of the site would result in an '*... inefficient use of land and the permanent and irreversible loss of ecologically valuable soils....*' (see paragraph B.12.61 of the SAPOP). In addition, the Council claims that the site is part of ALC Grades 2 or 3, and so development would lead to the loss of this '*...agriculturally important natural resource...*' (see paragraph B.12.6.2).

RPS disputes the score given for the site. Firstly, the site has been used for cultivation more many years and so, for the vast majority of the site, it is disputed whether the soils are, in fact, of 'ecologically valuable' given its current use. This is supported by technical work undertaken to inform the Vision Document (Appendix A, page 39) which indicates that the site is '*...largely of low ecological value in terms of the habitats and species that it supports...*'. It is therefore important to note that the low value habitats found on the site are there as a result of the soils on the site. Secondly, the SA methodology used to score the site as minor negative in relation to agricultural land is predicated on the mis-conception that all land within grade 3 is 'best and most versatile' (BMV). This is not the case, as only land that is classed as 'Grade 3a' should be considered potentially BMV land¹. Similarly, whilst the site is noted as being within an area graded Grade 3, no evidence is presented by the Council which shows the site to be of Grade 3a value, and thus classed as 'BMV' land.

In light of the above, RPS contends that the site should not be scored 'minor negative' under this objective without sufficient evidence to support the Council's claim. On this basis, RPS contends that the appraisal under this objective is not soundly-based (not justified) and should be scored 'uncertain' under this objective.

SA Objective 10 – Transport and Accessibility

The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is for the following reasons, notably:

- Bus stops - site 170 is partially or wholly located outside the target distance of 400m.
- Railways stations - site 170 is partially or wholly located outside the target distance of 2km.
- Local Services (convenience stores) – site 170 is located outside the target distance of 2km.

¹ Guide to assessing development proposals on agricultural land, Natural England, Updated 5 February 2021, section 4



RPS disputes the assertion that the site would have a minor negative impact with respect to access to bus stops and local services. With regards to bus stops, the Council applies a threshold of 400m or less as the basis for measuring the impact on end users' access to bus services. However, RPS contends that the use of a 400m threshold is unduly restrictive, given the rural nature of South Staffordshire, does not accord or recognise other national standards on accessibility, and also is inconsistent with other parts of the evidence which also considers access to services. This is explained below.

The latest available national guidance on what is an appropriate walking distance (or time period) to local services, including bus services, is set out in Manual for Streets (MfS), published by CLG/Department of Transport in 2007. Whilst slightly dated, it remains the most up to date official position regarding accessibility standards for plan-making purposes. Section 4.4 of MfS provides guidance on what is termed 'walkable neighbourhoods'. MfS defines these as,

"...typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot..."

The vision document (Appendix A, page 36) submitted alongside these representations highlights the presence of bus services operating in close proximity to the site. These services include bus stops located on the A460 to the east of the site, with other bus stops located on Brookhouse Lane, and also on Turnberry Drive both located to the north within the built-up area of Featherstone. All these services are located within 800 metres from the centre of the site when accessing the stops from the local footpath network.

Given these services are available within 800 metres from the site, RPS contends that the Site does promote walkable neighbourhoods for local residents, in line with national guidance, and thus promotes sustainable development in accordance with national policy. However, when applying the Council's SA methodology, this would not be the case.

Furthermore, the use of a 400m threshold differs from those used by the Council as part of its rural services audit. Specifically, the Rural Services and Facilities Audit (RSFA), which applies a proximity 'range' of between 800 to 2,000m (see paragraph 3.17 of that report). In applying this range, the RSFA makes reference to Manual for Streets (under footnote 4) which the audit considers to be *'...an acceptable walking distance to services and facilities...'*. The use of the 400m threshold is clearly at odds with the Council's own evidence on accessibility standards. The SA provides no justification for the use of such a punitive indicator that is half the distance of the standards defined at a national level.

For the reasons given above, RPS contends that the SA methodology for this objective is not robust and does not allow sufficient flexibility for those sites that accord with nationally defined access standards, such as those set out in Manual for Streets. RPS contends the SA methodology for this objective is not fit for purpose as a reasonable measure of significant effects. Consequently, when applying the national standards and those used elsewhere in the Council's evidence base, as a measure of access to local services, site 170 would clearly score 'minor positive'.

RPS also disputes the Council's suggestion that site 170 is located beyond 2km of a convenience store, and thus would score 'minor negative'. This finding again ignores the findings of the RSFA, which identified three convenience stores, all within Featherstone village centre (see Appendix 4, page 5). On this basis, the SA score is incorrect. Again, when appraised properly, the site would score 'minor positive' in relation to this aspect of the objective.

In summary, when the appraisal of significant effects is revisited and adjustments made in light of the issues and concerns raised above, the only minor negative score under this objective would relate to access to a railway station (though this is likely to equally affect all sites identified at Featherstone). On this basis, RPS contends that site 170 would, in overall terms, have a 'minor positive' impact on access to transport and accessibility. The score for site 170 is therefore wrong, and should be adjusted accordingly. Consequently, RPS contends the Council's appraisal of the Site under this objective is not soundly-based (not justified).

SA Objective 11 - Education

The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is for the following reasons, notably:

- Secondary schools – site 170 is located outside the target distance (1.5km) to the nearest secondary school.

RPS disputes the basis for the criteria identified in the SA methodology, and thus disagrees with a 'minor negative' score applied to site 170 against this objective. The 1.5km threshold applied under this objective equates to a distance of less than one mile (0.9 miles). However, both national² and local³ guidance applies a wider distance threshold in measuring appropriate distances between home and school locations.

These are based on the use of 3-mile distance for pupils aged 8 and above, which includes pupils who attend secondary school. Site 170 is located approximately 1.7 miles from Moreton School (using Google maps) and so falls within this threshold. On this basis, RPS considers the distance thresholds applied under this SA objective to be arbitrary in nature and are not based on any local assessment of what would constitute an appropriate distance between home and school for children living in South Staffordshire, and in particular those children living in Featherstone.

RPS therefore contends that the minor negative score under this objective is not correct because the basis for it, as set out in the SA methodology, is wholly inconsistent with national advice on measuring accessibility and contradicts the approach taken to assessing access to services applied elsewhere by the Council. When applying the thresholds in national guidance, site 170 achieves a 'minor positive' score.

On that basis, RPS contend the appraisal under this objective is not soundly-based (not justified) or consistent with other recognised guidance on distance to education applied national and locally across the county. Consequently, the score for Site 170 under this objective should be adjusted to 'minor positive'.

² Department of Education, *Home to school travel and transport guidance Statutory guidance for local authorities* July 2014

³ Staffordshire County Council *Home to School/College Travel Policy and Guidance* Updated June 2021



SA Objective 12 – Economy

The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is for the following reasons, notably:

- Site 170 is located in an area with 'unreasonable' sustainable access to employment opportunities (see paragraph B.12.12.1 of the SAPOP)

RPS disputes this score. The SA methodology (see Box 3.12) defines 'minor negative' as follows:

"Residential-led development proposals that would place site end users in locations with unreasonable or poor access to employment opportunities (the lower half Hansen scores, or adjacent to a village/urban area with Hansen score coverage to some extent) would have a minor negative impact on access to employment opportunities."
(RPS emphasis)

And for 'minor positive' impacts, this is defined as,

"Residential-led development proposals that would place site end users in locations with good or reasonable access to employment opportunities (the upper half Hansen scores) would have a minor positive impact on access to employment opportunities."
(RPS emphasis)

In relation to the use of Hansen scores for the appraisal of sites against this objective, the SAPOP (see paragraph 3.12.3) states,

"Hansen scores for public transport access to employment opportunities were used, which measured the number of destinations which could be accessed within 60 minutes journey time."

The SAPOP provides very little supporting analysis to justify this score. Nonetheless, it is important to note that the Hansen scoring approach has been applied by the Council in the Rural Services and Facilities Audit (RSFA) of settlements. The RSFA defined Featherstone, and thus site 170, as having 'medium access to employment' (see Appendix 4 and 5 of the RSFA). Based on this finding, it is wholly wrong to suggest that Featherstone, and the site itself, has 'unreasonable' access to local employment opportunities.

Given that locations with 'good' access to employment would fall within the 'upper quartile Hansen score' (see table on page 7 on the RSFA for the full list of scoring criteria), RPS assumes that those locations with medium access to employment would be deemed as falling within the 'upper half' of the Hansen score. This would seem reasonable given the number of local employers and employment centres within close proximity to Featherstone and to the site, as highlighted in Figure 5.2 of this submission.

On this basis, RPS contends that the SAPOP has wrongly applied the findings of the RSFA in light of Featherstone's accessibility to local employment. As a result, the SAPOP has wrongly scored the site as being in a location that is within the lower half of the

Hansen score and thus has 'unreasonable' access to local employment. The appraisal of Site 170 is therefore not soundly-based (not justified).

Accordingly, the Council should identify the correct effect consistent with the SA methodology. The correct score in RPS' view, as defined in the methodology, is 'minor positive'.

Summary of RPS appraisal – adjusted scores for Site 170

Based on the foregoing analysis, RPS has adjusted the SA findings for site 170. This is set out in the table below.

RPS Sustainability Appraisal – Site 170

Site Reference 170	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Featherstone												
RPS	+/-	+	0	0	0	+/-	+	-	0	+	+	+
Post-mitigation	+/-	+	0	-	-	-	+	-	0	-	-	-
Pre-mitigation	+/-	--	-	-	-	-	+	-	-	-	-	-

In conclusion, once the proper appraisal has been applied to Site 170, it is clear that the site performs well in terms of its sustainability. The appraisal undertaken by RPS shows that the site performs particularly well in terms of economic and social-related objectives, but also is broadly neutral and / or positive against the range of environmental-related objectives as well. The broadly positive outcome in terms of the Site's overall sustainability demonstrates that the site should be given greater consideration as a housing site allocation because it can deliver the Council's preferred spatial strategy.

Reasons for selection and rejection of Site 170

Under the regulations and based on recent case law, a prerequisite of any robust and soundly-based sustainability appraisal process is to ensure that reasons for rejecting and selecting reasonable alternatives is presented and properly justified in the SA.

The Council's reasons for selecting and rejecting the preferred housing site allocations and reasonable alternatives is set out in Appendix H of the Reg 19 SA. The reasons for rejecting Land east of Brookhouse Lane (Site 170) is provided on page H43-44.

Paragraph 32 of the NPPF makes clear that Local plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements (set out in Strategic Environmental Assessment regulations. However, paragraph H.2.1.1 of the Reg 19 SA states



"Table H.2.1 lists all reasonable alternative sites that have been considered as part of the SA process for residential-led use but are not preferred sites. The table sets out the reasons why these sites were not taken forward, as decided by SSDC" (RPS emphasis)

It is therefore unclear how the SA has informed the site selection process given that the reasons for why sites have been rejected have been inserted into the SA from elsewhere in the evidence base. This approach is therefore contrary to the approach required in national policy.

The reasons for rejecting Site 170 set out in the Reg 19 SA is shown below.

Key positives and negatives

- *Lesser Green Belt harm than the majority of land around the village (site is 'moderate')*
- *Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate')*
- *Highways authority raise initial concerns with highways capacity in surrounding area*

Conclusion

Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397

As highlighted in separate submissions, the first two factors are broadly positive in nature and point to Site 170 as performing comparatively better than the vast majority of other alternative potential allocation sites appraised at Featherstone. The only 'rejection' reason given in the Reg 19 SA, and the Housing Site Selection Topic Paper where the findings have been drawn from, relates to highway capacity concerns. As discussed in separate submissions, RPS disputes the highways concerns raised by the Council (through the County Highways Authority comments) and considers these to be overstated. This is primarily because the CHA comments on the Site ignore the recent decision that allows the construction of the M54/M6Toll/A460/M6 link, and which will significantly improve highway capacity and traffic flows in the vicinity of the Site. For the reasons set out in this and other submissions, the highways capacity concerns have not been evidenced and do not reflect the latest information. The reason for rejecting Site 170 is therefore not justified and so is not soundly-based.

Furthermore, other factors have been ignored by the Council in its rejection reasoning that nonetheless point to Site 170 as being a better option than other preferred locations in the vicinity of the Site. Notably, Site 646a&b (Land at Cross Green) performs significantly worse in terms of Green Belt harm (which has 'High-Very High' harm) and also landscape impacts ('Moderate' impact) in this part of the District. The Land at Cross Green is also located in an area at greater risk of flooding (Flood Zone 2 and 3) which renders the site less sequentially preferable to Site 170 (which lies in Flood Zone 1). In line with national policy, development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (NPPF 2021, para 162). These factors are relevant because Land at Cross Green is located close to Featherstone and is considered by the Council to be 'more sustainable' than sites like Land east of Brookhouse Lane. Nonetheless, both sites



offer an opportunity to meet local needs as well as opportunities to assist in meeting the needs of the wider HMA, notably the Black Country.

On the basis of this analysis, Site 170 does perform well in comparison to the closest preferred sites when considered as a whole. Similarly, RPS has raised wider concerns raised regarding Land at Cross Green, in particular the extent to which whether development in that location will be addressing the needs of the Black Country. In this context, there are clear merits in allocating the Land east of Brookhouse Lane which is in a prime position to help address these wider needs and which can deliver housing in a sustainable location in line with the preferred spatial strategy. RPS therefore does not consider the reasoning for excluding Site 170 to be soundly-based (not justified).

(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.

Update the sustainability appraisal for site 170 in response to the factors identified above, and allocate Site 170 (Land east of Brookhouse Lane) for housing in the South Staffordshire Local Plan.

(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, 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:

RPS has raised specific issues and concerns through this representation that goes to the soundness of the SWDP and it is essential these concerns and the councils evidence is fully tested.

***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 <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