

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<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*

**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.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Gregory"/>	<input type="text" value="Simon"/>
Last Name	<input type="text" value="Mann"/>	<input type="text" value="Hawley"/>
Job Title (where relevant)	<input type="text" value="Senior Land Manager"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Redrow"/>	<input type="text" value="Harris Lamb"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="Grosvenor House"/>
Line 2	<input type="text"/>	<input type="text" value="75-76 Francis Road"/>
Line 3	<input type="text"/>	<input type="text" value="Edgbaston"/>
Line 4	<input type="text"/>	<input type="text" value="Birmingham"/>
Post Code	<input type="text"/>	<input type="text" value="B16 8SP"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 455 9455"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="simon.hawley@harrislamb.com"/>



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"/>	Policy	<input type="text"/>	Policies Map	Omission Site – Castlecroft
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="" 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 checked="" 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.

The land at Castlecroft should be removed from the Green Belt and allocated for residential led development. These representations are accompanied by a Vision Document that highlights the opportunities presented by the site. The site can provide 600-655 new homes at a density of 35-38 dph alongside supporting infrastructure. In summary the proposals includes:

- The development will provide high quality new homes for the local area as well as a new 2 form-entry primary school serving both the new and existing residential communities. As such there is no education constraint to the allocation of the site, as suggested by the Sustainability Appraisal. Indeed, there will be a benefit in terms of education provision.
- The development will be responsive to its location creating a new transitional edge to Castlecroft and the Green Belt, enhanced with new and existing planting where appropriate as part of landscape buffers along the boundaries of the development. The development will also consider the impact of development upon the surrounding landscape and adjacent features such as the River Stour.
- The development will create large new areas of public open space incorporating existing blue-green infrastructure on the site and allowing the proposed community to have better access to nature and open space, benefiting health and well being whilst giving character to the development.
- The development is sustainably located with a range of services and facilities within walking and cycling distance, supported by provision of a new primary school and new pedestrian/cycle infrastructure as part of the development.



The Vision Document sets out a design framework to guide the site and explains how the scheme can respond to constraints. A concept masterplan is provided demonstrating how the site could be brought forward for an attractive development that takes advantage of the sites topography and natural features.

The site is within the Green Belt, as is the majority of the land in the southern and western section of South Staffordshire. Any development within the Green Belt will have some impact on its aim and purposes. However, Green Belt land release is required in South Staffordshire, and land at Castlecroft will have an acceptable impact on the Green Belt. Having regard to the five purposes of Green Belt land identified within the Framework:

- The development of the site will not result in the 'unrestricted' sprawl of a large built up area. The site is contained by the River Stour and well-defined field boundaries. It forms a local location to the edge of Wolverhampton. It has strong defensible Green Belt boundaries.
- It will not result in towns merging into one another. There are no nearby towns that will be visible from the scheme.
- The development of the site will result in encroachment into the countryside. This is true of any greenfield Green Belt site. However, the site is well contained reducing the impact in this regard.
- The development will not have any impact on the setting or character of a historic town
- The development will not hinder urban regeneration.

The South Staffordshire Green Belt Study suggests that there would be 'high' harm to the Green Belt should this site be developed. This is the same status as a large proportion of the Green Belt within the study area. However, it is our view that the Green Belt harm is limited, for the reasons referred to above.

As detailed in these Representations and the Vision Document, there are a number of significant benefits to the proposed allocation of the site. The benefits of development far outweigh any harm. The site can play a valuable contribution towards meeting the housing requirement. It is within the control of a housebuilder and can be brought forward for development promptly if it is allocated. However, if the Council decide that only part of the site is should be allocated within this Plan period the remainder should be identified as safeguarded land within the emerging Plan. Whilst it is our view the site as whole should be brought forward for development in the short term it is a suitable and sustainable location for development and on this basis, if it is not allocated it should be removed from the Green Belt and safeguarded for future Plan reviews.

(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.



(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:

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