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|  | **Local Plan** Publication Stage Representation Form   | **Ref:** **(For official use only)**  |

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| **South Staffordshire Council Local Plan 2023 - 2041**  |

**Name of the Local Plan to which this representation relates:**

**Please return to South Staffordshire Council by 12 noon Friday 31 May 2024**

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 2. Agent’s Details (if Details\* applicable)

\**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.*

 

Personal - Mrs Jennifer Cree, Parish Clerk, Kinver Parish Council, 95 High Street, Kinver, DY7 6HD. 01384873878 clerk@kinver-pc.gov.uk

# Part B – Please use a separate sheet for each representation

Name or Organisation: Kinver Parish Council

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|   | Policy  | HC19 | Policies Map  |   |

Paragraph

1. Do you consider the Local Plan is :

|  |  |  |
| --- | --- | --- |
|    | No  No  |   |
|   |   |
|    |    |

1. Legally compliant Yes

1. Sound Yes
2. Complies with the

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Duty to co-operate Yes No

Please tick as appropriate

1. 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 HC19: Green Infrastructure

We welcome the support for green infrastructure laid out in this policy, but feel that this could be strengthened and made more specific. We note there is no mention of Local Green Spaces anywhere in the Plan.

While the Local Green Spaces Topic Paper 2024 presents a useful overview of legislation, we feel it fails to clarify the special and complementary nature of LGS designation compared to other protections:

- Based on value to local people: LGS is the only protection which takes account of the value local people attach to a site.

- Specific to location: LGS is the only protection which is truly site-specific. (Green Belt sites are assessed only against the purposes of Green Belt, such as separating towns, making it possible to argue that an individual parcel is not very important. Wildlife and sports/amenity sites can be set aside if, in the judgement of the planning authority, similar habitats or amenities are available nearby).

This is clearly a missed opportunity, and policy enhancement should be linked to Biodiversity Net Gain projects.

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

1. 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.

(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.***

1. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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|   | **No**, I do not wish to participate in hearing session(s)  |   |

**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 |

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| participate in hearing session(s), you may be asked at a later point to confirm |

 |   |
| your request to participate. |   |

1. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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***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 [Data Protection (Strategic Planning) | South Staffordshire District Council (sstaffs.gov.uk)](https://www.sstaffs.gov.uk/planning/planning-policy/data-protection-strategic-planning)

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