



Part B – Please use a separate sheet for each representation

Name or Organisation: Staffordshire County Council

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.

Whilst the Plan makes provision for sustainable travel there is little specific consideration of the Public Rights of Way network and how access to and from them can be protected and improved when considering development.

The Plan should fully recognise that any development needs to take appropriate measures to ensure the public path network is protected and improved in order to achieve both sustainable travel and health and well-being objectives.

If any development is likely to affect the path network, either directly or indirectly, then section 106 funding and/or appropriate planning conditions should be imposed to improve the path network, through liaison with ourselves, at that time. This could also include situations where housing development is likely to lead to a rise in usage of the network in the vicinity of the development.

Developments should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:



- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking.
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture.

(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.

Policy EC12 part (d) should be amended as follows to ensure the Plan is sound in relation to Public Rights of Way

All new developments will be required to demonstrate all of the following:

(d) Protection and enhancement of existing rights of way, cycling and equestrian routes (within and in the vicinity of the development including both designated and non-designated routes and, where there is evidence of regular public usage, informal provision). If it is demonstrated that the loss of such as route is unavoidable, the development should provide suitable, more appealing or at least equal replacement routes. For Public Rights of Way improvements and/or diversions should have regard to Staffordshire County Council's Rights of Way Improvement 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:

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 \(sstaffs.gov.uk\)](#)

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