



Part B – Please use a separate sheet for each representation

Name or Organisation: JOHN DAVIES FARMS LIMITED

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 SA5 of the Publication Plan proposes a number of site allocations that, as detailed in the Green Belt Study (2019) (table 7.2), would result in 'moderate-high', 'high' or 'very high' levels of harm to the Green Belt. Such sites include sites 224 Codsall, 523 Cheslyn Hay and 536a Great Wyrley. The release of these sites will therefore result in a weakening of the Green Belt, for example by leaving a narrow gap between towns, increasing its containment by urban areas or by isolating an area of Green Belt that makes a stronger contribution (as detailed in paragraph 6.23 of the Green Belt Study).

Given the above, it is considered that growth proposed on allocations that would result in significant levels of harm (moderate-high and above) to the Green Belt, should be directed to sites where a lesser degree of harm would arise and where the level of growth would ensure that the Plan:

- plans positively for the provision of housing sites of less than one hectare through the allocation of land (in accordance with paragraph 70 of the NPPF), as detailed in the representor's objection to policy DS5;
- meets housing needs of lower tier (tier 4) settlements (in accordance with paragraph 74 of the NPPF), as detailed in the representor's objection to policy DS5; and
- maintains and enhances the vitality of rural communities and their local services (in accordance with paragraph 83 of the NPPF), as detailed in the representor's objection to policy DS5.



The Plan is therefore considered to be unsound as it not justified (is an appropriate strategy, taking into account the reasonable alternatives).

(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.

In order to ensure that the Plan is justified (is an appropriate strategy, taking into account the reasonable alternatives) a greater level of growth, and allocations, should be directed away from allocations that would result in significant levels of harm (moderate-high and above) to sites in lower tier (tier 4) settlements in need of growth where allocations would maintain and enhance the vitality of these communities and not give rise to the 'high' or 'very high' levels of harm to the Green Belt.

(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:

In order to contribute to discussions on the appropriateness of the Plan's housing site allocations (including their impact upon the Green Belt) and the considerations of alternative options.

***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