

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

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

**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 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	Fr	Ms
First Name	Tomas	Chontell
Last Name	Zuna	Buchanan
Job Title (where relevant)		Planning Consultant (where relevant)
Organisation (where relevant)	St Mary's Presbytery and The Archdiocese of Birmingham	First City Limited (where relevant)
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Line 2	Wharf Lane	Wolverhampton
Line 3	Brewood	West Midlands
Line 4		
Post Code	ST19 9BG	WV1 4DY
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## 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  Policy  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(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.

Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.

The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision.

Open space should be located in places on sites which are deemed suitable by the applicant as a result of taking into consideration differences in the sites opportunities and constraints.

Open space policy and the requirements of the site should work in accordance with other proposed policies and should take into consideration the proposed policy DS2: Green Belt Compensatory improvements and biodiversity net gain requirements.

Policy HC17 states, "On-site open space must be designed and located within development so as to maximise its recreational use and multifunctionality whilst benefiting from natural surveillance. In doing so it should have regard to the wider roles that open space can play in supporting health and wellbeing, sustainable food production, biodiversity, public art, local heritage and climate change mitigation and adaptation. The policies should work in unison."



The statement above, we consider, conflicts with, "Smaller areas of incidental green infrastructure without a clear recreational purpose (e.g. landscape buffers, highways verges) and areas without public access will not count towards meeting the quantitative on-site open space standard."

All areas of incidental green space should be considered as part of the open space as it will contribute to biodiversity, climate change mitigation and improved landscaping which will contribute to a positive design and improved appearance of the overall scheme, thus indicating multifunctionality and therefore should not be disregarded.

It is requested that the Council amend the policy to allow a more flexible approach to achieve the right design solution for each site.

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.

(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:

We are representing a previous allocated site and consider it is important for us to be present to support the re-inclusion of the former proposed allocation.

***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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX