

Lichfield District Local Plan 2040

Please return to Lichfield District Council by 5pm on 30th August 2021, by:

- Email: developmentplans@lichfielddc.gov.uk
- Post: Spatial Policy and Delivery, Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.

This form can also be completed on line using our consultation portal: <https://lichfielddc-consult.objective.co.uk/portal>

PLEASE NOTE: This form has two parts:

- Part A: Personal details.
- Part B: Your representation(s).

Part A: Personal details

	1. Personal details ^{1 2}	2. Agent's details (if applicable)
Title	Cllr	
First name	David	
Last name	Thompson	
Job title (where relevant)	Chair, Parish Council Planning and Property Committee	
Organisation (where relevant)	Shenstone Parish Council	
House No./Street	25c Main Street	
Town	Shenstone	
Postcode	WS140LZ	
Telephone number	01543 481 947	
Email address (where relevant)	admin@shenstone-staffs.gov.uk	

¹ If an agent is being used only the title, name and organisation boxes are necessary but please don't forget to complete all the Agent's details.

² Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice is at the end of this form.

Part B: Your representation

Where in the document does your comment relate:

Document	Section					
	Whole Document	Page Number	Paragraph Number	Policy Number	Appendix	Proposals Map
Lichfield District Local Plan 2040		98-100	8.27-8.32	H3		
Sustainability Appraisal Report						
Other	Gypsy and Traveller Accommodation Assessment (GTAA					

Question 1

Do you consider that the Local Plan 2040 complies with the Duty to Co-operate?

Yes	X	No	
-----	---	----	--

Q1a Please specify the reasons below:³

Question 2

Do you consider that the Local Plan 2040 meets the legal and procedural requirements?

Yes	X	No	
-----	---	----	--

Q2a Please specify the reasons below:⁴

³ Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

⁴ Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

Question 3

Do you consider that the Local Plan 2040 is positively prepared?

Yes	X	No	
-----	---	----	--

Q3a Please specify the reasons below⁴:

Question 4

Do you consider that the Local Plan 2040 is justified?

Yes		No	X
-----	--	----	---

Q4a Please specify the reasons below⁵:

Shenstone Parish Council has within its boundary a traveller's site on land not originally designated as a traveller's site by Lichfield District Council. Shenstone Parish Council has always maintained that this site at Gravelly Lane, Stonnall was in part a result of historic inadequate provision by Lichfield District Council to provide sites in more appropriate locations.

The 2007 accommodation assessment had identified the need for 19 pitches in the District Council area to 2026 and when the Gravelly Lane site was occupied initially without planning permission in 2017. At that time only 7 pitches were available in the District Council area. This is still the position, a shortfall of 12 pitches fourteen years after the needs assessment.

⁵ Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

This challenge to the Lichfield District Council Local Plan justification of only 7 additional pitches by 2040 is based on shortfalls in assessing need in the November 2019 Gypsy and Traveller Accommodation Assessment (GTAA). This follows the 2018 inspection at Gravelly Lane, where the Inspector highlighted that there has been a gross under provision over many years.

The shortfalls in providing a justification for only 7 additional pitches by 2040 are as follows:-

1. The proposal to increase site supply via the intensification of existing sites is not adequately justified by showing the potential for this on the existing sites. In particular there is no evidence of any consultation with existing landowners revealing their disposition to growth of the sites they own or explanation of existing owner/site extra land ownership potential.
2. The consultation proposal that traveller sites in the whole of the Green Belt are inappropriate development needs reconsideration as there is no rationale for the change from previous policy. The previous policy sought to locate traveller sites around Key Rural Settlements as they contained the supportive amenities necessary to sustain traveller sites. In 2018 the Gravelly Lane Planning Inspector gave only “moderate weight” to the location in the Green Belt. There is no justification of why this former policy has changed particularly when the Green Belt and the Key Rural Settlements it contains cover a significant proportion of the Lichfield District Council area.
3. The GTAA has primarily taken as evidence of need from the traveller households on existing sites. There is no evidence of consultation with organisations representing travellers regionally or nationally about needs. The Gravelly Lane planning application appeal allowed important insights from traveller representatives into the rhythm of migratory traveller employment patterns between the North West of England and the Midlands.
4. As the GTAA has primarily taken as evidence of need from the traveller households on existing sites it is primarily a snapshot of the needs of the households on those sites. The need to accommodate households outside the area is considered to be zero on the basis that the GTAA found no available data. This is a selective needs assessment.
5. The GTAA states that “recent evidence suggests that Lichfield has a need for traveller transit provision. However, that transit need has not yet been delivered.” The roadside and transit demand has not been engaged in forming the proposals. The transient demand may also point to the need for permanent pitches, this has not been considered.
6. The position on unauthorised sites is stated as “confusing” in the GTAA with key decision making residing with individual landowners. There is no clear proposal to clarify this position in the Local Plan 2040. This is seen as an area of confusion for the travelling population.
7. As site under provision has been a reality since 2007 the commitment to “consider all available delivery mechanisms” in 2024 in the event that additional provision has not been secured is weak as the commitment to “consideration” in 2024 could take several years further to be developed.

Question 5

Do you consider that the Local Plan 2040 is effective⁵?

Yes	X	No	
-----	---	----	--

Q5a Please specify the reasons below:

Question 6

Do you consider that the Local Plan 2040 is consistent with the National Planning Policy Framework?

Yes	X	No	
-----	---	----	--

Q6a Please specify the reasons below⁶:

⁶ Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

Question 7. Please set out what modification(s) you consider necessary to address your representations. You will need to say how this change will address the concerns and it would be helpful if you could put forward your suggested revised wording to any policy or text. Please be as precise as possible⁶.

The proposals for change are contained within the response to question 4.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Question 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	X

Question 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To give the opportunity to enlarge on this submission

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature⁷:	DSThompson
Date:	30/01/21

⁷ Please sign the box if you are filling in a paper copy. The box can be left blank if you are filling in an electronic copy

If you require this form in an alternative format please contact Spatial Policy and Delivery team on 01543 308192 or developmentplans@lichfielddc.gov.uk

Representation forms can be downloaded from the Council's website at www.lichfielddc.gov.uk/localplan2040. A paper copy can be provided by calling 01543 308192 or emailing developmentplans@lichfielddc.gov.uk

All responses received by 5pm on 30th August 2021 will be considered, late responses will not be accepted under any circumstances. Individual acknowledgement of receipt will not be possible.

Please note that copies of all comments received and the names of who submitted them will be made available for the public to view and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice can be viewed at <https://www.lichfielddc.gov.uk/privacy> or contact us for a copy to be sent to you.

Representations may be accompanied by a request to be notified at a specified email address or postal address of the following:

- The submission of the Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendation of the person appointed to carry out the independent examination
- The adoption of the Plan.

Lichfield District Council ('the Council') will process your personal data in accordance with the Data Protection Act 1998 and (when in force) the General Data Protection Regulation ('GDPR').

We are required to provide certain information to you:

Data Controller

The Council is the Data Controller. Our address is Frog Lane, Lichfield, Staffs, WS13 6YY, telephone 01543 308000 and email developmentplans@lichfielddc.gov.uk

We are represented by a Data Protection officer who can be contacted by emailing dpo@lichfielddc.gov.uk.

Why do we process your information?

To fulfil our statutory duty.

What entitles us to process your personal information?

Processing is necessary for the performance of a task (general development management) carried out in the public interest or in the exercise of official authority vested in the Council.

Who might see your personal data (recipients)?

We may share your information with officers of the Council employed to work in other service areas.

How long do we store your data for?

It is impossible to state a definite retention period. The Council will have received and recorded your personal data for a particular purpose(s). When the Council no longer needs your data for these purposes it will either be destroyed or deleted.

Your rights

- Access - you have a right to know if we are processing your data. We will tell you either way. If we are processing your data you have further rights such as to be provided with a copy of it.
- Rectification – if we are holding inaccurate information you can ask us to correct it.
- Erasure- in certain circumstances you can ask us to destroy or delete your information
- Restriction – in certain circumstances you can ask us to put a hold on the processing of your information
- Objection – again you can ask us to stop processing your personal data.

Complaints

If you are unhappy with the way we process your personal data then please speak to us in the first instance. Notwithstanding this you have the right to complain to the Information Commissioner. Their contact details can be accessed by clicking here: <https://ico.org.uk/>