

	<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 2018 - 2039**

**Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022**

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	Mr	
First Name	John	
Last Name	Marsh	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	██████████	
Line 2	██████████	
Line 3		
Line 4		
Post Code	██████████	
Telephone Number	██████████	
E-mail Address (where relevant)	████████████████████	



# 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="checkbox"/>	No	<input checked="" 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.

*5.9 The plan period runs from 2018 onwards, so it is also necessary for the plan to take account of the 992 dwellings already delivered in the district between 2018-2022 in any future housing needs. The district’s future housing need is then calculated using the government’s standard method for calculating housing needs and added to this figure. This currently requires the district to deliver a minimum annual average of 241 dwellings per annum, starting from the current year (2022) and running to the end of the plan period (2039).*

*5.12 In light of these unmet needs, the study recommended a series of strategic growth locations across the housing market area, including a number of locations in South Staffordshire. Using this evidence, it was proposed to test an additional contribution 1 37,900 homes as of the 2017 Birmingham Development Plan 2 The Black Country Urban Capacity Review (2021) 3 Cannock Chase District Council, Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council, Tamworth Borough Council, Birmingham City Council, South Staffordshire District Council, North Warwickshire District Council, Redditch Borough Council, Lichfield District Council, Bromsgrove District Council, Solihull Metropolitan Borough Council and Stratford on Avon District Council South Staffordshire Council Local Plan Review – Publication Plan 28 November 2022 of 4,000 dwellings to the unmet housing needs of the GBBCHMA in the council’s Local Plan review, based on the scale of growth implied in the district by the strategic locations identified in the GBBCHMA Strategic Growth Study*



In respect of Wombourne this section is not complied with

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According to my own mathematics, that's 241 homes over 17 years for a total of 4097 homes, minus the 992 already built for a South Staffs housing need of 3105 homes. Plus a duty to co-operate overspill of 4000 as an arbitrary number. More overspill than we need ourselves.

Yet, the governments formula for determining housing need is now considered innacurate based on modern data, and is likely to be reformulated with upcoming legislation (Levelling Up Bill etc), and there has been widespread concern from politicians and residents about unnecessary building because of top down arbitrary housing figures. So the 241 homes figure cannot be relied upon, neither can the 4000 overspill, especially when the overspill comes from an area that has already scrapped their own plan!

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.

- 1) To add a democratic vote of residents before approving any green belt site for development
- 2) To delay the local plan until the duty to co-operate issue is resolved, i.e is it being abolished, and how can we co operate with neighbours who have scrapped their own plans
- 3) To delay the local plan until the passing of the Levelling Up Bill currently going through parliament, which amongst other things adds a duty to adopt an infrastructure first approach to development. This plan asserts that 500+ homes can be added to Wombourne, the largest of any area despite being a tier 2 village. No Tier 1 village has such a large contribution, yet by its own definition a Tier 2 village does not have the resources and accessibility of a tier 1 village. There is not a single road, doctor, nurse, teacher or police officer accounted for in this plan to service the needs of a population that already cannot access services, already has congestion issue, has no rail station, no road connection to a major transit route, and has no large employment base which would negate the need to commute to/from the area in order to be able to afford to live there.

(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:

The consultation process has been deliberately frustrated by the planners in order to discourage and disengage with residents who dissent from this plan. Despite thousands of objections from residents our voices have not been heard.

***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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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