

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</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.

5.61 The Black Country authorities are also preparing their Local Plan with the Black Country Draft Plan (August 2021) confirming that they have a need of 565ha of employment up until the end of their plan period (2039). The Black Country Draft Plan confirms they are only able to deliver 355ha of this, leaving a shortfall of 210ha. Their Draft Plan indicates that this unmet need should be exported, as far as possible, to authorities that have a strong existing or potential functional economic relationship with the Black Country; to be agreed through a Statement of Common Ground.

The Black Country have scrapped the Black Country Plan, therefore the numbers quoted here are completely meaningless and cannot be relied upon as a factual basis upon which to calculate South Staffordshire's plan. These are now nothing better than made up numbers. There has also been significant press criticism that the Black Country has wasted £2million of taxpayers money on the now scrapped Black Country Plan, therefore it cannot be ruled out that South Staffordshire are pushing their plan through despite the wishes of residents in order to avoid similar embarrassment. Frankly the wishes and the needs of the people who live here far outstrip South Staffordshire Councils reputation or wish to not be criticized in the press.

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.
- 4) Reduce Wombourne's contribution to below 100 houses and place them on brownfield sites. The 'exceptional circumstances' necessary to justify destroying green belt land does not include the failure of SS planning dept to effectively identify and secure brownfield site.

(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 or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX