

Part B – Please use a separate sheet for each representation

Name or Organisation: **CPRE Staffordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	Para 5.17 Table 7 Para 5.21 Table 8	Policy	DS4 DS5	Policies Map	Localities 1 -5
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> No
4 (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.

CPRE Representation Number 2

Housing Numbers

We are concerned that South Staffordshire is unnecessarily and inappropriately proposing development in the Green Belt and greenfield sites well in excess of the need of its own residents and migration assessed using the New Standard Method (NSM) which it has stated that it is using.

“The Proposed Housing Target

5.17 Reflecting these issues, South Staffordshire is proposing to plan for a housing target of **9,089 dwellings between 2018 and 2039**. This will allow the district to meet its own housing needs over the plan period, whilst also making a proportionate and justified contribution to the unmet needs of the GBBCHMA. The specific elements of the housing target can be summarised as set out below from Table 2 of the Plan.

Completions in the district since the start of the plan period (2018- 2022)	992
Existing Planning Permissions and Allocations	2724
Safeguarded land	1604
New Allocations (at least) (*See our separate representation re. densities)	5270
Windfall allowance* (*See our separate representation justifying a higher number)	600
Total for South Staffordshire	11190
Minus provision for GBBCHMA	4000
Minus South Staffordshire's own calculation of housing need using the Government's standard method (2022-2039) 241p.a. x 17years	4,097
Apparent Excess Provision over target (7190 – 4097)	3093

This would be 75% over South Staffordshire's calculation of its own housing need.

Note:

Our calculation is so massively in excess of that we may have made an error - but have so far failed to see where it has occurred.

We consider that the apparent surplus over South Staffordshire's housing need is truly excessive. If we have made an error we would appreciate South Staffordshire's explanation before the opening of the Examination.

Background

The Regulation 19 Plan reads:

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).

We consider that the Plan seriously under-estimates windfall housing numbers – see the separate representation on this subject.

Note:

The Plan also appears to expect larger of dwellings to be delivered on allocated sites. For example, at Linthouse Lane:

- a) A minimum of 1,200 homes by the end of the plan period including affordable housing and specialist elderly housing (e.g. sheltered or extra care) of at least 80 units in accordance with other policies within the local plan.

On the same site, the Locality 3 diagram on Page 38 refers to a minimum of 1976 dwellings, of which 1200 will be in the plan period - but with no justification or explanation in the text. Phasing does not appear to have been included in policies.

(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.

Modification requested

To reduce new housing allocations in Green Belt and on greenfield sites to a realistic number and significantly reduce the levels of over-provision shown in the Regulation 19 Publication.

(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 think that these are key issues in the Local Plan and would definitely wish to appear and have the opportunity to speak at the hearing session when these matters are discussed.

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.