

## Model Representation Form for Local Plans

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

South Worcestershire  
Development Plan Review

**Please return to [ name of LPA ] BY [ time/ date/year ]**

*NB - LPA to include data protection / privacy notice, see para 4 of Explanatory Note*

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\*

2. Agent's Details (if applicable)

*\*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.*

Title	Dr	
First Name	Peter	
Last Name	King	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	CPRE West Midlands Regional Group	
Address Line 1	49 Stourbridge Road	
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(where relevant)

peterkingiron@blueyonder.co.uk

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## Part B – Please use a separate sheet for each representation

Name or Organisation: Campaign to Protect Rural England, Worcestershire Branch

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

Paragraph

\_\_\_\_\_

Policy

Housing  
See below

Policies Map

\_\_\_\_\_

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

\_\_\_\_\_

No

NO

4.(2) Sound

Yes

\_\_\_\_\_

No

NO

4 (3) Complies with the  
Duty to co-operate

Yes

\_\_\_\_\_

No

NO

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.

We object to Policies DS1, DS4, DS5 SA1, SA2, SA3, SA5, SA7, HC2 and related text.

In particular we are object to the level of housing being proposed in the plan and the figures given in Policy DS4 and DS5, and to the justification for this set out in paragraphs 5.8-5.24 of the Publication Plan.

In effect the need for housing development in the district can be met on existing allocated sites and there is no need for additional allocations.

Nor does the Authority need to provide additional homes for adjoining authorities in the Black Country and Birmingham. Both at a technical level, and as a matter of emerging Government Policy, it is no longer clear that those authorities have any unmet need. Furthermore, when they submit their plans, their calculation of housing need may be very different and it will be unlikely that South Staffordshire will still be under an obligation under the Duty-to-Cooperate to address those needs if they cannot be met within the respective authorities.

As a result of this we do not consider 'exceptional circumstances' currently exist for the removal of Green Belt under Policy DS1, which we object to. This would require

suitable amendments of Policies SA1, SA2, SA3, SA5 and SA7 although we are not making specific comments on individual sites.

To support our objection, we commissioned an Independent Report from Gerald Kells [CPRE South Staffordshire final], which examined the need and supply calculations. That report is attached along with relevant report we commissioned on housing need, along with two capacity reports we commissioned, one on the Black Country [Black Country Plan brownfield study, with its appendix Black Country Urban capacity update] and one on Birmingham [Birmingham Plan Issues and Options 2022], and these should be read alongside this objection.

He concludes that during the plan period:

1. The housing need in South Staffordshire can reasonably be set at 5089 but with 240 houses discounted for oversupply from 2018-2020.
2. The current total supply in the plan is at least 11,490 including a reasonable assumption for windfalls of which 6,066 are already allocated or delivered.
3. There is then no need for additional housing allocations, especially in Green Belt where exceptional circumstances are required.
4. The unmet need in the Black Country and in Birmingham is subject to considerable uncertainty and much of it may not exist. The CENSUS and up-to-date supply data both point to considerably lower short falls.
5. Given the early stages of the Birmingham Plan and (now separate) Black Country Plans, South Staffordshire should withdraw additional housing sites from the Green Belt to meet those needs.
6. Given the statement of Michael Gove in relation to planning there is no need to include a review policy for unmet need as the duty to cooperate would not by then exist.

He also advises in terms of specific policies, that the density policy (HC2) should include a higher figure (perhaps 40 dph) for urban brownfield sites and WM CPRE supports that as an objection.

In conclusion we consider that:

- The housing target is grossly excessive, as the need to provide housing for the Black Country is severely overestimated.
- There is likely to be more urban 'brownfield' capacity in the Black Country than hitherto estimated, which reduces the pressure for SSDC to allocate Green Belt land for its needs.
- Furthermore, any correspondence on the duty to cooperate has been overtaken by events, particularly the collapse of the Black Country Plan.
- Accordingly, the Plan fails to show that there are 'exceptional circumstances' to require land to be taken out of the Green Belt.
- In particular, one of the purposes of the Green Belt is to ensure that urban regeneration takes place. This is a property of the Green Belt as a whole, not of any individual parcel of it, and therefore cannot be judged from work on the value of individual land parcels.

(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.

- The Plan in its present form is so far removed from being in accordance with what the law requires that it ought to be withdrawn for reconsideration.
- A revised plan should allocate only land required to provide 4097 houses identified as needed for the district. This means that every allocated site needs to be reviewed, so that the allocations approximate to this target, after allowing for likely windfalls.
- Accordingly, the remaining sites should not be allocated, but retained as Green Belt. If it later proves necessary for Green Belt land to be allocated to meet Black Country needs (subject to legislation at that time), this should be done by means of a Local Plan Review, strictly limited to providing the necessary additional allocation.
- CPRE WM takes no particular view on which parcels should be de-allocated, regarding this as a matter for our colleagues in CPRE Staffordshire, whose view on the matter we would support. However, clearly, deallocation should be based on Green Belt policy, as well as landscape, biodiversity, sustainability and other relevant policies.

(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

**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:

Campaign to Protect Rural England is a leading organisation campaigning for good planning. It is able to provide an independent view, in opposition to those of developers, and thus ensure that the Examination hears all sides of the argument. CPRE's object is explicitly to protect the countryside and rural England more generally.

**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.