

## 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	
Line 2	Hagley	
Line 3	Stourbridge	
Line 4	West Midlands	
Post Code	DY9 0QS	
Telephone Number	01562-720368	

E-mail Address  
(where relevant)

peterkingiron@blueyonder.co.uk

## 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

See below  
Economic  
Land

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 the employment land levels in the plan. Our objections relate to Para 5.61, Policy DS4, as well as, by extension, to SA1, SA2, SA3, SA5 and SA7.

To support our objection, we attach the relevant capacity reports we did on the Black Country [Black Country Plan brownfield study, with its appendix Black Country Urban capacity update] and Birmingham [Birmingham Plan Issues and Options 2022], and these should be read alongside this objection.

We object to the level of employment provision, and in particular the allocation of 36.6 hectare for needs in the Black Country as set out in Para 5.61 and DS4

The Black Country Urban Capacity Report did refer to a shortfall of Industrial Land, which it puts at 553 hectares. However, the updated Economic Development Needs Assessment (published in August 2021) gave figures for industrial land varying from 364-502 based on past completions and 418-806 based on GVA assumptions. There is little need under their Employment based Scenario for any additional land.

Clearly the resulting plan figure is a matter of judgment and could have been subject to objection at Regulation 19 Stage and further testing had that gone ahead.

And even if one accepts, according to ABCA, a shortfall of 210 hectares we are not convinced that only 30-35% of the proposed 270-hectare West Midlands Interchange Site (80-100 hectares) should be considered as meeting Black Country need.

The Black Country Plan is not now going ahead and the individual plans are at an embryonic stage and will not be submitted to the Secretary for some time. It is unclear what obligation South Staffordshire will be to meet employment need if it arises or what level of need there will be, given structural changes to the economy.

(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.

- Any correspondence on the duty to cooperate has been overtaken by events, particularly the collapse of the Black Country Plan.
- the South Staffordshire's Employment need should, therefore, be based on its own requirement.
- This would have particular implications for employment allocation in the Green Belt where 'exceptional circumstances' are required to justify them and these should be reviewed.

(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:

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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.