



Local Plan  
Publication Stage  
Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which this  
representation relates:

South Staffordshire Council  
Local Plan 2023 - 2041

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

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.

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

First Name

Last Name

Job Title

(where relevant)  
Organisation

(where relevant)  
Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone  
Number

E-mail Address

**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	Section 5 From para 5.8 including Table 7 and Table 8	Policy	DS4 DS5	Policies Map	
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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	<b>No</b>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<b>No</b>

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 3**

**Housing Numbers**

Background

**Authority Monitoring Report 2022**

["6.0 Residential Monitoring Housing Requirement and Completions](#)

6.1 The council has a housing requirement in the adopted Core Strategy of 3,850 net dwellings for the plan period 2006 – 2028 (or 175 dwellings per annum). However, as this housing requirement is older than 5 years since adoption, the authority's local housing need figure is calculated using the government's nationally set standard methodology. For South Staffordshire, this currently calculates a local housing need figure of 241 dwellings per annum.

6.2 Between April 2018 and March 2022, there were a total of 1,278 net completions in the district. During 2021/22, there were 530 net completions alone. Overall, since 2018, there has been a total of 1,278 net dwellings completed; this indicates an oversupply of 22% when compared to the annualised standard methodology requirements year-on-year (which has superseded the Core Strategy target of 175 per annum). Across the plan period (2012 – 2022), the authority has regularly exceeded its housing requirement, and it is therefore

considered that the delivery mechanisms in both the Core Strategy and SAD have delivered and continue to do so.”

**Regulation 19 document 2024**  
**The housing target**

“5.21 The outcome of this site assessment process confirmed that there were suitable sites available to deliver the spatial strategy (spatial option I). The capacity of these sites is sufficient to meet our own need plus a proportionate 640 dwelling contribution towards unmet needs of the GBBCHMA. The specific elements of the housing target are set out below:

South Staffordshire’s own housing need using the government’s standard method (2023-2041) 4086

Additional housing to contribute towards the unmet needs of the GBBCHMA (2023-2041) 640

Total number of dwellings to be planned for 4726  
(Table 7: Housing Target)”

We have added the proposed housing totals in the Regulation 19 document  
“Table 8: How housing growth will be distributed across the district”

Our totals were:

Existing permissions 1476

Safeguarded land 1604

New Allocations 1925

**Total 5005**

**This total is 919 dwellings in excess of the Council’s own local need** (5005 – 4086)

**Allowing for an additional 640 for the needs of GBBCHMA the excess would be 279.**

The Regulation 19 document states in paragraph 5.23:

“In total, this distribution of growth exceeds the minimum amount of land release required to meet the district’s 4726 dwellings housing target. This will help the plan to meet the national policy requirement to respond to changing circumstances in the plan period and demonstrate plan flexibility. The housing numbers for each village/broad location are influenced by the capacity of sites considered suitable for allocation, as determined through the housing site assessment topic paper.”

As the Council has made clear in its Housing Monitoring Report quoted above in this representation it has a history of over-supply and has regularly exceeded its housing requirement.

We have noted that the allocations are stated to be the minimum for each site.

We see no justification for the level of allocations proposed.

See also our separate representations on:

- **Windfalls**, which we consider are underestimated.
- **Housing Densities**, which in policy terms are reasonable - but are apparently not being applied to proposed allocation sites.
- **CPRE Staffordshire Representation 7** the provision being made in Stafford Borough to meet the housing needs of South Staffordshire.



- The issues surrounding the housing provision to meet the needs of the Black Country authorities.

We consider that, in combination, the overprovision for housing makes the plan unsound.

(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 to decrease the levels of over-provision found 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.

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**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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

**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**