



**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.

**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)	Regional vice-chair (West Midlands)	
Organisation (where relevant)	Campaign to Protect Rural England	
Address Line 1	As other form	
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: Campaign to Protect Rural England – West Midlands region

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

Paragraph		Policy DS1		Policies Map	
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>		<input type="checkbox"/>
(2) Sound		<input type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	N/A	<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.

WM CPRE objects to the following paragraph in Policy DS1.

*The Green Belt boundary is altered through this Plan to accommodate development allocations set out in Policies SA1, SA3, and SA5. The boundaries of the reviewed Green Belt sites are identified in Appendices B-E of this document and on the policies map.*

We commissioned an independent report on housing numbers in the plan (attached to this objection.) That work suggested that there was a surplus of 2,292 homes in the plan.

Given that situation we do not consider 'exceptional circumstances' have been met to release Green Belt. Our objection to housing sets out the options open to the Council to address the housing surplus and until those are considered we do not believe the choice of Green Belt releases is properly justified and the allocations in SA1, SA2 and SA3 need to be reconsidered.

(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.



Review Green Belt allocations in line with our housing analysis.

(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:

To present our housing assessment and implications and ensure the Inspector has a range of views before him/her, not just the development lobby.

**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 [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