

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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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			
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 DS4 Table 7/8.	Policies Map	
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4. Do you consider the Local Plan is :

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

West Midlands CPRE commissioned an independent report on housing numbers in the plan (attached to this objection.) That work suggested that:

- a. The housing need in South Staffordshire can reasonably be set at 4,086.
- b. The current total supply in the plan (including new allocations and discounting 360 homes for oversupply from 2019-2022) should be at least 6,378, including a reasonable assumption for windfalls, of which 4,534 are already allocated or delivered.
- c. On the basis of the current plan there would be 2,292 homes provided above local need, 448 if only current allocations and safeguarded land are included.
- d. There is, therefore, no numerical need for any additional new housing allocations, especially in Green Belt where exceptional circumstances are required, and only sites already allocated or delivered need be included.
- e. At the same time, 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 shortfalls. Even if the Black Country shortfall were correct over-



provision in Shropshire and Telford should account for significant amounts of that housing need.

Taking this into account (and particular conclusion c) the Council should review its housing numbers. This would lead to one of three potential responses to the surplus of 2,292 homes.

The Council could:

- a. remove both or either of the strategic sites from the plan
- b. remove some or all the green belt allocations from the plan
- c. retain its current level of housing provision and increase the amount of that housing identified as meeting Black Country needs.

WM CPRE has not examined these options in detail, and defers to CPRE Staffordshire in regards to specific sites. However, we generally question whether there are 'exceptional circumstances' for the release of Green Belt which we address in our objection to the Green Belt policy and whether other policy restraints should have been considered with regard to the current new allocations.

(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.



(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:

WM CPRE consider it would be helpful to the examination to set out the basis for our concerns about housing numbers as set out in the attached report; also to 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 or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX