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|  | <p><b>Local Plan</b><br/>Publication Stage<br/>Representation Form</p> | <p><b>Ref:</b></p> <p><b>(For official use only)</b></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                            | Fr  | Ms                                      |  |
| First Name                       | Tomas   | Chontell                                |  |
| Last Name                        | Zuna  | Buchanan                                |  |
| Job Title<br>(where relevant)    |   | Planning Consultant<br>(where relevant) |  |
| Organisation<br>(where relevant) | St Mary's Presbytery and The<br>Archdiocese of Birmingham | First City Limited<br>(where relevant)  |  |
| Address Line 1                   |   | 19 Waterloo Road                        |  |
| Line 2                           | Wharf Lane  | Wolverhampton                           |  |
| Line 3                           | Brewood   | West Midlands                           |  |
| Line 4                           |   |   |  |
| Post Code                        | ST19 9BG  | WV1 4DY                                 |  |
| Telephone Number                 |   | 01902 710 999                           |  |
| E-mail Address                   |   | chontell@firstcity.co.uk                |  |



(where relevant)

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

Name or Organisation:

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

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

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

Policy DS4 states up to 2041 4,726 homes will be provided to meet the District’s housing target and of that 640 homes are to meet the needs of the GBBCHMA.

This is a significantly different number to the previous consultation document, publication plan 2022 which stated a development need of 9,089 dwellings from 2018-2039. The district’s own housing requirement was 5,089 and 4,000 to contribute to the GBBCHMA.

We are aware of changes to the NPPF 2023 in relation to Green Belt releases, however that paragraph 145 states, “Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non- strategic policies, including neighbourhood plans”. It does not imply that no Green Belt boundary changes should be made, or this should be significantly reduced from previous consultation documents as Green Belt boundary changes should not have been taken lightly.



It has been well publicised that there is a housing shortage throughout the Greater Birmingham and Black Country Housing Market Area (GBBHMA) with the most recent housing need position statement addendum, April 2023 states, " 6. *This document focuses on the period 2011-2031, uses figures from the municipal year 2020/21 and deals primarily with the 37,900-home shortfall identified in the Birmingham Development Plan 2011 - 31 (BDP, adopted 2017). As plans are now in the process of being reviewed their end dates will extend and housing need must be calculated using the Standard Method as required by the current National Planning Policy Framework and Guidance.*

7. *As of January 2022, the BDP became five years old and upon reaching this milestone its housing requirement became out of date and instead the Standard Method should be used until such time as a new requirement is set in a reviewed local plan. In late 2022 Birmingham City Council formally commenced the review of its plan and estimated a shortfall of 78,415 homes to 2042 in its Issues and Options document based on the Standard Method. The Standard Method calculation of Housing Need is higher than that used in the Strategic Growth Study baseline, which along with extended plan periods implies a much higher shortfall going forward. Further details and links can be found in Appendix 2.*

8. *In summer 2021, the Black Country Authorities consulted on a Regulation 18 Draft Black Country Plan which estimated a shortfall of 28,239 homes to 2039 based on the Standard Method."*

Despite a re-evaluation in the housing needs for the GBBCHMA the most up to date statement identifies there is still a significant shortfall.

We understand that increased densities have been considered and an increased focus on the tier 1 settlements, however we consider that is not a feasible solution for the length of the plan period.

We consider additional land/sites is required to meet not only the needs of South Staffordshire in the form of a buffer to the housing figures in the event of both smaller allocated sites or larger SUE sites not delivering as expected but also to assist neighbouring areas as part of the Duty to Co-operate.

We consider there is the requirement for additional land to be allocated for future development in other areas of the District including Brewood. We are disappointed to see the removal of site 079 Land at Kiddemore Green Road as this site would create an obvious rounding off of the settlement boundary of Brewood in a sustainable location adjacent to the Doctor's surgery. The site would not only provide much needed family housing but also a range of housing including bungalows and care facilities. The site would also accommodate car parking facilities to assist with the lack of parking in the centre of the village.

We therefore consider this site provides a number of benefits that would justify exceptional circumstances to validate its retention in the plan as a proposed allocation.

The site was deemed suitable for allocation and therefore the circumstance of the site and what it offers has not changed, only the Council's interpretation of the NPPF 2023 paragraph 145.

Please see attached a layout of site 079: Land off Kiddemore Green, Brewood.



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**, 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 are representing a previous allocated site and consider it is important for us to be present to support the re-inclusion of the former proposed allocation.

***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