

	<p><b>Local Plan</b> Publication Stage 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\*

*\*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)

<p>Title <input style="width: 90%;" type="text" value="Fr"/></p> <p>First Name <input style="width: 90%;" type="text" value="Tomas"/></p> <p>Last Name <input style="width: 90%;" type="text" value="Zuna"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="St Mary's Presbytery and The Archdiocese of Birmingham"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text" value="Wharf Lane"/></p> <p>Line 3 <input style="width: 90%;" type="text" value="Brewood"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text" value="ST19 9BG"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text" value="Ms"/></p> <p><input style="width: 90%;" type="text" value="Chontell"/></p> <p><input style="width: 90%;" type="text" value="Buchanan"/></p> <p><input style="width: 90%;" type="text" value="Planning Consultant (where relevant)"/></p> <p><input style="width: 90%;" type="text" value="First City Limited"/></p> <p>(where relevant) <input style="width: 90%;" type="text" value="19 Waterloo Road"/></p> <p><input style="width: 90%;" type="text" value="Wolverhampton"/></p> <p><input style="width: 90%;" type="text" value="West Midlands"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="WV1 4DY"/></p> <p><input style="width: 90%;" type="text" value="01902 710 999"/></p> <p><input style="width: 90%;" type="text" value="chontell@firstcity.co.uk"/></p>
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## 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 type="checkbox"/>
(2) Sound	Yes	<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.

Policy HC4 notes major development should clearly contribute to meeting the needs of older and disabled people.

The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.

It stipulates that all major development should provide bungalows, age restricted single storey accommodation such as flats and maisonettes, sheltered/retirement living and extra care housing with care and other supported living.

It is unclear if the policy is requiring ALL of the above-mentioned housing types on all sites or whether a site should include one or some of the housing.

If it is the former, we consider this to be overly prescriptive of enforcing every major site to accommodate all housing types in addition to all other policy requirements such as those set out within policies HC 1,2,3,5 and 8 in addition to open space needs and biodiversity net gain requirements etc.

It is important to note not all sites should be treated in the same way and certain types of housing are better suited to particular sites based on their location, size and the surroundings.

There needs to be a level of flexibility applied on a site-by-site basis to ensure sites have a level of individuality and take into consideration the surrounding area.



With the above taken into consideration, site 079 Kiddemore Green Road, Brewood provided a percentage of bungalows and retirement living with the potential for extra care/ supported living to be incorporated in a sustainable location in a desirable location, in addition to other housing types. This site has been removed from the Local Plan when we consider the site and what it had to offer warranted its retention in the Local Plan and provided exception justification as it is heavily policy compliant despite recent changes to the NPPF Green Belt policies.

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