

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<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 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

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"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%; border: 1px solid black;" type="text" value="Miller Homes"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone <input style="width: 90%;" type="text"/></p> <p>E-mail Address (where relevant) <input style="width: 90%;" type="text"/></p>	<p>Mr <input style="width: 90%;" type="text"/></p> <p>John <input style="width: 90%;" type="text"/></p> <p>Williams <input style="width: 90%;" type="text"/></p> <p>Director <input style="width: 90%;" type="text"/></p> <p>PlanIt Planning and Development <input style="width: 90%; border: 1px solid black;" type="text"/></p> <p>The Studio <input style="width: 90%;" type="text"/></p> <p>White Cottage <input style="width: 90%;" type="text"/></p> <p>Astley, nr Shrawley <input style="width: 90%;" type="text"/></p> <p>Worcestershire <input style="width: 90%;" type="text"/></p> <p>DY13 0RS <input style="width: 90%;" type="text"/></p> <p>01299 828084 <input style="width: 90%;" type="text"/></p> <p>john@planit-planningdevelopment.co.uk <input style="width: 90%; border: 1px solid black;" type="text"/></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 checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="checked" 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 HC12 requires all new residential developments to meet or exceed the Nationally Described Space Standards (NDSS) requirements. The starting point for the preparation of Local Plans is that they should not include policies requiring NDSS compliant housing. Policies should only be included where the standards can be "justified" (NPPF footnoted 49). The Council seek to justify a requirement for NDSS by reference to the Internal Space Standards Topic Paper.

However, the Internal Space Standards Topic Paper does not justify the requirement for use of space standards. It identifies a series of generic matters that are relevant throughout the country. There is no evidence to suggest that the existing stock of housing is deficient against NDSS; in the absence of such evidence there is no policy justification to impose the standards on all new development.

Furthermore, Local Plans should not simply require all developments to provide NDSS housing. They should identify how many properties are required to be NDSS and the policies should seek to deliver this amount. The policy should work in a similar fashion to the affordable housing policy and require, for example, 30% of all properties to meet NDSS if that meets the identified level of provision.

If the Council insists that all new properties must meet NDSS, there will be consequences; most notably, entry level properties will be more expensive because they will need to be larger which will increase the build costs. Those additional costs will be passed on to house buyers through the sales prices. The increased square footage could also adversely affect the density requirements which are set out in the Local Plan. The Council needs to recognise that if they require all properties to be



NDSS compliant, it will have a direct impact on densities and affordability of new homes.

(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.

Policy HC12 should be revised. The requirement for internal space standards should be removed until a full and proper localised evidence is produced to demonstrate they are necessary. If the policy is to remain, it should make it clear that some flexibility to the policy may be applied depending on the individual merits of the development proposal. This flexibility is applied to the part of the policy on external space standards and the same principle should also apply to internal space standards.

(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:

***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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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