

	<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 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.*

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone

E-mail Address (where relevant)

2. Agent's Details (if applicable)

Mr

John

Williams

Director

PlanIt Planning and Development

The Studio

White Cottage

Astley, nr Shrawley

Worcestershire

DY13 0RS

01299 828084

john@planit-planningdevelopment.co.uk



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.

The provisions identified in policy NB6 are particularly onerous and will jeopardise the deliverability and viability of residential schemes. Whilst we applaud the objectives to decarbonise new development, we can find no evidence that the cost implications of the net zero policy, and its impact on viability, have been assessed. We consider that this policy is unnecessary and that the proper framework for delivering carbon reduction is through the Building Regulations legislative framework.

Significant changes to building regulations came into effect on 15 June 2022. These measures make it mandatory to cut carbon emissions in new homes by 30%. The changes will apply to all units which are constructed after June 2023 and are aimed at improving the energy efficiency of buildings to help the country move towards its targets for Net Zero by 2050. More changes will be coming in 2025 to make buildings more energy efficient.

These changes are measures to improve energy efficiency in housing regulations ahead of the Future Homes and Buildings Standards introduction in 2025, which will require more significant cuts to carbon emissions. The aim of these measures is to make the changes in 2025 less severe for builders whilst also helping to cut carbon emissions in the meantime. Against that legislative context, there is no justification for the Council to accelerate the requirement for net zero through a planning policy.



In addition to the above comments, it is noted that policy NB6 requires a 10% improvement to the Part L 2021 Target for Fabric Energy Efficiency. However, that benchmark standard is already out of date and is replaced by the introduction of the 2022 changes to the Part L Building Regulations; those changes achieve the 10 % improvement which is referenced in policy NB6.

(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 cooperate 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.

This policy should be removed from the Plan.

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