

	<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.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Michael
Last Name	<input type="text"/>	Davies
Job Title (where relevant)	<input type="text"/>	Planning Director
Organisation (where relevant)	CWC Group - Clowes Developments	Savills
Address Line 1	<input type="text"/>	55 Colmore Row
Line 2	<input type="text"/>	Birmingham
Line 3	<input type="text"/>	
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	B3 3AA
Telephone Number	<input type="text"/>	07967 555 548
E-mail Address	<input type="text"/>	mpdavies@savills.com



(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: **Savills (on behalf of CWC Group - Clowes Developments)**

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

Paragraph	<input type="text"/>	Policy	HC1: Housing Mix	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

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

Clowes objects to the policy HC1, as written because it is not justified, effective, nor is it accordance with national policy. This policy requires all major housing sites to provide a minimum of 70% of properties to be 3 bedrooms or less. This is linked to the Council’s aspiration to increase delivery of 2 and 3 bedroom homes, which Clowes supports. Clowes does not however support such a blanket requirement. It is important that housing mix is determined on a site by site basis and takes account of market signals at the time (PPG Reference ID: 61-038-20190315). It would be appropriate for the Council to refer to other evidence not just the latest Housing Market Assessment and consider other elements such as the current demand.

Reference is made in the policy to: “any development that fails to make efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes compared with local housing need will be refused”. “disproportionate” is not defined in the policy, so it is therefore unclear how this is measured or how a developer should respond to this. This policy is therefore negatively worded, and has not been positively prepared as required by paragraph 35 of the NPPF.

If South Staffordshire and Dudley want to attract inward investment it needs to supply housing which is attractive to captains of industry. This part of the Black Country urban fringe is aspirational and attractive to executives and families. This is demonstrated by the type of houses located at Hunters Ride, adjacent to the



site. This demonstrates a site specific rationale for there to be consideration of the specifics of sites and their surroundings.

(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.

It is important that housing mix is determined on a site by site basis and takes account of market signals at the time (PPG Reference ID: 61-038-20190315). It would be appropriate for the Council to refer to other evidence not just the latest Housing Market Assessment and consider other elements such as the current demand.

Reference is made in the policy to: "any development that fails to make efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes compared with local housing need will be refused". "disproportionate" is not defined in the policy, so it is therefore unclear how this is measured or how a developer should respond to this. This policy should be reworded in order to evidence it has been positively prepared as required by paragraph 35 of the NPPF.

(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:

To provide oral evidence and engage in the Examination discussions on this matter.

***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