



Local Plan

Publication Stage Representation Form Ref:

(For official use only)

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		2. Agent's Details (if
Details*		applicable)
	ted, please complete only the Title, Na	
boxes below but compl	lete the full contact details of the age	nt in 2.
	r	
Title		Mr
First Name		Neil
I II St Ivallie		IVCII
	Г	
Last Name		Cox
Job Title		Director
(where relevant)		Director
(Where relevant)		Trake Planning & Design
Organisation	Four Ashes Road Ltd	Evolve Planning & Design
_	7 001 7 10 10 10 10 10	Ltd
(where relevant)		
Address Line 1		Office 1, Tollgate House
Address Line 1		Farm
Line 2		Blithbury Road
LINE Z		Dilitibuly Roau
Line 3		Hamstall Ridware
Line 4		Staffordshire
LINE 4		Standiusinie
	Г	
Post Code		WS15 3RT
Telephone		
Number		07815 324817
Nullibei		
E-mail Address		neil@evolvepad.co.uk



Name or Organisation:					
3. To which part of the Local Plan does this representation relate?					
Paragraph Police	DS4	Policies	з Мар		
4. Do you consider the Local Pla	n is :	·			
(1) Legally compliant	Yes		No		
(2) Sound	Yes		No		
(3) Complies with the Duty to co-operate	Yes	✓	No		
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.					
At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by 6,618 people between 2020-2040. Whilst this is in excess of the forecast jobs growth outlined in the EDNA, Four Ashes Road Ltd is concerned that the EDNA fails to realistically consider additional jobs created at WMI. Further consideration should therefore be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider housing market area					
See supporting representations for further details.					
	(Continue	on a senarate	sheet /expand ho	x 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.

Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.
See supporting representations for further details.
(Continue on a senarate sheet /eynand boy 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.

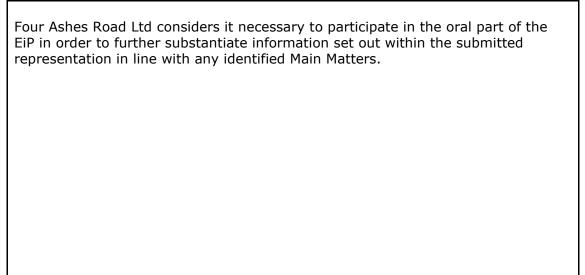
7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



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:





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Data Protection

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Name or Organisation:					
3. To which part of the Local Plan does this representation relate?					
Paragraph Policy	HC1	Policies Map			
4. Do you consider the Local Plan is	: .	./		_	
(1) Legally compliant Y	es -		No		
(2) Sound Y	es [No	./	
(3) Complies with the Duty to co-operate Y	es [✓	No		
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.					
Four Ashes Road Ltd would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.					
The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Four Ashes Road Ltd would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District					
See supporting representations for further details.					
(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.

Four Ashes Road Ltd considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.

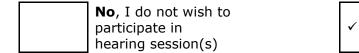
See supporting representations for further details.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

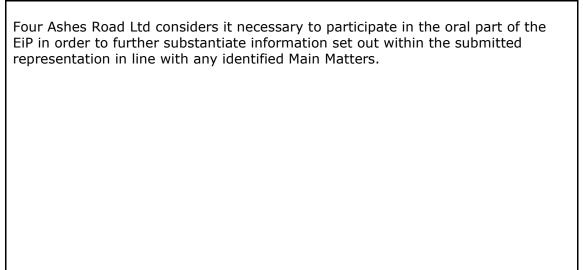


Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:





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Name or Organisation:					
3. To which part of the Local Plan does this representation relate?					
Paragraph Policy HC4 Policies Map					
4. Do you consider the Local Plan	is :	<u>/</u>			
(1) Legally compliant	Yes		No		
(2) Sound	Yes		No	1	
(3) Complies with the Duty to co-operate	Yes	✓	No		
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.					
It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements.					
The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Four Ashes Road Ltd considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.					
See supporting representations for further details.					
(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.

The Policy should be amended to require a maximum of 30% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.

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(Continue on a separate sheet /expand box if necessary)

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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)

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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:

Four Ashes Road Ltd considers it necessary to participate in the oral part of the EiP in order to further substantiate information set out within the submitted representation in line with any identified Main Matters.



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Name or Organisation:					
3. To which part of the Local Plan does this representation relate?					
Paragraph	Policy HC12	Policies Map			
4. Do you consider the Lo	cal Plan is : 「	<u> </u>			
(1) Legally compliant	Yes		No		
(2) Sound	Yes		No	/	
(3) Complies with the Duty to co-operate	Yes	✓	No		
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.					
It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. See supporting representations for further details.					
(Continue on a separate sheet /expand box if necessary)					





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Name or Organisation:						
3. To which part of the Local Plan does this representation relate?						
Paragraph	Policy HC17	Policies	Мар			
4. Do you consider the Lo	cal Plan is :					
(1) Legally compliant	Yes	<u> </u>	No			
(2) Sound	Yes		No	<i>y</i>		
(3) Complies with the Duty to co-operate	Yes	✓	No			
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.						
Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context.						
See supporting representations for further details.						
(Continue on a separate sheet /expand box if necessary)						



Accessibility standards should be established through the Local Plan to pr	ovide
certainty and not displaced to supplementary guidance which is not inten	ded to
establish policy.	

See supporting representations for further details.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Ī	No, I do not wish to		Yes, I wish to
	participate in	✓	participate in
Į	hearing session(s)		hearing session(s)

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Name or Organisation:						
3. To which part of the Local Plan does this representation relate?						
Paragraph	Policy NB6	Policies Map				
4. Do you consider the Lo	cal Plan is :					
(1) Legally compliant	Yes		No			
(2) Sound	Yes		No			
(3) Complies with the Duty to co-operate	Yes	✓	No	V		
Please tick as appropriate						
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A locally specific CO2 reduction requirement is unnecessary and without justification for deviation from Government emerging Future Homes standards to be considered through building regulations						
See supporting representations for further details.						
(Continue on a separate sheet /expand box if necessary)						



The Council should delete policy.					
See supporting representations for further details.					
	(Continue on a	a conarato che	eet /expand box if necessary)		
	(Continue on a	a separate sile	sec / expand box in necessary)		
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7. If your representation is seeking a necessary to participate in examinat			an, do you consider it		
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 provious participate in hearing session(s), you your request to participate.					
8. If you wish to participate in the hard consider this to be necessary:	nearing sessi	on(s), plea	se outline why you		
Four Ashes Road Ltd considers it nec EiP in order to further substantiate in representation in line with any ident	nformation s	et out with			



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Name or Organisation:				_
3. To which part of the Loc	cal Plan does this r	representation relat	te?	
Paragraph	Policy SA5	Policies Map		
4. Do you consider the Loc	cal Plan is :	√		
(1) Legally compliant	Yes	<u> </u>	No	
(2) Sound	Yes	✓	No	
(3) Complies with the Duty to co-operate	Yes	✓	No	
Please tick as appropriate				
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See supporting representa	ations for further d	etails.		
	(Continue on a sep	oarate sheet /expar	nd box if r	necessary)



See supporting representations for further details.				
(C	ontinue on a separate sheet /expand box if necessary)			
and your suggested modification(s). You further opportunity to make submission	ecessary to support your representation ou should not assume that you will have a ass. as may only be made if invited by the			
7. If your representation is seeking a m necessary to participate in examination	nodification to the plan, do you consider it hearing session(s)?			
No, I do not wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)			
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