

	<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)

<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%;" type="text" value="Keon Homes Ltd"/></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 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="Mr"/></p> <p><input style="width: 90%;" type="text" value="Neil"/></p> <p><input style="width: 90%;" type="text" value="Cox"/></p> <p><input style="width: 90%;" type="text" value="Director"/></p> <p><input style="width: 90%;" type="text" value="Evolve Planning & Design Ltd"/></p> <p><input style="width: 90%;" type="text" value="Office 1, Tollgate House Farm"/></p> <p><input style="width: 90%;" type="text" value="Blithbury Road"/></p> <p><input style="width: 90%;" type="text" value="Hamstall Ridware"/></p> <p><input style="width: 90%;" type="text" value="Staffordshire"/></p> <p><input style="width: 90%;" type="text" value="WS15 3RT"/></p> <p><input style="width: 90%;" type="text" value="07815 324817"/></p> <p><input style="width: 90%;" type="text" value="neil@evolvepad.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 **DS4** Policies Map

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.

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, Keon Homes 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 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.

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.

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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)?

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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 **HC1** Policies Map

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"/>

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Keon Homes 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. Keon Homes 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

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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.

Keon Homes 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.

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Paragraph Policy **HC4** Policies Map

4. Do you consider the Local Plan is :

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(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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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. Keon Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.

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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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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 **HC12** Policies Map

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

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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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NDSS requirement should be removed.

See supporting representations for further details.

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

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Name or Organisation:

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Paragraph Policy **HC17** Policies Map

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"/>

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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.

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Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy.

See supporting representations for further details.

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

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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 **NB6** Policies Map

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

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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)

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The Council should delete policy.

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Paragraph Policy **SA5** Policies Map

4. Do you consider the Local Plan is :

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Site 426a is sound

Site 426b is suitable, available and achievable and should be considered if omission sites are necessary to make the Local Plan sound.

See supporting representations for further details.

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

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Site 426b is suitable, available and achievable and should be considered if omission sites are necessary to make the Local Plan sound.

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