



### **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)
	d, please complete only the Title, Name and C	
boxes below but comple	te the full contact details of the agent in 2.	
Title		Mr
First Name		Neil
Last Name		Cov
Last Name		Cox
		[
Job Title		Director
(where relevant)		
Organisation	Lovell Homes	Evolve Planning & Design
_	Lovell Homes	Ltd
(where relevant)		
Address Line 1		Office 1, Tollgate House
Address Line 1		Farm
Line 2		Blithbury Road
		,
Line 3		Hamstall Ridware
LITIC 5		Hamstan Riaware
Line 4		Ct-ff-ud-l-iu-
Line 4		Staffordshire
Post Code		WS15 3RT
Telephone		07015 224017
Number		07815 324817
F-mail Address		neil@evolvenad.co.uk



-					
Name or Organisation:					
3. To which part of the Local Plan	does this rep	oresentation	n relate?		
Paragraph Policy	DS4	Policies	Мар		
4. Do you consider the Local Plan	is :	./			
(1) Legally compliant	Yes	•	No		
(2) Sound	Yes		No		
(3) Complies with the Duty to co-operate	Yes	<b>✓</b>	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 population in South Staffordshire Whilst this is in excess of the fore Homes is concerned that the EDN created at WMI. Further consideration minimum local housing need figur support the necessary growth in the community within South Staffords into consideration the 4,000 additional that the support the necessary growth in the community within South Staffords into consideration the 4,000 additional that the support that the suppo	will grow by cast jobs gro A fails to rea ation should to be derived fro he working a shire to supp	6,618 peopowth outline listically contherefore beam the standard populationt such job	le between 202 d in the EDNA, nsider additional given to whet dard method won to create a los growth, even	20-2040. Lovell al jobs her the ould balanced taking	
See supporting representations for further details.					
	(Continue o	on a separate s	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



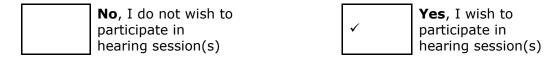
matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested 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.					
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.

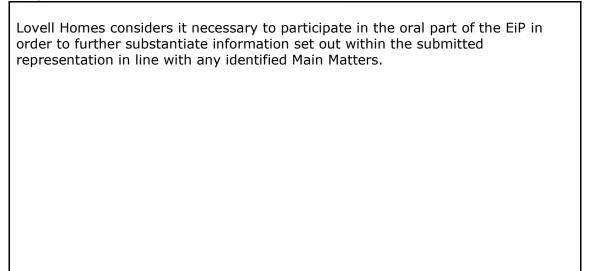
7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



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 rep	resentation rela	te?		
Paragraph Policy	HC1	Policies Map			
4. Do you consider the Local Plan i	s :	./			
(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.					
Lovell 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. Lovell 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					
See supporting representations for further details.					
(Continu	e on a separ	ate sheet /expa	nd box if n	ecessary)	

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.

Lovell 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.

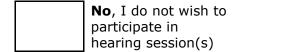
See supporting representations for further details.

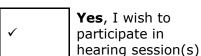
(Continue on a separate sheet /expand box if necessary)

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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)?

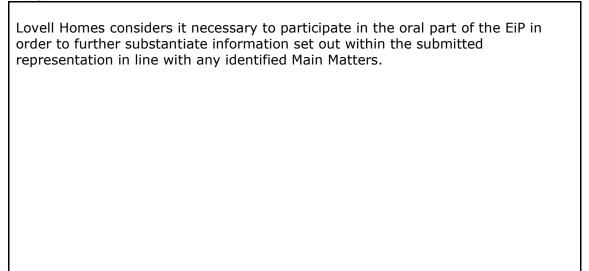




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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:





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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:	<b>√</b>			
(1) Legally compliant	Yes	·	No		
(2) Sound	Yes		No	<i>y</i>	
(3) Complies with the Duty to co-operate	Yes	<b>√</b>	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 instead the Council pursues a polioptional 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. Lovell Homes 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.					
(Contine	ue on a sepa	rate sheet /expa	nd box if r	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.

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)?

**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:

Lovell Homes 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 <b>HC12</b>	Policies Map					
4. Do you consider the Lo	cal Plan is : 「	<u> </u>					
(1) Legally compliant	Yes		No				
(2) Sound	Yes		No	<b>/</b>			
(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)							



116							
NDSS requirement should be removed.							
See supporting representations for further details.							
(Continue on a separate sheet /expand box if necessary)							
(continue on a coparate short, expana sox ii necessary)							
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No, I do not wish to participate in hearing session(s)  Yes, I wish to participate in hearing session(s)							
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Name or Organisation:							
3. To which part of the Local Plan does this representation relate?							
Paragraph	Policy <b>HC17</b>	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	<b>✓</b>	No				
Please tick as appropriate							
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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.							
	(Continue on a sep	parate sheet /	expand box if ı	necessary)			



Accessibil	ity standards	should be	established	through tl	he Local	Plan	to provide
certainty	and not displa	aced to sup	plementary	guidance	which is	not i	ntended to
establish	policy.						

See supporting representations for further details.

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

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<b>No</b> , I do not wish to participate in	<b>✓</b>	<b>Yes</b> , I wish to participate in
hearing session(s)		hearing session(s)

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Name or Organisation:				_		
3. To which part of the Lo	cal Plan does this rep	resentation rela	te?			
Paragraph	Policy <b>NB6</b>	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						
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.						
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 separ	ate sheet /expa	nd box if r	necessary)		



The Council should delete policy.								
See supporting representations for further details.								
(Continue on a separate sheet /expand box it	f necessary)							
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No, I do not wish to participate in hearing session(s)  Yes, I wish to participate in hearing session	1							
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Name or Organisation:					
3. To which part of the Loc	cal Plan does this	representation relat	te?		
Paragraph	Policy SA5	Policies Map			
4. Do you consider the Local 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					
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.					
See supporting representa	ations for further d	etails.			
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