

	<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	Mr	Title	Mr
First Name	Alastair	First Name	Paul
Last Name	Stewart	Last Name	Hill
Job Title (where relevant)	Planning Manager	Job Title (where relevant)	Senior Director - Planning
Organisation (where relevant)	Persimmon Homes WM	Organisation (where relevant)	RPS
Address Line 1		Address Line 1	4 th Floor, 1 Newhall St.
Line 2		Line 2	Birmingham
Line 3		Line 3	
Line 4		Line 4	



Post Code

Telephone Number

E-mail Address (where relevant)

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="" 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 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.

Strategic Objective 2 sets the commitment to meet the housing needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country (GBBC) HMA. In principle, RPS has no fundamental objection with this approach.

By proportionate, the Council means 4,000 dwellings will be accommodated from the GBBCHMA over the plan period. Nonetheless, RPS notes the plan period is now 2018-2039, or 21 years; it was 2018-2028 or 20 years in the Regulation 18 Preferred Options document consulted on previously. In light of this change, whilst a single year is not significant in terms of the difference in timeframes between the two consultations, it does make a difference in terms of housing numbers that should be planned for in the SSLP. By extending the plan period forward by one year, the local housing need for South Staffordshire has increased



by one year's growth (at least 241 dwellings). This is noted. However, the contribution towards the unmet needs of the Black Country has not increased in the same way. By doing so, this would increase the contribution from 4,000 to 4,200 (on a pro rata basis as a 1/20 of 4000). This would go some way towards helping to further reduce the shortfall in housing in the Black Country and would represent an effective planning response on this matter. RPS sees no reason why the proportionate contribution to the unmet need should not be extended forward by one year in line with the local housing need increase. The approach taken in the SSLP is not clear and consistent and so is not soundly-based.

(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.

RPS sees no reason why the proportionate contribution to the unmet need should not be extended forward by one year in line with the local housing need increase.

(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

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:

RPS has raised specific issues and concerns through this representation that goes to the soundness of the SSLP and it is essential these concerns and the councils evidence is fully tested.

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