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|  | <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"/> | <input type="text" value="Miss"/> |
| First Name | <input type="text"/> | <input type="text" value="Jessica"/> |
| Last Name | <input type="text"/> | <input type="text" value="Graham"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Associate Planner"/> |
| Organisation (where relevant) | <input type="text" value="Barratt West Midlands"/> | <input type="text" value="Savills (UK) Limited"/> |
| Address Line 1 | <input type="text"/> | <input type="text" value="55 Colmore Row"/> |
| Line 2 | <input type="text"/> | <input type="text" value="Birmingham"/> |
| Line 3 | <input type="text"/> | <input type="text"/> |
| Line 4 | <input type="text"/> | <input type="text"/> |
| Post Code | <input type="text"/> | <input type="text" value="B3 2AA"/> |
| Telephone Number | <input type="text"/> | <input type="text" value="0121 634 8494"/> |
| E-mail Address (where relevant) | <input type="text"/> | <input type="text" value="jgraham@savills.com"/> |



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 type="text"/> | No | <input type="text"/> |
| (2) Sound | Yes | <input type="text"/> | No | <input checked="" type="text" value="X"/> |
| (3) Complies with the Duty to co-operate | Yes | <input type="text"/> | No | <input type="text"/> |

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.

Paragraph 143 of the National Planning Policy Framework ('NPPF') requires plans to demonstrate that that the revised Green Belt boundaries will not need to be altered at the end of the plan period. SSDC is not proposing to safeguard any land for development and given the significant shortfalls arising from the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') (discussed further in our response to Policy DS4), we consider it is very likely that SSDC will need to review their Local Plan in the short term to accommodate more growth for the GBBCHMA. 80% of the District is Green Belt (Table 5 of the Publication Plan) and so future Green Belt release is considered to be inevitable to meet housing needs as required in this plan period. Barratt therefore considers that the plan is not consistent with national policy (NPPF Paragraph 35c).

(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.



Please see separate responses to Policies DS4, MA1 and SA1.

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| | | |
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| Title | <input type="text"/> | <input type="text" value="Miss"/> |
| First Name | <input type="text"/> | <input type="text" value="Jessica"/> |
| Last Name | <input type="text"/> | <input type="text" value="Graham"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Associate Planner"/> |
| Organisation (where relevant) | <input type="text" value="Barratt West Midlands"/> | <input type="text" value="Savills (UK) Limited"/> |
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| Post Code | <input type="text"/> | <input type="text" value="B3 2AA"/> |
| Telephone Number | <input type="text"/> | <input type="text" value="0121 634 8494"/> |
| E-mail Address (where relevant) | <input type="text"/> | <input type="text" value="jgraham@savills.com"/> |



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 :

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| (2) Sound | Yes | <input type="text"/> | No | <input checked="" type="text" value="X"/> |
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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.

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Policy DS2 states that Green Belt compensatory improvements will be delivered as part of future applications on development sites which have been removed from the Green Belt and allocated in the plan. This aligns with the requirements of NPPF paragraph 142. However, Policy DS2 does not provide any detail on the type or scale of compensatory improvements required. Any requirement should accord with the wording of the Planning Practice Guidance ('PPG') which states that policies for green belt compensatory improvements should be *"informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities"* [Savills emphasis] (Reference ID: 64-002-20190722). Compensatory improvements should not necessarily have to improve access, landscape and biodiversity.

The Policy states that compensatory improvements will be delivered in accordance with a hierarchy, with the preferred approach being on land adjacent to or in close proximity to the development site. National policy requires plans and decision making to make effective use of land (chapter 11 of the NPPF) and NPPF paragraph 143 requires plans to demonstrate that the Green Belt boundaries will not need to be altered at the end of the plan period. Most Green Belt release is on land immediately adjacent to settlement boundaries and primarily in highly sustainable and accessible locations. Therefore, it is important that the provision of Green Belt compensation near these sites should



not be proposed on land which could be more suitable for development in the future.

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.

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| <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="Barratt West Midlands"/></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 (where relevant) <input style="width: 90%;" type="text"/></p> | <p><input style="width: 90%;" type="text" value="Miss"/></p> <p><input style="width: 90%;" type="text" value="Jessica"/></p> <p><input style="width: 90%;" type="text" value="Graham"/></p> <p><input style="width: 90%;" type="text" value="Associate Planner"/></p> <p><input style="width: 90%;" type="text" value="Savills (UK) Limited"/></p> <p><input style="width: 90%;" type="text" value="55 Colmore Row"/></p> <p><input style="width: 90%;" type="text" value="Birmingham"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="B3 2AA"/></p> <p><input style="width: 90%;" type="text" value="0121 634 8494"/></p> <p><input style="width: 90%;" type="text" value="jgraham@savills.com"/></p> |
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Part B – Please use a separate sheet for each representation

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| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
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Policy DS4 states that the Council will promote a minimum of 9,089 homes between 2018-2039. SSSDC intend to meet their minimum standard need of 241 dwellings per annum (2022-2039) with a proposed 4,000 dwellings contribution towards the GBBCHMA. Barratt has significant concerns with this approach as set out in detail our response below.

The PPG is clear that the standard method sets the minimum housing need and does not produce a housing requirement figure (Reference ID: 2a-002-20190220); and there may be circumstances where a higher requirement figure is appropriate, for example, meeting unmet HMA needs or previous levels of housing under-delivery (Reference ID: 2a-010-20201216). Although the plan does include a contribution towards the HMA shortfall which the Council may consider is a suitable buffer, the Council has not proposed an uplift to the minimum standard method figure to meet local needs nor has the Strategic Housing Market Assessment ('SHMA') May 2021 and update October 2022 assessed the requirement for an uplift for economic growth aspirations. Without a buffer, we do not consider that the plan has been positively prepared in an aspirational way (NPPF paragraphs 16 and 35) nor does it support the Government's objective of significantly boosting the supply of homes (NPPF paragraph 60).



In order to be found sound, a plan should be positively prepared and “*seek to meet the area’s objective assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development*” (NPPF paragraph 35). Barratt therefore supports the proposed approach to contribute towards the GBBCHMA shortfall but objects to the 4,000 dwelling figure.

Paragraph 5.15 of the plan states that there is emerging evidence demonstrating a significant shortfall across the GBBCHMA but the “*exact extent is not currently known*”. Barratt agrees that the distribution of the housing shortfall across the HMA authorities has not been agreed, nor is it known when it will be so the Council cannot fully justify that 4,000 dwellings is a reasonable contribution. Particularly given that there are now additional significant housing shortfalls arising from the Black Country (circa 28,000 dwellings) and Birmingham (circa 78,000 dwellings). It is also unclear how SSDC propose to distribute the 4,000 dwellings with the authorities generating the shortfall. The District has a strong connectivity with the GBBCHMA and the Birmingham conurbation so is well placed to accommodate more of the shortfall than other authorities in the GBBCHMA. Barratt therefore considers that in order for the plan to be positively prepared (NPPF paragraph 35), SSDC should be proposing more than 4,000 dwellings towards the significant HMA shortfall.

Reference is made in paragraph 5.13 of the plan to the GBBCHMA position statement from July 2020. Notwithstanding the fact that Barratt has significant concerns with the most recent Position Statement (December 2021) and its unevidenced claim that the existing Birmingham shortfall (circa 38,000 dwellings) has reduced to just 6,302 dwellings, this work is now outdated given the release of Birmingham’s Issues and Options Plan which identifies a significant shortfall of circa 78,000 dwellings across the plan period and demonstrates how woefully inaccurate the Position Statement was.

In order to demonstrate on-going and effective joint working with the HMA authorities, one or more Statements of Common Ground (‘SoCG’) should be prepared to document how strategic matters are being progressed (NPPF paragraphs 27 and 35c). NPPF paragraph 27 also requires SoCG to be made “*publicly available throughout the plan-making process*”. Appendix D of the Duty to Cooperate Topic Paper 2022, sets out a range of SoCGs between SSDC and other HMA authorities. Confirmation is sought on whether these statements have been agreed as none of them are signed. The PPG expects authorities to produce a single SoCG where possible (Reference ID: 61-013-20190315). Given the significant shortfall which is arising from Birmingham and the Black Country, a collaborative and joined up approach to addressing the need is required. Barratt consider that a single SoCG with all authorities should be produced to set out the agreed distribution of the shortfall across the GHMA.

Table 8 in the local plan sets out how housing growth is proposed to be distributed across the District. Whereas 40.5% of the District’s growth is being directed to the Tier 1 villages, only 16.5% of growth is being directed to the



sustainable Tier 2 settlements. Barratt considers that more growth should be directed to the Tier 2 settlements as these have been assessed by SSDC as being sustainable and suitable for growth.

In previous representations (Issues and Options, Spatial Housing Strategy and Infrastructure Delivery and Preferred Options), Barratt objected to the proposed revised Rural Settlement Hierarchy and the categorisation of the village of Kinver as a proposed Tier 2 Settlement. In the adopted Core Strategy and Site Allocations Document, the settlements of Kinver, Perton,

Wombourne and Brewood are identified as 'Main Service Villages'. The previous versions of the Local Plan Review and this Publication document propose to re-categorise these settlements as Tier 2 Settlements. Barratt still consider that no change should be made to the current adopted settlement hierarchy and that the sustainable settlements of Kinver, Wombourne, Brewood and Perton should continue to be identified as Main Service Village settlements. As previously stated, Kinver provides a greater range of shops and services than some of the proposed Tier 1 settlements (Appendix 4 of the Rural Services and Facilities Audit ('RSFA') 2021). It is considered that the only key difference between the proposed Tier 1 settlements and the village of Kinver is that the Tier 1 settlements have access to a Train Station and a supermarket. A Train Station is not the only means of public transport and bus transport is also a sustainable transport option which is provided in Kinver as demonstrated by the public transport plans in Appendix 2 of the RSFA which highlight the good bus accessibility of the eastern part of Kinver (where SHELAA Sites 549 and 550 are located).

Only 2.6% of housing growth is being directed to Kinver within Table 8 of the plan. However, Wombourne and Perton, which are also a Tier 2 settlements, are proposed to deliver 8% and 3.7% of growth respectively. Essington, which is a Tier 3 settlement, is also delivering only marginally less than Kinver (2.3%). SSDC's approach to growth is not consistent with the proposed spatial strategy in the plan and is going to lead to disparities between which settlements are being allowed to grow and develop. Kinver has scored well within the RSFA, yet Perton and Essington are being allocated to more / similar level of growth. The Plan showing 'Housing Growth in Locality 5', clearly demonstrates the limited amount of growth being directed to Kinver and the southern part of the District.

Barratt continue to strongly object to the assessment of Kinver as a Tier 2 settlement and the limited growth being directed to Kinver in particular. Barratt does not consider that the approach being taken to amending the adopted hierarchy is justified (NPPF paragraph 25). It is considered that the modified Main Service Village settlements, which currently includes the settlement of Kinver, should remain as Main Service Villages as they are sustainable settlements which are capable of supporting significant residential growth. The approach being taken has the risk of constraining the growth of some Main Service Villages by not supporting growth, thereby constraining their potential to deliver more services.



Table 8 also sets out that 5.8% of the proposed growth is expected to be delivered through windfall sites (600 dwellings across the plan period). The Strategic Housing & Economic land Availability Assessment ('SHELAA') (2022) sets out that the proposed windfall allowance is 30 dwellings per annum that were previously assumed. The graph on page 53 of the SHELAA sets out completions between 2006-2018 on windfall, SHLAA and Site Allocation Document sites. To avoid double counting, windfall allowances should not form part of the first 5 years trajectory. The Housing trajectory in Appendix H should provide a breakdown of key sites so we can assess whether we consider they are reasonable assumptions or not (NPPF paragraph 74).

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The proposed contribution towards the GBBCHMA shortfall should be recalculated to reflect the significant increase in the identified shortfall across the plan period.

More growth should be directed to Kinver as one of the most sustainable settlements in the District which is currently only being the focus of very limited growth. Barratt's sites referenced 549 and 550 are considered to be in a sustainable location and should be released from the Green Belt and allocated for development.

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The Policy states that “*an integral part of the Strategy will be to ensure that growth is distributed to the district’s most sustainable locations, avoiding a disproportionate level of growth in the district’s less sustainable settlements*”. Barratt objects to this approach not being taken in relation to the Tier 2 settlements and Kinver.

As stated in our response to Policy DS4, we do not consider that the designation of Kinver as a Tier 2 settlement and the limited amount of growth being directed to this settlement is justified (NPPF paragraph 35). The approach being taken by the Council is leading to the majority of housing growth being directed to the north of the District which is not justified.

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

**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.*

| | |
|--|---|
| <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="Barratt West Midlands"/></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 (where relevant) <input style="width: 90%;" type="text"/></p> | <p><input style="width: 90%;" type="text" value="Miss"/></p> <p><input style="width: 90%;" type="text" value="Jessica"/></p> <p><input style="width: 90%;" type="text" value="Graham"/></p> <p><input style="width: 90%;" type="text" value="Associate Planner"/></p> <p><input style="width: 90%;" type="text" value="Savills (UK) Limited"/></p> <p><input style="width: 90%;" type="text" value="55 Colmore Row"/></p> <p><input style="width: 90%;" type="text" value="Birmingham"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="B3 2AA"/></p> <p><input style="width: 90%;" type="text" value="0121 634 8494"/></p> <p><input style="width: 90%;" type="text" value="jgraham@savills.com"/></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 Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|--|-----|-------------------------------------|----|--------------------------|
| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| (2) Sound | Yes | <input checked="" type="checkbox"/> | No | <input 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.

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Barratt acknowledges that it is a key longer-term aspiration of the council to explore potential options within the district for a sustainable independent new settlement, which has the capacity to accommodate the future housing and economic needs of the district. Given the limited evidence to support a new settlement at this stage, we support SSDC's approach to exclude the new settlement from the housing trajectory.

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.



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2. Agent's Details (if applicable)

| | | |
|------------------------------------|--|---|
| Title | <input type="text"/> | <input type="text" value="Miss"/> |
| First Name | <input type="text"/> | <input type="text" value="Jessica"/> |
| Last Name | <input type="text"/> | <input type="text" value="Graham"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Associate Planner"/> |
| Organisation (where relevant) | <input type="text" value="Barratt West Midlands"/> | <input type="text" value="Savills (UK) Limited"/> |
| Address Line 1 | <input type="text"/> | <input type="text" value="55 Colmore Row"/> |
| Line 2 | <input type="text"/> | <input type="text" value="Birmingham"/> |
| Line 3 | <input type="text"/> | <input type="text"/> |
| Line 4 | <input type="text"/> | <input type="text"/> |
| Post Code | <input type="text"/> | <input type="text" value="B3 2AA"/> |
| Telephone Number | <input type="text"/> | <input type="text" value="0121 634 8494"/> |
| E-mail Address (where relevant) | <input type="text"/> | <input type="text" value="jgraham@savills.com"/> |



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 :

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| (2) Sound | Yes | <input type="text"/> | No | <input checked="" type="text" value="X"/> |
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Please tick as appropriate

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As set out in our responses to Policies DS4 and DS5, Barratt objects to the limited amount of growth being directed to the sustainable settlement of Kinver. As the most sustainable settlement in the southern part of the district with could access to the Black Country, additional housing growth should be directed to this settlement.

Barratt is promoting land to the north and south of Dunsley Road, Kinver (both parcels are shown within the submitted Vision Document). The northern parcel (SHELAA reference 549) is approximately 13 hectares (32 acres) and is bound by Dunsley Road to the south, Dunsley Hall to the east, the Staffordshire and Worcestershire Canal to the north and residential dwellings to the west. The southern parcel (SHELAA reference 550) is approximately 3.5ha (9 acres) and is bound by Dunsley Road to the north, residential dwellings and the Staffordshire and Worcestershire Canal to the west and agricultural fields to the east and south. The Sites could deliver circa 350 market and affordable dwellings as well as a potential community use and public open space.

Site 549 has been assessed by the Council as “NCD1 – Sites potentially suitable for housing but not currently developable because of a policy designation” and Site 550 has been assessed as ‘NS – sites which are unsuitable because of constraints which cannot be overcome’. The 2021 Housing Site Selection Topic

Paper stated that sites assessed as 'NS' were not assessed in Stage 3 of the site selection process.

The key constraint identified within the SHELAA 2021 for Site 550 was that it is 'disassociated from any village development boundary'. Although the site is not immediately adjacent to the adopted settlement boundary, the site is adjacent to existing residential properties so it is not disassociated from development. Additionally, site reference 272 (land east of Dunsley Drive) is proposed to be allocated in the plan for 22 dwellings. Site 550 is immediately adjacent to Site 272 therefore it will no longer be disassociated from the settlement boundary when Site 272 is delivered.

As Site 549 was assessed as 'NCD1' in the SHELAA 2021, it has been further assessed in the Topic Paper 2021 and Sustainability Appraisal ('SA') 2021. The key constraints noted in Appendix 2 and 3 of the 2021 Topic Paper is the loss of agricultural land and no access to the wider village via a pedestrian footway. There is an existing informal footway along the southern boundary of the site which is used by existing residents. Barratt consider that, subject to further discussions with the Highway Authority, there is potential to formalise the existing footpath up to Hampton Grove where the formal footpath currently commences and provides a pedestrian link along the northern side of Dunsley Road to the village centre. Although comments have been made on the footpath, nothing has been stated about the site's close proximity to bus stops or its assessment in Appendix 2 of the RSFA 2021 as more accessible by bus than the western part of Kinver where sites are proposed to be allocated. The SA 2021 has also assessed site 549 as scoring the same as proposed allocations 272 and 567.

In addition to the above, the Housing Site Selection Topic Paper has been updated. The 2022 Topic Paper's assessment of the site is identical apart from where the 2021 Topic Paper stated that that the site could "*have the capacity to deliver a small site of up to 1 hectare*", the 2022 Topic Paper now states "*more recent monitoring evidence suggests that the Council can meet its small sites duty without additional allocations*". We do not consider that this amendment fundamentally changes the points previously made to SSDC and in this representation on the suitability of the site for residential development.

The Housing Site Selection Topic Paper 2022 states that the reasons behind the limited amount of growth being directed to Kinver is that SSDC has sought to balance the level of facilities and transport links with the villages' identification as one of the District's 'historic towns' and high landscape sensitivity on land immediately adjacent to the settlement.

Savills Heritage has reviewed the Historic Environment Site Assessment (HESA) (October 2022). The only reference to either Site 540 or 550 in the South Staffordshire Local Plan Historic Environment Site Assessment (HESA) October 2022 is in Appendix 1 (Local Plan Review Historic Environment Site Assessment Appendix 1: Site Summaries and Scoring, February 2020). This



replicates the assessment in the HESA Stage 1 Report Dec 2019 which forms part of the Local Plan Review Evidence Base. Site 549 is assessed as:

“No designated assets are located on the Site, although The Staffordshire and Worcestershire Conservation Area is located immediately north of the Site. The closest Listed Building is the Grade II Dunsley Hall (List No.1230952) c.130 m east of the Site. The Staffordshire HER records the site of Dunsley Mill within the Site although this is not shown on the Ordnance Survey map of 1888. Further post-medieval non-designated assets are recorded within 500m of the Site. Care will need to be taken to ensure that the settings of designated assets and the character of the Canal Conservation Area are protected. Archaeological mitigation will be required to address any archaeological remains that may be present.”

This description relates to the earlier extent of Site 549 and has not taken into account the revised boundary as per the submitted Vision Statement which does not now border the Staffordshire and Worcestershire Conservation Area. The Stage 1 report assesses Site 549 as having a RAG status of ‘green’ for direct impacts, and ‘amber’ for indirect impacts.

The Local Plan Evidence Base also references a ‘HESA Updated Sites 2020’ document where Site 549 has been assessed as having an ‘amber’ effect both directly and indirectly upon heritage assets. This assessment acknowledges that the site is part of a previously larger site, so it is unclear how it has been altered from ‘green’ status in terms of direct impact, to ‘amber’ status, and the assessment does not explain this. The 2020 HESA assesses Site 549 as: *“This Site formed part of a larger Site assessed in 2019 and allocated an Amber RAG score (Site 549). Care will be needed to protect the settings of both the Canal Conservation Area and the Grade II Listed Dunsley”*.

The previous assessments of Site 549 do not accord with each other and there is not clear justification as to why the assessment has changed when the site boundary has been reduced. This results in an inconsistent and unjustified evidence base. As stated in the Vision Document, it is considered that, subject to mitigation, the development of site 549 will not have a negative impact on adjacent heritage assets.

In summary, the Sites are located on the edge of Kinver’s settlement boundary and it is considered that they are easily accessible to the shops, services and facilities provided within Kinver as well as the wider transport network linking the site to Stourbridge. A range of technical work has been undertaken to support the promotion of the sites and assess the impact of any future development on the landscape, local highways network, ecology, trees and adjacent heritage assets. The submitted Vision Document sets out further information on the development proposals.



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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 Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|---|-----|----------------------|----|---|
| (1) Legally compliant | Yes | <input type="text"/> | No | <input type="text"/> |
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Please tick as appropriate

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This policy seeks to increase the supply of 2 and 3 bedroom homes which Barratt supports. However, the policy then seeks for all major development housing sites to provide a minimum of 70% of properties to be 3 bedrooms or less. We note that this requirement has reduced from the 75% previously proposed in the Preferred Options plan. However, Barratt do not support applying a blanket requirement across the District. Although the policy could provide useful guidelines to the type of dwellings that the District would seek to be provided on a site (e.g. stating that ‘a greater amount of 1, 2 and 3 bed dwellings is encouraged’), it is important that the final housing mix on a site is determined on a site by site basis taking relevant market signals (Planning Practice Guidance (PPG) Reference ID: 61-038-20190315), site location and needs assessments at the time of the application in to account.

The Policy also states that “*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*”. When stating ‘disproportionate’ does the Council mean anything above the 30% required under this policy? If it is, then we are not sure what benefit this part of the policy provides. The wording is negative and we therefore do not consider that it has been ‘positively prepared’ (NPPF paragraph 35).

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The final housing mix should be determined on a site by site basis and reference to a minimum of 70% of dwellings being 3 bed or less should be removed from this policy.

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| (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.

The Policy proposes a minimum density of 35dph in developments within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities. As set out in our response to Policy HC1, Barratt objects to a blanket approach to density being taken as it should be agreed on a site by site basis. However, it is appreciated that wording has been added to the policy to state that site context could be a consideration to deliver a lower density.

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 reworded to state that “*housing developments...are encouraged to achieve a minimum net density...*”.



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.

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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)

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Part A

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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 Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|--|-----|--------------------------|----|---|
| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox" value="X"/> |
| (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.

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The policy proposes specific percentages for each affordable tenure. Barratt objects to this requirement. Paragraph 8.10 of the SHMA 2022 sets out that 50% of the affordable housing requirement of the affordable housing provision to be both affordable rent/ social rent. A distinction needs to be made between affordable and social rent, and this should be reflected in the policy.

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.

Barratt considers that Policy HC3 should be amended to state 'where possible' in order to provide sufficient flexibility and allow tenures to be agreed between SSDC and the applicant on a site by site basis and determined on local need at the time of the application.



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.

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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 Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| (1) Legally compliant | Yes | <input 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

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The Policy requires for all dwellings delivered on major developments to meet M4(2) standards. The PPG states that Councils have the option to “set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access” where there is a justified need for this requirement (Reference ID: 56-002-20160519). The NPPF also requires all policies to be underpinned by relevant and up to date evidence which should be adequate, proportionate and focused on supporting and justifying planning policies (paragraph 31). The PPG (Reference ID: 56-005-20150327 to 56-011-20150327) sets out the evidence necessary to justifying a policy requirement for optional standards which includes:

- the likely future need;
- the size, location, type and quality of dwellings needed;
- the accessibility and adaptability of the existing stock;
- variations in needs across different housing tenures: and
- viability.

The PPG (Reference ID: 56-008-20160519) also states that when adopting accessibility standards, “Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied” [Savills emphasis]. Policy HC4 makes no provision for the PPG exceptions.



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.

In order to be justified (NPPF paragraph 35), Policy HC4 should be amended to refer to site specific factors which may render compliance with the Part M(4)2 standards unachievable or viable.

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Yes, I wish to participate in 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 Policies Map

4. Do you consider the Local Plan is :

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| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
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Policy HC8 states that major developments will be required to have regard to the need on the council's self-build register, and make provision of self and custom build plots to reflect this. Barratt supports the flexible approach being proposed in this policy.

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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 Policies Map

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Part c of Policy HC9 states that all developments will be required to incorporate tree lined streets. We consider that the policy should be worded as set out in the NPPF. Paragraph 131 states that “*planning policies...should ensure that new streets are tree-lined*” with footnote 50 adding “*unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate*”. In order to be consistent with national policy (NPPF paragraph 35), Policy HC9 should be amended to refer to situations where tree-lined streets may not be appropriate. Barratt’s experience on a number of current housing developments is that Highways Authorities are not always supportive of tree-lined streets particularly in relation to the long-term management of the highways trees.

Part e states that proposals should use “*bespoke house types to avoid a monotonous visual appearance*”. It is unclear what is meant from that but on major development schemes delivered by national housebuilders, providing all bespoke house types is not achievable or reasonable.

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.



Amend Policy HC9 part c as stated above.

Delete reference to ‘bespoke house types’ being required by Part e of the policy.

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 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**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.*

| | |
|--|---|
| <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="Barratt West Midlands"/></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 (where relevant) <input style="width: 90%;" type="text"/></p> | <p><input style="width: 90%;" type="text" value="Miss"/></p> <p><input style="width: 90%;" type="text" value="Jessica"/></p> <p><input style="width: 90%;" type="text" value="Graham"/></p> <p><input style="width: 90%;" type="text" value="Associate Planner"/></p> <p><input style="width: 90%;" type="text" value="Savills (UK) Limited"/></p> <p><input style="width: 90%;" type="text" value="55 Colmore Row"/></p> <p><input style="width: 90%;" type="text" value="Birmingham"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="B3 2AA"/></p> <p><input style="width: 90%;" type="text" value="0121 634 8494"/></p> <p><input style="width: 90%;" type="text" value="jgraham@savills.com"/></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 Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| (1) Legally compliant | Yes | <input 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.

The policy requires all new dwellings to meet Nationally Described Space Standards. Where a need for internal space standards is identified, the PPG (Reference ID: 56-020-20150327) requires Councils to take account of the need for the standards, the potential impact on viability and the timing of introducing the standards. We objected to this policy in our Preferred Options representations as no evidence was provided to justify these standards. SSDC has now produced an Internal Space Standards Topic Paper (November 2022). We have no further comments on this requirement within the policy.

The policy also proposes very specific garden area and distance requirements. Although private amenity space and distances between dwellings are not addressed within the internal space standards guidance, there is a national requirement to make the most effective use of land (NPPF Chapter 11). We consider that the Council should have to justify the requirement for these specific standards and the potential impact of this policy on proposed housing yields.

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.

If the garden areas and distance requirements remain, then the policy should be reworded to say 'where possible'.

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.

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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)

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2. Agent's Details (if applicable)

| | | |
|------------------------------------|--|---|
| Title | <input type="text"/> | <input type="text" value="Miss"/> |
| First Name | <input type="text"/> | <input type="text" value="Jessica"/> |
| Last Name | <input type="text"/> | <input type="text" value="Graham"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Associate Planner"/> |
| Organisation (where relevant) | <input type="text" value="Barratt West Midlands"/> | <input type="text" value="Savills (UK) Limited"/> |
| Address Line 1 | <input type="text"/> | <input type="text" value="55 Colmore Row"/> |
| Line 2 | <input type="text"/> | <input type="text" value="Birmingham"/> |
| Line 3 | <input type="text"/> | <input type="text"/> |
| Line 4 | <input type="text"/> | <input type="text"/> |
| Post Code | <input type="text"/> | <input type="text" value="B3 2AA"/> |
| Telephone Number | <input type="text"/> | <input type="text" value="0121 634 8494"/> |
| E-mail Address (where relevant) | <input type="text"/> | <input type="text" value="jgraham@savills.com"/> |



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 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.

The policy states that “*smaller areas of incidental green infrastructure without a clear recreational purpose (e.g. landscape buffers, highways verges) and areas without public access will not count towards meeting the quantitative on-site open space standard*”. No definition is provided as to what constitutes ‘small’ nor how applicants can demonstrate that it serves a purpose. SSDC has also not provided any information to justify why small areas of green infrastructure will not be regarded as part of the open space provision. Landscape buffers, highways verges and other small areas of green space, may not be ‘useable’ from a recreation perspective but they provide visual benefits for residents and place-making as well connecting green infrastructure across sites and with the wider network. This policy will just encourage applicants to provide green infrastructure across sites. Barratt request that Policy HC17 be amended to remove reference to smaller areas of incidental green infrastructure not forming part of the on-site open space standard.

Although there is no specific policy proposed, SSDC is proposing to allocate Local Green Space (‘LGS’). The Local Green Space Topic Paper (2022) sets out three proposed LGS, two of which are located within the Parish of Kinver. Barratt has no comments on the proposed LGS and wishes to support the Council’s thorough approach to assessing whether the sites meet the NPPF criteria for LGS (paragraph 102). We consider that SSDC should require all Parish Councils / Neighbourhood Plan Forums to follow the same approach



taken by the District Council. The emerging Kinver Neighbourhood Plan, proposes a blanket approach to designating Local Green Space across Kinver Parish. We have objected to the proposals as part of the Regulation 14 Neighbourhood Plan consultation process but wished to raise this concern with SSDC.

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.

Barratt request that Policy HC17 be amended to remove reference to smaller areas of incidental green infrastructure not forming part of the on-site open space standard.

SSDC should require all NP Forums and / or Parish Councils to undertake the same approach to LGS as SSDC has done within the merging Local Plan.

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.

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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 Policies Map

4. Do you consider the Local Plan is :

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| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
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Policy NB2 states that 10% Biodiversity Net Gain is required for all major developments. It is considered that our clients land (site reference 549 and 550) will be able to demonstrate at least 10% Biodiversity Net Gain if it were released from the Green Belt and allocated for development.

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.



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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 Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|---|-----|--------------------------|----|-------------------------------------|
| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
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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.

Policy NB4 proposes to amend the adopted Landscape Character policy to strengthen the protection of trees and hedgerows. The NPPF protects ancient woodland and ancient and veteran trees (paragraph 180c), there is no national requirement to protect all trees. However, that being said, we understand the important contribution trees can make to the character of an area. We consider that the policy should seek to protect ancient and veteran trees unless there are wholly exceptional reasons to justify their removal. Trees classified as Category A or B should be protected 'where possible'. We do not consider that Category C or U trees should be afforded any specific protection within the policy.

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.

In order for Policy NB4 to be consistent with national policy (paragraph 35d), it should be amended to remove protection of trees which are not defined as 'irreplaceable habitats' (NPPF Annex 2).



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Name or Organisation:

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

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Please tick as appropriate

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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.

This policy states that major developments must achieve a minimum 63% reduction in carbon emissions for each dwelling by on-site measures compared to UK Building Regulations through fabric and energy efficiency measures as well as on-site renewable energy regeneration. These requirements are considered to be over and above the requirements of PPG which states that Local Plans “*can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes*” (Reference ID: 6-012- 20190315).

The Sustainable Construction and Renewable Energy Topic Paper (November 2022) states that the requirement to not exceed Level 4 standards is not set out in the NPPF (paragraph 7.3). The Topic Paper (paragraph 7.3) goes on to make assumptions on whether standards above the Part L Building Regulations can be used and reference is made to other local authorities who have adopted policies above level 4 standards (although the names of the authorities have not been quoted). Barratt does not agree with the assumptions made by SSDC within the Topic Paper. Firstly, although the Level 4 standards may not be specifically quoted within the NPPF, in order to be “*consistent with national policy*” and sound, plans are required to accord with the NPPF and “*other statements of national planning policy*” (NPPF paragraph 35d). The PPGs is national guidance and therefore the inclusion of Reference ID: 6-012-



20190315, is relevant. Secondly, plans are examined on a case by case basis. Therefore, other plans may have been found sound with policies requiring energy performance above the Part L standards but this should not mean that every local plan can propose requirements which are contrary to national guidance.

The PPG also states that if a Council is “*considering policies on local requirements for the sustainability of other buildings, local planning authorities will wish to consider if there are nationally described standards and the impact on viability of development*” (Reference ID: 6- 009-20150327). The Viability Study 2022 has assumed a +7% increase on build costs for houses and +4% build cost for flats to meet these targets. Given Policy NB6 is proposing requirements much greater than existing regulations, further clarity is sought on the assumptions made in the Viability Study and where the costs have been taken from. As presented we consider the evidence to be unjustified and inconsistent with national guidance.

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.

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