

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<b>Ref:</b>  <b>(For official use only)</b>
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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	Gregory	First Name	Simon
Last Name	Mann	Last Name	Hawley
Job Title (where relevant)	Senior Land Manager	Job Title (where relevant)	Director
Organisation (where relevant)	Redrow	Organisation (where relevant)	Harris Lamb
Address Line 1	c/o Agent	Address Line 1	Grosvenor House
Line 2		Line 2	75-76 Francis Road
Line 3		Line 3	Edgbaston
Line 4		Line 4	Birmingham
Post Code		Post Code	B16 8SP
Telephone Number		Telephone Number	0121 455 9455
E-mail Address (where relevant)		E-mail Address (where relevant)	simon.hawley@harrislamb.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 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.

Policy HC1 advises that "a minimum" of 70% of all properties on major housing sites should be 3 bedrooms or less. This is based upon the conclusions of the Council's latest Housing Market Area Assessment.

The Plan has been prepared to have a 15 year time period. The demand for property types could change over time. As such, policy HC1 should not be prescriptive and restrict the number of larger properties at this stage as there may be demand for larger properties later in the plan period.

In addition, South Staffordshire has a large plan area. The demand for different property types is likely to change across the plan area. For example, housing sites allocated adjacent to the edge of the urban area to meet the growth requirements of Birmingham and the Black Country should meet Birmingham and Black Country's housing mix requirements, not South Staffordshire. The Council's HMA considers the mix requirements for the South Staffordshire element of the housing requirement only, not the Black Country and Birmingham's.

Similarly, the policy advises that housing developments must contribute to the district's ageing population requirements in accordance with provision of policy HC4 and provide affordable housing provision in accordance with policy HC3. The Birmingham and Black Country element of the housing requirement should meet the conurbation's affordable housing needs and reflect a demographic profile of the conurbation, not South Staffordshire.



Furthermore, it is unnecessary for a policy in the Plan simply to require developments to be in accordance with other policies in the Plan.

We also object to the suggestion that S.106 agreements will be used to secure the mix of outline planning applications. This is a matter that can be addressed by a condition, and as such a S.106 should not be used. Furthermore conditions should only be applied where there is evidence that this approach is "necessary". This should be determined on a site by site basis as and when planning applications are determined. If at that stage it is decided that a mix condition is "necessary" it can be applied.

(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 cooperate 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.

As detailed above, the policy should be revised to separate the requirements of the South Staffordshire and Birmingham elements of the Black Country housing requirement. The policy should not simply refer to other policies. It should not include prescriptive provisions on development mix.

(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**, 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:

Policy HC1 has the potential to result in unnecessary and inappropriate site development requirements that could stall housing delivery. Given the potential significant implication of this policy, we request the right to appear in front of the Inspector.

***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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX