

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<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" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Gregory"/>	<input type="text" value="Simon"/>
Last Name	<input type="text" value="Mann"/>	<input type="text" value="Hawley"/>
Job Title (where relevant)	<input type="text" value="Senior Land Manager"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Redrow"/>	<input type="text" value="Harris Lamb"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="Grosvenor House"/>
Line 2	<input type="text"/>	<input type="text" value="75-76 Francis Road"/>
Line 3	<input type="text"/>	<input type="text" value="Edgbaston"/>
Line 4	<input type="text"/>	<input type="text" value="Birmingham"/>
Post Code	<input type="text"/>	<input type="text" value="B16 8SP"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 455 9455"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="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 HC2 is fundamentally flawed. Density should be a product of good design. It is not appropriate for the policy to refer to 35dph being a "minimum" requirement, it should be a target.

The policy advises that developments with a net density below 35 dph will only be supported if developing sites at 35 dph would "result in significant adverse impacts to the surrounding area or historic environment, settlement pattern or landscape character". As drafted, this means it would be accepted for the scheme to deliver at 35dph if it had an "adverse", but not a "significant adverse" impact on the historic environment, settlement pattern or landscape character. This is clearly inappropriate. In terms of the historic environment, this approach would directly conflict with the guidance relating to designated and non-designated heritage assets set out in paragraphs 194 to 198 of the Framework.

In addition, if the Council pursues NDSS standards this will restrict the ability to deliver the proposed minimum density requirements particularly on smaller brownfield sites that may be constrained.

(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.

Policy HC2 should be reworded to advise that the density requirement of 35dph is a "target" rather than a requirement. As drafted, the policy advises that achieving a minimum density standard is more important than adversely impacting upon the historic environment, settlement patterns and landscape character.

(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:

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>



South Staffordshire Council

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