



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 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.*

Title	Mr	Mr
First Name	Gregory	Simon
Last Name	Mann	Hawley
Job Title (where relevant)	Senior Land Manager	Director
Organisation (where relevant)	Redrow	Harris Lamb
Address Line 1	c/o Agent	Grosvenor House
Line 2		75-76 Francis Road
Line 3		Edgbaston
Line 4		Birmingham
Post Code		B16 8SP
Telephone Number		0121 455 9455
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 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.

Policy HC3 requires 30% affordable housing provision. This approach is flawed. We comment on this matter in detail in our response to Table 7. In short, the 30% affordable housing provision target does not reflect the affordable housing needs of the district. It is based upon the Birmingham and Black Country element of the housing requirement delivering affordable housing support of the growth of South Staffordshire. Clearly any affordable housing delivered as part of the Birmingham and Black Country element of the housing target should be to support affordable housing needs to Birmingham and the Black Country.

As detailed in our response to Table 7, in order to meet the annual affordable housing requirement it would necessitate 50% affordable housing provision on the South Staffordshire element of the housing requirement. This is likely to make development unviable and has not been tested as part of the plan making process.

Furthermore, policy HC3 should set an affordable housing requirement for the South Staffordshire element of the Plan's housing requirement and separately for the conurbation's affordable housing need. These are two separate requirements and should be treated as such.

(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 HC3 needs to be completely revised. The affordable housing requirement is not reflective of demand, as it is skewed by incorporating the Birmingham and Black Country housing requirement as a source of affordable housing supply of South Staffordshire. The two elements are entirely separate and the policy should treat them as such.

(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>



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