

	<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="checked" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="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 HC12 requires all new residential developments to meet or exceed the NDSS requirements. The starting point for the preparation of Plans is that they should not include policies requiring NDSS compliant housing. Policies should only be included where the standards can be "justified" (NPPF footnoted 49). The Council seek to justify a requirement for NDSS by reference to the Internal Space Standards Topic Paper.

The Internal Space Standards Topic Paper does not justify the requirement for use of space standards. It identifies a series of generic matters that are relevant throughout the country. There is no information to suggest that the existing stock of housing cannot meet the requirements for NDSS housing.

Furthermore, Local Plans should not simply require all developments to provide NDSS housing. They should identify how many properties are required to be NDSS and the policies should seek to deliver this amount. The policy should work in a similar fashion to the affordable housing policy and require, for example, 30% of all properties to meet NDSS if that meets the identified level of provision.

Requiring all properties to meet NDSS will make smaller properties more expensive, as they will be larger and more expensive to construct. It could also adversely affect density requirements as these properties will take up more space than smaller properties. The Council needs to recognise that if they require all properties to be NDSS compliant, it will have a direct impact on densities and viability, due to potentially increased building costs.



We also note that the policy requires set spacing distances between dwellings. This will be difficult to achieve on small brownfield sites that are unusually shaped, which could adversely affect the Council’s windfall delivery aspirations from infilling.

The requirements of policy HC12 and should be properly factored into the Council’s density assumption calculations. They should also be fully explored in the Viability Appraisal. We are not aware of any evidence that this is the case.

(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 HC12 should be revised. The requirement for internal space standards should be removed until a full and proper localised evidence is produced to demonstrate they are necessary.

The external space standards and distance between dwellings should be set as a guide, rather than be prescriptive.

(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