



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 2023 - 2041

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

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		2. Agent's Details (if
Details*		applicable)
	d, please complete only the Title, Name and on the the full contact details of the agent in 2.	Organisation (if applicable)
Title		Mr
First Name		Neil
Last Name		Cox
Job Title		
(where relevant)		
Organisation	Cameron Homes Ltd	Evolve Planning & Design
(where relevant)		
Address Line 1		1 Tollgate Business Centre
Line 2		Blithbury Road
Line 3		Hamstall Ridware
Line 4		Rugeley
	-	
Post Code		WS15 3RT
Telephone Number		07815324817
E-mail Address		neil@evolvepad.co.uk



Name or Organisation:					
3. To which part of the Loca	l Plan does this	representation relat	:e?		
Paragraph	Policy DS4	Policies Map			
4. Do you consider the Loca	l 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.					

At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by just 1,012 people between 2023 and 2041. This is below the forecast jobs growth outlined in the EDNA which fails to consider additional jobs created at WMI. Further consideration should therefore be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 640 additional homes to meet unmet needs in the wider housing market area

See supporting representations for further details.

(Continue on a separate sheet /expand box if necessary)



Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.					
See supporting representations for further details.					
(0.11)					
	a separate sheet /expand box if necessary)				
Please note: In your representation you should evidence and supporting information necessary and your suggested modification(s). You should further opportunity to make submissions. After this stage, further submissions may of the information in the matters and issues examination.	to support your representation d not assume that you will have a conly be made if invited by the				
7. If your representation is seeking a modification necessary to participate in examination hearing					
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 participate in hearing session(s), you may be as your request to participate.					
8. If you wish to participate in the hearing sess consider this to be necessary:	sion(s), please outline why you				
Cameron Homes considers it necessary to partic order to further substantiate information set our representation in line with any identified Main M	t within the submitted				



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Data Protection

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Name or Organisation:				
3. To which part of the Local Plan does this representation relate?				
Paragraph	Policy HC1	Policies Map		
4. Do you consider the Lo	ocal Plan is :	√		
(1) Legally compliant	Yes		No	
(2) Sound	Yes		No	4
(3) Complies with the Duty to co-operate	Yes	✓	No	
Please tick as appropriate				
5. Please give details of w is unsound or fails to compossible. If you wish to support the compliance with the duty comments.	ply with the duty to e legal compliance or	co-operate. Plea soundness of th	ise be as p ie Local Pla	recise as an or its
Cameron Homes would w appears overly prescriptiv properties to comprise the	e with all market ho	using proposals		
The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Cameron Homes would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District				
See supporting represent	ations for further det	ails.		
	(Continue on a sepa	rate sheet /exna	and box if r	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.

Cameron Homes considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.

See supporting representations for further details.

(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)?

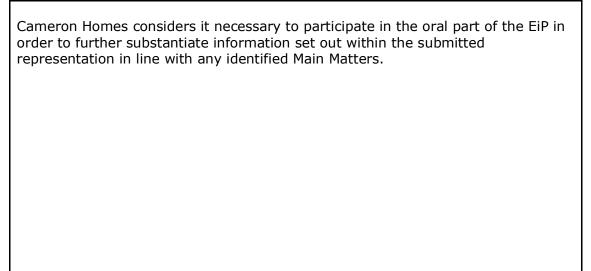
No, I do not wish to participate in hearing session(s)

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:





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Data Protection

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Name or Organisation:				
3. To which part of the Local Plan does this representation relate?				
Paragraph Policy	HC4	Policies	Мар	
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.				
It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements.				
The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced. Cameron Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified.				
See supporting representations for further details.				
(Continu	Je on a sepa	rate sheet /	expand box if r	ecessarv)

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 amended to require a maximum of 50% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.

See supporting representations for further details.

(Continue on a separate sheet /expand box if necessary)

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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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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Cameron Homes considers it necessary to participate in the oral part of the EiP in order to further substantiate information set out within the submitted representation in line with any identified Main Matters.



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Name or Organisation:					
n does this re	presentation	relate?			
HC12	Policies I	Мар			
nis :					
Yes	<u> </u>	No			
Yes		No	<i>y</i>		
Yes	✓	No			
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.					
It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. See supporting representations for further details.					
nue on a sepa	rate sheet /e	expand box if	necessary)		
	ry HC12 The second of the sec	ry HC12 Policies I Tyes Yes Yes Yes The consider the Local Plan is the duty to co-operate. If the compliance or soundness of operate, please also use the fordshire. To the contrary, the policy were to be introduction for further details.	Yes No Yes No Yes No Yes No I consider the Local Plan is not legally coth the duty to co-operate. Please be as properate, please also use this box to set of some compliance or soundness of the Local Plan operate, please also use this box to set of some contract of the contract, the evidence chapolicy were to be introduced.		



- PYU-	
NDSS requirement should be removed	1.
See supporting representations for fur	ther details.
	Continue on a separate sheet /expand box if necessary)
and your suggested modification(s). Ye further opportunity to make submission	necessary to support your representation You should not assume that you will have a ons. ons may only be made if invited by the
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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 participate in hearing session(s), you your request to participate.	e an initial indication of your wish to may be asked at a later point to confirm
8. If you wish to participate in the head consider this to be necessary:	aring session(s), please outline why you
Cameron Homes considers it necessar order to further substantiate informati representation in line with any identification.	



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Name or Organisation:					
3. To which part of the Lo	cal Plan does this	representation	relate?		
Paragraph	Policy HC17	Policies	Мар		
4. Do you consider the Lo	cal 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.					
Concern is raised that the with regards to a site's co		ments appear	to provide no f	flexibility	
See supporting representations for further details.					
	(Continue on a se	parate sheet /	expand box if ı	necessary)	



Accessibility standards should be established through the Local Plan to provide
certainty and not displaced to supplementary guidance which is not intended to
establish policy.

See supporting representations for further details.

(Continue on a separate sheet /expand box if necessary)

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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		Yes, I wish to
participate in	✓	participate in
hearing session(s)		hearing session(s)

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Name or Organisation:					
3. To which part of the Local Plan does this representation relate?					
Paragraph Poli	NB6A & C	Policies N	Мар		
4. Do you consider the Local Pla	an 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 yo is unsound or fails to comply wi possible. If you wish to support the legal compliance with the duty to cocomments.	th the duty to o	co-operate. F soundness o	Please be as po	n or its	
A locally specific sustainable conjustification for deviation from to considered through building regular supporting representations	he Governmen ulations.	t's Future Ho			
(Cont	inua on a cons	rata sheet /o	ynand hoy if r	necessary)	
(Continue on a separate sheet /expand box if necessary)					



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Name or Organisation:					
3. To which part of the Local Plan does this representation relate?					
Paragraph I	Policy SA3	Policies Ma	р		
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		
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(C	ontinue on a se	parate sheet /exp	oand box if r	necessary)	



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