



### **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 Details* *If an agent is appoint	ted, please complete only the Title, Name	2. Agent's Details (if applicable)  and Organisation (if applicable)
	lete the full contact details of the agent in	
Title		Miss
First Name		Jessica
Last Name		Graham
Job Title		Associate Director
(where relevant) Organisation (where relevant)	Taylor Wimpey UK Limited	Savills (UK) Limited
Address Line 1		55 Colmore Row
Line 2		Birmingham
Line 3		
Line 4		
Post Code		B3 2AA
Telephone Number		0121 634 8494
E-mail Address		jgraham@savills.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 F	Policy HC1	Policies	Мар				
4. Do you consider the Local Plan is :							
(1) Legally compliant	Yes		No				
(2) Sound	Yes		No	x			
(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.

The policy requires a flexible approach, recognising that the size and type of housing will change over the plan period and may be different across the District. Taylor Wimpey considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most upto-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.

Taylor Wimpey would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.

The Strategic Housing Market Assessment (2024) utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Taylor Wimpey 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.

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 determine housing mix on a site by site basis informed by market demand at the time of an application.						

**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		Yes, I wish to
participate in	X	participate in
hearing session(s)		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:

To provide oral evidence and engage in the Examination discussions on this matter.

**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 <u>Data Protection</u> (Strategic Planning) | South Staffordshire District Council (sstaffs.gov.uk)

Please return the form via email to <a href="localplans@sstaffs.gov.uk">localplans@sstaffs.gov.uk</a> or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX