

	<p>Local Plan Publication Stage Representation Form</p>	<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 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 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)

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%; border: 1px solid black;" type="text" value="Miller Homes Limited"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address <input style="width: 90%;" type="text"/></p>	<p>Mr <input style="width: 90%;" type="text"/></p> <p>John <input style="width: 90%;" type="text"/></p> <p>Williams <input style="width: 90%;" type="text"/></p> <p>Director <input style="width: 90%;" type="text"/></p> <p>PlanIT Planning and Development Ltd <input style="width: 90%; border: 1px solid black;" type="text"/></p> <p>The Studio <input style="width: 90%;" type="text"/></p> <p>White Cottage <input style="width: 90%;" type="text"/></p> <p>Astley <input style="width: 90%;" type="text"/></p> <p>Nr Stourport-on -Severn <input style="width: 90%;" type="text"/></p> <p>DY130RS <input style="width: 90%;" type="text"/></p> <p>07580128095 <input style="width: 90%; border: 1px solid black;" type="text"/></p> <p>John@planit-planningdevelopment.co.uk <input style="width: 90%; border: 1px solid black;" type="text"/></p>
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(where relevant)

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 checked="" type="checkbox"/>	No	<input 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.

The proposed plan period is 2023 to 2041. Paragraph 22 of the Framework requires Local Plans to have a "minimum" 15 year plan period from the point of adoption. As a consequence, the South Staffordshire Local Plan must be adopted in 2026 at the latest in order for this requirement is to be met.

Table 1 – Stages of Plan Making, of the consultation draft Plan advises that it is expected that the Plan will be adopted in "February 2026". There is, therefore, no scope for the plan making process to slip. In our experience the plan making process is often delayed, and there is a real danger that the emerging Plan will not have a minimum 15 year plan period. There is a strong possibility of a change in Government this year which is likely to result in further changes to the plan making system and the reversal of the December 2023 amendments to the NPPF; the consequences of such changes could delay the adoption of the local Plan.

The plan period should therefore be kept under review. If the Plan period does need to be extended to account for any slippage in its adoption date, the Council could explore the potential for increasing the capacity of the proposed housing allocations. We certainly believe that our client's Land at Keepers Lane/Wergs Hall Road, has potential for increased completions over the 317 minimum figure which has been quoted at policy SA3.



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.

On this issue, we are satisfied that the Plan period presently meets the test of soundness. However, if there are delays in the adoption of the Plan then it may be necessary to extend the plan period. In that scenario, the Council should explore the potential to increase the capacity of the allocated sites to address any increase in the housing requirement.

(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:

We have concerns that the Plan period is too short, and this will result in insufficient housing allocations being made across the Plan period. This is a fundamental issue, and we request the opportunity to discuss it during the Hearing sessions.

***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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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