

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></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)

Title	<input type="text"/>	Mr	<input type="text"/>
First Name	<input type="text"/>	John	<input type="text"/>
Last Name	<input type="text"/>	Williams	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	Director	<input type="text"/>
Organisation (where relevant)	Miller Homes Limited	PlanIT Planning & Development Ltd	<input type="text"/>
Address Line 1	<input type="text"/>	The Studio	<input type="text"/>
Line 2	<input type="text"/>	White Cottage	<input type="text"/>
Line 3	<input type="text"/>	Astley	<input type="text"/>
Line 4	<input type="text"/>	Stourport on Severn	<input type="text"/>
Post Code	<input type="text"/>	DY13 0RS	<input type="text"/>
Telephone Number	<input type="text"/>	07580 128095	<input type="text"/>
E-mail Address	<input type="text"/>	<a href="mailto:john@planit-planningdevelopment.co.uk">john@planit-planningdevelopment.co.uk</a>	<input type="text"/>



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

Policy HC1 requires that "a minimum" of 70% of all properties on major housing sites should be 3 bedrooms or less. This is based upon the conclusions of the Council's latest Housing Market Area Assessment.

The Plan has been prepared to have a 15 year time horizon. The demand for property types could change over time. As such, policy HC1 is overly prescriptive and will restrict the number of larger properties with no recognition that the demand for such properties could be very different over the plan period.

In addition, South Staffordshire has a large plan area. The demand for different property types will be different across the plan area. For example, housing sites allocated adjacent to the edge of the urban area to meet the growth requirements of Birmingham and the Black Country should meet Birmingham and Black Country's housing mix requirements, not South Staffordshire. The Council's HMA considers the mix requirements for the South Staffordshire element of the housing requirement only, not the Black Country and Birmingham's.

We object to the suggestion that S.106 agreements will be used to secure the mix of outline planning applications. This is a matter that can be addressed by a condition, and as such a S.106 should not be used. Furthermore, conditions should only be applied where there is evidence that this approach is "necessary". This should be determined on a site-by-site basis as and when planning



applications are determined. If at that stage it is decided that a mix condition is "necessary" it can be applied.

(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.

For the reasons which have been set out above, Policy HC1 should not impose a minimum requirement that 70% of dwellings on new housing schemes should be 3 bedrooms or less. A prescriptive requirement on development mix should be removed from this policy which should be reworded to make it clear that, whilst this may be a desirable target, it is not a policy 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:

Policy HC1 has the potential to result in unnecessary and inappropriate site development requirements that could stall housing delivery. Given the potential significant implication of this policy, we request the right to appear in front of the Inspector.

***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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX