

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: (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.*

<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>2. Agent's Details (if applicable)</p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="Mr"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="John"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="Williams"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="Director"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="PlanIT Planning & Development Ltd"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="The Studio"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="White Cottage"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="Astley"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="Stourport on Severn"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="DY13 0RS"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="07580128095"/></p> <p><input style="width: 90%; border: 1px solid black;" type="text" value="john@planit-planningdevelopment.co.uk"/></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	<input type="text"/>	Policy	SA3 and Appendix c	Policies Map	419A and B
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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.

Miller Homes control and is promoting land at Keepers Lane/Wergs Hall Road (Sites 419A and B) which is a proposed housing allocation for a minimum of 317 dwellings. Miller Homes wholly support the principle of the allocation for the reasons which are set out below, however, wish to submit some important clarification on the wording of the allocation policy.

Paragraph 35 of the National Planning Policy Framework requires Development Plans to be effective. This means that all of the plan's allocations should be deliverable over the plan period and consistent with national policy.

This allocation has a significant role to play in ensuring the delivery of housing growth within South Staffordshire and makes a significant contribution (26%) of new housing sites proposed at Codsall/ Bilbrook. The allocation of land at Keepers Lane/Wergs hall Road is fundamental to delivering the Plan's Spatial Strategy which seeks to focus growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements. These locations are well served by public transport and provide opportunities for well-planned, sustainable developments which provide, or have access to, a range of local services and employment opportunities which can be readily accessed on foot, by bicycle and public transport.

Miller Homes have tested the capacity of the allocation through masterplanning and technical work; this work has demonstrated that the site is significantly capable of delivering a scale of development which far exceeds the 317 homes referenced in the policy. Although this figure is expressed as a 'minimum' it is well short of the numbers which could be built on this site as demonstrated through masterplanning work; the site is capable of delivering between 340 and 400 dwellings.

A supporting concept plan is provided to illustrate how the development can deliver on many of the policy objectives; these design principles reflect Council policy on open space provision and density; hedgerow retention, housing mix and constraints such as highway impact and drainage infrastructure. It demonstrates that the site can accommodate the higher number of dwellings. We note that, according to the Council's own evidence base, development on the Keepers lane/Wergs Hall Road site, will have a low impact on the historic environment (Source: Historic Environment Site Assessment October 2022); there is therefore potential to increase the capacity of development on this site without substantial harm to the landscape or historic environment.

As required by the policy, the trees and hedgerow boundaries around the site can be retained and protected. It is envisaged that a policy compliant level of affordable housing will be provided alongside public open space and green infrastructure. Vehicular access can be achieved off Keepers Lane, Suckling Green Lane and Wergs Hall Road and the proposals are capable of being integrated into the wider urban area to deliver a high-quality housing scheme in a sustainable location.

(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.

We have concerns about the number of houses which are allocated against this site. Although the figure of 317 is described as a minimum, it is well short of the range of capacity which has been identified through the site analysis completed by our clients; the figure of 317 is therefore considered to be unsound. The quoted capacity of the site at policy SA3 should be revised to a minimum of 340 dwellings.

Paragraph 16 of the NPPF (b) states that '*plans should be prepared positively, in a way that is aspirational but deliverable*' and (d) '*contains policies that are clearly written and unambiguous, so it is evident how the decision maker should react to development proposals*'.



A supporting concept plan has been prepared to illustrate how the development can deliver on many of the policy objectives and provides support for this reasonable modification of the policy to support the soundness of the Plan.

(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:

My client wishes to be present at the Examination if there is to be a discussion on allocated site 419A and 419B. This will help the inspectors' to assess the delivery aspects of the allocated site.

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