

	<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" value="Fr"/></p> <p>First Name <input style="width: 90%;" type="text" value="Tomas"/></p> <p>Last Name <input style="width: 90%;" type="text" value="Zuna"/></p> <p>Job Title <input style="width: 90%;" type="text"/></p> <p>(where relevant)</p> <p>Organisation <input style="width: 90%;" type="text" value="St Mary's Presbytery and The Archdiocese of Birmingham"/></p> <p>(where relevant)</p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text" value="Wharf Lane"/></p> <p>Line 3 <input style="width: 90%;" type="text" value="Brewood"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text" value="ST19 9BG"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address <input style="width: 90%;" type="text"/></p> <p>(where relevant)</p>	<p><input style="width: 90%;" type="text" value="Ms"/></p> <p><input style="width: 90%;" type="text" value="Chontell"/></p> <p><input style="width: 90%;" type="text" value="Buchanan"/></p> <p><input style="width: 90%;" type="text" value="Planning Consultant"/></p> <p>(where relevant)</p> <p><input style="width: 90%;" type="text" value="First City Limited"/></p> <p>(where relevant)</p> <p><input style="width: 90%;" type="text" value="19 Waterloo Road"/></p> <p><input style="width: 90%;" type="text" value="Wolverhampton"/></p> <p><input style="width: 90%;" type="text" value="West Midlands"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="WV1 4DY"/></p> <p><input style="width: 90%;" type="text" value="01902 710 999"/></p> <p><input style="width: 90%;" type="text" value="chontell@firstcity.co.uk"/></p>
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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.

We support the notion of creating a mixed, sustainable and inclusive community with a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community.

However, we do not agree with the plan being too prescriptive which could potentially hinder the delivery of sites.

There is a collective desire for a range of house types but there is also the desire for sites to have an element of flexibility and individuality on a site by site basis.

Housing mix should be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 70% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility expected by NPPF Paragraph 63 in order to meet the need to provide for a range of size, type, and tenure for different groups.

It is important to note that there remains a need for 4+ bedroom houses within the District as indicated in the supporting evidence within the Strategic Housing Market Assessment 2024 (Table 8.1).

The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks a level of clarity and therefore



is open to interpretation. The policy should recognise that needs and demand will vary from different areas and different sites and identify that its requirements could be subject to a viability assessment, thus allowing for flexibility in its application.

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 consider the following text striked through should be removed and underlined included.

"On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing ~~must include a minimum of 70% of properties with 3 bedrooms or less~~, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council's latest Housing Market Assessment."

(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 are representing a previous allocated site and consider it is important for us to be present to support the re-inclusion of the former proposed allocation.

***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