



## Part B – Please use a separate sheet for each representation

Name or Organisation: Reiss Sadler, Marrons Planning for L&Q Estates Limited

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.

- Draft Policy HC8 seeks to require consideration of self-build and custom build needs, however the policy is ambiguous and does not provide sufficient clarity with regard to the expectation of an applicant for a major development proposal, particularly given the Council does not publish its Self-Build and Custom Housebuilding Register or any data relating to it publically.
- Further, it is considered the Council’s Register couldn’t be relied upon as clear evidence to support such a policy intervention in any case given the ability for an individual to enter their details on to multiple Registers, skewing the data derived, when that individual may have no means or desire to carry out such a project in reality in any case.
- In addition, the delivery of self-build and custom build plots on larger residential schemes are unlikely to be desirable to those on the Councils’ Register given the majority of self-builders and custom builders tend to seek standalone plots in the open countryside. Moreover, there are practical issues with delivery of self-build and custom-build homes on larger residential schemes which require consideration, along with the potential for impact on development viability.
- It is also considered that the requirement for developers to actively market plots at a reasonable price for a minimum period of 12 months as set out in the third paragraph of draft Policy HC8 is unreasonable. 12 months is a significant marketing period and could delay bringing forward sites with planning permission that are otherwise deliverable, impacting the Council’s short-term supply.



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.

- Clarity and flexibility should be incorporated into draft Policy HC8, to provide support for the provision of self-build and custom build plots on major residential development sites where appropriate, and to reduce any marketing period to a maximum of 6 months. Alternatively, the second and third paragraphs of draft Policy HC8 should be deleted.

**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:

In order for the Inspector(s) to be able to appropriately consider the evidence presented by all parties before taking a view.

**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**



## South Staffordshire Council

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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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