

	<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 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

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 2. Agent's Details (if Details* applicable)

**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.*

Title	Mr	No agent
First Name	Nicholas	
Last Name	Greenwood	
Job Title	N/a	
Organisation	N/A	
Address Line 1	████████████████████	
Line 2	██████████	
Line 3	██████	
Line 4		
Post Code		
Telephone Number	██████████████	



Email Address	<div style="background-color: black; width: 100%; height: 15px;"></div>	
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

7. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

8. Do you consider the Local Plan is :

(7) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(8) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(9) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

13. 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 council's policy HC2 has watered down the 35 dwelling per hectare recommendations in the GBMHA report.

The GBHMA Strategic Growth Study referred to building a housing density of 35 dwelling per hectare within the green belt for sustainability reasons.

See section 1.22 "Based on the analysis undertaken, GL Hearn concludes that it would be reasonable to assume minimum densities of 40 dph are achieved in the conurbation (Birmingham and the Black Country urban area), with minimum densities of 35 dph in other parts of the HMA. This approach would yield additional supply of 13,000 dwellings, principally over the period to 2031. This is a significant contribution to meeting the housing shortfall. This is the working assumption on the contribution to supply which increasing densities could make. "

This is the council's watered down version!

"HC2 : Aim to achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities "

There are so many caveats in this that the vast majority of sites in the Local Plan are in the low twenties." This includes, for example most sites in Codsall which is Tier 1, so clearly this is a policy that is effectively a dead letter.



This means bigger settlements; more Green Belt land lost.

The latest site in SE Wombourne, off Beggars Bush Lane boasts 70% 3+ bedroom houses, with 70% privately sold. Of the 'affordable' housing, only 15% of the estate is social rent – the rest is 'shared ownership' or first-time buyer schemes, which will eventually become unaffordable when they are sold on. Average prices on this estate are above £300,000.

Looking at the Beggar's Bush Lane planning application, the Council seems to hide behind the need to make developments in keeping with the surrounding settlements. For housing with proximity to Green Hill and Sytch Lane (the latter being Wombourne's most expensive road), this would, and has, resulted in low density housing. It is to be feared that applying the same 'principle' to the land North of Poolhouse Lane would have the same effect.

The only way you can drive down housing prices in Wombourne is to decrease the number of rooms and increase the density. This reduces the size of settlements, and hence the journey times. It also has the effect of using up much less land.

The aim in the plan to reduce house prices by over-supply can never work in a small desirable town of 14,000 people with a 1.1 million neighbour.

Could I just say that I had to calculate these densities myself. The Council didn't let us know how many exemptions to HC2 were in the plan,.

(Continue on a separate sheet /expand box if necessary)

Location	Site Ref	Development Type	Minimum dwellings	Hectares	Dwellings per hectare
Tier 1					
Codsall	419a,b	Residential	317	15.1	21.0
Codsall	224	Residential and station parking	85	4.0	21.3
Codsall	228	Residential	29	0.8	36.3
Cheslyn Hay	523	Residential	49	2.4	20.4
Cheslyn Hay	119a	Residential	60	2.9	20.7
Cheslyn Hay	536a	Residential	84	4.0	21.0
Gt Wyrley	141	Residential	31	1.2	25.8
Gt Wyrley	136	Residential, country park and allotments	155	7.4	20.9
Gt Wyrley	139	Residential	46	2.2	20.9
Gt Wyrley	638	Residential	29	1.1	26.4
Gt Wyrley	704	Residential	31	1.3	23.8



Gt Wyrley	536a	Residential, parking, specialist housing	84	4.0	21.0
Penkridge	5	Residential	88	4.2	21.0
Tier 2					
Brewood	617	Residential	63	3.0	21.0
Brewood	079	Residential in specialist housing	43	2.1	20.5
Huntington	591	Residential	44	2.0	22.0
Huntington	016	Residential	39	1.6	24.4
Kinver	274	Residential	120	5.5	21.8
Kinver	272	Residential	22	1.0	22.0
Kinver	576	Residential	22	1.0	22.0
Perton	239	Residential	150	7.2	20.8
Wombourne	416	Residential	57	2.8	20.4
Wombourne	285	Residential	82	3.9	21.0
Wombourne	562/415	Residential	44	1.9	23.2
Wombourne	459	Residential	97	4.6	21.1
Wombourne	463 & 284	Residential	223	10.6	21.0
Wombourne	286		16	0.6	26.7
Tier 3					
Coven	82	Residential	48	2.3	20.9
Featherstone	168	Residential	81	2.8	28.9

14. 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.

I think HC2 should adhere more closely to the 35%, and should give quotas for 1-2 bedroom houses as well. It is noted that the Council can have a policy of 70%+ of 3 bedrooms or less while this also equates to 70%+ of 3 bedrooms and more. A 3-bedroom house can be quite big



(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.

15. 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.

16. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

From what I understand of Wombourne Parish Council's objections, they seem in favour of lower density housing 'in keeping' with the village, whereas I take an opposing view. If we haven't got 2-bedroom homes for our young people – probably higher density – the policy has failed.

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

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