

Part B – Please use a separate sheet for each representation

Name or Organisation: **CPRE Staffordshire, the countryside charity**

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input 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.

CPRE Representation 3

Housing Densities

The Plan includes a density policy:

Policy HC2: Housing Density Housing developments, including rural exception sites, will 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. Where it would help to support the delivery of local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area. The net density on a site may go below the minimum density standard set above if to do otherwise would result in significant adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character.

But on the allocated sites the average density is far lower for no reason which is explained in the document. We find this to be surprising.

Average densities of the larger allocated housing sites are generally between 20 and 25 dwellings per hectare on larger sites, rather than the 35dpa quoted in Policy. Looking at the larger sites between pages 192 and 223, both the site area and number of dwellings are quoted and the density assumed can easily be calculated.

This leads to an under-estimation of capacity resulting in the allocation of significantly more land than is necessary or appropriate.

- *We realise that Strategic Sites need to be considered separately as they may include other facilities such as a school and community hub - see our separate representation on this.*
- *We acknowledge that not all sites may not be feasible to achieve 35dph, some may be higher, others lower. See the Council's Strategic Housing & Economic Land Availability Assessment.*

(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 think that the number of dwellings assumed in the allocations should be increased.

There may also be a case for indicating maximum numbers of houses on each site.

In our view, the allocations should be reviewed in the light of revised density assumptions.

(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 acknowledge that our representation, with those on housing numbers and windfall assessments, are potentially far-reaching as they result in over-allocation and the unnecessary loss of greenfield and Green Belt land to housing development.

We would like to hear and respond to the Council's views if the Inspector will permit this.