

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></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\*

2. Agent's Details (if 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	Dr	
First Name	Peter	
Last Name	King	
Job Title (where relevant)	Regional vice-chair (West Midlands)	
Organisation (where relevant)	Campaign to Protect Rural England	
Address Line 1	49 Stourbridge Road	
Line 2	Hagley	
Line 3	Stourbridge	
Line 4	West Midlands	
Post Code	DY9 0QS	
Telephone Number	01562-720368	
E-mail Address (where relevant)	peterkingiron@blueyonder.co.uk	

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

Name or Organisation: Campaign to Protect Rural England – West Midlands region

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

Paragraph  Policy HC2  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant

Yes

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

(2) Sound

No

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

(3) Complies with the  
Duty to co-operate

N/A



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.

The 2024 Plan retains a policy on housing density (Policy HC2) which includes minimum 35 dwellings per hectare (dph) net at all sites with an aim to have higher densities in central areas where services permit.

It is welcome that this is still referred to as a minimum density.

However, the policy has been weakened in two regards since the 2022 Plan. Firstly, there is no longer a reference to rural exception sites and it is unclear why those are no longer included. Secondly, the aim to exceed those densities is no longer on all sites where it promotes local services but only in 'central areas'. It is clear how central areas are defined (as opposed to the settlement hierarchy in the plan) and there may also be other places where higher densities are appropriate.

It is also welcome that the policy specifically expects all sites to 'seek' to make efficient use of land, but regressive that this requirements is no longer identified as a reason for refusal (as in the 2022 Plan) which may reduce the effectiveness of that element of the policy.

Nor is it clear if this would include gross/net assumptions on developable land.

(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 consider the policy set out in the 2022 Regulation 19 plan was better word and should be re-adopted.

We also consider a minimum density of 40-45 dph may be appropriate in some locations and this should be defined in the policy.

**Reference: 2022 Regulation 19 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.*

*All housing developments should make efficient use of land, whilst ensuring they still meet the requirements of other local plan policies. In areas not covered by the minimum density standards set out above, the appropriate density of a scheme will be determined on a case-by-case basis. In doing so it will have regard to the location of the site relative to services and facilities and other development plan policies, such as those addressing local design, character and housing mix requirements. Housing applications will be refused where they fail to demonstrate how they have optimised a site's density in accordance with these principles.*

*Development proposals should be consistent with other Local Plan policies.*

(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

**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:

To set out our views on housing density and ensure the Inspector has a range of views before him/her, not just the development lobby.

**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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX