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

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Name or Organisation: Keith Whitehead

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

Paragraph 

Table 6.2
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Policy 

H2
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4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes	<table border="1"><tr><td></td></tr></table>		No	<table border="1"><tr><td></td></tr></table>	

4.(2) Sound	Yes	<table border="1"><tr><td></td></tr></table>		No	<table border="1"><tr><td>X</td></tr></table>	X
X						

4 (3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td></td></tr></table>		No	<table border="1"><tr><td></td></tr></table>	

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review 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 Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

The table 6.2 heading in Policy H2: Housing Allocations is not sound.

This is the same wording as in the current local plan. The wording has led to huge controversy and confusion in many Planning Committees over the last few years as the wording lacks clarity.

The words used are “Total Dwellings”. Planning officers in Planning Committees have left themselves open to accusations of misleading Planning Committee members by saying that table 6.2 says the number of dwellings in Policy H2 for a particular development is “minimum”. Even though the table clearly says “Total”. This word lacks clarity. The dictionary definition of total in English is “comprising the whole number or amount”. This is completely different from minimum.

The written justification from Planning was that to use the word minimum instead of the actual policy word was “reasonable”. Residents around the City do not agree.

In a meeting with Planning, another reason was given. This time we were told that part way through writing the local plan, the Government changed the rules and development quantities could no longer be described as “total”. We were then told that the local plan was changed to meet the new rules but this table was missed and so not changed. When the mistake was noticed we were told it was too late as the local Plan had been signed off.

Given the amount of challenges and confusion, it is unacceptable that the error still has not been corrected.

6. Please set out the modification(s) you consider necessary to make the Local Plan Review 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 Review 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.

To correct the local plan and make it sound, the heading in table 6.2 of Policy H2: Housing Allocations has to be changed to be consistent with the English language so that anyone understanding English is clear of what is meant.

The suggestion is that instead of using “total” that “maximum” is used instead so that there is no confusion.

(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 they identify 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)?

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**No**, I do not wish to participate in hearing session(s)

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**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. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below.

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

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

**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.