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To whom it may concern,

### **LDC Representations to South Staffordshire Council Preferred Options Consultation**

Thank you for consulting Lichfield District Council on the South Staffordshire Local Plan Preferred Options (Regulation 18) consultation. Lichfield District Council welcomes the opportunity to provide comments on the South Staffordshire Local Plan Preferred Options (SSLP) at this emerging stage. Lichfield District Council welcomes the continuing, positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the SSLP progresses.

#### Housing requirement and delivery:

Lichfield District Council notes that the proposed housing requirement figure for the plan period (2018- 2038) for the SSLP area is 8,881, this includes a contribution of 4,000 dwellings to meet the unmet needs arising from the Greater Birmingham Black Country Housing Market Area (GBBCHMA) as detailed within Table 7 of the SSLP. This is based on the standard method used to calculate Local Housing Need (LHN) for the Council, completions from development in the first three years of the plan period and the aforementioned contribution to unmet needs.

Lichfield District Council supports the commitment within the SSLP to provide homes to meet the unmet needs arising from within the GBBCHMA. As stated at paragraphs 4.8 to 4.11 of the SSLP the GBBCHMA authorities produced a Position Statement in 2021 which demonstrated that the shortfall to 2031 has fallen significantly. The Position Statement noted that emerging evidence supporting the Black Country Local Plan (BCP) suggested a significant unmet need would arise from 2027/28. Lichfield District Council agree that this demonstrates there is likely to be significant unmet need arising beyond 2031. However, it is noted that as yet the evidence underpinning the BCP has yet to be tested at examination with the BCP still at a formative stage of its progression.

Lichfield District Council has progressed in the review of its Local Plan. The Local Plan 2040 was subject to consultation in July and August 2021. The draft Local Plan 2040 proposes a contribution of 2,665 homes between 2018 and 2040 towards the GBBCHMA shortfall. Lichfield District Council considers this to be a significant and proportionate contribution to unmet needs, equating to an additional 37.7% on the District's LHN.



It is noted that the SSLP places great significance on the Strategic Growth Study 2018 which was prepared on behalf of the GBBCHMA authorities and forms part of the evidence to the SSLP and the review of the Local Plan in Lichfield District. Whilst this is an important piece of evidence for authorities, it did not seek to specify where development should be located, rather it is for each authority to consider those options relevant to them through their plan-making process.

### Employment

It is noted the SSLP seeks to assist with unmet needs from within the Functional Economic Market Area (FEMA) within which South Staffordshire District is located. Lichfield District is unable to assist in meeting any unmet employment need. The emerging Local Plan seeks to meet the District's own employment needs. The emerging Lichfield District Local Plan 2040 makes clear that evidence demonstrates that there is only sufficient employment land within the District to meet our own requirements with limited potential further options beyond those allocated. Therefore, the District Council will be unable to assist in meeting unmet need for employment land which may arise.

The District Council notes the Green Belt Review and acknowledges the methodology used. The District Council concurs with the SSLP that exceptional circumstances exist to merit the release of Green.

Lichfield District Council welcomes continuing a positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the South Staffordshire Local Plan progresses.

Yours faithfully

*S W Stray*

Stephen Stray  
**Spatial Policy and Delivery Manager**

