

Our Ref: P1797/SS
Date: 13th December 2021

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Dear Sir / Madam,

**South Staffordshire Local Plan Consultation
Representations on behalf of Heyford Development Limited**

Harris Lamb Planning Consultancy are instructed to submit Representations to the South Staffordshire Preferred Options Consultation Draft Plan by Heyford Development Limited ("**Heyford**").

Heyford control land to the immediate west of the Wall Heath, at 'Land to the North of Enville Road' in South Staffordshire District. This site is being promoted as a residential development opportunity through the emerging South Staffordshire Plan making process. It is not, however, identified as a proposed allocation in the Preferred Options version of the Plan. It is our view that this is a serious omission, and this site should be allocated for residential development. The emerging Plan fails to plan for enough housing to meet both the growth requirements of South Staffordshire and the unmet housing needs of the conurbation. The land at Wall Heath provides the opportunity to deliver a high quality residential urban extension to Wall Heath and form a natural extension with housing development to the east and the south. The existing tree belt to the north and sub station to the west would form clear barriers to further expansion.

This letter should be read in conjunction with the Wall Heath Vision Document that is appended to these Representations. The Vision Document highlights the significant benefits associated with the allocation of the Wall Heath site for housing within the emerging Plan.

Set out below is our response to the various questions raised within the Consultation document.

Question 1 - Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

No. The housing evidence base which underpins the draft Plan's housing strategy is lacking. Paragraphs 4.6 to 4.12 of the Preferred Option consultation draft Plan refer to various evidence base documents that have been used to help identify the quantum of development

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South Staffordshire should provide to assist in accommodating the unmet housing requirements of the conurbation. None of the documents referred to in these paragraphs are referred to in the evidence base in Appendix A. They have, however, been fundamental in shaping the Plan's housing strategy and should be included.

That being said, as detailed in our response to Question 5, the housing requirement proposed by the draft Plan is unsound. It fails to reflect the most recent information available on the extent of the housing shortfall arising from the conurbation and fails to acknowledge the important role South Staffordshire needs to play in supporting housing growth to meet the development needs of the Black Country and Birmingham.

Question 2 - Do you agree that the correct infrastructure to be delivered alongside proposed Site Allocations has been identified in the IDP? Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

The infrastructure requirements included within the IDP are based upon the Preferred Options Plan's housing and employment development targets. As detailed in these Representations it is our view that the emerging Plan makes insufficient provision for housing development. That being the case, the IDP plans for an insufficient level of development. The IDP will need updating in due course should the housing and employment requirements be increased.

Question 3 - Have the correct visions and strategic objectives been identified? Do you agree that the draft policies and the policy directions will deliver these objectives?

No. The Plan's Vision is inappropriate.

We support the reference to South Staffordshire seeking to strive to protect and enhance its distinctive rural character, communities and landscape. The reference to creating beautiful thriving new places where people can live, work and play is also supported.

However, the Framework identifies three overarching objectives that together constitute sustainable development, with parts of the economic and social objectives largely being ignored by the Vision. For example, the economic objective of sustainable development requires a sufficient quantum of the right type of land to be available to support economic growth. The social objective requires local authorities to ensure that a sufficient number and range of homes are provided to meet the needs of current and future generations. The Vision is silent on these points.

It is, therefore, our view that the Vision should be amended to introduce additional text to confirm that South Staffordshire will deliver sufficient land of the right type to meet the economic and housing growth requirements of South Staffordshire and to support the growth of the conurbation.

We do not support Strategic Objective 1. This should be altered to reflect the fact that the Preferred Options plan identifies that Green Belt release is necessary and that exceptional circumstances exist.

Strategic Objectives 3, 4 and 5 are designed to address 'homes and communities'. However, nowhere within any of the Strategic Objectives for Housing is reference made to providing a sufficient quantum of housing to support the growing number of households within South Staffordshire, ensuring that enough homes are available to accommodate South Staffordshire's working population, or to supporting the growth requirements of the conurbation.

Two additional Strategic Objectives should be added:

1. to confirm that the Plan will provide enough houses to meet both South Staffordshire's and the conurbation's housing need.
2. To confirm that changes to Green Belt boundaries will have regard to their intended purpose in the long term, so that they can endure beyond the Plan period. This results in a requirement for "safeguarded" land, which is not currently addressed in the emerging plan.

Question 5 - Do you support the policy approach in Policy DS3 - The Spatial Strategy 2038?

Policy DS3 addresses several matters. We comment on these in turn below.

The Housing Requirement to meet the Growth of South Staffordshire

The emerging Plan suggests that a total of 8,881 dwellings should be planned for during the Plan period 2018 - 2038. There are two components to the housing requirement, the first is the quantum of housing required to meet South Staffordshire's growth requirements, the second is the additional housing which will contribute towards meeting the unmet needs of the Housing Market Area, particularly Birmingham and the Black Country.

Paragraph 61 of the Framework advises that to determine the **minimum** number of homes needed, strategic policies should be informed by a Local Housing Needs Assessment, conducted using the Standard Method in the National Planning Practice Guidance. That being the case, the Standard Method is the starting point for establishing the scale of the housing requirement to meet South Staffordshire's housing needs. In this case the Preferred Options Plan relies on the minimum annual housing needs figure of 243 dwellings per annum.

The South Staffordshire Housing and Market Assessment May 2021 ("**SSHMA**") has been prepared to help inform the Plan's overall housing requirement. It concludes that using the Standard Method, "Across a 20 year Plan period it is therefore intended that 5,068 new homes will be delivered to address the housing need in South Staffordshire" (paragraph 4.16).

However, the conclusions in the SSHMA are not reflected in paragraph 4.13 of the consultation draft Plan, which, states the housing need for the period 2021 - 2038 is 4,131 dwellings, with a further 750 completions between 2018 and 2021. Combined this gives a housing target of 4,881 dwellings to support the growth of South Staffordshire.

This approach is inappropriate. The emerging Plan should plan for the minimum Standard Method housing requirement from the start of the Plan period as a baseline, which the SSHMA advises is 5,068 dwellings.

Furthermore, the SSHMA demonstrates there should be a requirement for a significant uplift to the Standard Method housing. This is because the Council has:

- Not correctly factored in affordable housing need and whether an uplift to the South Staffordshire housing requirement is required; and
- Not considered uplifting the minimum Standard Method housing figure to take account of economic growth aspirations and the fact that the age profile of South Staffordshire is increasing.

Affordable Housing

As detailed in paragraph 8.5 of the SSHMA the PPG advises that it is necessary for local authorities to calculate their total affordable housing need. The total affordable housing need can then be considered in the context of its likely delivery as a proportion of the housing requirement, taking into account the probable percentage of affordable housing to be delivered by eligible market housing-led developments. An increase in the overall housing figure included in the Plan may be appropriate where it would help to deliver the required number of affordable homes (PPG paragraph 2a-024-20190220).

The SSHMA concludes a total affordable housing needs in South Staffordshire is 128 dpa. However, in determining whether this can be reached, it considers this as a percentage of the overall housing target, which includes the 4000 houses to meet the needs of the Black Country. This approach is flawed.

The 4000 houses are to meet the needs of the Black Country and so any affordable housing within this will also be meeting this need, rather than the need deriving from South Staffordshire. By concluding that these affordable houses will meet South Staffordshire's needs, these have inadvertently been double counted and skewed the figures.

When considered a percentage of the South Staffordshire's Standard Method housing requirement of 254 dpa, an affordable housing requirement of 128 dpa represents approximately 50% of these dwellings. With the current policy target of just 30%, it is clear that either the policy target needs to be increased if this is viable or that an uplift in the housing requirement needs to be robustly considered to see whether this affordable housing need can be met.

The emerging Local Plan needs to be careful with how the needs of South Staffordshire and the overspill of the Black Country are considered and presented, to make sure that all the relevant housing needs are being met.

Economic Growth

It is also noted that Chapter 2 of the HMA advises that the population of the District is older than the national average, with fewer family households present. It is also noted that unemployment levels are lower than the national average and there are more people employed in the most highly skilled roles. What this indicates is that there could be a "hollowing out" of South Staffordshire's workforce. This could create a position where additional houses are required in South Staffordshire to increase the size of the labour force

to support jobs within the District. This is not clear from the information available and further consideration should be given to whether this is an issue and whether an uplift in the housing requirement would ensure that sufficient houses are available to support the local workforce.

Additional Housing to Contribute Towards Meeting the Unmet Needs of the Housing Market Area

The draft Plan identifies that South Staffordshire will deliver 4,000 houses to support the housing needs of the conurbation. To justify this number, the Plan relies upon the conclusions of the GBHMA Strategic Growth Study 2018, and its subsequent update. As a starting point, South Staffordshire District Council should consider whether the conclusions of the Strategic Growth Study and its update are robust for the purposes of its plan making.

The Framework advises at Paragraph 61 that the Standard Method should be used as a starting point for establishing the housing requirement. The Strategic Growth Study does not establish housing need using the Standard Method. The Strategic Growth Study concludes that during the period 2011 - 2031 a minimum of 205,000 homes are required, which broadly reflects the 2014 based sub-national population scenario for the study area. The housing needs figure in the Strategic Growth Study is not, therefore, fit for plan making purposes. It is based upon out-of-date evidence and does not use the Standard Method.

Furthermore, the Study covers a period that is not commensurate with the South Staffordshire Plan. Its conclusions are not, therefore, directly transferable in any event.

There is more up to date and robust evidence on the potential housing shortfall arising from the conurbation and this should be factored in to determining what level of overspill South Staffordshire should be taking. The principal unmet housing need from the conurbation arises from the Birmingham and Black Country Authorities.

Birmingham Overspill

The Birmingham Development Plan ("**BDP**") was adopted in January 2017. Policy PG1 – identifies a shortfall of 37,900 homes (including 14,400 affordable homes) that will need to be delivered elsewhere within the HMA.

Since the BDP was adopted Birmingham City Council has suggested that the extent of the housing shortfall has reduced. This suggestion does, however, need to be treated with extreme caution for the following reasons:

- This is based on the findings in Birmingham's more recent SHLAA. However, not every site in the SHLAA will come forward in the plan period. Furthermore, this has not been subject to the same level of scrutiny as a site allocations Local Plan and should not be considered as such.
- Policy PG1 retains Development Plan status, there has been no suggestion from Birmingham City Council that it is an out-of-date policy and consequently the overspill identified within it still holds weight.

- If new information on potential source of housing land supply is to be considered, it is also necessary to consider new information on the need for housing within Birmingham City. In this context, the Standard Method for Birmingham City has increased by 35%, thereby increasing the annual requirement from 4,550 dpa (before any redistribution) to a minimum of 6,750 dwellings per annum.
- The Birmingham Plan period runs to 2031, whereas the South Staffordshire Plan has an end date of 2038. The South Staffordshire Plan does, therefore, need to make an allowance for delivering housing to meet the growth of Birmingham for the period 2031 to 2038.

Black Country Overspill

The emerging Black Country Plan Preferred Options consultation document identified a total housing requirement of 76,076 dwellings, with the need for 28,239 dwellings to be delivered elsewhere within the HMA.

Combined Shortfall

Combined the shortfall from Birmingham and the Black Country based on the adopted BDP and the emerging Black Country Plan equals 66,139 dwellings. This of course being before any additional overspill is considered between 2031 and 2038 from Birmingham City.

South Staffordshire's proposed contribution toward the shortfall

The 4,000 dwellings proposed by the draft South Staffordshire Local Plan represent just 4% of the total shortfall identified by the adopted BDP and emerging Black Country Plan.

There are 14 authorities within the Black Country HMA. Five of which are Birmingham and the four Black Country authorities. That means the shortfall needs to be distributed between the 9 remaining authorities. If the shortfall is split evenly between the 9 remaining authorities each authority should be providing approximately 7,370 dwellings.

However, it needs to be remembered that some of the remaining authorities are heavily constrained. For example, Redditch Borough is effectively built up to its boundary and is already reliant on Bromsgrove to meet its needs. Only part of Stratford on Avon District falls within the HMA, reducing development opportunities in Stratford on Avon and Cannock Chase's capacity is restricted due to environmental constraints such as the Cannock Chase SAC and AONB.

Consequently, there is clear evidence to suggest that South Staffordshire should be taking a greater proportion of development than other authorities within the HMA given the level of shortfall identified.

It is also widely acknowledged that the South Staffordshire has a very strong functional relationship with the Black Country. This further supports an increase in the 4000 dwellings proposed to reflect this relationship and South Staffordshire's ability to deliver homes in a location closest to where the need is derived.

It is our view that the number of homes being planned to contribute to addressing the shortfall should be increased significantly.

Spatial Strategy for Housing

Notwithstanding our concerns about the number of dwellings being proposed to meet the identified shortfall, Table 8 of the draft Plan advises that only 2,958 of the 4000 dwellings are proposed adjacent to the edge of the Black Country conurbation.

It is our view, that the housing allocations included within the Plan to support the growth of the conurbation should be directed to locations close to where the need arises. The Plan's spatial strategy for housing should be predicated on making allocations adjacent to the conurbation to meet its need, or within a sustainable commuting distance, to help reduce the need to travel. The housing requirement should be increased and redistributed so that further allocations are made adjacent to the built-up edge of the Black Country. This includes Dudley MBC, which is currently been left relatively untouched, and particularly those parts of Dudley MBC closer to Wolverhampton, such as Wall Heath.

Proposed Policy DS3 advises that development will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy included within the policy. The land adjacent to the Black Country provides some of the most sustainable locations for development within South Staffordshire. The Black Country provides a wide variety of services and facilities and directing new development to these locations would fulfil the emerging Plans objective of delivering development in the most sustainable of locations.

Furthermore, it is noted that Paragraph 4.19 of the Draft Plan refers to the GBHMA Strategic Growth Study 2018 as being an evidence-based document that has been used to inform the settlement hierarchy and the distribution of growth. However, the Strategic Growth Study does not consider development options of less than 1,500 dwellings and there are no allocations of this size included within the Draft Plan. Consequently, the GBHMA Strategic Growth Study is not a relevant evidence base against which to assess the suitability of sites or formulate a housing distribution strategy.

A sequence of smaller sites in appropriate locations, such as Heyford's site at Wall Heath, would not only make a positive and sensitive contribution to meeting the overspill, but would also provide sites that can be delivered in the short term. These sites are needed desperately, because the Green Belt is currently placing a significant constraint to meeting the housing needs identified and when it is released, the quicker it can be delivered the better.

Q11 - Do you agree the proposed policy approaches set out in Chapter 6?

The Draft Plan does not include the proposed wording of the various Development Management Policies, and instead identifies "directions of travel". We set out our proposed response to the Draft Policies below, however, we reserve the right to comment further once the full suggested wording of the policies is available. In our view, the Preferred Options version of the Plan should set out the full proposed policy wording, as opposed to leave this matter to the pre-submission stage.

The Sustainability Appraisal

The Plan's Sustainability Appraisal provides guidance on the approach that has been used to identify the proposed residential allocations. We have a number of concerns with the way in which it has been used to inform the site selection process as it is incomplete and fails to properly consider mitigation, and the advantages of making particular allocations.

By way of an example, sites such as Wall Heath are penalised heavily for falling even a short distance outside of the 800 metres catchment identified for primary schools. In the case of Wall Heath, there are three primary schools within walking distance as identified in the Vision Document. Whilst a line needs to be drawn somewhere, it needs to be remembered that for the overspill from the Black Country to be met, sites outside of this catchment will need to be allocated.

Omission Site – Wall Heath

The land at Wall Heath should be removed from the Green Belt and allocated for residential led development. These representations are accompanied by a Vision Document that highlights the opportunities presented by the site. The site can provide 148 new homes at a density of 37 dph alongside supporting infrastructure, including 4 hectares of multifunctional open space and the incorporation and enhancements of the existing public rights of way within the site.

The Vision Document sets out a design framework to guide the site and explains how the scheme can respond to constraints. A concept masterplan is provided demonstrating how the site could be brought forward for an attractive development that takes advantage of the site's topography and natural features.

Contrary to the assessment of the site within the Sustainability Appraisal and Housing Selection Paper, the Vision Document demonstrates:

- The site is highly accessible to a wide range of services, facilities and employment opportunities by other means of transport to the car.
- Three primary schools are in walking distance, contrary to the double negative score given for falling just outside of the 800-metre walking distance in the assessment criteria.
- The development of the site will not cause a 'high' level of harm to the Green Belt. Wall Heath is not one of the large built-up areas identified for the purposes of 'unrestricted sprawl' and the Site is well contained with development of two sides in any event. The score should be corrected accordingly. Furthermore, greenfield, Green Belt sites are needed to meet the development needs and an element of encroachment will occur. Relatively to many other sites, the Wall Heath site will only result in a modest level of encroachment and this should not weight against an allocation on this site;
- The Site is within Flood Zone 1 and not Flood Zone 2 and 3 as suggested;
- Surface water can be actively managed on site;

- The loss of deciduous woodland would not occur due to the development of this site; and
- The Site could come forward quickly, providing much needed housing early in the plan period.

In summary, the assessment of the Site should be updated accordingly. The Site is extremely well placed to provide housing to meets the significant needs arising from the Black Country and should be allocated accordingly.

I trust you have found these representations useful. If you have any queries, please do not hesitate to contact me.

Yours sincerely



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Encl. Wall Heath Vision Document