



South Staffordshire Local Plan Preferred Options Consultation

**LAND AT KEEPERS LANE/WERGS HALL ROAD,
CODSALL**

Representations on behalf of landowners Cox and Jenks.

INTRODUCTION

PlanIT Planning and Development (**"PlanIT"**) are instructed to submit representations on the Preferred Options South Staffordshire Local Plan consultation. Our client controls land at Codsall which is identified as a proposed housing allocation (Site 419 A&B). Whilst we fully support the allocation of this parcel of land we wish to comment on the draft policies which will influence the scale and design content of a future planning application.

We set out below our response to the questions which are set out at Appendix G of the consultation document where they are relevant to our client's land interests and the purpose of these representations.

BACKGROUND

PlanIT has represented the interests of the landowners since 2013. Over that time, we have provided planning consultancy and land agency support to promote land at Keepers Lane/ Wergs Hall Road through the various consultation stages of the now adopted Site Allocation Development Plan (SAD) resulting in the allocation of part of the land fronting Keepers Lane (SAD policy reference SAD 2) and the redesignation of the land, which is the subject of these latest representations, from Green Belt to Safeguarded Land (SAD policy ref SAD3).

PlanIT has subsequently secured planning permission for up to 65 residential units on Site SAD 2 and this land has now been sold to Miller Homes who has commenced development on the site. PlanIT, in conjunction with its joint selling agents Bruton Knowles, have reached agreement with a national housebuilder on the sale/purchase of the Site 419A&B and contracts will be exchanged in the near future.

The Landowners whom we represent are in agreement to collaborate on the delivery of this site through the Local Plan and planning application process. Agreement has been reached on a formal collaboration agreement which establishes a contractual framework for funding the costs associated with the planning application and the division of the proceeds from the eventual sale of the site. The collaboration agreement recognises that land within the Site will be made available for the delivery of essential infrastructure including drainage, amenity land and a new link road from Wergs Hall Road to Keepers Lane.

We can therefore confirm that a legal framework is in place to ensure the delivery of Site 419A&B. There are therefore excellent prospects for securing completed homes on this Site during the Local Plan period should its allocation progress through the remaining stages of the Local Plan Review process.

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

Our Response

We have made separate representations on the evidence base to support the allocation of additional sites through the Local Plan Review process. Whilst we support the Council's interpretation of the evidence base documents, in so far as it demonstrates the need to confirm the allocation of the Safeguarded Sites which are identified in the SAD, we do explain our concerns that the size of the housing requirement may be understated. The proposed housing requirement fails to reflect the most recent information which is available on the extent of the housing shortfall arising from the conurbation and, in particular, it fails to acknowledge the important role South Staffordshire must play to support the development needs of the Black Country. The Council should consider this point carefully because there would appear to be a requirement to identify housing sites in addition to the sites which are currently proposed for allocation on the Preferred Options Plan. We have set out the scale of the under provision in our answer to Q5 below; it underscores the need for those sites which are presently identified for development in the consultation document to progress through the remaining stages of the Local Plan process. In that respect Site 419 A&B will make an important contribution to the District's housing needs and we support its allocation.

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?

Our Response

The infrastructure requirements which are included within the IDP appear to be reasonable based upon the level of housing and employment growth which is currently planned. However, should the Council accept the need for additional development over and above the Plan's current allocations, the infrastructure requirements may change.

We are satisfied that, as drafted, the proposed housing allocations at Codsall will provide an appropriate level of affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, biodiversity enhancement, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure. We can confirm that the landowners of Site 419 A&B will continue to work with the Council to ensure that appropriate levels of infrastructure

will be delivered in line with the relevant development plan policy standards.

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?

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 Vision should be clear that the emerging Plan will deliver the development necessary to support South Staffordshire's growing population, economic objectives. Significantly, it should also recognise the important role South Staffordshire will play in supporting the development needs arising from the conurbation.

The Framework identifies three overarching objectives which constitute sustainable development. The Vision correctly identifies matters that will help to deliver the environmental objective of sustainable development. However, parts of the economic and social objectives are largely 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.

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 which will support the growth of the conurbation.

We do not support Strategic Objective 1. It is inevitable that Green Belt land release will be required in order to support the housing and employment land requirements of South Staffordshire and the conurbation. Paragraph 140 of the Framework confirms that once Green Belt boundaries are established, they should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of Plans. The "exceptional circumstances" test has been met in this instance given that the emerging Plan acknowledges that Green Belt land release is required. Furthermore, paragraph 140 advises that strategic policies should establish the need to change Green Belt boundaries having 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. Strategic Objective 1, and the Plan as a whole, fail to have any regard to this requirement of the Framework.

Strategic Objectives 3, 4 and 5 are designed to address homes and communities.

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

An additional Strategic Objective should therefore be added to require the Plan to provide a sufficient number of houses to meet both South Staffordshire's and the conurbation's growing population.

We support the Plan's recognition that Codsall/Bilbrook are locations which are suitable to make a significant contribution towards the District's housing needs. These two settlements have an excellent range of local services including two rail stations. They are eminently suitable for accommodating additional proportionate development in accordance with the recommendations in the GBHMA Strategic Growth Study for proportionate dispersal of development at locations which are centred around these settlements.

Strategic Objective 6 - Developing an Economic Strategy, is supported. The Plan should seek to retain existing employment and foster sustainable economic growth, encouraging inward investment and job creation. There must, however, be a sufficient quantum of housing delivered to accommodate South Staffordshire's workforce.

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

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 course of 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 (HMA) 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).

This guidance is not, however, reflected in paragraph 4.13 of the consultation draft Plan. Here it is suggested that the South Staffordshire's housing need for the period 2021 - 2038 is 4,131 dwellings. Completions to date from the start of the Plan period are added to this requirement, regardless of whether the number of completions are sufficient to meet the housing need. As such it is suggested that provision is made for the development 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 HMA advises is 5,068 dwellings. Paragraph 4.17 of the HMA is clear that the minimum total housing requirement (assuming that 4,000 dwellings are delivered to meet the growth requirement of the conurbation) is 9,068 dwellings. This is not reflected in paragraph 4.13 of the Plan, and this is a clear omission.

That being said, there is a requirement for a significant uplift to the Standard Method housing requirement in any event, which is demonstrated by the HMA.

As detailed in paragraph 8.5 of the SHMA 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. Therefore, 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 024).

Paragraph 8.7 of the HMA says that the total affordable housing needs in South Staffordshire is 128 dpa. It then goes on to advise that this represents 28.2% of the annual housing requirement in the District (expressed as a figure of 453 dpa). That being the case, the HMA proposes 30% affordable housing provision. However, the figures in paragraph 8.7 of the HMA are skewed because the total housing requirement which is proposed in the Plan (9,068 dwellings) includes the 4,000 dwellings the Plan proposes to deliver to meet the growth requirements of the conurbation. The 4,000 dwellings cannot be considered a source of affordable housing supply to support affordable housing delivery to meet the needs of South Staffordshire. Any affordable houses provided as part of the delivery of these 4,000 units will be to support affordable housing needs from the conurbation, not South Staffordshire. This is a fundamental flaw of the calculation.

It is, therefore, clear that an uplift is required to South Staffordshire's housing requirement in order to ensure that the required 128 affordable dwellings per year **within South Staffordshire** are delivered. The Plan should include a housing requirement for South Staffordshire, and state what proportion of that housing requirement should be affordable. Separately it should include a housing requirement for meeting the unmet needs of the conurbation, and state what proportion of that requirement should be affordable.

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. Employment levels are lower than the national average and there are more people employed in the most highly skilled roles.

The Plan sets out its intention to support economic growth, retaining and creating jobs within the District. However, with an aging population there may well be a "hollowing out" of South Staffordshire's workforce. This may 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. Further consideration should therefore be given to increasing the housing requirement to ensure that a sufficient number of houses are available to support the local workforce.

To summarise, there are in our opinion three matters that the Preferred Option Plan fails to address in its assessment of the South Staffordshire's element of the housing requirement:

- The housing requirement proposed in the consultation draft Plan is below the Standard Method figure that is derived from the Council's own HMA.
- The HMA fails to correctly factor in affordable housing need and whether an uplift to the South Staffordshire housing requirement is required. The 4,000 dwellings proposed to meet the growth requirements of the conurbation will have its own affordable housing requirement that is separate to that of South Staffordshire.
- No consideration has been given to 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.

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

In order to support the suggestion that the Plan should deliver 4,000 houses to support the housing needs of the conurbation, 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.

As referred to above, 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 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. The principal unmet housing need from the conurbation arises from the Birmingham and Black Country Authorities.

The Birmingham Development Plan was adopted in January 2017. Policy PG1 - Overall Levels of Growth, advises that 89,000 additional dwellings are required during the period 2011 - 2031 to meet the growth requirements of the City. However, only 51,100 additional dwellings can be accommodated within the City's administrative area. This leaves 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:

- Whilst Birmingham City's most recent SHLAA suggests that the development capacity of the City is greater than previously estimated, not every site in SHLAA will be delivered.
- Policy PG1 retains Development Plan status, there has been no suggestion from Birmingham City Council that it is an out-of-date policy, or the shortfall figure within it should be afforded significant weight.
- If new information on potential source of housing land supply are to be considered, it is also necessary to consider new information on the need for housing within Birmingham City. The Standard Method housing requirement for Birmingham results in a significant uplift to the quantum of housing required. This is driven by the fact that Birmingham City is subject to the large city and urban area 35% housing uplift requirement by the Standard Method. That being the case, whilst the adopted BDP includes a housing requirement of 4,550 dpa (before any redistribution) the uncapped Standard Method figure for Birmingham under the Standard Method

requires the delivery of 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.

The emerging Black Country Plan Preferred Options consultation document, that was subject to public consultation between August and October 2021, identified a total housing requirement of 76,076 dwellings. It is, however, only possible to accommodate 47,837 dwellings within the Black Country's administrative area. As a consequence, 28,239 dwellings need to be delivered elsewhere within the HMA.

Drawing the housing shortfall figure from the BDP and the emerging Black Country Plan together, there is a total housing shortfall in the conurbation of 66,139 dwellings. This should be considered an absolute minimum, given that Birmingham City's housing requirement will increase significantly under the Standard Method.

The 4,000 dwellings proposed by the draft South Staffordshire Local Plan represent just 4% of the total shortfall. This is inadequate.

There are 14 authorities within the Black Country HMA. This includes Birmingham and the four Black Country authorities. That means the shortfall needs to be distributed between the 9 remaining authorities. However, Redditch Borough is effectively built up to its boundary. Redditch Borough is relying upon Bromsgrove District delivering significant urban extensions within its administrative area to support its growth. Furthermore, only part of Stratford on Avon district falls within the HMA, reducing development opportunities in Stratford on Avon.. Cannock Chase's capacity is restricted due to environmental constraints such as the Cannock Chase SAC and AONB. However, even if the full extent of the 66,139 dwelling shortfall were distributed evenly amongst the 9 remaining authorities each authority should be providing approximately 7,370 dwellings. In addition, there is clear evidence to suggest that South Staffordshire should be taking a greater proportion of development than other authorities within the HMA given its functional relationship with the Black Country.

The Spatial Strategy to 2038

We support the Plan's recognition that Tier 1 Settlements such as Codsall/Bilbrook are locations which are suitable to make a significant contribution towards the District's housing needs. These two settlements in particular have an excellent range of local services including two rail stations. They are eminently suitable for accommodating additional proportionate development in accordance with the recommendations in the GBHMA Strategic Growth Study for proportionate dispersal of development at

locations which are centred around these settlements.

Question 6 – Do you support the policy approach in Policy DS4 – Long Term Growth Aspirations for a New Settlement?

Our Response

We have no particular objection to the emerging plan including a policy that advises that the Council will consider the allocation of a new settlement in the subsequent version of the Local Plan. Indeed, given the lead in times and complex nature of new settlement proposals it is sensible for such schemes to be identified as a concept in the plan making process.

That being said, it is our view that it is more sustainable to extend existing settlements in the first instance. Existing settlements already have key services in place such as shops, schools and employment opportunities. The allocation of urban extensions next to existing settlements is a sustainable and logical way of bringing forward new development.

Question 8 – Do you support the proposed housing allocations in Policy SA5?

Our Response

We support the proposed allocation of Site 419 A&B – Land at Keepers Lane/Wergs Hall Road, Codsall. Policy SA5 identifies that the Site is suitable for a minimum of 317 homes. Whilst this is expressed as a minimum, we consider that, based on feasibility work which has been completed by PlanIT, the minimum figure could be expressed at a higher level. PlanIT has prepared a development concept Framework Plan which is attached at Appendix 1 of these representations. In our assessment a policy compliant development is likely to comfortably exceed 317 residential units. A minimum figure of 345 units would be appropriate.

Codsall includes a range of services and facilities that makes it a sustainable location to support additional development. Site 419 is located within an acceptable walking distance to local services which include a parade of shops on Codsall High Street adjacent to the Council Offices/Library, all within a 10 minutes' walk. Numerous bus stops and Codsall rail station is also within a 10 minutes' walk from the Site. Its proximity to local services justifies the Site as an excellent choice for housing development.

Question 11 - Do you agree with the proposed Development Management policies set out in Chapter 6?

Our Response

Policy HC1- Housing Mix.

We do not support the direction of travel for Policy HC1. It proposes that 75% of properties should be three bedrooms or less. This policy is too prescriptive and does not recognise that the market requirements for housing based upon their size and type may change during the course of the plan period. The policy should be more flexible to respond to changes arising from the Housing Need Assessments which will be prepared over the plan period.

We object to the suggestion that the Council should refuse schemes with a “disproportionate” amount of large four-bedroom homes. It is not clear what “disproportionate” means in this context. Furthermore, it disregards the demand for executive style housing in South Staffordshire. If South Staffordshire wishes to retain and attract high income households then accommodation should be provided to meet their needs.

Policy HC11 Space about Dwellings and Internal Space Standards

This proposes to impose a policy to meet governments Nationally Described Space Standards. We are not aware of any evidence that supports this approach. Footnote 49 of the Framework advises that policies may make use of the Nationally Described Space Standards “where the need for internal space standard can be justified”. We are however unable to identify any evidence to suggest that Nationally Described Space Standards are appropriate within South Staffordshire District. The evidence which is required to justify the use of the standards are detailed in the PPG. In the absence of evidence to explain why property sizes in the South Staffordshire is substandard, the imposition of these national standards cannot be justified in policy terms.

Appendix A: Development Concept Plan



PROJECT	CLIENT	DEVELOPMENT FRAMEWORK OPTION 2			townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH E: kbrown@townscapesolutions.co.uk t: 0121 4296111, f: 0121 2268789
South Codsall					
		Drawing Number	Rev.	Date	
		DF-02	C	12-02-17	