

Part B – Please use a separate sheet for each representation

Name or Organisation: **JOHN DAVIES FARMS LTD**

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|--|
| (1) Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

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 publication plan details, in Table 7, that the Plan’s proposed housing target is made up of South Staffordshire’s housing need (2022-2039), completions in the district since the start of the Plan period (2018-2022) and additional housing to contribute towards the unmet needs of the Greater Birmingham Housing Market Area.

This approach is supported as it accords with the Inspector’s Report into the South Staffordshire Site Allocations Document (SAD), which stated, in paragraph 22, that unmet need from Birmingham and the Black Country would need to be addressed in the South Staffordshire Local Plan review.

However, we are aware that the Association of Black Country Authorities (ABCA) wrote to Shropshire Council on the 24 February 2021 (in response to Shropshire Council’s Regulation 19 consultation), to highlight that there will continue to be a shortfall of land to meet the Black Country’s housing needs even in the light of Shropshire’s proposed contribution in its Regulation 19 Plan and the proposed contributions in other emerging neighbouring Local Plans, including South Staffordshire, Lichfield and Cannock. ABCA anticipate that these contributions could accommodate in the region of up to 10,500-12,500 homes and, in the best-case scenario, would leave the Black Country with a significant shortfall.

Significantly, paragraph 5.15 of the Publication Plan highlights the significant housing shortfall likely to remain across the Greater Birmingham Housing Market Area (GBHMA) but states that its exact extent is not currently known. As a consequence, the Publication Plan proposes to retain a contribution of 4,000 dwellings to the GBHMA. This appears to be an arbitrary figure brought forward from the 2018 Issues and Options consultation, which was based on the findings of a 2018



Strategic Growth Study that did not extend up to 2039 (the end date of the Publication Plan).

In addition, as detailed in the 'Duty to Cooperate Topic Paper' (November 2022), no Duty to Cooperate body has yet prepared or achieved agreement to the principle of an alternative GBHMA-wide evidence base. The GBHMA authorities are therefore in the process of agreeing a Statement of Common Ground (SoCG) to deliver a review of the 2018 GBHMA Strategic Growth Study that will reflect the changing positions on housing shortfalls across the GBHMA. The Draft SoCG (provided in the Duty to Cooperate Topic Paper) highlights, in section 6, a number of key issues, including that:

- there remains a shortfall of 6,302 homes between 2011 and 2031 based on April 2020 information; and**
- there is evidence of a shortfall post-2031 that is unlikely to be met and which is likely to increase in the future.**

Given the above, it is considered evident that, in order to meet housing needs in the period up to 2039, the contribution provided in the South Staffordshire Local Plan towards the unmet needs of the Greater Birmingham Housing Market Area should be increased. This is additional justification for the release of land in South Staffordshire for housing development. As detailed in the representor's objection to policy DS5, the release of additional land for housing development should be focused on Tier 4 settlements to recognise the sustainability of those settlements, protect and enhance their sustainable village centres / services and facilities and to meet housing needs including the requirement to provide 10% of housing growth on sites of less than 1 hectare.

The Plan is therefore considered to be unsound as it fails to meet housing development requirements.

(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.

Policy DS4 should be amended to increase the housing contribution made by the South Staffordshire Local Plan towards the unmet needs of the Greater Birmingham Housing Market Area.

As identified in the representor's objection to policy DS5, any increase in housing land supply should be focused in Tier 4 settlements to recognise the sustainability of those settlements, protect and enhance their sustainable village centres and meet housing needs during the Plan period, including the needs of the settlement and the requirement to provide 10% of housing growth on sites of less than 1 hectare.

The proposed modification to policy DS4 will therefore contribute to the soundness of the Plan by ensuring that housing development requirements are met and that the Plan is, as a consequence, consistent with the national policy.

(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)
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✓	Yes , I wish to participate in hearing session(s)
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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:

In order to contribute to discussions on how the Plan may most appropriately contribute towards meeting the needs of the Greater Birmingham Housing Market Area.

(Continue on a separate sheet /expand box if 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.

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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX