



Local Plan
Publication Stage
Representation Form

Ref:

**(For
official
use only)**

Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Ms	Mr
First Name	Sarah	Fred
Last Name	Day	Davies
Job Title (where relevant)	Senior Land Manager	Consultant
Organisation (where relevant)	Clowes Developments	Harris Lamb
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E-mail Address (where relevant)	sarah.day@clowes.co.uk	fred.davies@harrislamb.com

Part B – Please use a separate sheet for each representation

Name or Organisation:

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 checked="" 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 checked="" 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 suggested housing requirement included in the Plan, of 9,089 dwellings, is fundamentally flawed. It is not supported by robust evidence and will not result in a sufficient quantum of development being delivered to support the growth requirements of South Staffordshire and the conurbation.

There are two components to the housing requirement identified in the plan. The first is the quantum of housing required to meet South Staffordshire's growth requirements and the second is the additional housing that is required to contribute towards meeting the unmet needs arising from Birmingham and the Black Country. There are significant problems with both parts of the housing target.

South Staffordshire Housing Requirement (excluding unmet need from the conurbation)

Paragraph 61 of the Framework advises that in order 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 Guide. That being the case, the Standard Method is the starting point for establishing the scale of the housing required to meet South Staffordshire's housing needs. Paragraph 5.9 of the draft plan suggests that this is 241 dwellings per annum, starting from 2022 and running to 2039.

The South Staffordshire Housing Market Assessment May 2021 ("**SSHMA**") had been prepared in order to help inform the Plan's overall housing requirement. It concludes that using the Standard Method "across the 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). Now that the Plan period has been extended to 21 years this would increase on a pro rata basis to 5,322 dwellings. This guidance is not reflected in the pre-submission Plan. It is suggested that the housing requirements since the start of the 21 year plan period is 5,089 dwellings (Table 7 – 4,097 dwellings plus 992 dwellings). The plan is not based upon a Standard Method housing requirement.

One of the key reasons for the Plan including a South Staffordshire housing requirement below the Standard Method requirement is that completions to date from the start of the plan period are used as a proxy for housing need for the period 2018 to 2022. There have been 992 completions during this period. There is no evidence to suggest that the 992 completions were sufficient to meet the housing requirements of the district during this period. Any suggestion that this quantum of development is sufficient to meet the needs during this period is not supported by any evidence.

Developments in South Staffordshire have been restricted by the fact that the large portion of the authority area is Green Belt. Housing schemes have been restricted to windfall schemes within settlement boundaries due to restrictive policies that are in place.

As a matter of fact, the housing requirement in the Plan is less than the Standard Method housing target for the Plan period. This conflicts with the provision of the Framework.

In addition, there is a requirement for a significant uplift to the Standard Method housing requirement in any event. This is demonstrated by the SSHMA.

Paragraph 8.5 of the SSHMA confirms that the PPG advise 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 a proportion of the overall housing requirement, taking into account the probable percentage of affordable housing that can be delivered by eligible market housing developments. An increase to the overall housing figure included in the plan may be appropriate where it would help to deliver the required number of affordable homes (PPG - ID: 2a-024-20190220).

Paragraph 8.7 of the SSHMA advises that the total affordable housing needs in South Staffordshire is 128dpa. It then goes on to advise that this represents 28.2% of the annual highest housing requirement of 453 dwellings per annum. That being the case, the SSHMA proposes 30% of housing provision. This approach is flawed.

The South Staffordshire Standard Method housing requirement is 254dpa according to the SSHMA. As a consequence, an affordable housing requirement of 128dpa is approximately **50%** of South Staffordshire’s minimum Standard Method housing requirement. The figure in paragraph 8.7 of the SSHMA is skewed, as the total housing requirement proposed by the Plan is used (9,068 dwellings). This includes the 4,000 dwellings the plan proposes to deliver to meet the growth requirements of the conurbation. The 4,000 dwellings proposed to meet the growth requirements of the conurbation cannot be considered as a source of affordable housing supply to support the affordable housing delivery needs of South Staffordshire. Any affordable housing provided as part of the delivery of these 4,000 units will be to support the affordable housing needs arising from the conurbation, not South Staffordshire.



In short, if 30% of the 4,000 dwellings proposed to meet the growth requirements of the conurbation were actually delivered as affordable units to meet the growth requirements of South Staffordshire, this would reduce the Plan's contribution to meeting the growth requirements of the conurbation to 2,800 units. This is significantly below the 4,000 unit figure suggested by the Plan.

It is, therefore, clear that an uplift is required to the South Staffordshire housing requirement in order to ensure that 128 affordable dwellings per year are delivered. The plan should include a housing requirement for South Staffordshire and state what proportion of the 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.

The Plan sets out its intentions to support economic growth, retaining and creating jobs within the district. It is advised in Table 2 that there continues to be development opportunities at strategic employment sites, including I54, ROF Featherstone and the West Midlands Interchange leading to greater investment and prosperity. Paragraph 2.13 confirms that South Staffordshire has attracted internationally significant businesses such as Jaguar Land Rover. The Plan continues to seek to support economic growth.

However, it is also advised in Table 2 that there are "demographic imbalances" with a higher than average proportion of the residents aged 65 and over, with a projected decline of families and working age residents. If there is a decline of working age residents and the Council wishes to maintain the current number of jobs, or increase them, there are two options. There can be an increase in the number of people commuting to South Staffordshire to work from the wider area. This will result in increased road mileage and unsustainable commuting patterns. The alternative is for the plan to provide a sufficient number of homes to allow for workers to move into South Staffordshire. There is no evidence of this properly being considered anywhere within the Plan.

Drawing this together, there are three matters that the Plan fails to address in establishing the South Staffordshire element of the housing requirement:

- The housing requirement proposed in the consultation draft Plan is below the Standard Method figure derived from the Council's own SSHMA.
- The SSHMA fails to correctly factor in affordable housing need. The draft plans seeks to rely upon affordable housing delivery from the 4,000 dwellings proposed to meet the growth requirements of the conurbation to support the South Staffordshire affordable housing need. This is inappropriate given that these 4,000 dwellings are proposed to meet the growth requirements of the conurbation have their own affordable housing needs.
- No consideration has been given to uplifting the minimum Standard Method housing figure to take into account economic growth aspirations and the fact that the age profile of South Staffordshire is increasing resulting in a decrease in residents of a working age.

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, it relies upon the conclusions of the GBSSHMA Strategic Growth Study 2018 and its subsequent updates. It is advised at



paragraph 5.16 of the Plan that this evidence base has not been updated to recommend an alternative or additional strategic locations for housing growth. It is, however, clear there is significant evidence to support the fact that the Strategic Growth Study is completely out of date and not fit for purpose to inform preparation of the South Staffordshire Plan.

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. It concludes that during the period 2011 to 2031 a minimum of 205,000 homes are required, which broadly reflect the 2014 based sub-national population scenario of the study area. The basis for establishing the housing requirement in the Strategic Growth Study is not based upon any recognised methodology, it is not robust and it is not suitable for plan making purposes.

Furthermore, the Strategic Growth Study covers the period 2011 to 2031. The emerging South Staffordshire Plan covers the period to 2039. The shortfall figures in the Strategic Growth Study are, therefore, only for the next 9 years. Even if the housing figure in the Strategic Growth Plan was robust, it provides no evidence on housing need for the later part of the Plan period.

Significantly, there is more up to date evidence of a potential housing shortfall arising from the conurbation that is based upon the Standard Method, and updated housing capacity figures, than those included within the Strategic Growth Study.

The Birmingham Development Plan ("**BDP**") was adopted in January 2017. Policy PG1 – Overall Levels of Growth, advised that 89,000 additional dwellings are required during the course of the plan period (2011 to 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 SSHMA. This figure has been tested through the Local Plan examination process, unlike the Strategic Growth Study figure.

Since the BDP was adopted, Birmingham City Council have suggested that the extent of the housing shortfall has reduced. This is due to the fact that additional urban capacity has been found through the Council's SHLAA updates. There is now, however, also further evidence that the housing shortfall in Birmingham has increased significantly.

Birmingham City Council has produced an Issues and Options consultation draft version of its emerging replacement Local Plan. It advises that the Standard Method housing requirement for the period 2020 to 2042 is 149,286 dwellings. As this is the minimum Standard Method figure this level of need should be afforded significant weight in understanding the extent of the housing shortfall as it has been established using the guidance in the Framework and PPG.

The Issues and Options consultation document suggests that the total capacity for development within the built up area boundary of the city is 70,871 dwellings. This relies upon all SHLAA sites coming forward for development and the provision of a significant number of windfalls (the windfall assumption is 11,675 meaning that windfall development in Birmingham City will be greater than the total housing requirement currently proposed for South Staffordshire). This would result in a housing shortfall of 78,415 dwellings.



Until recently, the Black Country authorities were in the process of preparing a joint plan. This has now been abandoned in favour of the preparation of the individual plans. However, as the emerging Black Country Plan had a housing requirement based upon the Standard Method the housing requirement is a significant consideration in identifying the housing shortfall arising from the conurbation. Whilst the four Black Country authorities are now preparing their own Local Plans they should also be using the Standard Method and therefore the combined housing requirement should be the same as that as if a single plan was being prepared.

The Black Country Plan Preferred Options consultation document that was subject to consultation between August and October 2021 identified a housing requirement of 76,076 dwellings. It was, however, concluded that only 47,837 dwellings could be accommodated within the Black Country administrative area. As a consequence, 28,239 dwellings need to be delivered elsewhere within the SSHMA.

If the housing shortfall figures identified in policy PG1 of the BDP and the emerging Black Country Plan Preferred Options document are added together, there is a total housing shortfall of 66,139 dwellings. This should be considered as an absolute minimum, given that the emerging Birmingham City housing shortfall is significantly greater than this combined figure. The 4,000 dwellings proposed by South Staffordshire Local Plan to meet the growth requirements of the conurbation is approximately 6% of the total shortfall.

There are 14 authority areas within the Birmingham and Black Country HMA. This includes Birmingham and the 4 Black Country authorities. This means that the shortfall will need to be distributed between the remaining 9 authorities.

Redditch Borough is effectively built up to its boundary. The adopted Redditch Local Plan relies upon Bromsgrove District to delivering approximately half of its housing requirement through urban extensions to support its growth. A small part of Stratford-upon-Avon District falls within the SSHMA, reducing development opportunities in Stratford-upon-Avon. Cannock Chase's capacity is restricted due to environmental constraints including the Cannock Chase SAC and AONB. However, even if the full extent of the current shortfall is distributed evenly amongst the now remaining 9 authorities, each authority should be providing approximately 7,370 dwellings. South Staffordshire, given its functional relationship to the Black Country, should be accommodating a significantly greater amount of development than this in order to support the growth requirements of the conurbation.

The housing requirement in the Plan is not sound. It should be increased significantly. The South Staffordshire element of the housing requirement should be based upon the Standard Method and increased to address affordable housing and economic growth requirement. The 4,000 dwellings proposed to meet the growth requirements of the conurbation is woefully inadequate.

(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.



The housing requirement in the Plan is not sound. It should be increased significantly. The South Staffordshire element of the housing requirement should be based upon the Standard Method and increased to address affordable housing and economic growth requirement. The 4,000 dwellings proposed to meet the growth requirements of the conurbation is woefully inadequate.

(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)

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

The emerging plan will fail to deliver enough housing to meet the growth requirements of South Staffordshire, including the full housing requirement and the growth requirements of the conurbation. One of the fundamental roles of the plan is to deliver a sufficient number of housing to support housing needs. The plan fails to do so. Given the magnitude of this issue, we request the opportunity to address the Inspector to outline our concerns.

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