

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b>  <b>(For official use only)</b></p>
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**Name of the Local Plan to which this representation relates:**

**South Staffordshire Council  
Local Plan 2023 - 2041**

**Please return to South Staffordshire Council by 12 noon Friday 31 May 2024**

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)

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="Amadis Holdings Limited"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text" value="Mr"/></p> <p><input style="width: 90%;" type="text" value="John"/></p> <p><input style="width: 90%;" type="text" value="Williams"/></p> <p><input style="width: 90%;" type="text" value="Director"/></p> <p><input style="width: 90%;" type="text" value="PlanIT Planning &amp; Development Ltd"/></p> <p><input style="width: 90%;" type="text" value="The Studio"/></p> <p><input style="width: 90%;" type="text" value="White Cottage"/></p> <p><input style="width: 90%;" type="text" value="Astley"/></p> <p><input style="width: 90%;" type="text" value="Stourport on Severn"/></p> <p><input style="width: 90%;" type="text" value="DY13 0RS"/></p> <p><input style="width: 90%;" type="text" value="07580128095"/></p> <p><input style="width: 90%;" type="text" value="john@planit-planningdevelopment.co.uk"/></p>
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(where relevant)

## 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 type="checkbox"/>	No	<input checked="" 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.

We are concerned that the suggested housing requirement of 4,726 dwellings fails to meet the housing need of the Greater Birmingham and Black Country Housing Market Area. There is evidence to suggest that the actual housing need exceeds this figure and that there are therefore exceptional circumstances to justify the alteration of Green Belt boundaries per paragraph 145 of the Framework. It will therefore need to be tested at the Examination.

There are two components to the housing requirement. 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. The Council has chosen to row back from its previous spatial strategy in the 2022 Regulation 19 Plan to provide 4,000 additional homes, over and above the district’s own objectively assessed housing needs. The extent of the housing pressures in neighbouring councils, and their inability to accommodate those housing numbers without the cooperation of neighbouring councils, is well evidenced. The Plan’s strategy is failing to cooperate with its neighbouring councils on this issue and this will result in under provision of housing. Paragraph 24 of the Framework imposes a duty on councils to cooperate on strategic housing issues across administrative boundaries.

We comment on these matters below.

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

Paragraph 61 of the Framework says 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 Guide. The Standard Method is therefore the starting point for establishing the scale of the housing requirement to meet South Staffordshire's housing needs. While not mandatory, the National Planning Policy Framework (NPPF) "expects strategic policy-making authorities to follow the standard method...for assessing local housing need". According to government planning guidance, any other method for calculating housing need can only be used in "exceptional circumstances".

Paragraph 5.9 of the draft plan suggests that the local housing need is 227 dwellings per annum, for the periods 2023 to 2041.

We raise a related concern which is whether the housing target will meet the District's actual affordable housing needs. Following PPG advice, Paragraph 8.5 of the SSHMA recognises that it is necessary for local authorities to calculate their total affordable housing need. The total affordable housing need can then be considered as a proportion of the overall housing requirement, considering the probable percentage of affordable housing that can be delivered through 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 2021 SSHMA advises that the total affordable housing needs in South Staffordshire is 128dpa. This represents 56 percent of the annual housing requirement which is planned over the Plan period. However, the total planned housing requirement includes the 640 dwellings which is the growth requirements of the conurbation. Those 640 dwellings should not 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 640 units will be to support the affordable housing needs arising from the conurbation, not South Staffordshire.

In short, if 30% of the 640 dwellings proposed to meet the growth requirements of the conurbation were 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.

It is, therefore, clear that an uplift is required to the South Staffordshire housing requirement 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, 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 which should be applauded.

However, it also recognises in Table 2 that there are “demographic imbalances” across the district with a higher than average proportion of the residents aged 65 and over, and a projected decline of families and working age residents. Given this decline of working age residents; if the Council wishes to maintain and increase employment opportunities, there are two options available through the plan making system. Option 1 is to accept an increase in the number of people commuting to South Staffordshire to work from the wider area. However, this will result in increased road usage and unsustainable commuting patterns. Option 2 is the better alternative which is to provide the number of new homes within its administrative area which will allow the job pool to reside closer to their place of work. There is no evidence that this balance between the number of new homes and their geographical relationship to the sources of employment has been properly assessed through the preparation of the Plan.

Drawing this together, the Plan fails to address two matters in establishing the South Staffordshire element of the housing requirement:

- The SSHMA fails to correctly factor in affordable housing need. The draft plan seeks to rely upon affordable housing delivery from the 640 dwellings proposed to meet the growth requirements of the conurbation to support the South Staffordshire affordable housing need. This is inappropriate given that these 640 dwellings are proposed to meet the growth requirements of the conurbation which has its own affordable housing needs.
- No consideration has been given to increasing the minimum Standard Method housing figure to reflect the local authority’s economic growth aspirations and the fact that the age profile of South Staffordshire is increasing resulting in a decrease in the ‘pool’ of working age demographic.

#### ***Additional housing to contribute towards meeting the unmet needs of the Housing Market Area***

The Plan is proposing to support the housing needs of the conurbation through the delivery of 640 houses, this is a reduction of 3,360 homes compared to the 2022 Reg 19 Plan. It seeks to justify this approach on the basis that the conclusions of the GBSSHMA Strategic Growth Study 2018 and its subsequent updates are out of date.

The Strategic Growth Study covers the period 2011 to 2031. The emerging South Staffordshire Plan covers the period to 2041. We acknowledge that the Strategic Growth Plan provides no evidence on housing need for the later part of the Plan period. Conversely, the Birmingham Development Plan (“**BDP**”) provides more up to date evidence on the potential housing shortfall arising from the conurbation; that evidence is based upon the Standard Method and updated housing capacity figures.

The BDP was adopted in January 2017. Policy PG1 – Overall Levels of Growth, advised that 89,000 additional dwellings are required during 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 though 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 because additional urban capacity has been found through the Council's SHLAA updates. There is, however, alternative evidence that the housing shortfall in Birmingham has increased significantly.

Birmingham City Council consulted on an Issues and Options document as part of its preparation of a replacement Local Plan. 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 was subject to consultation between August and October 2021; it 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. 28,239 dwellings would 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 640 dwellings proposed by South Staffordshire Local Plan to meet the growth requirements of the conurbation is approximately 1% 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 administrative 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 to support the growth requirements of the conurbation.



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.

We have concerns about the Plan's housing target and the adequacies of the housing target which is set by the Plan. For the reasons which we have explained in these representations, it is important that the Council makes the best use of the sites which the Plan allocates for housing development. If additional sites are required for allocation, then there is an opportunity to allocate land at Yew Tree Lane, nr Wolverhampton; the site's details are provided through our representations on policy SA3 (representation form 7).

(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:

To discuss the points which we have made in these representations.

***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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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