



Planning Policy
South Staffs Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Date: 13 December 2021

Our Ref: LS M5/0308-11

By email only:
localplans@sstaffs.gov.uk

Dear Sir/Madam,

RE: SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW PREFERRED OPTIONS CONSULTATION

We represent the **West Midlands Housing Association Planning Consortium (HAPC)** which includes leading Housing Associations (HAs) across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the West Midlands region.

As significant developers and investors in local people, the HAPC is well placed to contribute to local plan objectives and act as long-term partners in the community. The existing Core Strategy was adopted in 2012 and therefore pre-dates significant changes made to the National Planning Policy Framework (NPPF) in 2018, 2019 and most recently 2021. We therefore welcome the opportunity to participate in this Local Plan Review Preferred Options consultation to assist in the production of a new local plan for the authority area which will plan ahead until 2038.

Evidence Base

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

The HAPC is pleased to see that the Local Plan Review is supported by a new Strategic Housing Market Assessment (2021) which establishes an affordable housing need of 128 affordable dwellings per annum. It should be noted that the net requirement would increase from 128 to 195 affordable homes per year in South Staffordshire if 30% of gross household income could be spent on housing costs. This would increase further to 262 affordable homes per year if 25% of income could be spent on housing costs. The HAPC encourages South Staffordshire to set realistic targets and to introduce policies that will assist in tackling the affordability issues in the authority.

Vision and Strategic Objectives

Question 3: a) Have the correct vision and strategic objectives been identified? b) Do you agree that the draft policies and the policy directions will deliver these objectives?

Yes, the HAPC supports South Staffordshire's vision for the local plan. The HAPC also agrees with the proposed strategic objectives, in particular:

- **Strategic Objective 2:** "Meet the housing needs of the district whilst making a proportionate contribution towards the unmet needs of Great Birmingham Housing Market Area. New development will be focused on sustainable locations within the district, either within or adjacent

to the district's key villages or through urban extensions adjacent to neighbouring towns and cities."

- **Strategic Objective 3:** *"To provide housing to meet the needs of different groups of the community, including a good range of market and affordable housing of varying sizes and housing that meets the need of an ageing population and people with specialist housing needs."*

A key objective of the NPPF is to significantly boost the supply of homes. The NPPF requires at paragraph 62 that *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies"*. This includes affordable housing. It remains appropriate for the Council to set a district-wide policy of encouraging affordable housing development to deliver a sufficient mix of house types, tenures, and restrictions to meet specific needs where these occur, and as viable. Policy on housing mix should reference not only the most up to date evidence base but allow developers to demonstrate how proposals will meet local needs in accordance with any other up to date evidence, such as housing need surveys, the housing register, and reference to existing stock.

Draft Policy DS1: Green Belt

Question 4: Do you support the policy approach in Policy DS1 – Green Belt?

The HAPC understands that South Staffordshire is a largely rural authority with 80% of the area being situated within the Green Belt. Such constraint has proven challenging in recent years with high demand for additional new homes. South Staffordshire is proposing to plan for a housing target of 8,881 dwellings between 2018 and 2038.

We are pleased to see that South Staffordshire have approached the topic of the Green Belt with a balanced and objective perspective. While the authority recognises the important role of the Green Belt, it has also realised its restrictive characteristics when it comes to delivering new homes. Amending the Green Belt will help to ensure that a sufficient supply of deliverable and developable land is available. The HAPC therefore supports the removal of sites from the Green Belt to ensure an appropriate level of housing delivery over the plan period, and to maximise the provision of affordable housing. We support the following statement:

"Limited affordable housing for local community needs in the Green Belt will be supported on small rural exceptions sites where the development complies with Policy HC6. The Green Belt boundary will be altered through the Local Plan Review to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5 and SA7."

It is positive to know that compensatory improvements will be made in areas which will be removed from the Green Belt to improve the environmental quality and accessibility of the remaining Green Belt. This includes improving access to the countryside and ecological and biodiversity enhancement.

Housing Growth

Section 4.7 states: *'The district need to deliver a minimum annual average of **243 dwellings per annum**, starting from the current year (2021) and running to the end of the plan period (2038).'*

There is also pressure for South Staffordshire to try and address the housing shortfall in surrounding local authority areas, including Birmingham City and the Black Country. South Staffordshire is therefore proposing to plan for a housing target **of 8,881 dwellings between 2018 and 2038**. This will allow the district to meet its own housing needs over the plan period, whilst also making a proportionate and justified contribution to the unmet needs of the GBHMA. Page 34 onwards provides a strategy for delivering this housing growth in different areas of the district¹. The HAPC supports the clear breakdown

¹ Locality 1 – North of the District
Locality 2 – North West of the District
Locality 3 – North East of the District
Locality 4 – Central Area
Locality 5 – South of the District

of how housing growth will be delivered in each of the five areas, however we urge the Council to take a flexible approach to the delivery of housing and more specifically, affordable housing where possible. The HAPC suggest that what is set out in each of the localities is a guideline rather than policy.

Draft Policy DS3: The Spatial Strategy to 2038

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

The HAPC support the wording set out in draft policy DS3, especially *‘that growth is distributed to the district’s most sustainable locations, avoiding a disproportionate level of growth in the district’s less sustainable settlements, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below.’*

The draft policy goes on to state that the focus of development will be in Tier 1 settlements. Whilst the members understand this approach, they would urge the Council to also consider alternative rural locations for development, where suitable, to ensure that rural needs are met and that the required affordable housing provision is delivered across the authority.

Strategic Site Locations

While the HAPC support the inclusion of strategic development sites in the Local Plan Review, as set out by draft policies SA1-SA4, we urge the Council to also consider a more flexible approach to the delivery of housing. If enough affordable homes are to be delivered the Council will need to assess proposals on a case-by-case basis and accept that affordable housing may have to be located in a range of different locations. Small sites are just as important to the delivery of housing and affordable housing as large strategic sites and can often be delivered much quicker.

Policy Approaches

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6?

Draft Policy HC1 – Housing Mix

Under Draft Policy HC1, the proposed direction of travel states:

- *“All development to provide a mixture of property sizes, types and tenures*
- *Proposals for major residential development:*
 - *Market housing – 75% of properties to have 3 bedrooms or less, with specific breakdown to be determined with reference to latest Housing Market Assessment*
 - *Affordable housing – Specific breakdown to be determined with reference to latest Housing Market Assessment and other affordable housing needs evidence.”*

The HAPC support in principle the aims of Draft Policy HC1 and are pleased to see that South Staffordshire have considered the importance of housing mix in the context of up to date needs evidence.

Draft Policy HC2 – Housing Density

The HAPC support the Council’s ambition to deliver a minimum net density of 35 dwellings per net developable hectare on developments within or adjoining Tier 1 settlements. We understand this is a minimum, and where appropriate a higher density will be sought. We urge the Council to set a minimum density requirement for other areas to ensure an adequate supply of homes is being provided.

Draft Policy HC3 – Affordable Housing

The HAPC members are pleased to see that a draft policy on affordable housing has been set out, and welcome opportunities to facilitate the delivery of affordable homes in the region.

The direction of travel set out for draft policy HC3 states:

'30% of all dwellings on major residential developments should be affordable housing, broken down using the following ratio 50% social rent, 25% shared ownership and 25% first homes.'

Given the need for affordable housing across the area and increasing affordability issues, we are pleased to see that the Council has included a requirement for major residential developments (10 or more dwellings) to provide 30% affordable housing. Providing an affordable housing threshold is a useful mechanism to boost the supply of affordable housing in the area. Nonetheless, such a threshold must be realistic and achievable for various development scenarios so it must rigorously viability tested. The need for 30% of new housing to be affordable will mean that the Council must take a flexible and proactive approach to the delivery of affordable housing. The HAPC urge the Council to request affordable housing contributions or on-site provision on smaller schemes, where viable.

Our HAPC members often submit planning applications for 100% affordable developments, and it is important that their role is recognised in delivering much needed affordable homes. The role of smaller sites is important to maintain a consistent housing land supply and such sites can be delivered promptly following the grant of planning permission.

The HAPC recognises that the government has recently introduced First Homes as an alternative affordable home ownership product, which requires local planning authorities to secure First Homes as 25% of the affordable housing contribution. This is reflected in the HC3 policy direction. Notwithstanding the requirement for First Homes, we hope that South Staffordshire will continue to support shared ownership as an affordable homeownership tenure which is a well-recognised and enables many to access the property ladder.

Regarding affordable housing integration, the HC3 policy direction states:

'Affordable homes to be fully integrated, via suitable pepper potting in clusters across the development and design which is materially indistinguishable from market housing'

Whilst the HAPC support the suggestion that affordable housing should be indistinguishable from affordable housing, we would recommend that affordable housing is clustered across larger sites, with policy expressing a maximum group size or range; 10 to 15 dwellings forming each cluster on larger sites is commonly favoured. Clustering can be achieved while delivering visually indistinguishable housing products that are well dispersed throughout developments. Clustering also makes the maintenance of affordable housing easier for housing associations.

The HAPC encourages the council to allocate and identify sites for up to 100% affordable housing. Given the demographics of the authority it is important that the delivery of affordable housing remains a key priority for South Staffordshire. It is also important that a diverse range of sites are allocated from small sites to strategic locations.

The draft policy has suggested that the Council will adopt an Affordable Housing SPD to further clarify the Council's expectations for the delivery of affordable housing. The HAPC supports this suggestion.

Draft Policy HC6: Rural Exception Sites

With regard to future development outside of settlement boundaries, we recommend the Council considers the importance of Rural Exception Sites (RES) in delivering a large proportion of affordable housing. We recommend the Council considers as many suitable sites adjoining existing and new settlement boundaries as possible. The HAPC therefore supports the inclusion of an exception site policy, in line with paragraph 78 of the NPPF. The direction of travel for Draft Policy HC6 states:

'Affordable housing need in the parish to be demonstrated through a robust, independent housing need survey which considers all tenures of affordable housing in NPPF definition, carried out within the last 3 years, in partnership with the Parish Council and a Rural Housing Enabler.'

The HAPC asks that the Council takes a more flexible approach to demonstrating local affordable housing need. Producing a parish housing need survey is not always achievable and their production

can delay applications significantly. We recommend that the Council accepts other forms of evidence such as that of the housing register and government data returns.

Draft Policy NB2: Biodiversity

The HAPC support draft policy NB2, however the policy should ensure that while schemes are future proofed and make a positive impact on the environment, this should not prejudice the delivery of affordable housing which remains one of the most critical priorities for South Staffordshire.

The HAPC strongly supports improvements and gains to existing biodiversity. The requirement for 10% biodiversity net gain is expected to be a mandatory requirement after the provisions in the Environment Act are introduced through secondary legislation.

South Staffordshire is also looking to mandate biodiversity net gain through the Plan, as such guidance must be provided (or signposted) on how to practically achieve net gain in development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development. The HAPC supports a minimum 10% net gain and do not believe this needs to be any higher due to the potential impacts on viability.

Draft Policy HC11: Space about dwellings and internal space standards

The Draft Policy information states that all properties will be required to meet the government's Nationally Described Space Standard. We must emphasise that the need for and viability impact of the introduction of the Standards must be appropriately assessed before they are embedded into local planning policy. If the Council wishes to implement this as policy, it must do so to address a **clearly evidenced need** as required by the PPG (Paragraph: 002 Reference ID: 56-002-20160519). There is currently no published evidence in the evidence base which shows the Council's **need** for adopting the standards. As a result, the introduction of Policy HC11 is incompatible with national planning guidance.

The above comments are intended to be constructive, to ensure the policies are found sound at examination. We would like to be consulted on further stages of the above document and other publications by the Council, by email only to consultation@tetlow-king.co.uk; please ensure that the **West Midlands Housing Association Planning Consortium** is retained on the consultation database, with **Tetlow King Planning** listed as its agents.

Yours faithfully,



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Planner**

For and On Behalf Of
TETLOW KING PLANNING

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