

**South Staffordshire Local Plan
Preferred Options
Consultation
Representations on behalf of
Taylor Wimpey UK Limited**

December 2021

LICHFIELDS

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1.0 Introduction

1.1 This report has been prepared by Lichfields on behalf of Taylor Wimpey UK Limited [Taylor Wimpey]. It forms Taylor Wimpey's response to the South Staffordshire Local Plan [SSLP] Preferred Options consultation and is submitted for consideration in the formulation of the Plan.

1.2 These representations are subsequent to representations submitted to the previous Local Plan consultation below:

- 1 South Staffordshire Local Plan Review Issues and Options [IOC] (November 2018)
- 2 South Staffordshire Local Plan Review Spatial Housing Strategy and Infrastructure Delivery [SHSID] (December 2019)

1.3 These representations are submitted in the context of Taylor Wimpey's land interests on the following sites:

- 1 Land at Pool House Road, Wombourne
- 2 Land at Clent View Road, Stourbridge

1.4 Taylor Wimpey is seeking the allocation of these sites for residential development in the SSLP. Plans showing the locations of these sites are attached at Appendices 1 and 2.

1.5 SSLP draft Policy SA5 identifies Taylor Wimpey's land at Pool House Road, Wombourne (Site 285) as part of a wider allocation which includes additional land to the east (Sites 459 and 562/415). The whole allocation is identified as 'Pool House Road' and has an identified minimum capacity of 218 dwellings. Taylor Wimpey's site is identified as having a minimum capacity of 82 dwellings.

1.6 The land controlled by Taylor Wimpey site at Poolhouse Road and the proposed wider allocation are currently designated as Safeguarded Land in the adopted South Staffordshire Site Allocations Document [SAD] (Policy SAD3).

1.7 The Clent View Road site has not been identified as a draft allocation and is currently identified as Green Belt. Taylor Wimpey sets out the reasons in these representations why this site should also be identified for residential development to meet the South Staffordshire's housing needs.

1.8 The following documents also accompany these representations:

- 1 Poolhouse Road Development Statement (supplied as a separate document)
- 2 Poolhouse Road Development Statement Update (supplied as a separate document)
- 3 Clent View Road, Stourbridge Delivery Statement (supplied as a separate document)

Structure

1.9 This report provides detailed representations in relation to the following matters relating to the SSLP.

- 1 Question 1
- 2 Question 2
- 3 Question 3
- 4 Question 4
- 5 Question 5

- 6 Question 6
- 7 Question 8
- 8 Question 11
- 9 Question 12

2.0 **Question 1:**

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

- 2.1 Whilst Taylor Wimpey considers that the evidence base is broadly appropriate, we have some concerns regarding the robustness of some of the documents within the evidence base, largely due to the passage of time.
- 2.2 As identified by the Council in the SSLP [§4.58] and the ‘Employment Sites: Site Assessment Topic Paper (September 2021)’ [§5.7], the Council’s ‘South Staffordshire EDNA Part 1 (August 2018) [the EDNA] is now markedly out of date in light of the implications of Covid-19 and Brexit; albeit, it may be that the Council’s forecast job growth may have increased compared to the forecasts from Oxford Economics in 2018. This is discussed in further detail in our response to Question 5 below.
- 2.3 Taylor Wimpey considers that the Council’s Staffordshire Housing Market Assessment [SHMA] requires an update to reflect the publishing of the most recent 2020 median work-place based affordability ratios, amongst other things.
- 2.4 For the reasons set out in our response to Question 2, we also consider that further information needs to be provided in the Infrastructure Delivery Plan with regard to Health and Education provision.
- 2.5 Accordingly, the Council should update these documents, particularly given that they are core and critical pieces of the Council’s evidence base, to ensure that the Local Plan Review is *‘underpinned by relevant and up-to-date evidence’*, and *‘should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned’* as per the Framework [§31].

3.0 **Question 2:**

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations has been identified in the IDP?

- 3.1 Whilst we agree that the appropriate types of infrastructure have been identified in the Infrastructure Delivery Plan [IDP] 2021, Taylor Wimpey considers that clarity needs to be provided on future requirements for health infrastructure. The IDP [§5.25] indicates that the NHS are currently undertaking an estates review that will inform what the need for new provision, factoring in increased housing growth, will be over the plan period and intend to provide any site specific requirements and associated costs by the end of November 2021.
- 3.2 As this will inform contributions towards healthcare facilities from new development, it is vital that this information is reviewed, and any requirements are evidenced and clearly set out in the next version of the SSLP and associated evidence base. The viability implications should also be tested in the Viability Assessment to ensure that the policies in the SSLP are viable in accordance with the Framework [§58].
- 3.3 With regard to Education, the IDP indicates [§5.26] that work with the School Organisations Team [SOT] at Staffordshire County Council has been ongoing for a number of years to ensure that school place planning is taking account of development proposals coming through Local Plans. The information provided on Education in the IDP suggests that growth proposals at Codsall/Bilbrook will trigger the need for a new First School and the level of growth proposed at the northern edge of the Black Country, at Land at Cross Green and Land north of Linthouse Lane will facilitate the need for new first/primary school.
- 3.4 The IDP notes that the level of growth proposed at other villages is not projected to facilitate the need for a new First or Primary school. However, it is not clear whether existing schools in these areas have sufficient capacity to meet need or whether expansion will be necessary, as no information on capacity or proposals for expansion have been identified. Taylor Wimpey would welcome clarity on this matter. We consider that the appropriate evidence should be provided in the SSLP and evidence base to identify any relevant projects and confirm which allocations would be expected to contribute to these projects. Again, the viability implications should be tested in the Viability Assessment to ensure that the policies in the SSLP are viable in accordance with the Framework [§58].

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

- 3.5 Taylor Wimpey has no comment on this matter at the current time.

4.0 **Question 3**

a) Have the correct vision and strategic objectives been identified?

4.1 Taylor Wimpey considers that the Vision for what South Staffordshire will be like in 2038 is appropriate. In respect of the 12 Strategic Objectives that the Local Plan Review would seek to address [Page 24], Taylor Wimpey broadly agrees with the Objectives and considers that they would align with the economic, social and environmental goals and ambitions of the Framework, and would be delivered through the preparation and implementation of the Local Plan Review, as required by the Framework [§9].

4.2 However, Taylor Wimpey considers that the Council's Strategic Objective 2 should explicitly refer to the Black Country Authorities [BCAs], rather than just the Greater Birmingham HMA. This is because whilst the BCAs fall within the Black Country sub-HMA within the Greater Birmingham and Black Country Housing Market Area [GBBCHMA], the plan-making and Duty to Cooperate [DtC] approaches being taken by Birmingham and the BCAs indicates that the issue of addressing the unmet housing needs of each of the sub-HMA areas is no longer being grappled with at the GBBCHMA-level. Therefore, it would be pertinent and clearer if the Strategic Objective explicitly referenced the unmet needs of the two sub-HMA areas.

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

4.3 Taylor Wimpey generally considers that the draft policies set out in within the SSLP would deliver the Strategic Objectives identified. However, Taylor Wimpey has some reservations regarding whether the Council's proposed draft Policy DS3 (The Spatial Strategy to 2038) would adequately deliver Strategic Objective 2. We discuss this matter further below in our response to Question 5.

5.0 **Question 4:**

Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? If no, please explain how these policies should be amended?

Policy DS1 – Green Belt

5.1 Policy DS1 states that 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.

5.2 We set out our response to the policy below in relation to Taylor Wimpey’s sites at Pool House Road, Wombourne and Clent View Road, Stourbridge

Land at Pool House Road, Wombourne

5.3 Taylor Wimpey’s land at Pool House Road, Wombourne is identified as Safeguarded Land in the adopted South Staffordshire Site Allocations Document [SAD] as part of a wider area identified as ‘Land north of Poolhouse Road’ (Policy SAD3). The Safeguarded Land includes the other sites which have been identified as part of the Pool House Road allocation in SSLP Policy SA5.

5.4 The release of the Pool House Road site from the Green Belt and the identification of a new Green Belt boundary around it has therefore already been established through the adopted SAD. **Taylor Wimpey therefore fully supports the allocation of the site.**

Land at Clent View Road, Stourbridge

5.5 Taylor Wimpey objects to the inclusion of land at Clent View Road, Stourbridge within the Green Belt boundary. The assessment of this part of the Green Belt in the evidence supporting the SSLP is also considered to be incorrect. We consider this matter in detail below and identify the reasons as to why the site is suitable for Green Belt release and should be allocated for residential development.

5.6 The Clent View Road site is located on the western edge of Stourbridge and is bordered by Clent View Road to the east. The site is located primarily within the local authority boundary of South Staffordshire District Council [SSDC] but is also partially within the authority boundary of Dudley Metropolitan Borough Council [DMBC].

5.7 The Site comprises 19.6ha of improved grassland (16.5ha in South Staffordshire and 3.1ha in Dudley) currently used as equestrian paddocks.

5.8 The site is situated approximately 2.5km south-west of the centre of Stourbridge and immediately abuts the established residential suburb of Stourbridge to the east, which is located within DMBC.

5.9 The Site is contained within well-defined existing boundaries. It is bounded:

- To the north by a public bridleway beyond which is dense woodland and agricultural land.
- To the east there is a permissive footpath named ‘Roman Road’, Clent View Road and the urban area of Stourbridge. This footpath is separated from the Site and Clent View Road by hedgerows.
- To the south there is a Public Right of Way and a line of mature trees, beyond which lies agricultural land; and to the south-west is a heavily wooded area (Bunkers Hill Wood).

- To the west, a line of trees extending from the northern boundary of the site to Frog Hall Cottages, bound the site towards the centre west. The site is further bounded to the west by a heavily wooded area, and a further line of trees which joins the wooded area to the south-west of the site, beyond which lies agricultural land.

5.10 The site is currently identified as Green Belt on the SSLP Draft Policies Map.

South Staffordshire Green Belt Study (July 2019)

5.11 LUC have completed a Green Belt Study on behalf of South Staffordshire District Council as part of the evidence base to inform the Local Plan Review. The South Staffordshire Green Belt Study [SSGBS] was published in July 2019. The Study draws out variations in the contribution of land to the five Green Belt purposes, identifying areas of land whose performance ranges from relatively weak to relatively strong in Green Belt terms.

5.12 The Green Belt Study has two stages.

- Stage 1 of provides a strategic review of the contribution made by land to Green Belt purposes.
- Stage 2 includes a more focused assessment of the potential ‘harm’ of removing specific sites or parcels of land from the Green Belt.

5.13 In assessing harm, in addition to the contribution to Green Belt purposes, consideration is given to how loss of land from the Green Belt would affect the strength/integrity of the remaining Green Belt and the residual Green Belt boundaries.

5.14 The Stage 1 assessment uses the following Green Belt Contribution Ratings:

- Strong Contribution - Green Belt performs well against the purpose.
- Moderate Contribution - Green Belt performs moderately well against the purpose.
- Weak/No Contribution - Green Belt makes a weak or no contribution to the purpose.

5.15 With regard to Purpose 4, the SSGBS concludes that no Green Belt land in South Staffordshire makes a contribution to the setting or special character of a historic town. It also concludes that all Green Belt land within South Staffordshire makes a strong contribution to urban regeneration (Purpose 5).

5.16 The Stage 2 assessment analysed each sub-parcel identified through the process outlined below:

- Step 1: Considered contribution ratings in more depth.
- Step 2: Assessed potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
- Step 3: Assessed overall Green Belt harm.
- Step 4: Considered harm resulting from alternative Green Belt release ‘scenarios’

5.17 For Stage 2 - the ‘Harm’ ratings range as follows:

- Very Low
- Low
- Low-Moderate
- Moderate
- Moderate-High
- High

- Very High

- 5.18 The SSGBS notes that without a clear and consistent definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment was based on the assumption that the openness (in Green Belt terms) of a defined area will be lost.
- 5.19 The SSGBS [§7.6] notes that where sub-parcels are assessed as having lower harm to the Green Belt if they were to be removed, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the ‘exceptional circumstances’ justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as the sustainability and the ability to meet development needs outside of the Green Belt also need to be taken into consideration.

The SSGBS Methodology

- 5.20 Having reviewed the SSGBS methodology, we are concerned that there are shortcomings in the SSGBS and this has resulted in the contribution of some sites to the Green Belt purposes being assessed as greater than they actually are.
- 5.21 In particular, we note that the findings of the Stage 1 assessment provide a strategic review of the contribution made by land to the Green Belt purposes. Given the strategic nature of the Stage 1 assessment, the parcels of land which are assessed are significant in size and the boundaries identified often extend to several different urban areas. The assessed contribution of these parcels does not therefore necessarily reflect the contribution of smaller areas of land within the parcels.
- 5.22 In addition, we note that the findings of the Stage 1 Assessment have been carried through into the assessment of sub-parcels at Stage 2. We consider that the use of the findings as the starting point to assess the ‘Harm’ of smaller sub parcels results in the assessed harm being greater in some instances than it would be if the contribution of sub-parcels was assessed individually.
- 5.23 In addition, at Stage 2 of the Assessment process, the ‘Harm’ ratings applied are based on an assessment of sub-parcels rather than individual sites. They are not therefore considered to provide an accurate assessment on the contribution of individual sites as they are often larger in size and assessed using different boundaries.
- 5.24 In this regard, Taylor Wimpey wishes to draw upon the significant issues raised by the Inspector in the ongoing examination into the Welwyn Hatfield Local Plan. Submitted for examination in May 2017, the plan as submitted did not provide for a sufficient housing land supply to meet the Full Objectively Assessed Housing Need [‘FOAHN’]. Following stages 1 and 2 of the hearing sessions, the Inspector issued a ‘Green Belt review’ note¹ in December 2017 setting out their initial thoughts relating to the soundness of the plan in the context of the Green Belt Review findings:

“The Council has suggested that it is unable to meet its housing need because of Green Belt restrictions among other concerns. In my concluding remarks to the Hearing sessions into Strategic Matters, I pointed out that I did not consider the development strategy put forward in the plan to be sound, in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt. That is largely because the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large

¹ ‘Green Belt review note’, Ref: EX39, December 2017

parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. It goes without saying that a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt. Such an approach is also more likely to reveal opportunities as well as localised constraints, both of which might reasonably be considered further.” (page 1) [Lichfields emphasis]

5.25 In order to ensure that the contribution of sites to the Green Belt is accurately assessed, Taylor Wimpey consider that a similar finer grained approach is appropriate in the case of the SSGBS.

The SSGBS Stage 1 Assessment

5.26 The SSGBS only considers that part of the site which falls within the authority boundary of South Staffordshire.

5.27 The Clent View Road site is identified within a much wider parcel of land measuring 716.5ha [Parcel S82]. This parcel is shown in Figure 5.1. As Figure 5.1 shows, this parcel covers a significant length of the Green Belt to the west of the urban area of Dudley and beyond.

Figure 5.1 Parcel Ref S82 - West of Stourbridge



Source: South Staffordshire Green Belt Study

5.28 The results of the Stage 1 assessment are set out in Table 5.1.

5.29 We consider that the ‘Strong’ and ‘Moderate’ ratings scored for this Parcel do not provide an accurate reflection of the contribution of the Clent View Road site, as it forms part of a wider parcel and is not considered in isolation. Having undertaken our own assessment of the site in isolation, we have set out the ratings we consider are appropriate in the final column of the

table. Our full assessment of the site which explains how these ratings have been derived in set out in Table 5.2.

Table 5.1 Assessment of Parcel Contribution to Green Belt Purposes (as derived from SSGBS Stage 1 Study)

GB Purpose	BCGBS Assessment	Rating	Lichfields Rating based on review of the site in Isolation
P1: Checking the unrestricted sprawl of large built-up areas	Land is close to the West Midlands conurbation, contains no significant urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside, aided by the woodland ridge separating the sub-parcel from the settlement edge to the north.	Strong	Moderate
P2: Preventing the merging of neighbouring towns	Land lies between the towns of Dudley and Kidderminster, a gap where intervening settlements diminish the sense of separation, however there is sufficient physical and visual separation for each town to retain its own distinct landscape setting.	Moderate	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong	Moderate
P4: Preserve the setting and special character of historic towns	Land does not form part of the setting of a historic town.	Weak / No contribution	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong	Weak / No contribution

Source: South Staffordshire Green Belt Study

The SSGBS Stage 2 Assessment

5.30

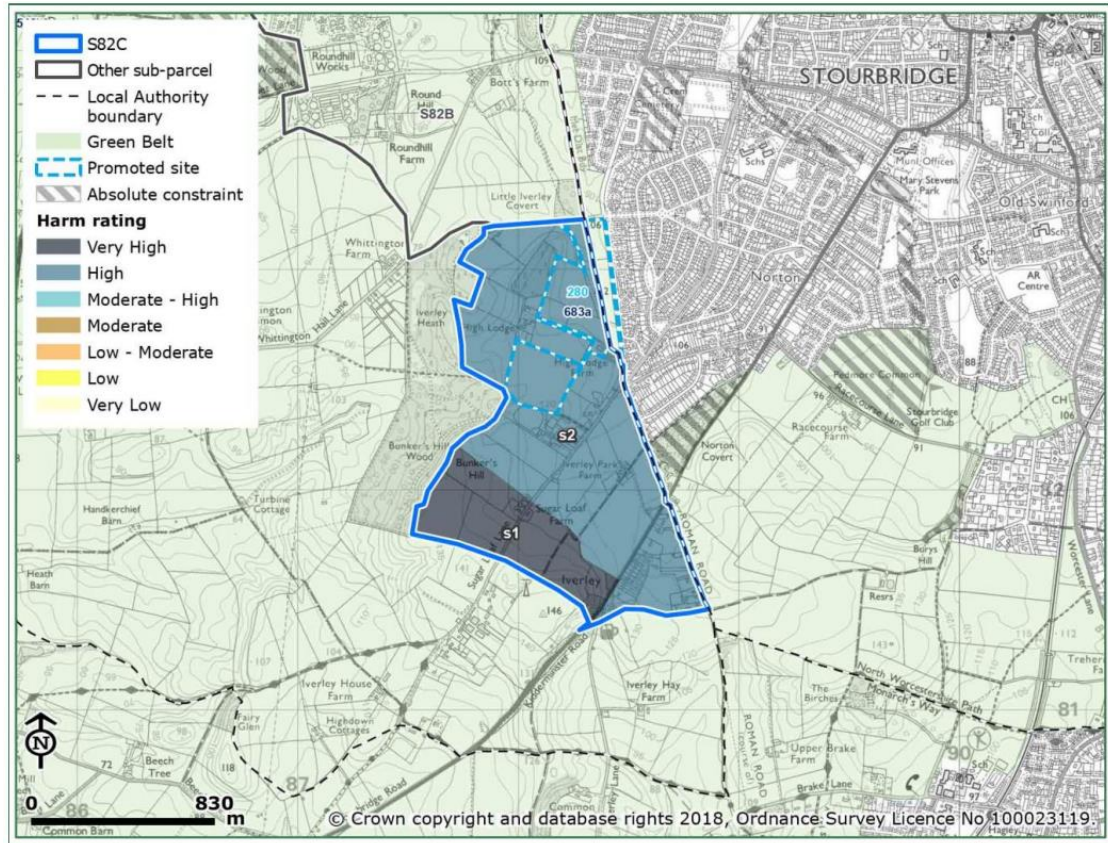
The Stage 2 assessment identifies the Clent View Road site as part of a much larger 105.6ha Sub-Parcel [Sub Parcel Ref S82Cs2] which includes additional areas of land to the south and west (see Figure 5.2). The assessment attributes a ‘High’ harm rating to the Sub-Parcel and provides the following commentary:

*“The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation at Stourbridge, a moderate contribution to maintaining the separation between the town of Stourbridge (Dudley) and the inset settlement of Kinver, and a strong contribution to preventing encroachment on the countryside. **Releasing land here would partially weaken the existing consistent boundary, however the containment provided by the woodland block at Iverley Heath/Bunker's Hill would limit wider harm**”.*

[Lichfields emphasis]

5.31 The Study therefore recognises the role that the woodland plays in helping to provide containment and a permanent defensible boundary in this location.

Figure 5.2 Harm Rating Overview Map of Land within Sub-Parcel



Source: South Staffordshire Green Belt Study

Black County Green Belt Study (September 2019)

5.32 LUC have completed a Green Belt Study on behalf of the Black Country Authorities (September 2019) as part of the evidence base to inform the draft BCP. The Black Country Green Belt Study [BCGBS] was published in January 2020.

5.33 As part of the Clent View Road site falls within the administrative boundary of Dudley MBC we have also considered the findings of this study.

BCGBS Stage 1 Assessment

5.34 The BCGBS only considers that part of the site which falls within the authority boundary of DMBC.

5.35 It is identified as part of Parcel B59 which measures 14.8ha in size. Parcel B59 comprises a strip of land along the western boundary of the Stourbridge urban area, and includes additional land for a length of approximately 1.5km to the north of the site. The parcel is shown in Figure 5.3.

Figure 5.3 Parcel Ref B59 - Roman Road



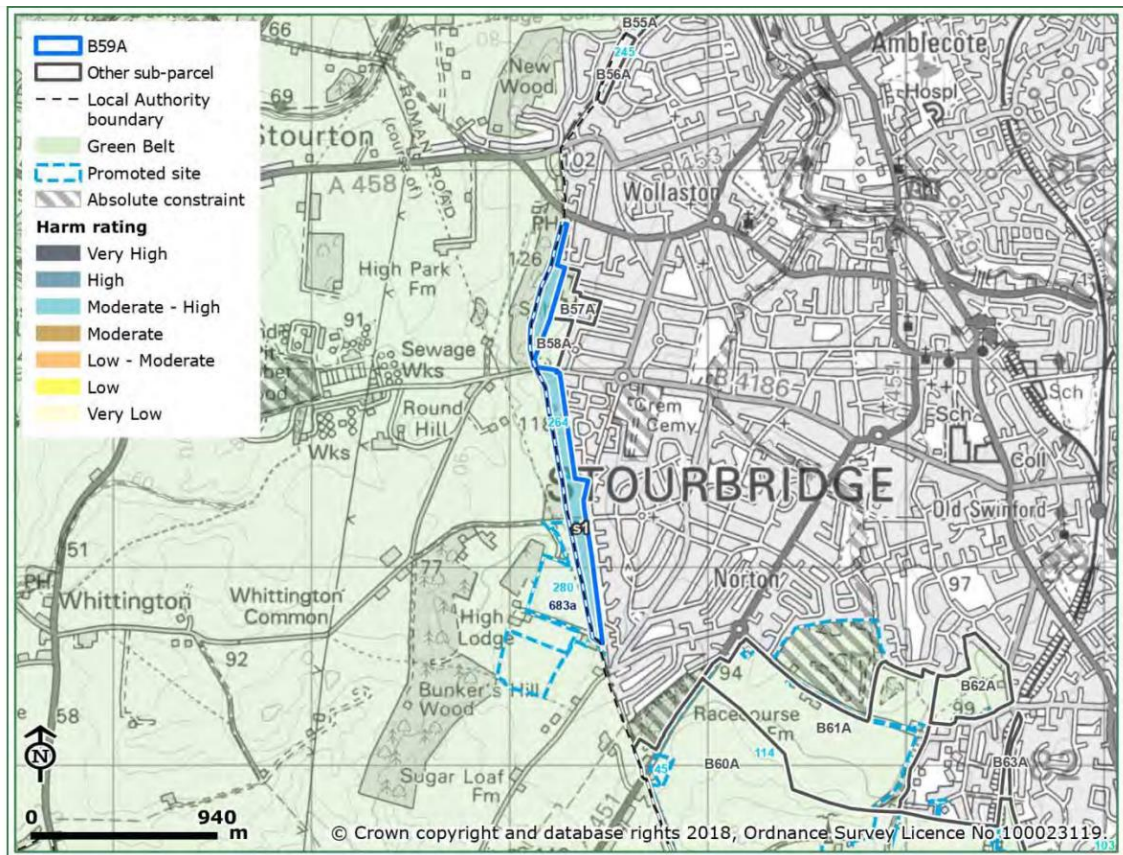
Source: Black Country Green Belt Study

- 5.36 The assessment in Stage 1 of the study reaches similar conclusions to the SSGBS. It concludes that the sub parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation, makes a moderate contribution to maintaining separation between the West Midlands conurbation and the neighbouring town of Kidderminster but there is sufficient physical separation for each town to retain its own distinct landscape setting; and makes a strong contribution to preventing encroachment in the countryside. The Study notes that the land does not contribute to the setting or special character of a historic town. It concludes that all parcels are considered to perform strongly against Purpose 5.

BCGBS Stage 2 Assessment

- 5.37 The site forms part of Sub-Parcel B59As1 in the Stage 2 Assessment. This Sub-Parcel covers the same area as Parcel B59 considered at Stage 1 as shown in Figure 5.4.

Figure 5.4 Harm Rating Overview Map of Land within Sub-Parcel



Source: Black Country Green Belt Study

5.38 Sub-Parcel B59AS1 is given an overall harm rating of ‘Moderate - High’ and the following commentary is provided:

“The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation to the east of the suburbs of Stourbridge, and to preventing encroachment on the countryside, and a moderate contribution to maintaining the separation of Stourbridge and Kidderminster (via intervening settlements). The sub-parcel is adjacent to the urban edge but has no containment by urbanising uses. To the south of Westwood Avenue the urban edge is bound by the well-treed hedgerow along Roman Road, at the centre of the sub-parcel is elevated ground which forms a well-defined boundary feature in its own right, and to the north it is mostly tree covered forming part of a belt of woodland that extends into South Staffordshire. Release of this narrow strip of land would cause little harm in terms of settlement separation, but it would constitute urban sprawl and countryside encroachment. There would be less harm associated with release of the land occupied by The Foresters Arms pub at the far northern end of the parcel, but this is too small to assess as a separate release scenario in its own right”.

5.39 The assessment acknowledges that the parcel serves a limited function in terms of settlement separation, so it is not clear why it has been scored a ‘Moderate’ contribution at Stage 1.

Conclusions on the South Staffordshire and BCGBS Green Belt Studies

5.40 Having considered the findings of the SSGBS and the BCGBS, Taylor Wimpey considers that the land at Clent View Road would perform a more limited contribution to the five tests if it were to be reviewed on a site-specific basis.

5.41 We have therefore undertaken our own review of the site to assess its contribution in isolation to the Green Belt purposes, as this is considered to be the most appropriate method of assessing its suitability for Green Belt release.

Lichfields Assessment of the Clent View Road Site

5.42 The following assessment considers the Clent View Road Site against the five purposes of the Green Belt to establish its suitability for Green Belt release.

Table 5.2 Lichfields Assessment of the Contribution of the Clent View Road site to Green Belt Purposes

GB Purpose	Lichfields Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	<p>The site comprises a land parcel which is adjacent to the existing urban area and would provide a natural extension to this area. Several buildings bound parts of the site to the west (Frog Hall Cottages), the south-west (High Lodge Care Services) and to the south (Stourbridge Lawn Tennis and Squash Club). The site has a strong woodland boundary to the west (including Bunkers Hill Wood) and is further bound to the north by an access road, and to the south by a line of mature trees and a wooded area.</p> <p>These physical features provide strong, enduring defensible boundaries to the north, south and west of the site which are capable of preventing sprawl into the wider countryside. The masterplan for the site illustrates how natural boundaries would be retained and enhanced within the proposed development to safeguard their permanence.</p> <p>Therefore, the removal of the site from the Green Belt will not result in the unrestricted sprawl of the urban area.</p>	Moderate
P2: Preventing the merging of neighbouring towns	<p>The site is not essential in preventing any neighbouring towns merging into one another. The site does not comprise an essential parcel of land that needs to be kept open for any strategic reason.</p> <p>The future development of the site would not result in merging of settlements and would retain a significant gap of approximately 2.7km between Stourbridge and Kinver. In addition, a gap of approximately 4.9km between Stourbridge and Kidderminster would be retained. The woodland planting to the west and south west provides a permanent defensible boundary and would ensure that a gap can be retained.</p> <p>The development of the Site would not therefore result in the merging of settlements.</p>	Weak / No contribution

GB Purpose	Lichfields Assessment	Rating
<p>P3: Safeguarding the countryside from encroachment</p>	<p>The Clent View Road Site is located on the urban fringe and would comprise a natural extension to the existing urban area on the opposite side of Clent View Road. It represents a logical continuation of existing residential development on the western edge of Stourbridge, which currently terminates on the eastern side of Clent View Road in this location.</p> <p>The woodland area to the west and south-west provide strong, established boundaries, and the site is bounded to the north by an access road and to the south by a line of mature trees.</p> <p>The development would result in some encroachment into land which presently is countryside, but this would apply to development in any other part of the Green Belt. In addition, it is immediately adjacent to the existing urban area and a sympathetic layout which reinforces site boundaries could assist in the integration of any future development of the land. The perceived connection between the site and the wider countryside is also reduced by the ridge which runs to the west and obscures views in this direction.</p> <p>The existing tree belts and hedgerows which run along the boundaries of the site would be retained and enhanced to improve levels of site containment and mitigate visual impact.</p> <p>The removal of the Site from the Green Belt does not affect the purpose of safeguarding the countryside from encroachment.</p>	<p>Moderate</p>
<p>P4: Preserve the setting and special character of historic towns</p>	<p>The site does not affect the setting and special character of a Historic Town and therefore does not contravene this purpose</p> <p>The removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of a historic town.</p>	<p>Weak / No contribution</p>
<p>P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land</p>	<p>It should be noted that for Purpose 5, in the BCGBS all of the Green Belt in the study area has been assessed as making a strong contribution to urban regeneration.</p> <p>However, the Draft BCP evidence base recognises that the amount of housing need which cannot be accommodated in the Black Country urban areas is significant. The Draft BCP fails to adequately address this matter in the Green Belt releases it identifies and a significant shortfall of almost 30,000 homes remains. Further Green Belt release is necessary in order to address this shortfall. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts such as South Staffordshire. The emerging South Staffordshire Local Plan recognises that Green Belt release is required in order to help meet housing need.</p> <p>Therefore, there is a requirement for the identification of new sites on land outside the urban area that are not currently proposed for development. Land will need to be removed from</p>	<p>Weak / No contribution</p>

GB Purpose	Lichfields Assessment	Rating
	<p>the Green Belt and safeguarded from development to meet housing needs beyond the plan period.</p> <p>The release of the land at Clent View Road from the Green Belt would not prevent the recycling of derelict land and other urban land within Walsall, as there is insufficient previously developed land available to meet future housing requirements.</p>	

Source: Lichfields

5.43 When the Clent View Road site is assessed in isolation, we consider that the overall harm to the Green Belt would be moderate and it is suitable for release from the Green Belt.

Conclusion

5.44 Land at Clent View Road, Stourbridge represents a sustainable location for development which does not make a valuable contribution to the purposes of the Green Belt when considered in isolation. The site would play an important role in meeting the need for housing land over the period to 2038.

5.45 The scheme would include the retention and enhancement of the existing tree belts and hedgerows which run along the boundaries of the site to improve levels of site containment and mitigate visual impact.

5.46 The site should therefore be removed from the Green Belt boundary and allocated for residential development in the emerging SSLP.

Exceptional Circumstances

5.47 South Staffordshire is very heavily constrained by the Green Belt and the scale of housing need currently far exceeds the supply of housing land and the capacity of the existing safeguarded land. Taylor Wimpey therefore supports the Council’s recognition that Green Belt release will be required in order to ensure the District provides enough homes for both its own needs and a proportionate contribution to the unmet needs of the GBBCHMA.

5.48 For the reasons we have set out in these representations, Taylor Wimpey considers that additional housing land needs to be identified within the SSLP to meet need over the plan period, including a larger contribution to the unmet needs of the GBBCHMA. Given South Staffordshire’s strong functional relationship with the Black Country conurbation and its potential to meet the unmet needs of the Black Country HMA, the allocation of additional land in close proximity to the conurbation would be appropriate. On this basis, Taylor Wimpey considers that its land at Clent View Road, Stourbridge would be appropriate for allocation as it lies on the western edge of the Black Country conurbation.

5.49 The Framework is clear on the weight attached to Green Belt by the Government, and notes that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. The Framework [§141] provides a set of criteria which should be satisfied prior to establishing exceptional circumstances, including the optimisation of brownfield land and densities, and discussions with neighbouring authorities.

5.50 The SSLP [4.3] indicates that the Council’s preferred spatial strategy has sought to account for existing sources of non -Green Belt supply. The Framework [§141] is clear that the Council is required to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. The Council’s current approach appears to accord with the

Framework in principle, but Taylor Wimpey considers that the Council should sufficiently, and robustly, evidence this position.

- 5.51 Taylor Wimpey considers that on the basis of the need provide sufficient land to meet its own need and that of the GBBCHMA and the lack of non-Green Belt alternatives, there are exceptional circumstances for the release of Green Belt land for housing in South Staffordshire.

Safeguarded Land

- 5.52 Taylor Wimpey is concerned that the current version of the SSLP does not meet the requirements of the Framework [§143] as it does not identify Safeguarded Land. Despite this Plan undertaking a Green Belt Review, no sites have been identified as Safeguarded Land to meet needs beyond the Plan period.
- 5.53 This land should be identified now and safeguarded to meet the needs beyond the Plan period and ensure that the Green Belt boundaries endure beyond the Plan period too. Taylor Wimpey is of the opinion that the land to be identified as Safeguarded should be varied in size and be capable of coming forward in the short terms should the need arise at any point in the plan period.
- 5.54 This would allow any future Local Plan Review to allocate the Safeguarded sites for development and ensure they are capable of delivering units in the first 5 years post adoption of the Review.
- 5.55 The selection of the most appropriate sites to be Safeguarded should be identified in a robust and consistent Green Belt Review and based on a robust Site Selection methodology which considers matters including the sustainability, accessibility, deliverability and viability of the sites.

6.0 Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?

- 6.1 Draft Policy DS3 (The Spatial Strategy to 2038) sets out the Council’s proposed housing requirement, which includes a contribution towards meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area [GBBCHMA], alongside the spatial strategy for meeting these needs.
- 6.2 In general, Taylor Wimpey supports the general thrust of the Council’s preferred spatial strategy. However, Taylor Wimpey has the below comments on draft Policy DS3, and the evidence base underpinning it, which it is considered would need to be addressed by the Council to ensure the policy is robust and sound.

The District’s Housing Needs

- 6.3 The SSLP sets out the context for the District’s housing needs in paragraph 4.7 and states that needs have been calculated using the Framework’s standard method for calculating local housing needs [LHN]. It goes on to state that this “*requires the district to deliver a minimum annual average of 243 dwellings per annum*”.
- 6.4 Broadly, Taylor Wimpey supports the Council’s approach to assessing its minimum LHN. The Council’s LHN calculation and figure of 243 dwellings per annum [dpa], although not explicitly stated, appears to have correctly utilised the 2014-based household projections and 2020 median work-place based affordability ratios – in line with the PPG². Taylor Wimpey also welcomes the Council’s update to the LHN figure following on from the SHSID (c.254 dpa), which reflects the PPGs clear instructions to keep this number under review and revise it where appropriate.³
- 6.5 However, the Council should not utilise the c.750 dwelling completions already delivered in the district between 2018-2021 in generating the District’s housing need for the plan period. Crucially, to ensure a sound approach, which aligns with the guidance in the PPG, Taylor Wimpey consider that the Council’s LHN should be applied to the whole emerging plan period (2018-2038). The PPG² is clear that the current year should be taken as the start of the 10-year period upon which to calculate the standard method figure. Elsewhere in the PPG⁴, it states that the:
- “method provides authorities with an annual number, based on a 10-year baseline, which can be applied to the whole plan period” (Emphasis added)*
- 6.6 This is set out without any further qualification. If applied to the emerging Plan period (2018-2038) this equates to a minimum LHN figure of c.4,860 dwellings. It is entirely reasonable for the Council to include the 2018/21 completions within its supply from the 2018 base date, therefore reducing the overall plan requirement. However, these should not form part of the Council’s housing need figure for the 2018/21 period. The Council should, therefore, update the assessment of its LHN to reflect the need across the whole plan period (i.e. a policy-off figure), and explicitly state that the Plan’s housing requirement (i.e. policy-on figure) reflects the existing sources of housing supply (i.e. completions and permissions). This would result in a

² PPG ID: 2a-004

³ PPG ID: 2a-008

⁴ PPG ID 2a-012

marginal c.21 dwelling reduction compared to the minimum housing need figure of c.4,881 dwellings set out in the SSLP.

- 6.7 In addition to this, Taylor Wimpey notes that the LHN calculation set out within the SHMA, which was published in May 2021, still refers to the c.254 dpa figure set out in the SHSID. This is because, despite the 2020 median house price to workplace-based earnings ratios being published in March 2021, the SHMA still utilises the 2018 figures. Whilst the LHN figure set out within the SSLP itself is correct, the Council will need to update the SHMA to reflect this updated LHN calculation, as it forms part of the Council’s evidence base underpinning the plan.

Uplifts to the minimum LHN figure

- 6.8 As the Council will be aware, both the Framework⁵ and PPG⁶ are clear that the LHN figure generated by the standard method is a minimum starting point (i.e. actual housing need may be higher than this figure). Moreover, elsewhere in the guidance, the PPG differentiates between the minimum figure arrived at through the standard method and ‘actual’ housing need which can be higher.
- 6.9 It is ‘actual’ housing need that represents the objectively assessed need to which the tests in paragraph 11 of the Framework apply, and there is also a requirement for the Council to test reasonable alternatives.⁷ Therefore, the Council should actively identify whether there are reasons for testing higher figures as estimates of housing needs. The PPG goes on to state that it would be appropriate for a higher figure to be adopted on the basis of employment, infrastructure, affordable housing or unmet housing needs.⁸ In this regard, Taylor Wimpey has the following comments for the Council:

1.Affordable Housing

- 6.10 The PPG⁹ is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. In this context, it is noted that following the SSHID consultation, the Council has now updated its evidence on affordable housing needs within the SHMA, which has concluded that the District’s affordable housing need equates to 128 dpa.
- 6.11 Taylor Wimpey notes that the SHMA indicates that the Council’s annualised affordable housing need figure when compared with the proposed housing requirement, comprising its own LHN figure and a contribution towards unmet housing needs, would *“represents 28.2% of the annual planned growth in the District of 453 dwellings per year”* [§8.7]. It also states that a 30% affordable housing requirement would enable the Council to address this need. On the face of it, the Council’s evidence would indicate that the Council’s affordable housing needs could be adequately delivered within the plan period, subject to the provision of a 30% affordable housing requirement and testing through the viability process.
- 6.12 However, Taylor Wimpey notes that the Council’s affordable housing need for its residents actually equates to 53% of its LHN figure. Whilst it is true that the Council’s proposed annualised housing requirement (e.g. its LHN figure and GBBCHMA contribution) would enable it to meet its own affordable housing needs, the SHMA does not appear to have given any consideration to whether the in-migration of households from the Black Country or Birmingham, resulting from this contribution, would also need affordable housing.

⁵ Paragraph 61

⁶ PPG ID: 2a-002

⁷ PPG ID: 11-018

⁸ PPG ID: 2a-010

⁹ PPG ID: 2a-024

6.13 At present, a 30% requirement against the elements of supply which the Council has set out in Table 8 of the SSLP would indicate that the Council would be able to deliver a maximum of c.2,682 affordable dwellings over the plan period. Annually, this would equate to c.134 dwellings, which would be marginally higher than the annualised need identified within the SHMA, resulting in a c.6 dwelling contribution towards meeting the affordable needs of those migrating into the District. Whilst the SHMA has explored the profile of in-migrating households in Section 5, as a part of its assessment on housing mix, it does not appear to have considered this in relation to affordable housing needs in Section 6.

6.14 As a part of wider updates to the SHMA, which Taylor Wimpey consider necessary to robustly support the Local Plan Review, the Council should explore the implications of this further and consider whether an uplift to the LHN figure to help deliver the District's affordable housing need would be justified, and crucially, necessary to addressing worsening affordability within the District.

2. Economic Growth

6.15 The Framework emphasises importance “*on the need to support economic growth and productivity*” [§81] and is clear that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*” [§82c]. In essence, the NPPF recognises the implicit link between economic growth and housing need, and that economic growth should not be decoupled from housing growth.

6.16 Firstly, it is noted that the forecast job growth – based on the Oxford Economics forecasts – included within the EDNA only indicated a 0.5 ha need for employment land. However, these were based on forecasts from 2018, which are now nearly 4 years out of date. As acknowledged in the SSLP [§4.58], the EDNA is now markedly out of date in light of the implications of Covid-19 and Brexit and the Council intends to prepare an update prior to the Publication version of the Local Plan Review.

6.17 Taylor Wimpey agree with the Council and consider that such a review is necessary, particularly in light of the passage of time. Whilst past job forecasts indicated a limited increase in job growth within the District, partly as a result of declining manufacturing employment, it is important to note that the latest national Experian forecasts (April 2021) show an increase of 1.6% nationally in the logistics sector alone by 2040, when compared to the pre-Covid 19 (March 2020) forecasts, which is largely a result of Brexit. Indeed, nationally, industrial & logistics take-up was 15.0m sq. ft in Q1 2021– the strongest on record for a first quarter and 21% above the five-year quarterly average.¹⁰ Similarly, research indicates a markedly increased demand for logistics units within the West Midlands, which has resulted in only 0.91 years' worth of supply in the region.¹¹ Indeed, as Knight Frank has advised, “*availability is reaching critical levels of shortage, and the current pipeline of speculative development only goes some way in plugging the gap*”.¹²

6.18 The above, when coupled with the fact that the job growth associated with the West Midlands Interchange [WMI] – 8,500 jobs – would fall out with the Oxford Economic ambient forecasts for growth, indicates that job growth within the District may now be markedly above the previous 2018 projections. Indeed, the EDNA concluded that going forward “*consideration should be also given to a number of development and infrastructure proposals that could have*

¹⁰ See LSH ‘Record First Quarter For Industrial Take-Up’ (Available at: <https://www.lsh.co.uk/explore/research-and-views/research/2021/may/record-first-quarter-for-industrial-take-up?listing=true>)

¹¹ See Savills ‘The logistics market in the West Midlands’ (Available at: https://www.savills.co.uk/research_articles/229130/316120-0)

¹² See Knight Frank ‘Midlands Logistics & Industrial Market Insight Report 2021 Mid-Year Review’ (Available at: <https://content.knightfrank.com/research/489/documents/en/logic-midlands-2021-mid-year-review-8296.pdf>)

a significant impact on the future property market in South Staffordshire, should/when they materialise e.g. West Midlands Interchange and M54/M6/M6 toll link road” [Page 58].

Moreover, the SHMA only identified that the projected population growth for the District could support between 1,989 and 2,826 jobs [§5.9], which would fall significantly short of the job growth associated with the WMI.

- 6.19 The Framework is clear that the *“planning system should actively manage patterns of growth”* and significant development should be *“focused on locations which are or can be made sustainable, through limiting the need to travel”* [§105]. It goes on to state that planning policies should *“support an appropriate mix of uses across an area, and within larger-scale sites, to minimise the number and length of journeys needed for employment (inter alia)”* [§ 106]. There is, therefore, a clear emphasis within the Framework to manage and mitigate unsuitable patterns of commuting through the Local Plan process.
- 6.20 In this regard, it is noted that the SSLP reiterates that the EDNA confirmed the District has a sufficient supply of available employment land to meet its own employment requirements up to 2038, with a c.19ha oversupply based on past completions and growth GVA [§4.52]. Furthermore, the SSLP notes that subsequent to the publishing of the EDNA, the approval of the WMI has markedly increased the oversupply of employment land within the District [§4.57]. Moreover, the SSLP acknowledges that the BCAs are unable to meet their own employment land needs up to 2039, with a c.210ha shortfall [§4.55]. In this regard, the EDNA highlighted that the oversupply in South Staffordshire could contribute towards meeting the future employment land requirements of the South Staffordshire Functional Economic Market Area [FEMA], in particular, some of the Black Country gap given the existing strong policy links [§8.14].
- 6.21 Whilst the WMI will serve a regional role, and indeed as the BCA’s ‘West Midlands Strategic Rail Freight Interchange Employment Issues Response Paper – Whose need will the SRFI serve? (February 2021)’ (“the SRFI study”) has shown that it would serve c.72 ha of the Black Country’s employment needs, this may lead to a very high proportion of in-commuting associated with the Black Country. Indeed, a similar issue is being faced by Solihull Metropolitan Borough Council [SMBC] in respect of their ongoing Examination in Public. In particular, the SMBC’s evidence base suggested that the delivery of UK Central would result in 13,000 additional jobs above the 10,000 jobs baseline supported by the Council’s LHN figure. Their evidence, however, also suggested that only c.25% of these jobs would be for Solihull residents, resulting in 75% of in-commuting for the remainder of these jobs. To rebalance this matter, SMBCs evidence concluded that an additional 379 dpa would be required in Solihull; however, SMBC has not sought to address this within its housing requirement – a matter which is now being reviewed by the Inspector.
- 6.22 The above highlights the clear need to ensure sufficient homes are delivered within the District to align with the anticipated job growth associated with the District’s employment growth, as this could lead to migration out of the neighbouring authorities, as people move to seek a home closer to their place of work. In the absence of this, the Council could end up promoting unsustainable patterns of commuting.
- 6.23 As such, Taylor Wimpey recommends that as a part of the aforementioned updates to the EDNA and SHMA, the Council also considers the implications of the job growth associated with the WMI and whether there would be a sufficient supply of housing provided to accommodate an increase in the workforce resulting from this economic growth. Taylor Wimpey considers that this approach is crucial and would be consistent with the Framework.

3. The Unmet Housing Needs of the Greater Birmingham and Black Country Housing Market Area

6.24 The Framework is clear that:

“Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas” [§11b] (Emphasis added)

6.25 It is also clear that Local Plans should be:

“based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground” [§35c] (Emphasis added)

6.26 In this regard, Taylor Wimpey welcomes the Council’s commitment to addressing part of the GBBCHMA unmet needs [§4.10]. Taylor Wimpey also agrees with the Council that including a provision for the GBBCHMA from the outset of the Local Plan Review process was critical to ensuring that constructive Duty to Cooperate [DtC] discussions were held with the GBBCHMA authorities. Such an approach is entirely consistent with the Framework [§25 and §27]. Taylor Wimpey also welcomes the Council’s acknowledgement that since the ‘Greater Birmingham HMA Strategic Growth Study’ (February 2018) [the 2018 SGS] – and subsequent Position Statements – that the BCAs have also now identified a c.28,239 dwelling shortfall up to 2039 on top of that already declared in Birmingham.

6.27 However, Taylor Wimpey still has concerns regarding the Council’s derivation of its 4,000-dwelling contribution. Taylor Wimpey notes that the SSLP states that this figure is underpinned by the *“scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study”* [§4.10]. Indeed, the IOC set out five housing level of growth policy options (A-E), with options C-E unmet housing need contributions being based upon the minimum (4,000 dwellings), mid-point (12,000 dwellings) and maximum (20,000 dwellings) *“capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study”*. These options were subsequently tested through the Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options (September 2018)[the IOC SA].

6.28 However, it should be noted that the SGS has not been examined, and therefore the findings of the SGS carry little to no weight. Moreover, this is contrary to the clear caveats set out in the SGS, which stated that:

“It is important to recognise that further work will be undertaken in considering and testing the potential for strategic development by local authorities through their respective local plan processes...” [§1.41] (Emphasis added)

“For the avoidance of doubt, the identification of Areas of Search for strategic development in this report does not indicate that these areas could or should be brought forward for development. The purpose of the Study is to assess and shortlist potential Areas of Search for strategic development which can then be considered and assessed in further detail by individual councils through the preparation of local plans alongside further small and medium-sized sites. On the same note, LPAs may seek to explore strategic options which have not been considered through this Study, should those opportunities arise from their own plan-making processes.

SA” [§1.42] (Emphasis added)

- 6.29 The quantum of growth identified within the SGS is therefore not a maximum or minimum, and it is for the Council to establish through its own Local Plan process, and – crucially – Sustainability Appraisal [SA] process, whether the sites identified, or other sites, could cumulatively form a package of sites that could sustainably contribute towards addressing this need. At present, the Council’s current approach relies upon a document that clearly caveats its findings and has not been robustly tested through the examination process. As such, Taylor Wimpey do not consider that the SGS is an appropriate or robust piece of evidence to underpin the Local Plans contribution towards the GBBCHMA unmet housing needs.
- 6.30 The Council should be able to sufficiently demonstrate that it has tested reasonable alternatives through the SA process, as required by the PPG13 and Friends of the Earth High Court judgment.¹⁴ At present, the Council’s testing of reasonable alternatives has been limited to the aforementioned quantum, which as set out above are neither maximums nor minimums nor robustly evidenced. Moreover, as a result of this, the Council’s options unreasonably and significantly increase the provision of unmet housing needs – there is no in-between. Indeed, the difference between Option C-D and D-E is c.8,000 dwellings.
- 6.31 As such, the Council runs the risk of potentially falling into a position where either the evaluation of reasonable alternatives in the SA could be interpreted to either have not been undertaken or to have been ‘improperly restricted’, in the context of the iterative process necessary for progressing a plan.
- 6.32 In this regard, Taylor Wimpey continue to consider that there is a cogent need – if not a requirement – for the Council to prepare a robust and evidence-led approach to distributing the unmet housing needs of the Black Country and Birmingham and test the outcomes of this through the SA process. Without this, there is a very real risk that the region’s housing needs may not be fully met. In this context, Lichfields has previously prepared an analysis that considers the functional housing market relationship between the various local authority areas – set out in Taylor Wimpey’s SHSID representations.
- 6.33 Such an approach has recently been adopted by North Warwickshire in the preparation of their Local Plan, in which they considered the proximity, connectivity and strength of functional inter-relationships with Birmingham; an approach which the Inspector endorsed.¹⁵ This was similar to the approach taken in distributing Coventry’s unmet needs across the Coventry & Warwickshire HMA. Again, the Inspector for the Stratford-on-Avon Core Strategy (2017) endorsed this approach.¹⁶
- 6.34 Reflecting the ongoing and changing nature of this matter, Lichfields has updated this work – set out in Appendix 3. Importantly, Lichfields’ analysis builds upon the existing model but has broken down the GBBCHMA into its two constituent sub-HMAs – the justification for which is set out in more detail within Appendix 3. Importantly, Lichfields’ analysis ultimately illustrates the functional linkages between South Staffordshire and the Black Country HMA and Birmingham HMA and shows how the unmet housing needs of each of the sub-HMAs could be sustainably distributed within South Staffordshire.
- 6.35 For South Staffordshire, Lichfields’ functional housing market relationship analysis indicates that the Council should be seeking to make provision for c.25% of the total unmet needs of the Black Country HMA up to 2039 and c.7% of the total unmet needs of the Birmingham HMA up to 2031. The contribution identified for the Black Country HMA is because the District

¹³ PPG IDs: 11-017 and 11-018

¹⁴ Paragraph 88 of R (Friends of the Earth England, Wales and Northern Ireland Ltd) v The Welsh Ministers [2015] EWHC 776 (Admin)

¹⁵ IR129, Inspectors Report

¹⁶ IR61, Inspectors Report

demonstrates a particularly strong functional relationship with the Black Country conurbation, to a far greater extent than other authorities. Conversely, the District has a much weaker socio-economic link with the city, and as such, its contribution towards the cities unmet needs would be markedly lower. Nevertheless, when combined this would equate to c.8,650 dwellings above the District's own housing needs.

- 6.36 It is important to note that the aforementioned apportioned figures should be seen as a starting position, which should be tested through the SA process. Indeed, this would fall between Options C and D which have been tested through the IOC SA already. This serves to highlight that the Council's proposed contribution to the Black Country and Birmingham's unmet housing need is insufficient and that the Council should re-evaluate its approach to deriving an appropriate contribution to meeting these needs and test this through the SA process accordingly.

Sufficient Flexibility

- 6.37 It is expected that Local Plans should be sufficiently flexible to adapt to rapid change. In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land, or allow sufficient headroom so that there is an appropriate buffer within the overall planned supply.
- 6.38 The SSLP sets out the Council's housing supply in Table 8, which is comprised of four key components: Existing Planning Permissions and Allocations, Safeguarded Land, New Allocations and Windfalls. Cumulatively, the Council's housing supply would deliver c.8,954 dwellings over the 2018-2038 plan period. Notwithstanding Taylor Wimpey's comments on the Council's housing requirement and unmet housing needs contribution above, the Council's proposed housing supply would only equate to the provision of a c.1% buffer against its 'housing requirement' – comprising the Council's correct housing need figure and 4,000 dwelling contribution towards the GBBCHMA unmet needs.
- 6.39 What this means in practice is that there would be no scope within the Local Plan Review to respond to changing circumstances. If any single component of supply does not come forward or falls behind the timescales implied by the Council, which buffers are intended to address, this may result in the GBBCHMA's unmet housing needs not being delivered, rather than the Councils. Importantly, the buffer in supply to ensure flexibility should be detached from the Council's contribution to the GBBCHMA housing shortfall (i.e. 10% on top of its LHN figure and GBBCHMA unmet need contribution).
- 6.40 To ensure a robust approach, the Council should determine the level of its contribution to the GBBCHMA – as discussed above – and apply a 10% buffer to this and the Council's LHN figure for the plan period to ensure that there is the flexibility to respond to failures to deliver the required dwellings for both the District and the GBBCHMA unmet housing needs in the allotted time frames and across the whole plan period. The consequence of this is that it will be necessary for the Council to identify additional suitable land supply (i.e. more than needed to meet the total housing requirement) to facilitate an additional 10% headroom to be built into the supply.

Land at Clent View Road, Strourbridge

- 6.41 For the above reasons, Taylor Wimpey considers that additional housing land needs to be identified within the SSLP to meet need over the plan period. Given South Staffordshire's strong functional relationship with the Black Country conurbation and its potential to meet the

unmet needs of the Black Country HMA, the allocation of additional land in close proximity to the conurbation would be appropriate. On this basis, Taylor Wimpey considers that its land at Clent View Road, Stourbridge would be appropriate for allocation as it lies on the western edge of the Black Country conurbation.

Wombourne

- 6.42 Policy DS3 identifies Wombourne as a Tier 2 settlement. The Council's preferred Spatial Strategy, as set out in Section 4 of the SSLP, seeks to locate additional housing growth in Wombourne over the plan period 2018 to 2038, including the existing safeguarded land sites around the village. Taylor Wimpey supports this approach and we agree that it recognises the level of facilities and public transport links in the settlement compared to other rural settlements in the District, with Wombourne being the District's largest Tier 2 settlement.
- 6.43 The proposed allocation of Taylor Wimpey's site at Pool House Road, Wombourne (Site 285) in Policy SA5 will contribute to achieving this growth and is fully supported.

7.0 Question 6:

Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

- 7.1 The SSLP states that, alongside setting the spatial strategy for the District up until 2038, the Council intends for the Local Plan to set out the parameters for what a new settlement to be delivered beyond the plan would need to incorporate should a suitable option come forward [§4.60]. As a part of this, the SSLP has identified a specific area of search along the A449/ West Coast Mainline transport corridor. This, it states, is based on the findings of the SGS in 2018.
- 7.2 The draft policy itself (Policy DS4 – Longer Term Growth Aspirations for a New Settlement) goes on to state that “*it is not anticipated that a new settlement will contribute to housing growth during the current plan period*” and “*instead, it will form a key option that the Council will want to consider alongside alternatives in future plan-making, meaning it is important that work to identify any potential options begins now*”. Importantly, the SSLP is clear that the exact location of a New Settlement would be assessed alongside alternative growth options through the plan-making process as part of a subsequent review of the Local Plan, along with preparing the evidence base to support the deliverability of such an approach.
- 7.3 Whilst the Council has clearly caveated its approach, Taylor Wimpey has some concerns regarding the proposed policy approach of defining an area of search within the emerging Local Plan. In particular, Taylor Wimpey would draw the Council’s attention to the recent EiP of the ‘Hart Local Plan (Strategy and Sites) 2032’. Notably, Policy SS3 (New Settlement) identified an Area of Search at Murrell Green/Winchfield for the delivery of up to 5,000 dwellings through the production of a New Settlement Development Plan Document [DPD] after the adoption of the Plan. Similarly, the Council were clear that the development was not required in the Plan period to meet identified housing needs; albeit could deliver c.1,500 dwellings towards the end of the plan period.
- 7.4 However, the Inspector raised significant concern regarding the Council’s approach. The Inspector argued that Plan established the ‘principle’ of the new settlement as the most appropriate growth strategy for meeting the Council’s long-term needs within a relatively confined area of search. However, he highlighted that the Plan had not tested other reasonable alternatives to a new settlement (IR 58). As a result, he concluded that the policy, and therefore the new settlement, should be removed from the plan (IR 67).
- 7.5 Crucially this emphasises the critical need for the Council to robustly test reasonable alternatives for the spatial distribution of the District’s housing needs through the Sustainability Appraisal [SA] process at an early stage – as per the requirements of paragraph 32 of the Framework, the Planning Practice Guidance [PPG]¹⁷, and Friends of the Earth High Court judgment.¹⁸
- 7.6 Whilst the Council has highlighted that a new settlement would not be required to meet housing needs in this plan period, would be assessed against other spatial options in a future Local Plan Review, and further evidence to support one would be required, it raises the question as to whether including a confined area of search within a strategic policy, recommended by a piece of evidence that has not been tested through an EiP or an SA process, is a robust approach.
- 7.7 Notwithstanding Taylor Wimpey’ comments on the spatial strategy and housing allocations below, although not explicitly stated, the SSLP concludes that the preferred spatial strategy

¹⁷ PPG IDs: 11-017 and 11-018

¹⁸ Paragraph 88 of R (Friends of the Earth England, Wales and Northern Ireland Ltd) v The Welsh Ministers [2015] EWHC 776 (Admin)

would enable the Council to meet its own housing needs, and part of the wider GBBCHMA unmet needs, without the need to allocate a new settlement within this plan period. Fundamentally, there is no evidence to suggest that such a policy approach is necessary within this plan period and why a strategic policy is necessary to set out the Council's ambitions for the next Local Plan Review.

- 7.8 Whilst Taylor Wimpey recognises that the Framework is clear that the supply of large numbers of new homes can often be best achieved through planning for larger-scale developments (Para 72), such as new settlements, Taylor Wimpey does not consider that new settlements are the *panacea* for housing delivery – especially where development of such a scale is not necessary to address housing needs in this plan period even if further unmet needs were to be met within the District.
- 7.9 Taking the above together, Taylor Wimpey considers that identifying a new settlement within this plan period is unnecessary, as it would not serve to meet the District's, or GBBCHMA's, housing needs in this plan period. Fundamentally, Taylor Wimpey considers that the Council have provided insufficient justification for why such an approach is necessary, and invariably such an approach is likely to be found unsound at EiP. To this end, Taylor Wimpey considers that the Council should omit this policy from the draft Local Plan review as it is not necessary to make the plan sound.

8.0 **Question 8:**

Do you support the proposed housing allocations in Policy SA5? Please reference the site reference number (e.g. site 582) for the site you are commenting on in your response.

Site 285 – Pool House Road

- 8.1 Taylor Wimpey fully supports the allocation of its site at Pool House Road (Site 285) as part of the wider allocation proposed in this area which includes additional land to the east (Sites 459 and 562/415). The whole allocation has an identified minimum capacity of 218 dwellings. Taylor Wimpey's site is identified as having a minimum capacity of 82 dwellings.
- 8.2 The site is suitable for housing development because it:
- Offers a suitable location for development and can be developed immediately following allocation.
 - Could utilise existing infrastructure surrounding the Site, with no utilities or drainage or infrastructure constraints preventing the Site coming forward for development.
 - Has no identified environmental constraints that would prevent the Site coming forward for residential development.
 - Can deliver satisfactory vehicular access from Pool House Road. In addition, existing bus stops are located within 0.4km of the Site.
 - Will deliver new open space for use by residents and the local community.
 - Is highly sustainable with a number of local shops and services located within close proximity to the Site.
- 8.3 The site would see the delivery of Safeguarded Land previously removed from the Green Belt and its allocation is supported by the findings of the Housing Site Selection Topic Paper which states [§5.5.6]:
- “Wombourne contains existing safeguarded land sites outside of the Green Belt. These sites are non-Green Belt and need to be proactively explored for their potential to assist in meeting the District's proposed housing target. The sites assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land in Wombourne. Given this, and the sites being considered suitable for safeguarding through the examination of the Site Allocations Document as recently as 2018, Sites 285, 562/415 & 459 and Site 416 are considered suitable for housing allocation”.*
- 8.4 Appendix 3 of the Topic Paper also notes that:
- 1 No major negative effects are predicted in the SEA (post mitigation) and there would be positive effects in terms of climate change and housing.
 - 2 Wombourne is the District's largest Tier 2 village and has been identified for growth on safeguarded land.
 - 3 The site was previously selected as being suitable for development through the Site Allocations Document 2018. This judgement had regard to its landscape sensitivity.
 - 4 There are no concerns with regard to impact on the historic environment.
 - 5 County Highways have assessed the site as acceptable in principle as long as a footway connection to existing is constructed.

6 The site is well contained by existing woodland and brook to the north.

8.5 The Proforma conclusions in Appendix 3 the Topic Paper recognise that the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.

8.6 The suitability of the site for allocation has been established through its identification as Safeguarded Land in the adopted SAD and we consider that the evidence provided in our Technical Report further supports the allocation of the site.

Consideration of the Allocation Policy for Site 285

8.7 The Housing Allocation Proforma for Site 285 (attached at Appendix C of the SSLP) sets out the following key infrastructure requirements for the site:

- Provide highway and pedestrian connectivity to site 459.
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.

8.8 The Concept Masterplan in the Delivery Statement for the site (which has been submitted alongside these representations) provides pedestrian linkages to the public footpath to the northern boundary of Site 285, which would provide a link to the wider allocation to the east.

8.9 However, it is not clear why the SSLP is seeking the provision of a highway connection to site 459 to the east as that site appears to be capable of taking direct access from Pool House Road. We would welcome clarification on this matter as we do not consider that this vehicular connection is otherwise necessary.

8.10 Taylor Wimpey supports the delivery of infrastructure (or financial contributions) to meet policy requirements in principle. However, any policy requirements need to be supported by the appropriate evidence and we are concerned that the current evidence base does not provide all of this evidence. We provide further detail on this matter in our responses to individual development management policies.

8.11 The Housing Allocation Proforma for Site 285 also identifies the following Proposed Access:

- Provide vehicular and pedestrian access via Pool House Road alongside pedestrian links to the village centre along Ounsdale Road.

8.12 The Development Statement for the site demonstrates how the main access to the site will be provided from Pool House Road. It is likely that this will be achieved through the provision of a T-junction with a right turn lane along Pool House Road. To provide access to the village centre, it is anticipated that pedestrian accessibility will be improved through the provision of a short section of new footway on the northern side of Pool House Road extending from the proposed access to a new crossing point provided as part of the right turn lane to facilitate access to Brindley Close through removal of part of the hedge in this area. Appropriate pedestrian and vehicular access to the site to meet draft policy requirements can therefore be provided.

Conclusions on Site 285 – Pool House Road

8.13 Taylor Wimpey fully supports the allocation of its site at Pool House Road (Site 285) as part of the wider allocation proposed in this area which includes additional land to the east (Sites 459 and 562/415).

8.14 The suitability of the site for allocation has been established through its identification as Safeguarded Land in the adopted SAD and the need identify existing Safeguarded Land as

allocations for new homes to meet future housing need is recognised in the SSLP and associated evidence base. The Pool House Road site is a sustainable and deliverable site and will deliver much needed housing.

- 8.15 However, for the reasons set out above, we have some minor concerns with the requirements of the policy for the site on which we consider further clarification needs to be provided.

Land at Clent View Road, Stourbridge

- 8.16 Land at Clent View Road, Stourbridge has not been allocated for residential development and Taylor Wimpey objects to the SSLP on this basis. We consider that the site should be identified as a cross boundary allocation in order to meet the needs of both South Staffordshire and the wider HMA.
- 8.17 Insufficient land is available within South Staffordshire and the Black Country and on non-Green Belt land to meet the unmet housing needs of present and future generations and the release of Green Belt land is required. For the reasons identified in these representations, it is essential that further housing sites are allocated in the SSLP and BCP if the objectives of the Framework [§60] are to be achieved. This will involve the release of additional Green Belt land. Exceptional circumstances therefore exist to remove land from the Green Belt.
- 8.18 A Delivery Statement has been prepared to support the allocation of the site and is submitted alongside these representations. We have also provided a brief description of the site and the reasons why it is considered suitable for allocation below.
- 8.19 The site will deliver up to 400 high quality homes suitable to the needs of the local community with a varied mix of house type, tenure and size, including affordable housing.

Clent View Road Site Description

- 8.20 The site is located on the western edge of Stourbridge and is bordered by Clent View Road to the east. The site is located primarily within the local authority boundary of South Staffordshire District Council [SSDC] but is also partially within the authority boundary of Dudley Metropolitan Borough Council [DMBC].
- 8.21 The Site comprises 19.6ha of improved grassland (16.5ha in South Staffordshire and 3.1ha in Dudley) currently used as equestrian paddocks.
- 8.22 The site is situated approximately 2.5km south-west of the centre of Stourbridge and immediately abuts the established residential suburb of Stourbridge to the east, which is located within DMBC.
- 8.23 The Site is contained within well defined existing boundaries. It is bounded to the north by a public bridleway beyond which is dense woodland and agricultural land. To the east there is a permissive footpath named 'Roman Road', Clent View Road and the urban area of Stourbridge. This footpath is separated from the Site and Clent View Road by hedgerows. To the south there is a Public Right of Way and a line of mature trees, beyond which lies agricultural land; and to the south-west is a heavily wooded area (Bunkers Hill Wood). To the west, a line of trees extending from the northern boundary of the site to Frog Hall Cottages, bound the site towards the centre west. The site is further bounded to the west by a heavily wooded area, and a further line of trees which joins the wooded area to the south-west of the site, beyond which lies agricultural land.

Suitability of Clent View Road for Green Belt Release

- 8.24 We note that the site has not been considered in isolation in the South Staffordshire Green Belt Study [SSGBS] and this has a resultant impact upon the ratings identified in the Study.
- 8.25 In these representations we have carried out our own assessment of the site in isolation as this is considered to be the most appropriate and transparent method of assessing its suitability for Green Belt release (see our response to Policy DS1). Our representations set out the reasons why land at Clent View Road, Stourbridge is suitable for release from the Green Belt.

Deliverability of Clent View Road

- 8.26 The site is being promoted by a national housebuilder, Taylor Wimpey, who can deliver the proposed residential scheme. Taylor Wimpey is seeking to commence development as soon as the Site is allocated.
- 8.27 It could deliver a up to 400 high quality family houses and will make a valuable contribution towards meeting the quantitative and qualitative needs of the community for market and affordable housing.
- 8.28 The site is not subject to any known constraints that would impede deliverability. There are no legal impediments, or any need for land in third party ownership.
- 8.29 Taylor Wimpey has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales; as well as the cost factors associated with the site including site preparation costs and site constraints. The site is economically viable and Taylor Wimpey is confident that residential development can be achieved within the first five years of the plan period
- 8.30 The land also benefits from clear, well-defined boundaries and it is considered that its allocation and future development will not have a detrimental impact on the form and character of the settlement. The allocation and development of the site provides an opportunity to create a long term defensible boundary to Stourbridge and the provision of housing development for South Staffordshire and Dudley.
- 8.31 For the above reasons the site is fully deliverable.

Sustainability of Clent View Road

- 8.32 Stourbridge is identified within the adopted Black Country Joint Core Strategy [BCJCS] and the emerging Black Country Plan [BCP] as a Town Centre, which provides for convenience shopping as well local comparison shopping opportunities, local services and local leisure facilities. The delivery of high-quality housing in the locality will contribute to ensuring that population growth is focused in an area close to employment opportunities, which can be easily accessed via a sustainable transport network.
- 8.33 The Site is located to the west of the residential area of Stourbridge in close proximity to a number of services and facilities in Stourbridge. Schools, shops, residential communities, and leisure facilities are all accessible by a choice of means of transport, including walking and cycling.
- 8.34 Stourbridge Town Centre is approximately 30 minutes walking distance from the northwest of the site where access to Stourbridge Town railway station is also available. Stourbridge Junction rail station is located approximately 3km from the proposed site and provides regular services to nearby and well-connected stations including Birmingham New Street, Kidderminster, Solihull, Worcester Shrub Hill, and Stratford-Upon-Avon.

- 8.35 The site is situated is situated 0.4km from Shenstone Avenue bus stop, which provides regular services to the centre of Stourbridge and Dudley.
- 8.36 The site is therefore located in an accessible location and would contribute to supporting existing services and facilities in the area including Stourbridge Town Centre.
- 8.37 The development of the site would provide a suitable range of dwellings in various types, sizes and tenures, including affordable housing, to meet the needs of the local population, and establish a mixed and sustainable community.
- 8.38 As detailed in the Delivery Statement for the site, the proposal will bring a number of economic and fiscal benefits in terms of job creation, additional monies to the Local Authority and increased expenditure in the economy.
- 8.39 No environmental constraints have been identified that would inhibit the future allocation and development of the site. It is currently in agricultural use and is considered to be of limited ecological value. The proposals will provide numerous compensatory improvements, and seek to retain, enhance or mitigate the existing ecological and environmental features of value on the site.
- 8.40 Existing hedgerows and trees will be retained and incorporated where possible within the proposed development supplemented with further woodland planting to help screen the site and integrate it with surrounding assets such as Iverley Heath and Bunkers Hill Woods. The site extent allows the opportunity to provide wide-ranging enhancements to demonstrate a 'biodiversity net gain'.

Masterplan for Clent View Road

- 8.41 The proposed masterplan is designed to:
- Create a development which is specific to Stourbridge by sensitively responding to the unique attributes and characteristics of the Site and its wider context.
 - To provide safe and convenient access for both new and existing residents to local amenities and facilities through the delivery of public open space and pedestrian connections to Clent View Road, Roman Road, the public footpath adjacent to the Site leading to Iverley Heath and Bunkers Woods, and the adjacent public bridleway 'Westwood Avenue' to allow for opportunities to access nearby recreation assets, including Little Iverley Covert woodland.
 - To provide a central area of greenspace to create a sense of place and provide recreational opportunities within the site through the provision of facilities such as LEAPs and MUGAs, and the use of sustainable links through the site incorporating existing assets such as the Roman Road.
 - To provide green gateways into the site along the main accesses, with the opportunity to create tree lined streets to contribute to the character and quality of the development and help mitigate and adapt to climate change.
 - To provide a development of suitable scale, form and appearance which meets both the needs of the local community in a sustainable way, whilst also being sensitive to the character of the surrounding townscape and landscape setting.
 - To retain, enhance and embrace the Site's natural assets through the inclusion of naturalised green infrastructure including wetland attenuation basins, managed wild grasslands and the planting of native shrubs/trees to contribute to a well-designed and beautiful place in accordance with the Framework.

Alternative Masterplan

- 8.42 Taylor Wimpey is currently investigating the potential to include additional areas of land within the proposed masterplan for Clent View Road. The Alternative Masterplan which shows these additional areas is included in the Delivery Statement for Clent View Road that has been submitted alongside these representations. As these areas would effectively provide development in areas surrounded by the land being promoted, or between this land and the existing urban area, they are not considered to perform any significant additional Green Belt role and are therefore suitable for release.
- 8.43 These additional pieces of land would provide approximately 150 additional dwellings within a network of high-quality greens, routes and open spaces which would integrate with and connect to the wider development area. Existing tree belts and hedgerows to boundaries would be retained and enhanced to further improve containment and mitigate visual impact and would provide a well-connected and comprehensive greenspace network as part of the overall scheme. The additional open space brought forward in these areas would provide further recreational and placemaking opportunities within the site.
- 8.44 The Alternative Masterplan also identifies a ‘Potential Expansion Site’ to the west of the masterplanned area which measures 24ha in area. The potential to acquire and develop this land is also being investigated by Taylor Wimpey.
- 8.45 This land is well contained by existing permanent defensible boundaries which are capable of preventing urban sprawl and preventing encroachment into the wider countryside. An access road lined by established boundary hedgerows runs to the north and a thick belt of woodland planting at Bunkers Hill Woods to the west and south. The land would be contained by development on the Clent View Road site to the east. The future development of the site would not result in merging of settlements. It would retain a significant gap of approximately 2.3km between Stourbridge and Kinver and a gap of approximately 4.9km between Stourbridge and Kidderminster. This land does not affect the setting and special character of a historic town and therefore does not contravene this purpose. The release of this land from the Green Belt would not prevent the recycling of derelict land and other urban land within South Staffordshire or Dudley, as insufficient previously developed land and land in the urban area is available to meet future housing requirements.
- 8.46 It is considered that this land would form a logical future phase of development once the masterplanned area is completed and could potentially come forward for release towards the end of the Plan period or be identified as Safeguarded Land to meet needs beyond the plan period.

The Local Plan Housing Site Selection Topic Paper (September 2021)

- 8.47 To help to identify a shortlist of sites for allocation, the Local Plan Housing Site Selection Topic Paper notes that the Strategic Employment and Housing Land Availability Assessment [SHELAA] categorises sites using the categories set out in Table 8.1.

Table 8.1 SHELAA Site Selection Categories

Category	Description
S1	Sites currently suitable for housing and deliverable within 5 years
S2	Sites currently suitable for housing and developable between years 5 and 10
S3	Sites currently suitable for housing and developable 10+ years
NCD1	Sites potentially suitable for housing but not currently developable because of a policy designation (e.g. Green Belt, Open Countryside/Employment Land/

Category	Description
	outside current Spatial Strategy/Safeguarded Land Policy)
NCD2	Sites potentially suitable for housing but not currently developable because of other constraints
NS	Sites which are unsuitable because of constraints which cannot be overcome.

Source: Local Plan Housing Site Selection Topic Paper (September 2021)

- 8.48 The Housing Site Selection Topic Paper notes that to focus the assessment of potential housing site allocations on sites which could be suitable for allocation, the Council has only considered the allocation of sites which are either suitable (i.e. S1, S2 and S3), or could be made suitable through the removal of a policy or physical constraint (i.e. NCD1 and NCD2). All unsuitable sites not assessed further for allocation are set out in the 2021 SHELAA.
- 8.49 Taylor Wimpey's site at Clent View Road is identified in the SHELAA as two separate parcels as follows:
- 683a - Land at Clent View Parcel A
 - 683b - Land at Clent View Parcel B
- 8.50 Both sites are categorised as Not Suitable [NS] on the basis that the Council considers they are disassociated from any village development boundary. The commentary on Parcel A states:
- "The site is a cross-boundary site suggestion, and there is not currently any suggestion that Dudley Met. Borough Council are allocating the land in their portion of the site. Notwithstanding this, the site is separated from the urban edge by a well established landscape buffer and it is unclear how access would be gained to the site. Site modelled at 32 dwellings per hectare"*.
- 8.51 The commentary of Parcel B states:
- "The site forms part of a wider cross-boundary site suggestion along with site 683a. This parcel has been considered in isolation as it is remote from the majority of parcel 683a. The site itself is physically remote from the urban edge of Dudley. Site modelled at 32 dwellings per hectare"*.
- 8.52 For the reason set out below, Taylor Wimpey considers that the site is not subject to the constraints identified in the SHELAA and we note that no other constraints are identified.
- 8.53 With regard to this matter, we can confirm that the site is being actively promoted through the emerging Black Country Plan [BCP]. This includes representations to the most recent Draft Black Country Plan [BCP] (Regulation 18) consultation in October 2021 seeking the removal of the site from the Green Belt and its allocation for new homes. Those representations set out in detail why the Black Country Authorities [BCA] will be required to identify and release additional land from the Green Belt for housing to meet its identified needs and how the allocation of the Clent View Road site can contribute to meeting those needs. It may therefore be the case that Dudley Council wishes to bring forward the site as an allocation in further iterations of the emerging BCP.
- 8.54 For the reasons set out in these representations we also consider that South Staffordshire needs to identify additional Green Belt release to meet housing need, including the needs of the wider HMA. As a cross boundary site, Clent View Road is well suited to meeting the needs of the wider HMA and we consider that the BCA and South Staffordshire should be working together to deliver the site.
- 8.55 The Delivery Statement submitted with these representations demonstrates that the site comprises a land parcel that is adjacent to the existing urban area to the east and is bound by

physical features providing strong and enduring defensible boundaries to the north, south and west. It would therefore provide a logical urban extension. The Alternative Masterplan included in the Delivery Statement also illustrates how there is potential to provide additional land within a network of high-quality greens, routes and open spaces which would integrate with and connect to the wider development area.

8.56 The Delivery Statement demonstrates how safe and attractive access can be provided by primary vehicle and pedestrian access points proposed off Clent View Road. The site is sustainably located and benefits from an active travel route (Roman Road) for walking and cycling. The Delivery Statement also shows the connection between the northern and southern parts of the site as part of an overall comprehensive scheme.

8.57 For the above reasons, we consider that the assessment of the site in the SHELAA is not justified and it's potential for allocation should be assessed as part of the work undertaken to inform the next stage of the SSLP. As demonstrated in these representations, the site is suitable for housing and would be capable of delivering new homes within the first 5 years following the adoption of the SSLP.

Conclusions on Clent View Road

8.58 South Staffordshire needs to identify additional Green Belt release to meet housing need, including the needs of the wider HMA. As a cross boundary site, Clent View Road is well suited to meeting the needs of the wider HMA and we consider that the BCA and South Staffordshire should be working together to deliver the site.

8.59 Land at Clent View Road, Stourbridge is considered suitable for allocation for residential development because:

- It is entirely deliverable and would make a valuable contribution to meeting future housing needs, including affordable housing within the first five years of the plan period.
- There is no overriding constraint that will impede the delivery of the site.
- It does not make a significant contribution to the purposes of the Green Belt and is suitable for release.
- It is in close proximity to a number of services and facilities in Stourbridge. Schools, shops, residential communities, and leisure facilities are all accessible by a choice of means of transport, including walking and cycling.
- There is an acute need for housing in South Staffordshire and the Black Country and further Green Belt release is required. The site should be identified as it will meet the needs of both South Staffordshire and the Black Country where there are clear issues with regards to the duty to cooperate and meeting cross-boundary strategic needs.

8.60 The reasons in the SHELAA for discounting the site from further assessment are not justified and it's potential for allocation should be assessed in further detail as part of the work undertaken to inform the next stage of the SSLP.

9.0 **Question 11:**

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

- 9.1 We note that, at this stage, fully worded development management policies have not been provided for comment and these are preferred policy approaches. The SSLP [§6.4] indicates that they are intended to highlight key requirements, aims and measures that the final submitted policies will deliver, focusing on the most important parts of the future policies to seek views on these.
- 9.2 Taylor Wimpey therefore reserves the right to provide more detailed responses on these matters as the Local Plan progresses and detailed policies have been produced. However, we have set out below our responses to a number of the preferred policy approaches as currently drafted.

Policy HC1 – Housing Mix

- 9.3 The SSLP supporting text [§6.7] states that a policy is proposed to ensure a mix of property sizes which reflects the latest needs set out in the SHMA and avoid “*a disproportionate amount of large dwellings on new schemes*” and the “*risk of development exacerbating existing under-occupation of market housing in the District*”.
- 9.4 To this end, the Council’s proposed direction of travel is set out for draft Policy HC1 (Housing Mix), which includes a requirement for all market housing to deliver no more than 25% 4-beds and that proposals “*that fail to make an efficient use of land by providing a disproportionate amount of large 4+ bedroom homes*” will be refused.
- 9.5 In this context, the Framework highlights the importance of ensuring an appropriate housing mix is addressed by local planning authorities, stating that it is important that the needs of groups with specific housing requirements are addressed [§60]. It goes on to state that “*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*” [§62]. Furthermore, the PPG states that “*strategic policy-making authorities will need to look at the current stock of houses of different sizes and assess whether these match current and future needs*” [PPG ID: 2a-023].
- 9.6 In this regard, Taylor Wimpey considers that it is entirely appropriate for the Council to address the District’s future housing mix and tenure needs within the Local Plan Review and that such an approach would, in principle, align with the requirements set out in the Framework and PPG. However, whilst it is noted that the SSLP has not set out the specific policy wording *per se*, Taylor Wimpey has some concerns regarding the Council’s proposed direction of travel and in particular the implied inflexibility in the policy.
- 9.7 Firstly, as established in the *William Davis Ltd v Charnwood Borough Council*¹⁹ judgment, Taylor Wimpey considers that the Council should explicitly set out market and affordable housing mixes by dwelling size within the policy itself, which can be guided by the Council’s evidence base (i.e. the SHMA). Secondly, the policy should include wording that defers to alternative mixes should more up-to-date information become available. This is because the SHMA is a point in time assessment, and the needs and demands for dwelling sizes within the District will evolve over time, and the policy should be suitably flexible for developments to respond to this.
- 9.8 Secondly, and notwithstanding the above, the Council’s proposed direction of travel implies that the policy would set out the housing mix which reflects the District-wide level (i.e. an average

¹⁹ William Davis Ltd v Charnwood BC Queen’s Bench Division (Administrative Court) 23 November 2017 [2017] EWHC 3006 (Admin)

housing mix for South Staffordshire). That being the case, Taylor Wimpey would have concerns in relation to a prescriptive District-wide approach.

- 9.9 It would be inflexible and unsuitable to prescriptively apply a District-wide housing mix to all parts of the District when different areas will have differing requirements and demographic profiles. Indeed, the SHMA, which includes a review of the housing market sub-areas within the District, demonstrates this. By way of example, the SHMA (Appendix 5) assesses the sub-area results for the type and tenure of new housing needed. For example, it identifies that the North-Western Sub-Area has a c.30% demand for owner-occupied 4+ bed dwellings, along with a c.32% demand for 4+ bed First Homes. Similarly, the North Eastern Sub-Area had a c. 27% demand for owner-occupied 4+ bed dwellings, a 27% demand for 4+ bed private rented dwellings and a 33.5% demand for 4+ bed First Homes.
- 9.10 Notably, the above examples from the SHMA are all well above the implied 25% limit set out in the Council’s proposed direction of travel, which states that 75% of properties should ‘have 3 bedrooms or less’ and that proposals with a ‘disproportionate amount of large, 4+ bedroom homes’ would be refused.
- 9.11 This is because the housing mixes across urban, suburban and rural areas will generally be reflective of the locations’ existing characteristics. For example, densities in urban areas will generally be higher (and more suited to smaller 1-2 bed dwellings) in urban areas and town centres, whilst being lower on the edge of settlements and in rural areas. This is generally consistent with Framework [§124], in regard to making effective and efficient use of land and achieving appropriate densities. It would therefore be reasonable for schemes across the District to deliver different mixes of housing whilst still meeting the overall District-wide need.
- 9.12 Furthermore, the SHMA’s methodology for deriving market and affordable housing mixes – set out in paragraphs 5.14-5.18 – principally utilises a demographically-led calculation. This is an important point because households occupy market housing more in line with their wealth and age than the number of people which they contain. Whilst the SHMA has made some adjustments to the baseline 2011 Census occupational patterns to reflect more recent trends²⁰ – as required by the PPG²¹ – this data is not necessarily reflective of South Staffordshire’s market demand and wider trends, by virtue of the English Housing Surveys limited sample size.²² Indeed, the English Housing Survey is clear that *“Results based on small sample sizes should therefore be treated as indicative only because inference about the national picture cannot be drawn”* (Para 3, Technical Notes).
- 9.13 Moreover, the SHMA has not considered more recent trends in housing occupation following the outbreak of Covid-19. In this context, the Covid-19 pandemic has led many people to reconsider their living environments and has increased the demand for properties with more internal and external space. This will include living and sleeping space as well as additional space at home to work. Indeed, the Council recognises that *“home working is becoming an increasing feature in rural areas, which has been further accelerated as an effect of the Covid-19 pandemic”* in the ‘Economic Vibrancy – issues and challenges’ (Table 4) of the PO. However, the SHMA has not considered the implications of this. Rather, in respect of property prices, it states *“given the unknown future impact that COVID-19 might have on the real estate market, we recommend that the Council keeps the assessment under review”* (Para 1.14). Taylor Wimpey would advise the Council, as a part of the aforementioned update to their SHMA, to

²⁰ Data from the Regulator of Social Housing’s Statistical Data Return and trends indicated within the English Housing Survey and by the Census.

²¹ PPG ID: 2a-023

²² The English Housing Survey 2019-2020 surveyed 13,332 households between April 2019 and March 2020 and 12,300 dwellings between April 2018 and March 2020.

consider the implications of Covid-19 on household occupational trends to ensure that a more up-to-date understanding of market demand has been considered.

- 9.14 In summary, whilst Taylor Wimpey would support the inclusion of a housing mix policy within the Local Plan Review, the Council should not be overly prescriptive in the application of a principally demographically-derived District-wide housing mix. Indeed, the SHMA is clear that the *“profile set out is a guide to the overall mix of accommodation required in South Staffordshire although it is acknowledged that the Council may wish to divert away from this profile in particular instances”* [§8.12]. Should the Council elect to include a District-wide housing mix, Taylor Wimpey consider that any policy should also include policy provisions that enable developments’ housing mixes to come forward having regard to local characteristics, market demand, and more up to date evidence.

Policy HC2 – Housing Density

- 9.15 Policy HC2 aims to achieve a minimum net density of 35 dwellings per net developable hectare in developments within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities. However, it is not clear what the density expectations would be for allocations on the edge of existing settlements (such as the proposed allocation at Pool House Road Wombourne). Taylor Wimpey would therefore request that clarification is provided on this matter.

Policy HC4 – Homes for Older People

- 9.16 Draft Policy HC4 proposes that major residential development makes a clear contribution to meeting the needs of the district’s ageing population, through the provision of either: general needs properties for older people e.g. bungalows, other ground floor accommodation with appropriate age restrictions on occupation; or specialist housing e.g. sheltered, extra care homes.
- 9.17 Taylor Wimpey generally supports the provision of homes that are suitable to meet the needs of older people in principle and often provides general needs housing, such as bungalow schemes, on new development to help meet these needs. However, we consider that any requirement for more specialist types of accommodation such as sheltered or extra care accommodation would best be addressed through the identification of specific allocations to meet this need. This will help to ensure that this type of accommodation can be delivered in the right places (e.g. locations with easy access to local services and facilities) or where a specific need has been identified.

Policy HC7 - Self & Custom Build Housing

- 9.18 Draft Policy HC7 requires sites for major residential development to have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis.
- 9.19 Whilst it is accepted that new development should contribute to achieving an appropriate mix of housing, Taylor Wimpey objects to this policy for a number of reasons.
- 9.20 The Council has a legal obligation to grant sufficient planning permissions to meet the demand for self-build and custom housebuilding [SCHB]. It is considered that the Policy approach would not be effective, as it would provide no guarantee that the Council’s obligation to ensure that sufficient self and custom build plots are provided to meet demand, would be achieved. As it is not known what level of provision for such plots could be achieved on schemes by market

housing developers, across the borough, the Council cannot rely on these sites as the source of supply to meet this demand. The Council should therefore identify an alternative mechanism to ensure that this demand can be met. Taylor Wimpey considers that the only way this can be achieved is through the Council identifying standalone sites which are specifically allocated to meet this demand.

9.21 Providing self or custom build on market housing sites will also create issues with the apportionment of planning obligations between the ‘market’ housing area and self-build plots. It may also be the case that those undertaking custom builds do not wish to accommodate a plot on a ‘market’ housing site as this may limit the potential for customisation if schemes need to reflect the character of the surrounding development.

9.22 As the Council should be aware, the Self-Build and Custom Housebuilding Act 2015 and subsequent Self-Build and Custom Housebuilding (Register) Regulations 2016 require authorities to maintain a register of those who have expressed an interest in buying serviced plots. Taylor Wimpey notes that the Council does not publish annually any data on the level of demand for SCHB, or how it has met its statutory duty to grant suitable permissions for the SCHB plots within the monitoring year. No evidence is therefore available on demand and supply to support the requirements of the policy.

9.23 We also note that this policy requirement does not appear to have been properly considered in the Local Plan Viability Assessment which states²³:

“From DSP’s experience of this type of development, we consider the provision of plots (serviced and ready for development) for custom-build has the potential to be sufficiently profitable so as not to provide a significant drag on viability. Broadly, we would expect it to be at least neutral in viability terms, with the exact outcomes dependent on site-specific details, as with other aspects of the development process. In this case the Council are not proposing any requirements and policy merely supports proposals”.

9.24 No evidence is provided to justify this view on viability and we are concerned that the Viability Assessment also suggests that the Council are not proposing any requirements given that the Policy HC7 specifically refers to provision on major sites.

9.25 Taylor Wimpey therefore considers that the policy requirement for major residential development to have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis, should be deleted and the Council should identify stand-alone sites which are specifically allocated to meet the local demand for self and custom build dwellings.

Policy HC9 – Design Requirements

9.26 Draft Policy HC9 states that to promote high quality design, the policy will include a policy hook for local design codes to be prepared for specific areas of the District following adoption of the Local Plan.

9.27 If local design codes are to be prepared, Taylor Wimpey would suggest that they are prepared alongside the emerging Local Plan rather than following adoption, so that the viability implications of their requirements can be properly assessed through the Local Plan process.

²³ Viability Assessment - Local Plan & Community Infrastructure Levy (October 2021), page 60

Policy HC11 – Space About Dwellings and Internal Space Standards

- 9.28 Taylor Wimpey objects to Policy HC11 which states that as a replacement to the existing internal space standards set out in the adopted Core Strategy, all properties will now be required to meet the government’s Nationally Described Space Standard [NDSS].
- 9.29 Taylor Wimpey notes that the Government’s decision to make these standards optional suggests that they do not expect all properties to be built in accordance with them. If the standards are to be applied, the Practice Guidance²⁴ sets out a clear set of criteria local planning authorities should address in order to justify them, these being:
- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed.
 - viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.
- 9.30 With regard these criteria, we firstly note that no need evidence is provided in the SSLP and there appear to be nothing in the evidence base to justify the policy requirement.
- 9.31 With regards to viability, the Viability Assessment [§2.4.6] states that the dwelling sizes assumed for the purposes of the study are based on the NDSS. However, it is not clear whether the impact of meeting this standard upon affordability has been considered. The policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home.
- 9.32 For the above reasons, Taylor Wimpey considers that additional evidence needs to be provided if the Council wishes to proceed with this policy approach. If the Council is able to provide sufficient evidence to justify the policy, Taylor Wimpey considers that a transitional period should be applied. It is not clear whether a large proportion of new dwellings currently meet the standard, and the cost of such provision may not therefore be factored into current and past land acquisitions. A reasonable transitional period following adoption of a new policy would help enable developers to factor the cost of space standards into future land acquisitions.

Policy HC12 – Parking Standards

- 9.33 Policy HC12 states that electric vehicle charging standards will be introduced to achieve the following on new development:
- Houses: One 7kW (or better) charge point per dwelling.
 - Residential Flats/ C2 institutional accommodation: 20% of available spaces to be fitted with 7kw (or better) charge point and 20% of available spaces to be provided with power supply to allow for additional fast charge socket in future.
- 9.34 We understand that the Government is proposing to introduce requirements for charging points under Schedule 1 to the Building Regulations 2010, which are expected to come into force in 2022. This will introduce a nationwide standardised approach to the provision of charging

²⁴ Practice Guidance - ID: 56-020-20150327

points in new buildings. It is therefore questionable whether this Policy is required and whether it should be introduced as it may not align with national requirements.

- 9.35 The Viability Assessment [2.13.1] notes that an allowance of £500 per dwelling (for all dwellings - regardless of type) has been assumed within the study to cover the potential additional cost of provision for electric vehicle charging. Taylor Wimpey is concerned that the £500 per dwelling cost under-estimates the actual cost for providing a charging point. Typically, the provision of car charging points will require higher voltage cabling to be installed throughout the site, resulting in higher on-site infrastructure costs. In this regard, we note that the Government Electric Vehicle Charging in Residential & Non-Residential Buildings consultation²⁵ estimated a cost of £976 per EVCP and proposed an exemption threshold of £3,600 where the installation of a charge point would increase grid connection costs by more than this. We are therefore concerned that the costs applied in the Viability Assessment are too low.

Policy HC14 – Health Infrastructure

- 9.36 Draft Policy HC14 states that proposals for major residential developments must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Clinical Commissioning Group [CCG]. Where it is determined that the development results in an unacceptable impact on these facilities then a proportionate financial contribution will be sought agreed through engagement with the CCG. In the first instance, any infrastructure contributions will be sought for existing facilities.
- 9.37 As noted on our response to Question 2, the Infrastructure Delivery Plan [IDP] [§5.25] indicates that the NHS are currently undertaking an estates review that will inform what the need for new provision, factoring in increased housing growth, will be over the plan period and intend to provide any site specific requirements and associated costs by the end of November 2021.
- 9.38 As this policy requirement will affect allocations in the SSLP and will be used to inform infrastructure provision on these sites, Taylor Wimpey considers that any requirements for contributions towards existing facilities or the development of new facilities should be evidenced in the Local Plan evidence base and identified in the Local Plan, and tested through the viability work which accompanies the Local Plan.
- 9.39 This is the only way to ensure that the requirements of the policy are transparent and justified and ensure that the policies in the SSLP are viable in accordance with the Framework [§58].

Policy HC15 – Education

- 9.40 Draft Policy HC15 indicates that new education infrastructure to be required from new development in line with the latest Staffordshire Education Infrastructure Contributions Policy.
- 9.41 As noted in our response to Question 2, with regard to Education, the IDP indicates [§5.26] that work with the School Organisations Team [SOT] at Staffordshire County Council has been ongoing for a number of years to ensure that school place planning is taking account of development proposals coming through Local Plans. The information provided on Education in the IDP suggests that growth proposals at Codsall/Bilbrook will trigger the need for a new First School and the level of growth proposed at the northern edge of the Black Country, at Land at Cross Green and Land north of Linthouse Lane will facilitate the need for new first/primary school.
- 9.42 The IDP notes that the level of growth proposed at other villages is not projected to facilitate the need for a new First or Primary school. However, it is not clear whether existing schools in

²⁵ DfT (July 2019) Electric Vehicle Charging in Residential and Non-Residential Buildings, page 7

these areas have sufficient capacity to meet need or whether expansion will be necessary, as no information on capacity or proposals for expansion have been identified. Taylor Wimpey would welcome clarity on this matter. We consider that the appropriate evidence should be provided in the SSLP and evidence base to identify any relevant projects and confirm which allocations would be expected to contribute to these projects. Again, the viability implications should be tested in the Viability Assessment to ensure that the policies in the SSLP are viable in accordance with the Framework [§58].

Policy HC17 – Open Space

- 9.43 Draft Policy HC17 requires 0.006 hectares of multi-functional, centrally located open space per dwelling and notes that on-site open space should include equipped play provision as a default.
- 9.44 Whilst not explicitly stated in the SSLP, this 0.006 ha standard appears to derive from the Open Space Standards Paper²⁶ [Table 3.4.3] which identifies the different open space typologies which make up this standard. Taylor Wimpey would suggest that this table is included in the SSLP, as part of the Policy or the explanatory text, so that the typology breakdown is clear to applicants.
- 9.45 We would also suggest that the policy makes clear that any requirements for open space will be assessed against existing provision in the area using the latest available information on open space provision. On this basis, we do not consider that the proposed policy requirement for equipped play to be provided by default is appropriate, as it may be the case that there are existing facilities within an acceptable walking distance which would be suitable to accommodate the needs of a development.

Policy HC19 – Wider Green Infrastructure Design Principles

- 9.46 Draft Policy HC19 seeks to introduce a policy to ensure opportunities to introduce green infrastructure provided to meet open space, biodiversity, active travel, climate mitigation/adaptation and sustainable drainage are integrated together within a scheme in a genuinely multi-functional manner, where this can be achieved in a manner consistent with other local design policies. As this policy would essential cover design matters Taylor Wimpey suggest that it may be better to integrate the content of this policy into Policy HC9 which deals with design requirements.

Policy EC10 - Developer contributions

- 9.47 Draft Policy EC10 states that it will retain commitment to using s106 payments to fund all types of infrastructure. In notes that specific infrastructure requirements will be identified in relevant policy areas and site proformas.
- 9.48 Taylor Wimpey supports the use of s106 payments to fund infrastructure in principle. However, for the reasons set out in these representations, we are concerned that some of the infrastructure requirements for the Local Plan have yet to be fully established, including those in relation to Health and Education. In order to satisfy the soundness tests at EiP, the Council will need to demonstrate that the policies within the SSLP are deliverable in accordance with the Framework [§35]. It is therefore vital that all infrastructure requirements are fully identified and evidenced as part of the Local Plan preparation process, so that they can be properly tested as part of the viability assessment process to ensure they are viable in accordance with the Framework [§58].
- 9.49 At this stage, the SSLP or the Infrastructure Delivery Plan [IDP] do not appear to confirm whether CIL might also be introduced and Taylor Wimpey would welcome clarification on this

²⁶ South Staffordshire District Council Open Space Study Standards Paper (January 2020)

matter. If CIL is to be introduced, the Council will need to be clear on what infrastructure it will cover and this should be distinct from any s106 contributions to avoid ‘double dipping’

Policy EC11: Sustainable Transport

9.50 Draft Policy EC 11 seeks to support the widespread delivery of electric vehicle charging points through new development, through the revision of existing car parking standards. With regard to this matter we would refer the Council to our comments on Policy HC11 which relate to this subject.

Policy NB2 – Biodiversity

9.51 Draft Policy NB2 states that all new development will contribute a measurable net biodiversity gain. We note that legislation on this matter has recently been introduced in the Environment Act 2021 and any policy requirements will need to ensure that they align with this legislation and any subsequent secondary legislation or amendments to national planning policy in relation to this matter.

Policy NB3 -Cannock Chase SAC

9.52 Draft Policy NB3 states that the principle of requiring mitigation to address the likely adverse effects of residential development on the Cannock Chase SAC remains valid.

9.53 Taylor Wimpey is concerned that no clarity is provided on which areas of South Staffordshire would be affected by this policy and considers that any areas affected should be clearly identified on the SSLP Proposal Map for the avoidance of any doubt.

Policy NB6 - Energy and Water Efficiency, Energy and Heat Hierarchies and Renewable Energy in New Development

9.54 Draft Policy NB6 states that all major residential developments must:

- Achieve a 31% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013 or conform with any national targets which subsequently exceed this standard.
- Exceed the carbon emission targets set by current UK Building Regulations through fabric and energy efficiency measures alone, whilst achieving the additional 31% CO₂ improvement target through further fabric and energy efficiency and/or the use of decentralised, low and zero carbon energy technologies.
- Submit an energy statement identifying the predicted energy consumption and associated CO₂ emissions of the development and demonstrating how the energy hierarchy has been applied to make the fullest practicable reduction in regulated carbon emissions arising from the development.
- Deliver the optional water efficiency standards for new developments set out in the Planning Practice Guidance.

9.55 Taylor Wimpey recognises the importance of mitigating and adapting to climate change and meets Part L on all sites, and regularly seeks efficiencies above the recommended standard. However, we wish to make the following comments on Policy NB6.

9.56 Whilst not explicitly stated in the SSLP, the Viability Assessment [§1.3.24] indicates that the 31% carbon reduction requirement derives from the Government’s response to the Future

Homes consultation²⁷. We understand that the Government intends to update the Building Regulations this year to ensure that new homes from 2022 will produce up to 31% lower emissions compared to the levels current. It is not therefore clear why the Council is seeking this reduction through planning policy when it will be secured through Building Regulations. In order to ensure consistency with the Building Regulations, it is considered that any reduction in emissions should be informed by up to date Building Regulations targets rather than through the application of a local plan policy.

9.57 The Viability Assessment indicates that +4% has been added to base build costs to account for the 31% reduction sought but no evidence is provided to explain how this 4% additional cost has been derived, so it is not possible to assess whether it is sufficient.

9.58 In relation to the suggested provision of decentralised energy networks, the provision of such networks on small to medium scale sites is not likely to be practical given size constraints. In addition, at present, the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP). Meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. For the foreseeable future, it will remain uneconomic for most heat networks to install low-carbon technologies.

MHCLG: The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings: Summary of responses received and Government response ²⁷

10.0 **Question 12:**

a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies?

10.1 Taylor Wimpey agrees with the Council that the draft Policies set out in Policies DS1-DS4 and SA1-SA7 are strategic policies as defined by paragraph 21 of the NPPF.

b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No If yes, then please provide details including the Policy Reference (e.g. HC1 – Housing Mix)

10.2 Taylor Wimpey do not consider that any of the draft policies set out in Chapter 6 should be identified as Strategic Policies.

Appendix 1 Land at Pool House Road, Wombourne



Taylor Wimpey

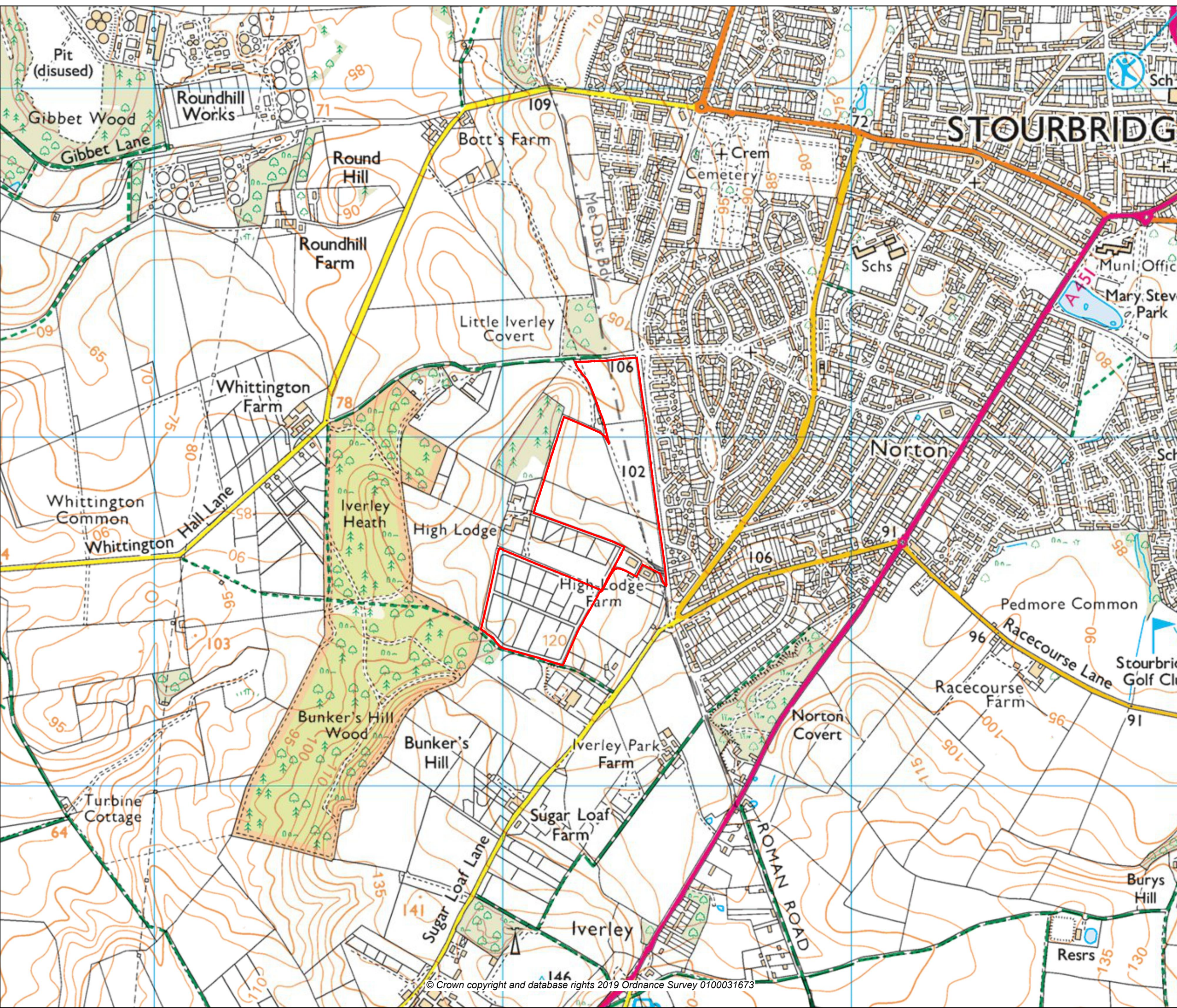
Taylor Wimpey UK LIMITED
 Unit 2, Tournament Court,
 Edgehill Drive, Warwick, CV34 6LG
www.taylorwimpey.com

DRAWING TITLE:
Pool House Road
Wombourne
Contract Plan

DRAWING STATUS:
PRELIMINARY
 DRG SCALE: 1:1250 @ A2 DATE: Nov 18 DRAWN: GTD

DRAWING NUMBER			
SITE CODE	DRAWING CODE	DRAWING NO	REVISION
1305	CP	01	-

Appendix 2 Land at Clent View Road, Stourbridge



CLIENT:		Clent View Road, Stourbridge
SCALE:	PROJECT REF:	
1:20,000@A3	CRM.1680.004	
DRAWN:	CHECKED:	DATE:
CH	XX	August 2019
PROJECT:		Clent View Road, Stourbridge
TITLE:		Site Location 1-20K
DRAWING NO:		NOT FOR ISSUE

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Appendix 3 Functional Housing Market Analysis Note

**Distributing the unmet
housing needs of the
GBBCHMA
Functional Housing Market
Analysis**

St Philips and Taylor Wimpey

December 2021

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Appendices

Appendix 1 Birmingham HMA Functional Model

Appendix 2 Black Country HMA Functional Model

1.0 Introduction

- 1.1 This report has been prepared by Lichfields, on behalf of St Philips Land Ltd (“St Philips”) and Taylor Wimpey, to consider how the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area [GBBCHMA] could sustainably be distributed amongst neighbouring districts based upon the functional relationships between the authorities. This is not an ‘Objectively Assessed Needs [OAN] report. It has been prepared in support of both St Philips and Taylor Wimpey’s respective representations to the South Staffordshire Local Plan Preferred Options (“the PO”) consultation which runs between 1 November and 13 December 2021.
- 1.2 It is important to note that both St Philips and Taylor Wimpey welcome the South Staffordshire Council’s (“the Council”) commitment to assisting in addressing the unmet housing needs of the GBBCHMA – which at present is proposed as c.4,000 dwellings over the plan period. However, the purpose of this report is to demonstrate to the Council that there is a clear and cogent need to underpin their proposed contribution with a robust evidence base that sustainably capitalises on the socio-economic links the District has with the main conurbations. Importantly, this report provides an evidence-led approach to the Council to assist in addressing this important and strategic cross-boundary matter.
- 1.3 It should be noted that a Briefing Note, which set out a high-level functional housing market analysis for the District, was previously submitted in support of St Philips representations to the South Staffordshire Spatial Housing Strategy & Infrastructure Delivery (“the SHSID”) consultation in 2019. This initial high-level functional housing market analysis explored how the needs of Birmingham and the Black Country could be distributed across the GBBCHMA and concluded that South Staffordshire would need to accommodate c.23% of the total unmet needs of the GBBCHMA – or c.14,000 dwellings. However, following updates in the level of unmet housing need within the GBBCHMA, coupled with the clear breakdown in the GBBCHMA-wide approach to addressing cross-boundary matters, Lichfields has updated this analysis accordingly.

Structure

- 1.4 This report is structured as follows:
- Section 2.0 – Sets out the Council’s proposed approach to addressing the unmet housing needs of the GBBCHMA through the emerging Local Plan Review;
 - Section 3.0 – Defines the extent of the GBBCHMA and the Birmingham and Black Country sub-markets;
 - Section 4.0 – Sets out the current unmet housing need position across the GBBCHMA, explores the genesis of, and the quantum of the need, and defines the scale of unmet housing needs within the Birmingham and Black Country sub-markets to be met up to 2031 and 2039 respectively;
 - Section 5.0 – Sets out the approaches taken by other GBBCHMA authorities, the need for an evidence-led approach, and Lichfields’ approach to modelling the location of where the Birmingham and Black Country sub-markets unmet housing needs should be addressed;
 - Section 6.0 – Sets out Lichfields’ step-by-step analysis of key indicators to conclude on where the how much of the Birmingham and Black Country sub-markets unmet housing needs should be addressed within South Staffordshire; and
 - Section 7.0 – Provides Lichfields’ conclusions on the quantum of unmet housing needs which the Council should be testing and planning to meet through its Local Plan Review.

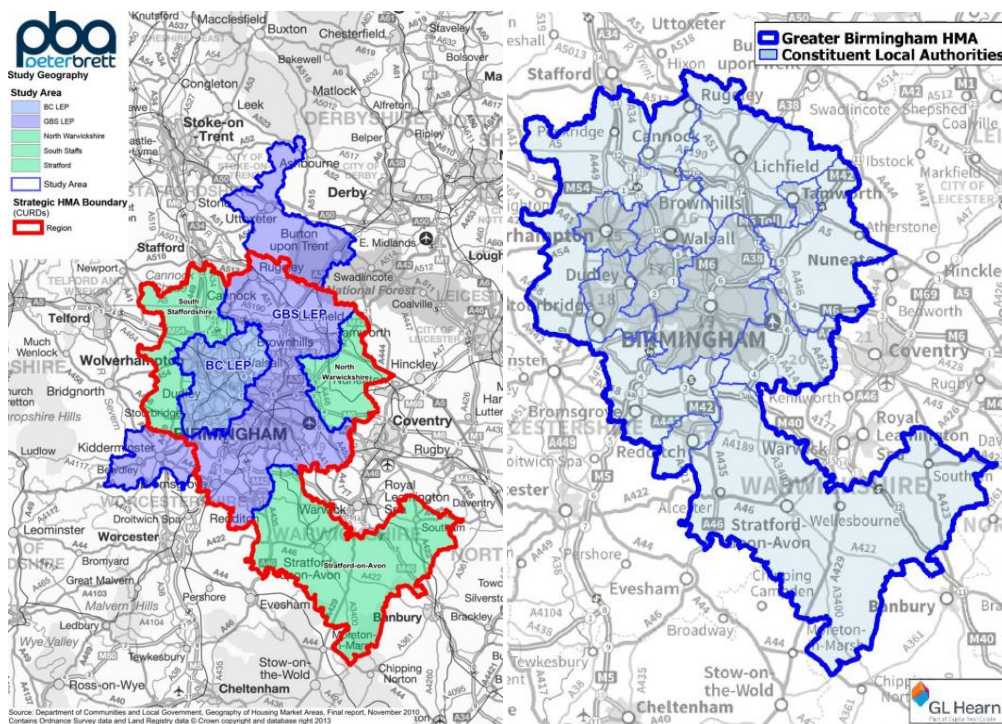
2.0 The Council's Current Approach

- 2.1 As stipulated by the Examining Inspector, Policy SAD1 of the Council's *'Site Allocations Document'* (2018) [SAD] required the Council to carry out an early review of its Local Plan in order to respond to the evidenced unmet housing needs across the Greater Birmingham Housing Market Area. Consequently, following the adoption of the SAD in September 2018, the Council began its Local Plan Review in October 2018.
- 2.2 As a part of the 'Issues and Options Consultation (October 2018)' [IOC] the Council set out five housing growth policy options (A-E). Option A provides only enough housing to meet South Staffordshire's OAN. Options B-E include additional housing contributions on a sliding scale to help meet the unmet needs of the wider GBBCHMA that were underpinned by the Areas of Search identified in the '2018 Strategic Growth Study' [SGS]. For South Staffordshire, the SGS identified 6 Areas of Search across the District, comprising a range of Urban Extensions, New Settlements and Employment-led opportunities (Table 5), which it recommended should be *"assessed in further detail by individual councils through the preparation of local plans"* (Para 1.42). Option B only made provision for c.1,250 dwellings, whereas Options C-E made higher provision based on the minimum (4,000 dwellings), mid-point (12,000 dwellings) and maximum (20,000 dwellings) *"having regard to the capacity implied by the Green Belt and Open Countryside strategic areas of search set out in the HMA Strategic Growth Study"*.
- 2.3 These options were subsequently tested through the *'Sustainability Appraisal of the South Staffordshire Local Plan Review: Issues and Options'* (September 2018) [the IOC SA]. Importantly, the IOC did not define the Council's preferred approach, but rather considered a range of five potential future spatial strategies to meet the District's OAHN plus a sliding scale of unmet housing need across the wider HMA up to 2037.
- 2.4 Following this, the Council consulted on the South Staffordshire Spatial Housing Strategy & Infrastructure Delivery [SHSID] and the Infrastructure Delivery Plan 2019 [IDP] between October and December 2019. This consultation 'confirmed' the Council's housing requirement, based on the local housing need [LHN] figure based on the standard method, and a c.4,000 dwelling contribution towards the GBBCHMA's unmet housing needs and sought views on how the Council's housing target could be best planned for through a variety of Spatial Housing Options.
- 2.1 The Council is now undertaking a consultation on the PO, which builds upon the responses received to the IOC and SHSID and arrives at an amended infrastructure-led strategy. Alongside proposed site allocations to meet the District's housing, employment and the Gypsy and Traveller community's needs, it once again reaffirms the Council's proposed provision of c.4,000 dwellings towards meeting the unmet needs of the GBBCHMA.

3.0 The Housing Market Area

- 3.1 In 2014, the ‘Strategic Housing Needs Study Stage 2 Report’¹ (“Stage 2 Report”), commissioned by the Greater Birmingham and Solihull Local Enterprise Partnership [GBSLEP] and the Black Country Authorities [BCA], was published. The purpose of the Stage 2 Report was to assess future housing needs across the area and to set out options on where those needs could be met.
- 3.2 Importantly, it concluded on a functional strategic housing market area [HMA] that, in addition to the seven Greater Birmingham districts, includes the four Black Country districts, South Staffordshire, North Warwickshire and Stratford-on-Avon² (of whom the latter two also fall within the Coventry-Warwickshire HMA). This strategic functional HMA was subsequently endorsed by the Inspector at Birmingham City Council’s [BCC] Birmingham Development Plan [BDP] (2011-2031) Examination in Public [EiP].

Figure 3.1 Greater Birmingham and Black Country Constituent Parts and Overall Housing Market Area Geography



Source: Strategic Housing Needs Study Stage 2 Report November 2014 (Figure 2.1) and Greater Birmingham HMA Strategic Growth Study February 2018 (Figure 11)

- 3.3 Following the adoption of the BDP, which included an accepted housing shortfall of c.37,900 dwellings and included a policy requirement for neighbouring authorities to assist in taking up the unmet need (Policy TP48), the GBBCHMA authorities jointly commissioned the SGS. The SGS drew on this long-established functional strategic HMA as the framework and starting point for distributing Birmingham’s unmet housing needs.
- 3.4 The GBBCHMA is therefore considered to comprise of 14 constituent authorities³, as well as the Greater Birmingham and Solihull LEP and Black Country LEP areas, but can be further refined into two submarkets: the Birmingham sub-market (“the Birmingham HMA”) and Black Country sub-market (“the Black Country HMA”). In the context of South Staffordshire, whilst the

¹ Prepared by Peter Brett Associates

² East Staffordshire and Wyre Forrester were not included as they fell outside of the core Greater Birmingham housing market area.

³ Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Stratford-on-Avon, , South Staffordshire, Solihull, Tamworth, Walsall and Wolverhampton

District falls within the GBBCHMA, the Council's 'South Staffordshire Housing Market Assessment (May 2021)' [SSHMA] clearly identifies that the District is more closely linked with the Black Country (Para 1.28).

4.0 The Origins and Scale of Unmet Housing Needs

4.1 As set out above, the GBBCHMA can be further refined into the two sub-market areas; the Birmingham HMA and the Black Country HMA. Crucially, it is these areas, comprising the main conurbations within the GBBCHMA, which are unable to meet their housing needs as a result of constrained land supplies. However, by virtue of the fragmented plan-making process across the region, the respective Local Plans and consequent levels of unmet housing needs span different periods and it can be difficult to disentangle the levels of unmet housing need and the extent to which it is being addressed, and by whom. To this end, this section sets out the different levels of unmet housing need across the two sub-markets within the GBBCHMA.

Birmingham HMA

4.2 As set out above, the BDP identified a need for 89,000 homes over the period 2011-31, against a supply of just 51,100 homes – hence a shortfall of 37,900 homes to 2031. To address this, Policy PG1 (Overall levels of growth) of the BDP stated that the BCC would “*work actively with neighbouring Councils through the Duty to Co-operate to ensure that appropriate provision is made elsewhere within the Greater Birmingham Housing Market Area*”. This was further expanded on in Policy TP48 (Monitoring and promoting the achievement of growth targets), in which BCC stated that they would monitor the progress of meeting these needs through neighbouring authorities respective Local Plan Reviews, which needed to adopt a plan within three years of the adoption of the BDP. As such, how to sustainably address this very substantial level of unmet housing need has been the subject of considerable and complex debate since the adoption of the BDP.

4.3 However, following the adoption of the BDP, the SGS calculated a range of housing need scenarios (e.g. 2011-2031 and 2011-2036), a number of assumptions on the supply of housing (which included increasing the density on sites⁴) and a non-implementation discount ranging from 5%-15%. The SGS concluded that the shortfall across the GBBCHMA (as the SGS does not provide a breakdown of need by individual district) would be up to 15,150 by 2031, and 47,855 by 2036. The 2031 figure represents a marked reduction on the adopted 37,900 dwelling shortfall, which was largely underpinned by increasing densities.

4.4 Over the following years, the Council released several updates to this position, which updated the GBBCHMA’s unmet need figure up to 2031. Principally these included the ‘*Housing Need and Housing Land Supply Position Statement*’ (September 2018) (‘the 2018 Update’) and most recently the ‘*Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement*’ (July 2020) (‘the 2020 Position Statement’).

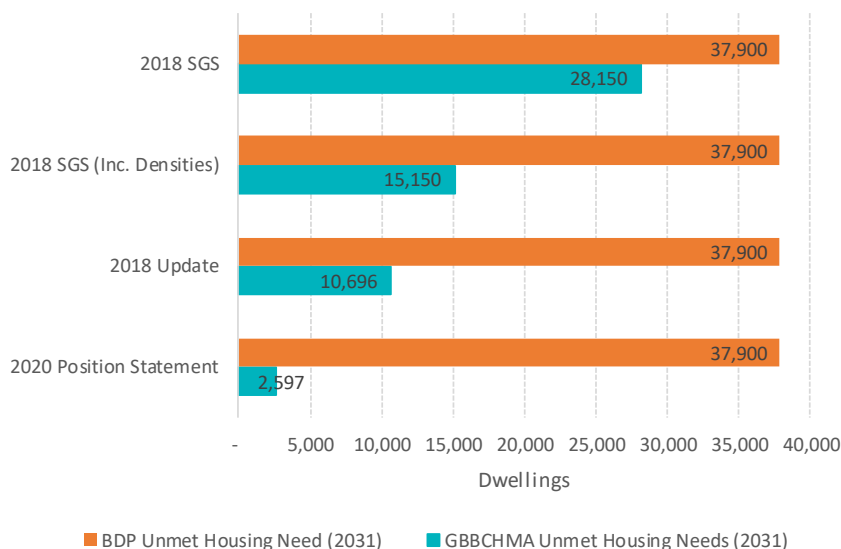
4.5 Each of these updates has featured very different land supply positions, generally reflecting either changing supply evidence or differing assumptions on densities.⁵ Indeed, the latest position reflected BCC’s ‘*Strategic Housing Land Availability Assessment*’ [SHLAA] 2019 data, which concluded that completions over 2011 to 2019 had exceeded the requirement by c.1,374 dwellings and that the Council’s supply of land has increased by c.14,300. Nevertheless, throughout each update, the level of unmet housing needs up to 2031 appears to have decreased.

⁴ Which would boost supply by a further 13,000 homes.

⁵ The land supply data in the 2018 Update suggested that the supply had increased by 5,629 since the 2018 SGS. However, the land supply figures are not quite directly comparable, as the 2018 Update removes the 5%-15% non-implementation discounts on supply. Furthermore, it does not apply the 13,000 additional dwellings resulting from the increased densities.

Indeed, the July 2020 Position Statement concluded that the unmet need was now ‘just’ 2,597 dwellings to 2031.

Figure 4.1 Comparison of GBBCHMA Unmet Needs



4.6

Despite the above, arguably, the only adopted – and examined – shortfall is that which has been set out in the BDP. Therefore, the actual figure BCC ought to be considering the contributions against remains the adopted 37,900 shortfall. Moreover, as set out in Lichfields’ *All the West-Laid Plans* blog,⁶ this position is now over a year old, and there are critical flaws in the assumptions underpinning the direct contributions summarised within the 2020 Position Statement – set out in Table 4.1 below.

Table 4.1 Unmet Need contributions in the GBBCHMA Authorities

LPA	Current / Emerging Plan	Provision for GBBCHMA Unmet Need
Bromsgrove	Issues and Options	TBD
Cannock Chase	Preferred Options	500-2,500
Lichfield	Draft Plan	4,500
Redditch	Not started	N/A
Solihull	Examination	2,000
Tamworth	Not started	N/A
North Warwickshire	Adopted	3,790 + 620
Stratford on Avon	Adopted/Preferred Options ⁷	2,720
Black Country authorities	Draft Plan	N/A
South Staffordshire	Preferred Options	4,000
HMA Total		18,130-20,130

Source: Appendix 2, Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement’ (July 2020) and Lichfields Analysis

⁶ Available at: <https://lichfields.uk/blog/2021/august/9/all-the-west-laid-plans-the-unmet-housing-needs-of-the-greater-birmingham-and-black-country-housing-market-area/>

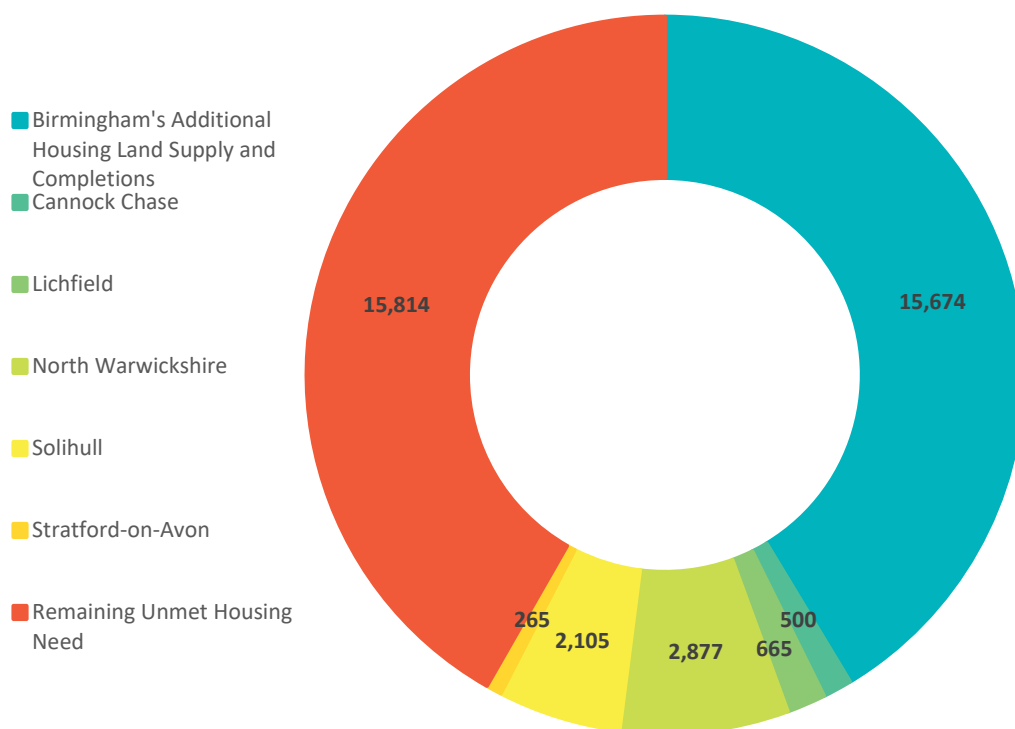
⁷ The Stratford-on-Avon Core Strategy was adopted 11 July 2016. However, the Council is preparing a Site Allocations Plan, per the requirements of Policy CS.16 (Housing Development) of the Core Strategy, to identify reserve housing sites to meet the needs of (*inter alia*) the GBBCHMA and C&WHMA. Stratford-on-Avon recently consulted on its Site Allocations Plan Preferred options in October 2020.

- 4.7 However, and most importantly, of the contributions set out above, BCC has ‘banked’ all of the commitments for the whole of the GBBCHMA, including any commitments for the Black Country HMA. Furthermore, several of the contributions are now markedly lower than were originally stated. By way of example:
- 1 **South Staffordshire – ‘Up to 4,000’:** The Council’s PO report is clear that its current proposed contribution is for the wider GBBCHMA (e.g. Birmingham and the Black Country) (Para 4.6). However, the Council has not specified the proportion which would be for each of the sub-HMAs. Furthermore, there are no signed Statements of Common Ground [SoCG] or Memorandums of Understanding [MoU] agreeing to any or all of this contribution to help meet Birmingham’s needs. Given the Council’s geographic, social and economic links with the Black Country, it is therefore unclear how much of the Council’s emerging contribution can realistically be said to be exclusively Birmingham’s. At best, only a small part of this contribution is likely to be meeting the Birmingham HMA’s unmet needs, with the bulk going towards the Black Country HMA’s. Indeed, the BCAs have requested the entire 4,000 dwelling contribution should go towards meeting their needs alone.⁸
 - 2 **Lichfield – ‘4,500’:** In the Lichfield District Local Plan 2040 Regulation 19 consultation, Lichfield City Council has reduced its contribution from c.4,500 to c.2,665. Moreover, the Council is apportioning 75% of this contribution to help meet the Black Country HMA’s emerging unmet housing need, reducing its contribution to Birmingham from 4,500 to just **665** (paragraph 4.22);
 - 3 **North Warwickshire – ‘3,790 + 620’:** The North Warwickshire Local Plan has now been adopted. The Inspector’s Report notes that the MoU between “*NWBC and BCC and TBC acknowledge that the ‘discrete’ figure of 913 homes is subsumed within the overarching figure of 3,790*” (IR127). In essence, only 2,877 dwellings are actually going towards meeting the Birmingham HMA’s unmet housing needs; and
 - 4 **Stratford on Avon – ‘2,720’:** The 2020 Position Statement states that this c.2,720 dwelling contribution arises from the Coventry and Warwickshire MoU, which estimated that c.50% of the Council’s c.5,440 dwellings, above its demographic need, could be apportioned 50/50 between the GBBCHMA and Coventry and Warwickshire HMA. However, this is completely at odds with the Inspector’s conclusions at the Core Strategy Examination and the purpose of Policy CS.16, which is to provide a mechanism to meet these needs. Indeed, the Inspector was clear that the “*MoU has identified a figure but this is based on an incorrect assumption that everything over and above the demographic need is ‘surplus’ and available to meet the needs of others.*” (IR62). Stratford-on-Avon is currently progressing a Site Allocations Plan [SAP], in accordance with Policy CS.16 (Development Strategy) of the Core Strategy. The policy required the Council to release reserved housing sites to meet four purposes, including meeting the needs of the GBBCHMA. As a part of this emerging SAP, Stratford-on-Avon is proposing to allocate 4 sites, totalling 265 dwellings, to meet the unmet needs of Birmingham up to 2031 (purpose d). In essence, only the 265 dwellings being brought forward through the emerging Site Allocations Plan would contribute towards Birmingham, as the economic-based growth above the district’s demographic need cannot be attributed to meeting Birmingham’s needs.
- 4.8 Taking all of this into account, whilst Birmingham’s unmet housing need may well have reduced from the original 37,900 in 2017 due to BCC’s increased completions over the 2011-2019 period and an increased land supply, Lichfields considers that even with the emerging commitments there would remain a likely – and at present, unaccounted – shortfall of between c.11,814-15,814

⁸ A letter (dated December 2019) from the Association of Black Country Authorities requests that the whole contribution is made towards the Black Country’s unmet needs, rather than Birmingham’s.

dwellings up to 2031⁹ – the actual committed contribution are shown in Figure 4.2 below, but excludes the Council’s proposed 4,000 dwelling contribution as it is unclear as to whether this will be solely to meet the Birmingham HMA’s needs. Fundamentally, this is because several of the ‘banked’ housing contributions from other HMA districts are earmarked to help meet the Black Country HMA’s needs.

Figure 4.2 Contributions towards Birmingham's unmet housing needs up to 2031



Source: Lichfields’ analysis

4.9 There are two issues with this. Firstly, this is, of course, only addressing the Birmingham HMA’s unmet housing needs up to 2031, and it is very likely that there will be a very considerable level of additional unmet housing need arising in Birmingham as a result of the City being subject to the Government’s 35% urban uplift¹⁰ on its local housing need figure, whilst the LHN figure will rise still further to 6,750 dpa when the standard method Local Plan ‘cap’ is removed in January 2022.¹¹ However, the scale of the future unmet need beyond 2031 is not known at this time, as BCC has only recently begun its Local Plan Review process in January 2021. And finally, given Lichfields’ contention that these emerging commitments have not been underpinned by a robust evidence base, if BCC’s completions and commitments and North Warwickshire’s adopted commitment were factored against the BCC’s adopted shortfall, there remains a shortfall of **c.19,349** dwellings to be distributed across the GBBCHMA up to 2031.

⁹ Dependent on how much of South Staffordshire’s 4,000 dwelling contribution can go towards Birmingham’s needs.

¹⁰ Birmingham is subject to the 35% urban centres uplift, following the Government’s changes to the standard method in December 2020 as set out in the Planning Practice Guidance.

¹¹ PPG ID: 2a-004: “Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of: a. the projected household growth for the area over the 10 year period identified in step 1; or
1. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).”

Black County HMA

- 4.10 Whilst the primary purpose of the SGS was to assist the GBBCHMA authorities in addressing the c.37,900 dwelling unmet housing needs of Birmingham up to 2031, it became evident throughout its production, along with the emergence of the Black Country Plan Review, that other authorities within the GBBCHMA were also facing significant land supply pressures. This was alluded to in the SGS and subsequent Position Statements, and the genesis of this additional unmet housing need has seen the precise figure fluctuate, but it has more recently been confirmed in the publication of the Draft Black Country Plan in August 2021 which identified an unmet need of 28,239 dwellings up to 2039.
- 4.11 In this context, the BCA's '*Issues and Options Black Country Core Strategy*' (June 2017) consultation identified an additional shortfall of around 21,670 homes over the period 2014-2036 for the BCAs, separate from the existing unmet need in Birmingham. This was based on the 2017 Strategic Housing Market Assessment [SHMA] for the area, which identified a need for 78,190 homes between 2014 and 2036. Deducting 5,678 housing completions between 2014-16; 42,507 existing housing supply in the urban area; and a further 8,335 further housing supply in the urban area (totalling 56,520) left 21,670 to be found between 2016 and 2036. The BCS also committed to providing a further 3,000 homes beyond the local need to 2031 for Birmingham's shortfall, thus resulting in an overall unmet need of c.24,670 homes.
- 4.12 This was followed by the publication of the '*Black Country Urban Capacity Review*' (December 2019), which reviewed the assumptions about the supply of land for housing and opportunities to maximise delivery in the urban area to quantify the potential development capacity across the urban area. Notably, it identified a c.26,920 dwelling unmet need up to 2038. This was consequently followed up by an update in May 2021, in which the '*Black Country Urban Capacity Review Update*' (May 2021) concluded that this 'remained significant', but had increased to c.36,819 dwellings up to 2039, despite "*reviewing all potential sources of housing capacity, making a series of structured assumptions around density and windfalls, and comprehensively exploring the capacity on occupied employment land in the context of up-to-date employment land evidence*" (paragraph 4.3).
- 4.13 However, as noted above, in the Draft Black Country Plan, published for consultation in August 2021, the BCAs identified that the housing shortfall had decreased to c.28,239 dwellings up to 2039 across the Black Country. It is fundamentally unclear as to the actual source of land supply attributable to the reduction of the shortfall from 36,819 dwellings to 28,239 dwellings, though it is inferred this is derived from sites released from the Green Belt in addition to other sources such as increased densities and/or employment land.
- 4.14 In any event, this is, of course, on top of the existing shortfall in Birmingham up to 2031. However, as a part of this consultation, the BCAs recently set out¹² the direct and indirect 'offers' from neighbouring authorities, which could total up to 14,750 dwellings, suggesting that the shortfall would still be in the order of c.13,489 dwellings up to 2039. However, notably, these contributions comprise the Birmingham HMA's 'banked' contributions, alongside looking beyond the GBBCHMA towards Stafford, Shropshire, Telford and Wrekin and Wyre Forrest¹³ – authorities which fall outside of the GBBCHMA – many of which have not been confirmed in SoCGs or MoUs. This is clearly leading to a degree of double counting.
- 4.15 Notwithstanding this, the precise scale of the Black Country HMA's unmet needs remains at least 28,239 dwellings up to 2039 until such time as these commitments have been adopted through the respective Local Plans.

¹² In the Duty to Cooperate Statement (July 2021)

¹³ Draft Policy 6A of the Wyre Forrest District Local Plan 2016-2036 includes an early review requirement to help meet these needs if required.

Table 4.2 Direct and Indirect Contributions to Black Country's housing shortfall

HMA Authority	Emerging Plan Status	Potential Contribution
South Staffordshire	Preferred Options	4,000
Cannock Chase	Preferred Options	500
Lichfield	Pre-submission	2,665
Shropshire	Examination	1,500
Stafford	Issues and Options	Under review
Solihull	Examination	2,105
Telford and Wrekin	Issues and Options	Under review
Bromsgrove	Issues and Options	Under review
Redditch	N/A	N/A
North Warwickshire	N/A	N/A
Tamworth	Review	Unlikely
Wyre Forest	Main Modifications	None
Total		10,770

Summary

- 4.16 Across the GBBCHMA the level of unmet housing needs from the two conurbations has fluctuated significantly since 2017. Whilst the Birmingham HMA identified an unmet need of 37,900 dwellings in 2017 and has made some progress in reducing this figure through windfall completions and an increased land supply, a shortfall of between c.11,814-15,814 dwellings still exist up to 2031 based on emerging commitments; albeit, there are legitimate questions regarding whether all of BCC's purported land supply is actually deliverable and whether these commitments are robustly evidenced. However, and importantly, if BCC's completions and commitments and North Warwickshire's adopted commitment were factored against the BCC's adopted shortfall and the emerging commitments are disregarded, there is actually a shortfall of **c.19,349** dwellings to be distributed across the GBBCHMA up to 2031 – see Table 4.3 below.
- 4.17 Furthermore, a considerable level of unmet need is also likely to arise beyond 2031 and up to 2039, as alluded to in the SGS but worsened by the Government's changes to the standard method calculation. Indeed, Birmingham's LHN figure, prior to the implementation of the 35% urban centres uplift was 3,577 dpa, due to the implementation of the standard methods cap, which had the effect of artificially lowering the city's housing requirement. Of course, the urban centres uplift has increased this (c.4,829 dpa); however, as of January 2022, when the BDP becomes more than 5 years old, the standard method cap would then be applied to the projections, which would have the effect of significantly increasing the city's need to 6,750 dpa – a 52% increase on the BDPs objectively assessed needs. There is, therefore, very likely to be an even more significant shortfall in Birmingham post-2031 on this basis.
- 4.18 In addition to this, the Black Country HMA's position has markedly worsened, with the most recent consultation identifying a **c.28,239** dwelling unmet need up to 2039. In essence, collectively, the GBBCHMA currently has, at the very least, a **c.47,588** dwelling unmet need arising up to and between 2031 and 2039 – see Table 4.3 below.
- 4.19 However, notably, the above also highlights that there has been a fundamental breakdown in the whole-GBBCHMA approach originally set out in the SGS and subsequent Position Statements, with the sub-HMAs separately vying for the same contributions from members of the GBBCHMA, and the Black Country HMA looking markedly beyond the boundaries of the strategic HMA to help address its needs. At present, this disjointed and unevidenced approach

by the sub-HMAs is likely to result in the region's housing needs not truly being met. The outcome of this will be that these needs will not disappear, and the GBBCHMA will either see a worsening of housing outcomes, such as increasing affordability pressures for those residents in Birmingham and the Black Country, or these households will need to look elsewhere within the GBBCHMA would result in higher levels of commuting into the conurbations.

Table 4.3 Summary of the sub-markets unmet housing needs up to 2031 and 2039

	Birmingham HMA	Black Country HMA
Identified Unmet Housing Need		
No. Dwellings	37,900	28,239
Period	2011 - 2031	2018 - 2039
Changes to Position Since Identification		
Windfall Completions	1,374 (2011-2019)	N/A
Increased Land Supply	14,300	N/A
Adopted Commitments from other authorities	North Warwickshire – 2,877	N/A
Outstanding Unmet Housing Need		
Unmet Housing Need yet to be addressed	19,349 Up to 2031	28,239 Up to 2039
GBBCHMA-wide	47,588	

Source: Lichfields' analysis

5.0 **Distributing Unmet Housing Needs**

5.1 The National Planning Policy Framework (2021) [NPPF] is clear that:

“Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas”
(paragraph 11b) (Emphasis added)

5.2 It goes on to state that:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” (paragraph 31) (Emphasis added)

5.3 It is also clear that Local Plans should be:

“based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground” (paragraph 35c) (Emphasis added)

5.4 In essence, the NPPF is clear that local planning authorities [LPAs] are required to work together to identify and meet (where it is sustainable to do so) the housing needs of the relevant HMA, underpinned by adequate, relevant and up-to-date evidence.

The Need for an Evidence-led Approach

5.5 In the context of the above, whilst it is welcomed that the Council has continued to commit to addressing part of the GBBCHMA unmet needs, Lichfields has concerns regarding the Council’s derivation of its 4,000-dwelling contribution. As set out above in Section 2, and reiterated within the PO (Para 4.10), the Council’s proposed c.4,000 dwelling contribution is underpinned by the *“scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study”*. Firstly, it is important to note that the SGS has not been formally examined, and therefore the findings of the SGS carry little to no weight. Secondly, such an approach is contrary to the clear caveats set out in the SGS, which stated that:

“It is important to recognise that further work will be undertaken in considering and testing the potential for strategic development by local authorities through their respective local plan processes...” (Para 1.41) (Emphasis added)

“For the avoidance of doubt, the identification of Areas of Search for strategic development in this report does not indicate that these areas could or should be brought forward for development. The purpose of the Study is to assess and shortlist potential Areas of Search for strategic development which can then be considered and assessed in further detail by individual councils through the preparation of local plans alongside further small and medium-sized sites. On the same note, LPAs may seek to explore strategic options which have not been considered through this Study, should those opportunities arise from their own plan-making processes.” (Para 1.42) (Emphasis added)

5.6 The quantum of growth identified within the SGS is therefore not a maximum or minimum, and it is for the Council to establish through its own Local Plan process, and – crucially – Sustainability Appraisal [SA] process, whether the sites identified, or other sites, could cumulatively form a package of sites that could sustainably contribute towards addressing these needs. Indeed, although not explicitly, the Council has acknowledged this point in its response

to the Solihull EiP in which the Council was clear that even “*if the Council does not consider the exact location proposed by that study [the SGS] to be deliverable, it should examine other land supply alternatives within its area more thoroughly before concluding that it cannot increase its contribution to GBHMA unmet needs*” (See the Council’s responses to Matter 3, Question 7). At present, the Council’s current approach relies upon a document that clearly caveats its findings and has not been robustly tested through the examination process. It is, therefore, not an appropriate or robust piece of evidence to underpin the Council’s Local Plans contribution towards the GBBCHMA unmet housing needs.

- 5.7 In addition to defining the scale of the GBBCHMA’s unmet housing needs, identifying how to sustainably address these needs has equally been the subject of a considerable debate; it has been at the heart of plan-making for the constituent authorities of the GBBCHMA and beyond for the last four years. Indeed, despite the production of the SGS, many authorities have – politically – distanced themselves from the outcomes of the study and it has not resulted in an agreed spatial distribution of these strategic needs. Although there are emerging contributions proposed, fundamentally there has not been a consistent or coordinated approach that has been used to define and test the appropriate level of unmet housing need which should be addressed. Few authorities have wedded themselves to existing outcomes, opting to define and test levels of growth with no clear links to the existing (untested) evidence base.
- 5.8 By way of example, Solihull has taken a capacity-led approach to determine its contribution to the GBBCHMA’s unmet needs. In particular, Solihull is proposing to contribute 2,105 dwellings, which equates to the difference between Solihull’s identified supply and its LHN figure for the plan period. Although it should be noted that the Inspector has questioned whether this is appropriate and indeed, the Council itself has suggested that such an approach is inappropriate (See the Council’s responses to Matter 3, Question 8).
- 5.9 In contrast, the recently adopted North Warwickshire Local Plan considered the proximity, connectivity and strength of functional inter-relationships with Birmingham; an approach which the Inspector supported.¹⁴ This was similar to the approach taken in distributing Coventry’s unmet needs across the Coventry & Warwickshire HMA. Again, the Inspector for the Stratford-on-Avon Core Strategy (2017) endorsed this approach.¹⁵
- 5.10 It is clear from the above, that whilst the GBBCHMA’s approach began with an evidence-led whole-HMA approach, this is no longer the case, with individual authorities taking different and inconsistent approaches to addressing this matter, with some even looking beyond the strategic HMA to address their needs (e.g. the Black Country).
- 5.11 In this regard, Lichfields considers that there is a requirement for the Council to prepare a robust and evidence-led approach to distributing the unmet housing needs of the Black Country and Birmingham and test the outcomes of this through the SA process. Without this, there is a very real risk that the region’s housing needs may not be fully met. Our view is that it should be a demand-led analysis similar in scope to the North Warwickshire work, rather than the current, constrained, supply-led analysis.

Functional Housing Market Relationships

- 5.12 Given the above, there is a clear and cogent need for these strategic cross-boundary issues to be addressed in an efficient, sustainable and appropriate way, underpinned by a robust evidence base. It is clear that a ‘fair share’ approach would not work as authorities such as Redditch and Tamworth are nearly as constrained as both Birmingham and the Black Country – this is a point

¹⁴ IR129, Inspectors Report

¹⁵ IR61, Inspectors Report

the Council agrees with in respect of a ‘pro-rata’ approach considered by the Solihull EiP Inspector (See the Council’s responses to Matter 3, Question 5).

- 5.13 Moreover, as stated by the Stratford-on-Avon Core Strategy Inspector, “*there is no point trying to meet the unmet needs of Birmingham in Glasgow because the socio-economic links would be lost.*” (IR61, Inspectors Report). Again, this is a point that aligns with the Council’s position taken at the Solihull EiP, in which the Council were clear that the approach to distributing these unmet housing needs should “*have regard to the existing and potential infrastructure opportunities, sustainability principles, public transport infrastructure and Green Belt purposes of broad locations across the GBHMA*” so as not to reinforce an “*unsustainable pattern of development across the GBHMA*” (See the Council’s responses to Matter 3, Question 5).
- 5.14 The NPPF requires housing needs to be met but does not explicitly set out a single, or definitive, approach to distributing this unmet need. Having regard to the above, the key question, therefore, is where outside of the Black Country HMA and Birmingham HMA will those needs arise and how much (and what proportion) of those unmet needs should that location seek to plan for? In this regard, Lichfields considers that there is a need to explore distributing the unmet housing needs of the Birmingham HMA and Black Country HMA based upon the functional relationships between the authorities to provide an evidence-led approach to addressing this matter. To this end, Lichfields has developed a three-stage ‘Functional Relationship and Gravity Model’, which builds on the foundations of the functional relationship approaches taken by North Warwickshire, the Coventry-Warwickshire HMA, and Lichfields’ previous high-level analysis in 2019.
- 5.15 However, whilst Lichfields’ 2019 high-level analysis took a GBBCHMA-wide approach, it is important to acknowledge that the sub-HMAs have differing levels of unmet need over different periods and are separately vying for each of the contributions being proposed by the GBBCHMA authorities (i.e. a clear breakdown in the strategic HMA approach). Moreover, the Black Country HMA is exploring spatial options for meeting its needs in authorities beyond the GBBCHMA.¹⁶ In this context, there is, therefore, a strong and cogent argument to explore a sub-HMA approach to distributing the respective unmet housing needs, as, by way of example, it would be inappropriate for the Birmingham HMA’s needs to be distributed to areas such as Wyre Forest, as firstly BCC has not requested their assistance as they fall outside of the GBBCHMA, and Wyre Forrest has limited socio-economic links with the city.
- 5.16 To this end, Lichfields has undertaken separate analysis for each of the sub-HMAs. Firstly, Lichfields has analysed the functional housing market relationship between the constituent authorities of the GBBCHMA and the Birmingham HMA. And, secondly, Lichfields has analysed the functional housing market relationship between the GBBCHMA authorities and authorities that the BCAs have approached and the Black Country HMA.¹⁶ Both sets of the analysis show how these sub-market unmet housing needs could be sustainably distributed when reflecting key choices people make in respect of where they live and work. Importantly, Lichfields’ analysis ultimately illustrates the functional linkages between South Staffordshire and the Black Country HMA and Birmingham HMA and shows how the unmet housing needs of each of the sub-HMAs could be sustainably distributed within South Staffordshire.

Methodology

- 5.17 The three stages of Lichfields’ ‘*Functional Relationship and Gravity Model*’ are as follows:

¹⁶ In addition to the constituent members of the GBBCHMA, the BCAs have also requested the assistance of Stafford, Shropshire, Telford and Wrekin and Wyre Forrest in meeting its unmet housing needs.

- 1 **Stage 1: Quantifying Linkages** – It is important to begin by identifying and analysing the functional linkages between the GBBCHMA and other authorities and the sub-HMAs. This draws on an analysis of out-migration and in-commuting flows,¹⁷ which are then converted into a percentage of the total flows into and out of the Birmingham and the Black Country HMAs. A blended average is then taken. This then represents a baseline degree of housing market linkage (“baseline share”) that an area has with either of the two sub-HMAs and forms the starting position;
- 2 **Stage 2: Sustainability and Market Signals Adjustments** – There is a need to consider how, and whether, additional factors might influence the proportion of the baseline share that an authority has. Stage 2 includes adjustments for:
 - a **Sustainable transport links:** Authorities that benefit from good public transport links to Birmingham and the Black Country can enable the promotion of sustainable commuting patterns. This is particularly important when having regard to Green Belt release, as the NPPF is clear that plans should give first consideration to land which has been previously developed and/or is well-served by public transport.¹⁸ The adjustment utilises the quickest train travel times from a station within the District to a Birmingham or Black Country terminus.
 - b **Affordability pressures:** Higher affordability ratios are a core indicator of a worsening housing market. It is necessary to consider how some areas (i.e. with greater affordability pressures) should be expected to do more than their ‘share’, as pressures are more pronounced. Doing so could reasonably be expected to improve affordability and ensure that housing needs are met. This adjustment utilises the ONS median workplace-based affordability ratios (i.e. the 2020 ratios¹⁹) and the Standard Method’s affordability adjustment.²⁰
- 3 **Stage 3: Environmental, Policy and Physical Constraints** – The NPPF is clear that strategic policies should, as a minimum, provide for objectively assessed needs for housing and any unmet housing needs, unless it is not sustainable to do so.²¹ There is a need to consider whether environmental and physical constraints could prevent development. The Stage 3 analysis includes adjustments for:
 - a **Fundamental environmental constraints:** The analysis delineates between fundamental (e.g. NPPF footnote 7 environmental constraints) and policy (e.g. Green Belt) constraints, and also considers the proportion of the district’s area that is fundamentally constrained (e.g. NPPF Footnote 7 – excluding Green Belt).
 - b **Policy constraints:** The analysis considers the proportion of Green Belt within a district’s area; however, it recognises that if those areas with high levels of Green Belt are excluded, this would unsustainably burden authorities with no Green Belt land and shift needs onto districts that may be less sustainable; and
 - c **Under-bounded authorities:** Some authorities’ urban areas have grown to the extent of their administrative boundaries and have limited available land to accommodate the pressure for further expansion. These authorities are considered ‘under-bounded’ and are unable to accommodate significant further growth.

5.18

A summary of the Stage 2-3 adjustments is shown in Table 5.1 below. As a part of Stage 3, authorities that are under-bounded are excluded from the analysis; accordingly, a -100%

¹⁷ PPG ID: 61-018

¹⁸ Para 141b, NPPF (2021)

¹⁹ Published in March 2021

²⁰ PPG ID: 2a-004

²¹ Para 11b, NPPF (2021)

adjustment factor is applied to these authorities. In addition, the final stage accounts for existing/emerging commitments in Local Plans and includes the application of a cap that limits the increases any one individual local authority can face up to 25% and rebalances the proportions accordingly. The model then summarises the proportion of the overall sub-HMAs unmet housing needs that each of the GBBCHMA authorities and others should seek to meet through their Local Plans.

Table 5.1 Stage 2-3 adjustments applied to each district’s base share of unmet needs

Adjustment	Stage 2		Stage 3	
	Time from Station in District to Birmingham/Black Country Terminus (Minutes)	Standard Method Theoretical Uplift	Footnote 7 Constraints (% of Districts Available Land)	Green Belt (% of Districts Available Land)
+20%	<10 mins	>20%	<10%	<25%
+10%	10-20 mins	15-20%	10-20%	25-50%
0%	20-30 mins	10-15%	20-30%	50-75%
-10%	30-40 mins	5-10%	20-40%	70-90%
-20%	>40 mins	<5%	>40%	>90%

5.19 Importantly, Lichfields’ model reflects the key choices people make in respect of where they live and work and utilises this to demonstrate how far, and the degree to which, this impacts on the authorities within the strategic HMA and beyond. Fundamentally, the model is weighted towards location and communities that can accommodate greater levels of growth across the region, but it also ensures that each authority would still take a ‘fair share’ and would not be disproportionately impacted by the outcomes of the model.

6.0 South Staffordshire's Functional Relationship

Stage 1: A baseline degree of Linkage

- 6.1 As a result of some residents being unable to find appropriate housing in Birmingham and the Black Country, this will place additional pressures on those areas that are linked in housing market terms to both areas. This is because, compared to past trends, this will result in either more migration out of these areas (as people move to seek a home) or less migration into these areas as people cannot find a home to move to and therefore choose a different location but commute to a place of work. As such, areas that are strongly related to Birmingham and the Black Country will face greater pressures from the unmet needs. Identifying how inter-dependent a location is within the housing market within Birmingham and the Black Country is a function of movement, both to live (migration) and to work (commuting).

1. Migration

- 6.2 In respect of migration patterns for the Birmingham HMA, Lichfields' analysis of migration flows between 2012 and 2020 shows that, whilst the city is a major inward migration destination, it also sees significant levels of outward migration to neighbouring authorities reflecting different stages of life and living preferences. In particular, nearly half of all of the city's outward migration is into Solihull (25%) and Sandwell (24%), with a majority of the remaining people migrating to Walsall (13%) and Dudley (8%). It is therefore clear that Birmingham exerts a significant migration pressure on these urban areas, to a much greater extent than it does the more rural areas such as South Staffordshire (**c.1%**).
- 6.3 However, in terms of the Black Country HMA, Lichfields' analysis demonstrates a contrasting migratory flow to that of Birmingham. In particular, nearly 44% of all residents migrating out of the Black Country over this period chose to go to Birmingham. However, the preference for migration to more rural authorities is stronger in the Black Country, with flows suggesting that the housing preferences for households leaving the Black Country, after Birmingham, tend to gravitate towards South Staffordshire (**17%**) in the first instance, followed by Shropshire (6.4%) and Cannock Chase (5.2%), as one might expect given the close proximity of those predominantly rural authorities to the Black Country conurbation.

2. Travel to Work

- 6.4 With regards to the travel to work patterns, Lichfields' analysis demonstrates that Birmingham's economy is wide-reaching across the GBBCHMA, with a gross inflow of c.130,000 commuters into Birmingham every day. As a result, the City's economic prosperity is placing pressure on local housing markets in areas where there is good commuter access. In this regard, the Birmingham HMA analysis shows that the strongest travel inflows are from Solihull (20%), followed by Sandwell (16%) at c.28,000, then Dudley (15%) and Wolverhampton (12%). Conversely, as was seen in migration flows, more rural areas to the north of Birmingham, such as South Staffordshire (**4%**), see significantly weaker inflows of residents commuting into the city daily.
- 6.5 Whilst the Black Country's strongest commuting links are internal (e.g. it has a high degree of self-containment), the Black Country experiences an overall net decrease of c.25,000 commuters daily. Despite this, in general, travel to workflows into the Black Country tend to correlate with the above-mentioned migration patterns. The 2011 Census showed that the major

travel inflow from the HMA and wider area into the Black Country arises from Birmingham, at around a third, with South Staffordshire at c.25%.

Baseline degree of linkage

- 6.6 Drawing on the analysis of out-migration and in-commuting flows into and out of the Birmingham HMA and Black Country HMA, which are converted into a simple percentage and then averaged out, we can determine a percentage for each District (adding up to 100% for the whole of each of the sub-HMAs). This percentage represents the baseline degree of housing market linkage an area has with both the Birmingham HMA and the Black Country HMA and therefore represents its starting share of their unmet needs which will need to be met.
- 6.7 For South Staffordshire District, Lichfields' analysis results in the following baseline starting point shares, which the Stage 2 and 3 adjustments will be applied to:
- Birmingham HMA – **2.7%**; and
 - Black Country HMA – **20.9%**.

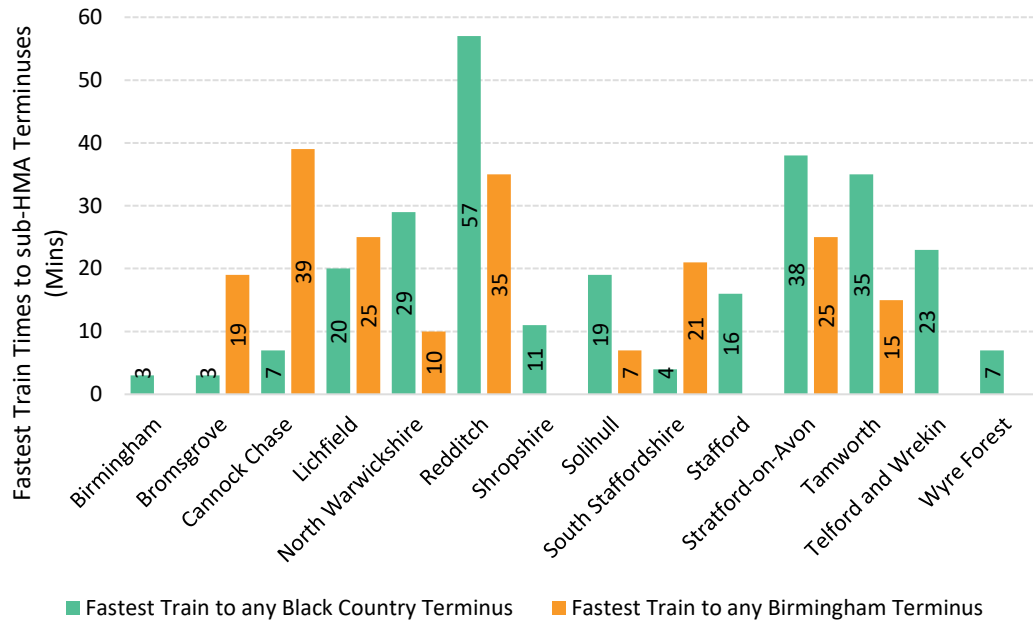
Stage 2: Uplift and Restraint Factors

- 6.8 When accounting for the Stage 2 adjustments, the District's baseline share for the Birmingham HMA would increase to **3.2%** and for the Black Country HMA, it would increase to **29.2%**. The detailed analysis for the Stage 2 adjustments is set out below in more detail:

1. Sustainable Transport Links

- 6.9 The NPPF sets out an approach to sustainable development patterns that specifically identifies support for patterns of development that facilitate the use of sustainable modes of transport. In this regard, the West Midlands benefits from one of the most highly-integrated rail networks in the country. However, South Staffordshire District only has four stations: Bilbrook, Codsall, Landywood and Penkridge. Alongside all other stations within the other districts, Lichfields has reviewed the fastest train times between these stations and all terminuses within the Birmingham and the Black Country (as shown in Figure 6.1).
- 6.10 Notably, all four stations provide rapid access to Birmingham and several Black Country terminuses (via a change in some instances). Indeed, the fastest train to Birmingham from the District is from Bilbrook, at c.21 minutes, whilst most of the stations can access Birmingham City Centre within c.30 minutes. In terms of the Black Country, South Staffordshire District is most accessible to Walsall and Wolverhampton, which can be accessed within 4-10 minutes from most stations. This is closely followed by Dudley, which can be accessed within c.13 minutes.

Figure 6.1 Fastest Train Times to sub-HMA Terminuses



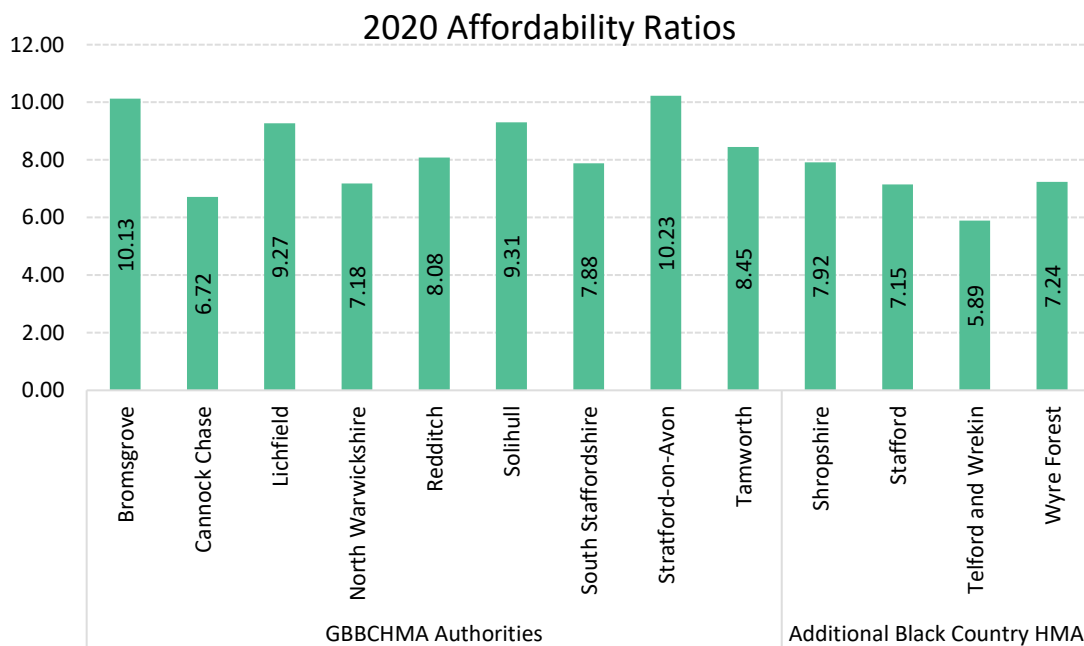
Source: Lichfields based on the Train Line

6.11 Compared to other areas across the GBBCHMA and beyond, the District is one of the most accessible authorities for access to the Black Country, with only Birmingham (c.3 minutes) and Bromsgrove (c.3 minutes) offering faster commuter times – which is logical given their geographical relationship of these authorities to the Black Country. Accordingly, in the Black Country HMA analysis, Lichfields’ model has ascribed a **20%** uplift to the baseline degree of linkage as the fastest commuting times is under 10 minutes. Other authorities across the GBBCHMA offer much faster commuting times to Birmingham. Although the District has access to Birmingham within c.21 minutes, for the Birmingham HMA analysis, Lichfields’ model has ascribed a **0%** uplift to the baseline degree of linkage. This aligns with some of the other more rural authorities in the GBBCHMA, such as Lichfield and Stratford-on-Avon, but the Districts rail-links with the city are stronger than Redditch and Cannock Chase (ascribed a -10% adjustment) as these authorities are located on the outer edges of the GBBCHMA. Conversely, and logically, those authorities closer to the city, such as Solihull, have faster access to the city and are therefore ascribed a 20% uplift.

2. Adjusting for Affordability

6.12 As set out above, higher affordability ratios are a core indicator of worsening housing market pressures. In this regard, the 2020 median workplace-based affordability ratio for the District is 7.88, which is close to the District’s peak ratio in 2019 (8.21). Following the worsening of the District’s affordability between 1999 and 2007 – from 4.24 to 8.11 – the District’s ratio did begin to see an improvement following 2007, with a 6-year downward trend up to 2013 (6.86). Despite this, it has subsequently begun to increase again, reaching similar levels to those seen in 2007.

Figure 6.2 GBBCHMA and Additional Black Country HMA Authorities Affordability Ratios



Source: Lichfields based on the ONS 2020 median workplace-based affordability ratios

6.13 However, in the context of the Black Country HMA, as shown in Figure 6.2, whilst there are some authorities with more acute affordability pressures, such as Stratford-on-Avon (10.23), Bromsgrove (10.13), Solihull (9.31) and Lichfield (9.27), affordability pressures are still higher in South Staffordshire than half of the other authorities. This is relatively the same in the context of the Birmingham HMA. Nevertheless, based on an affordability ratio of 7.88, the affordability uplift to the baseline 2014-based household projections in the standard method would be c.24%. Accordingly, in both the Birmingham HMA and Black Country HMA analysis, Lichfields’ model has ascribed a **20%** uplift to the baseline degree of linkage for each sub-HMA. This was similar to the adjustment ascribed to Stratford-on-Avon as both areas affordability uplifts exceed 20%, whereas more affordable areas, such as Telford and Wrekin (5.89) only had a c.11% affordability uplift and were ascribed a 0% uplift accordingly. In general, most authorities were ascribed a **20%** uplift to the baseline degree of linkage.

Stage 3: Environmental, Policy and Physical Constraints

6.14 When accounting for the Stage 3 adjustments, the District’s baseline share following the Stage 2 adjustments for the Birmingham HMA would increase to **5.5%** and for the Black Country HMA, it would increase to **37.2%**. The detailed analysis for the Stage 2 adjustments is set out below in more detail:

1. Environmental Constraints

6.15 Lichfields’ analysis shows that very few if any, districts are fundamentally constrained by environmental designations to the point where they cannot accommodate any additional growth. Whilst constraints will cover parts of a district, in most areas, there are also less environmentally sensitive areas that could potentially accommodate development. With the exception of Cannock Chase (62%) and Shropshire (28%), by virtue of both districts containing Areas of Outstanding Natural Beauty, few authorities have more than 10% of their remaining land constrained by NPPF Footnote 7 constraints. Indeed, of South Staffordshire’s land, only **8%** is constrained by statutory environmental designations.

2. Policy Constraints

- 6.16 Lichfields' analysis does not consider Green Belt a fundamental constraint. This is because it is a function of the Local Plan process, where there will be legitimate reasons for reviewing its boundaries, such as the acuteness of unmet housing needs.²² Moreover, to include Green Belt as a fundamental constraint would unsustainably burden authorities with no Green Belt land, shifting needs onto districts that may be less sustainable.
- 6.17 In respect of the Birmingham HMA, Lichfields' analysis indicates that all districts (to a greater or lesser degree) contain Green Belt, with many heavily constrained as a consequence. All except Tamworth (17%) and Stratford-on-Avon (23%) have more than 90% of their remaining land covered by Green Belt. Areas such as Lichfield, North Warwickshire and Redditch are less constrained than Birmingham, the Black Country and even South Staffordshire (84%). Comparatively, with regards to the Black Country HMA, Telford and Wrekin do not benefit from a Green Belt, and Shropshire only has a small amount (8%).
- 6.18 This emphasises the need to review the Green Belt through the Local Plan process, as to exclude or even markedly reduce the amount of development a district could accommodate of either sub-HMAs unmet needs would unduly and unsustainable burden a small minority of authorities.

3. Physical Constraints

- 6.19 It is important to acknowledge that a significant challenge for authorities within the GBBCHMA is that, whilst some authorities might not be overly constrained by Footnote 7 designations, they may have grown to extent of their administrative boundaries and have limited available land to accommodate the pressure for further expansion. These authorities are considered 'under-bounded' and are not likely to be in a position to help meet the unmet needs of the Birmingham HMA or Black Country HMA. Indeed, this is, arguably, the reason why both Birmingham and the Black Country are unable to meet their needs.
- 6.20 In this regard, reflecting the problems such areas face meeting their own needs, these districts are ascribed a -100% adjustment factor, essentially meaning that the 'gravity model' assumes these areas will be unable to help meet the Birmingham HMA and Black Country HMAs unmet needs. Areas such as Birmingham, the Black Country and Tamworth are therefore excluded from Lichfields' analysis at this stage; however, with only c.8% of the District's area developed, **South Staffordshire is not considered under-bounded.**

Outcomes

- 6.21 For both the Birmingham HMA and Black Country HMA, Lichfields' models have analysed the degree of migration and commuting linkages within the GBBCHMA and beyond, opportunities to capitalise on sustainable transport links and improve affordability, and the degree of environmental, policy and physical constraints which might impede on an authority's ability to accommodate unmet housing need.
- 6.22 Drawing on the above analysis, importantly, Lichfields' model concludes on the functional linkages between the districts and the Birmingham HMA and Black Country HMAs separately – shown in Appendix 1 and 2 respectively – and shows how the respective unmet housing needs of each of the sub-HMAs could be sustainably distributed to South Staffordshire District.

²² Nottingham City Council v Calverton Parish Council [2015] EWHC 503 (Admin) (02 March 2015)

- 6.23 However, regard should also be had to whether an authority has already made a commitment through an adopted Local Plan, or is progressing a contribution towards these needs that is higher than Lichfields' model would suggest.
- 6.24 In this respect, for the Black Country HMA, there are no contributions that meet these parameters. However, for the Birmingham HMA, Lichfields' model suggested a figure which is markedly lower than the adopted contribution set out in North Warwickshire's Local Plan. As such, the Birmingham HMA model adjusts for this, with the other authorities experiencing a commensurate reduction in their contributions.
- 6.25 In addition to this, whilst the fundamental aim of Lichfields' model is to apportion these needs to areas with higher levels of socio-economic linkages with the origin of the unmet housing needs, there is clearly a need to ensure that each authority would still take a 'fair share' and would not be disproportionately impacted by the outcomes of the model. Much in the same way that the NPPF's Standard Method utilises one, the model ascribes a 25% 'cap' to authorities that the models indicate would exceed this figure, with the other authorities experiencing a commensurate increase in their contributions. In this regard, Lichfields' model caps South Staffordshire's contribution towards the Black Country HMA at 25%, reduced from 37.2%.
- 6.26 When accounting for the above, Lichfields' model indicates that to address the unmet housing needs of the Birmingham HMA and Black Country HMA, a reasonable distribution would see **South Staffordshire accommodating 7% of Birmingham's unmet needs up to 2031, and 25% of the Black Country's unmet needs up to 2039.** This would equate to a contribution of **c.1,600 dwellings towards the Birmingham HMA²³** and **c.7,050 towards the Black Country HMA²⁴** above the District's own housing needs.
- 6.27 The higher contribution identified for the Black Country HMA is because the District demonstrates a particularly strong functional relationship with the Black Country conurbation, to a far greater extent than other authorities. Conversely, the District has a much weaker socio-economic link with Birmingham City, and as such, South Staffordshire's contribution towards its unmet needs would be markedly lower.

²³ Based on an unmet need of 19,349 dwellings up to 2031 in the Birmingham HMA.

²⁴ Based on an unmet need of 28,239 dwellings up to 2039 in the Black Country HMA.

7.0 Conclusions

- 7.1 The NPPF is clear that LPAs are required to work together to identify and meet (where it is sustainable to do so) the housing needs of the neighbouring authorities, underpinned by adequate, relevant and up-to-date evidence.
- 7.2 Both Birmingham and the Black Country authorities have identified that they are unable to meet their housing needs across their respective plan periods (2031 and 2039 respectively). In particular, despite improvements in Birmingham's land supply, there is still an unaccounted for shortfall of between c.19,349 dwellings up to 2031, which, when coupled with the Black Country's emerging c.28,239 dwelling shortfall up to 2039, means that there is c.47,588 dwellings of unmet need up to and between 2031 and 2039.
- 7.3 If the two sub-HMAs fail to address these needs, the implications are that those needs will not simply disappear; they will either result in increasingly negative housing outcomes for people living in these conurbations, or they will mean households will have to look elsewhere to meet their housing needs. The practical implication is that unmet needs in Birmingham and the Black Country will mean greater net outward migration than the ambient trends accounted for within the population projections, which will affect those areas in close proximity, and particularly South Staffordshire.
- 7.4 Whilst some of the GBBCHMA, and indeed authorities beyond the strategic HMA, have made some commitments to addressing the unmet housing needs of the Birmingham HMA and Black Country HMA, this report has demonstrated that many of these assumptions are flawed and are not underpinned by an evidence-led approach. Moreover, Lichfields' model indicates that in nearly all instances the proposed quantum is seriously insufficient and would need to at least be doubled to fully grapple with this strategic matter.
- 7.5 In this regard, Lichfields considers that there is a strong and cogent need to distribute the sub-HMAs unmet needs based on functional relationships between the authorities; an approach that aligns with the North Warwickshire and Coventry and Warwickshire HMA authorities Inspector-endorsed methods. In addition, given the clear breakdown in the GBBCHMA-wide approach, there is a need to factor in – where necessary – authorities beyond the strategic HMA.
- 7.6 To this end, Lichfields has prepared this report and accompanying models to demonstrate how each of the sub-HMAs needs could sustainably be distributed amongst neighbouring authorities based upon the functional relationships between those authorities.
- 7.7 For South Staffordshire, Lichfields' model indicates that to address the unmet housing needs of the Birmingham HMA and Black Country HMA, a reasonable distribution would see South Staffordshire accommodating 7% of Birmingham's unmet needs up to 2031, and 25% of the Black Country's unmet needs up to 2039. As a proportion of the unmet housing needs set out above, this would equate to a cumulative contribution of **c.8,650 dwellings towards the Birmingham HMA and Black Country HMA** shortfalls above the District's own housing needs.
- 7.8 It is important to note that the abovementioned apportioned figures should be seen as a starting position, which should be tested through the SA process. Indeed, this would fall between Options C and D which have been tested through the IOC SA already. Again, whilst St Philips and Taylor Wimpey support the Council's efforts to meet the needs of the GBBCHMA through the emerging Local Plan Review, this report and analysis underpinning it demonstrates how an evidence-led approach (e.g. functional relationships) would strongly suggest that the Council should increase its contribution towards meeting the unmet housing needs of Birmingham and the Black Country, which should be tested through the SA process accordingly.

Appendix 1 Birmingham HMA Functional Model

Birmingham HMA Functional Model			South Staffordshire	Source
Stage 1: Functional Relationship	Migration	% of Gross out-migration from Birmingham to LPA in GBBCHMA	1%	ONS Migration Estimates
	Commuting	% of Gross in-commute from LPA in GBBCHMA to Birmingham	4%	Census 2011 Table WU03UK
	Baseline Share		2.7%	
Stage 2: Sustainability and Market Signals	Rail Links	Fastest Train from District to Birmingham Terminus (Mins)	21	Trainline
	Affordability	Uplift Factor	0%	
		Affordability Ratio	7.88	2020 Median Affordability Ratios
		Standard Method Theoretical Uplift	24.25%	PPG Standard Method Calculation
	Uplift Factor	20%		
	Total Uplift Factor	20%		
% Baseline Share following adjustments		3.2%		
Stage 3: Environmental, Policy and Physical Constraints	Environmental Constraints	Fundamental Constraints (SSSI, AONB, National Park) % Coverage	8.0%	Magic Maps and Lichfields Analysis
		Uplift Factor	20%	
	Policy Constraints	Green Belt % Coverage of Non-Urban Land	83.6%	
		Uplift Factor	-10%	
	Physical Constraints	Underbounded Authorities (Unlikely to meet even their own needs)	No	
			0%	
Total Uplift Factor	10%			
% Baseline Share following adjustments		4%		
Share of Birmingham Unmet Housing Need 2031 (Rebased Proportion)			5.5%	
Share of Birmingham Unmet Housing Need 2031 - Re-Balanced if Commitments exceed model			5%	
Share of Birmingham Unmet Housing Need 2031 - Re-Balanced Commitments and 25% Cap			7%	

Appendix 2 Black Country HMA Functional Model

Black Country HMA Functional Model			South Staffordshire	Source
Stage 1: Functional Relationship	Migration	% of Gross out-migration from Black Country to LPA in GBBCHMA and beyond	17.0%	<i>ONS Migration Estimates</i>
	Commuting	% of Gross in-commute from LPA in GBBCHMA and beyond to Black Country	24.8%	<i>Census 2011 Table WU03UK</i>
	Baseline Share		20.9%	
Stage 2: Sustainability and Market Signals	Rail Links	Fastest Train from District to Black Country Terminus (Mins)	4	<i>Trainline</i>
	Uplift Factor		20%	
	Affordability	Affordability Ratio	7.88	<i>2020 Median Affordability Ratios</i>
	Standard Method Theoretical Uplift		24.25%	<i>PPG Standard Method Calculation</i>
	Uplift Factor		20%	
	Total Uplift Factor		40%	
% Baseline Share following adjustments		29.2%		
Stage 3: Environmental, Policy and Physical Constraints	Environmental Constraints	Fundamental Constraints (SSSI, AONB, National Park) % Coverage	8.0%	<i>Magic Maps and Lichfields Analysis</i>
	Uplift Factor		20%	
	Policy Constraints	Green Belt % Coverage of Non-Urban Land	83.6%	
	Uplift Factor		-10%	
	Physical Constraints	Underbounded Authorities (Unlikely to meet even their own needs)	No	
	0%			
Total Uplift Factor		10%		
% Baseline Share following adjustments		32.1%		
Share of Black Country Unmet Housing Need 2039 (Rebased Proportion)			37.2%	
Share of Black Country Unmet Housing Need 2039 - Re-Balanced if Commitments exceed model			37.2%	
Share of Black Country Unmet Housing Need 2039 - Re-Balanced Commitments and 25% Cap			25%	

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