

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

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

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

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Ian"/>	<input type="text" value="Paul"/>
Last Name	<input type="text" value="Deverell"/>	<input type="text" value="Hill"/>
Job Title (where relevant)	<input type="text" value="Senior Planning Manager"/>	<input type="text" value="Senior Planning Director"/>
Organisation (where relevant)	<input type="text" value="IM Land"/>	<input type="text" value="RPS"/>
Address Line 1	<input type="text"/>	<input type="text" value="1 Newhall Street"/>
Line 2	<input type="text"/>	<input type="text" value="Birmingham"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="B33NH"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 622 8520"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="Paul.hill@rps.tetrattech.com"/>



Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy **DS4** Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy DS4 (Development Needs) now proposes a housing target of a minimum of 4,726 homes to be delivered between 2023 and 2041. This comprises 4,086 homes to meet local housing needs of South Staffordshire, and 640 dwellings towards the unmet need of the Greater Birmingham and Black Country Housing Market Area (Table 7). The council will seek to demonstrate a 5 year housing land supply upon adoption of the plan.

The proposed housing target in this Plan (second Reg 19) represents a substantial reduction compared to the quantum of growth proposed in the previous (first) Regulation 19 version consulted on in 2022 (5,089 based on local needs, and 4,000 towards the unmet needs of the wider Birmingham and Black County HMA). This level of growth was assessed by the Council as being in their view sustainable and deliverable and consequently considered to be soundly-based (though RPS had raised soundness concerns with various aspects of the first Reg 19 Plan). The second Reg 19 Plan proposes a dramatic reduction in the scale of growth planned for now, in light of wider (unmet) housing need from the BBCHMA as well as sub-regional employment growth proposals planned to come forward in the District (considered below), which does not represent positive planning and is not justified.

Assessing local housing need

However, it is unclear whether other relevant factors, including employment growth in the District, have been taken into account in determining the appropriate minimum level of housing need to be provided for in the SSLP.



Planning Practice Guidance¹ identifies those circumstances that might justify a higher housing need figure than the standard method would indicate. This is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances, or what impacts other factors might have on demographic behaviour. This covers a range of factors, including *'growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth'*. This would include major new employment investment in the District that is not accounted for when projecting forward future housing need.

A notable example of relevance in South Staffordshire, is the proposals to deliver the West Midlands Interchange (WMI) at Four Ashes. This site is allocated in the SSLP, under Policy SA5, with an expectation that 297 hectares of employment development will be delivered at the WMI by 2039 (which itself is a significant increase on the 232.5 ha expected to be delivered in the first Reg 19 Plan between 2018 and 2039). This scheme is also expected to deliver around 8,550 jobs in the District². Paragraph 4.56 of the Preferred Options Document acknowledged that the WMI:

"...significantly increases the known oversupply of employment land in South Staffordshire, and with this, the scope to contribute towards unmet needs elsewhere in the FEMA...."

The total supply of employment land in South Staffordshire is estimated to be at least 399.7 ha (up from 327.9 ha in the first Reg 19 Plan) (see Table 9 of the SSLP), including at WMI (comprising c. 297 ha). This is against an estimated employment land need in the District of 62.4 ha (see paragraph 6.43 of the second Reg 19 Plan) a marginal reduction on the first Reg 19 Plan. The estimated over-supply of employment land available in the District is therefore in the region of 337.3 hectares. Of this surplus, around 112.2 ha is 'claimed' by the Black Country to meet cross boundary needs, comprising 67 ha from WMI and 45.2ha from other strategic sites allocated in the second Reg 19 Plan under Policy SA5. This leaves around 225.1 ha of net surplus employment land. Of the 184.8 ha of employment land at WMI, 18.8ha is also attributed to meeting South Staffordshire's labour demand (see para 5.58, Table 9, and footnote 5 of the second Reg 19 Plan). When accounting for this, the residual surplus of employment land allocated in the second Reg 19 Plan is still 166 hectares and which is not anticipated to meet either local employment need nor address the unmet employment needs from the Black Country but which clearly forms a key part of the overall economic strategy.

The Council's justification for the radical shift in the overall growth strategy now being taken forward is considered in separate representations (in response to Policy DS5).

The substantial over-allocation of employment land in the second Reg 19 Plan, including that resulting from the WMI project, will need an additional labour supply to fill the new jobs provided. The Council's employment evidence suggest that the additional jobs, including those provided at WMI, will be met by the existing South Staffordshire labour force through either reduced unemployment or reduced out-commuting (Economic Development Needs Assessment 2020-2040, June 2022, paragraph 0.56; and South Staffordshire EDNA Update 2024, para 8.7). However, it remains unclear whether the potential impact on the demand for housing within

¹ Paragraph: 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020

² West Midlands SRFI Employment Issues Response Paper – Labour Supply, Stantec, May 2020

the District, as a result of the jobs growth required to support the over-supply of employment, has been taken into account in determining the minimum local housing need figure now proposed in the second Reg 19 Plan. From the review of the published evidence undertaken by RPS, this appears not to be the case. Without clarity on this matter, the proposed housing target in the second Reg 19 Plan is not justified and so is not soundly-based.

RPS therefore recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District and consider the implications on housing demand of the significant level of over-supply of employment land identified in the second Reg 19 Plan.

Accounting for unmet need from neighbouring areas

As highlighted above, draft Policy DS4 includes a contribution of 640 dwellings towards the unmet housing needs of the GBBCHMA. This is based on the Council's assertion that 4,726 dwellings (the proposed target) can be built on suitable sites available to deliver the spatial strategy (see second Reg 19 Plan, para 5.21). This is significantly lower than the 4,000 dwellings contribution, a contribution the Council had proposed as being suitable and deliverable in the first Reg 19 Plan.

The principal reason why the contribution has been reduced (equating to a 84% decrease in overall terms) is because in December 2023 the updated NPPF was published and confirmed that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared and that it is within authorities' gift to choose to review Green Belt boundaries through the Local Plan where they feel that exceptional circumstances for doing so exist and these can be fully evidenced and justified (second Reg 19, para 5.12). As the second Reg 19 accepts, at paragraph 5.10, the wider housing shortfall elsewhere across the BBCHMA is increasing, not decreasing. Recent consultations carried out by the Black Country authorities in 2021 and Birmingham City Council in 2022 indicated a potential shortfall of 28,239 and 78,415 homes respectively; equating to a total 106,654 dwellings. Assuming this shortfall could be met over an 18-year plan period for this plan (2023-41) elsewhere across the BBCHMA or beyond, this would equate to 5,925 dpa. A contribution of 640 dwellings would equate to 35.5 dwellings built each year in South Staffordshire up to 2041, or just 0.6% of the shortfall. This is despite South Staffordshire's strong functional relationship to the West Midlands conurbation.

Whilst in strict terms national policy has changed with regards to Green Belt review at the plan-making stage, national policy³ nonetheless makes clear that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for housing including affordable housing. This 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 areas⁴. A contribution of less than 1% of the unmet housing need from elsewhere in the BBCHMA now proposed in the second Reg 19 plan does not, in our view, make sufficient provision for housing and is not positively prepared. The proposed strategy revision is not soundly-based.

(Continue on a separate sheet /expand box if necessary)

³ NPPF 2023, para 20

⁴ NPPF 2023, para 11b



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Address the housing implications of the 166 ha surplus of employment land planned for in the Second Reg 19 Plan.

Increase the contribution towards the unmet need of the Black Country and Birmingham to properly reflect increasing scale of the shortfall and the functional relationship with the District.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

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

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

To properly represent our client's interests and contribute towards the oral discussions and issues raised at the examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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