



**South Staffordshire Council**

**Local Plan Review**

# **Exceptional Circumstances for release of Gypsy & Traveller sites from the Green Belt Topic Paper**

**November 2024**

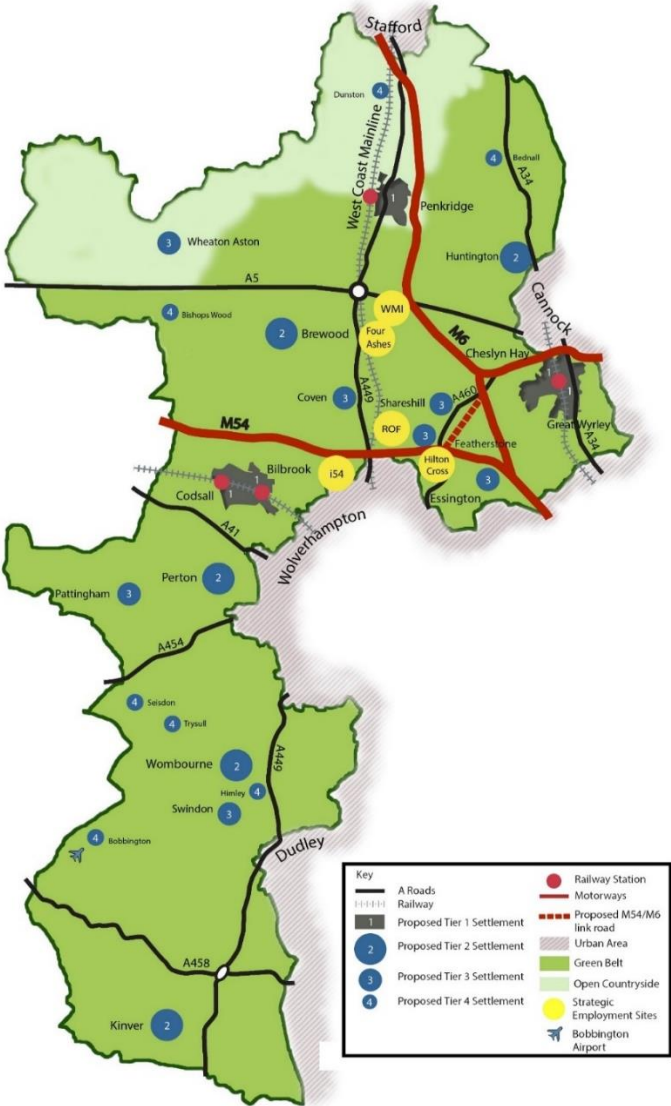
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# 1. Introduction

1.1. This Topic Paper forms part of the submission documents for South Staffordshire District Council’s new Local Plan for the period 2023 – 2041. It has been produced to support the Plan process and seeks to justify and outline the exceptional circumstances for the release of Green Belt land for Gypsy and Traveller sites, should the Planning Inspector overseeing the examination into the South Staffordshire Local Plan deem this necessary.

1.2. In South Staffordshire around 80% of the district is designated as Green Belt, which has broadly prevented the outward spread of the West Midlands conurbation to the northwest. The 20% of the district’s countryside which is not designated as Green Belt is concentrated in the north of the district.



- 1.3. Due to this, the district has previously removed and allocated sites within the Green Belt through the Local Plan process to meet its housing needs. This included through the 1996 Local Plan and more recently through the 2018 Site Allocations DPD, several which are being carried forward to this Plan.
- 1.4. The April 2024 Publication plan consultation was accompanied by a [Green Belt Exceptional Circumstances Topic Paper 2024](#) that set out the case for Green Belt release to accommodate new housing allocations in the emerging Local Plan. Whilst Gypsy and Traveller sites in the Green Belt were discussed in chapter 6 of that topic paper, it did not put forward the case that they should be released from the Green Belt. The Council is however aware that different Planning Inspectors have interpreted this issue differently, with some requiring that gypsy and traveller sites are removed from the Green Belt. The Council has therefore set out in this topic paper the case for release of gypsy and traveller sites from the Green Belt should the examining inspector deem this necessary in order to find the Plan sound.
- 1.5. Chapter 2 of this paper sets out the Council's proposed approach for keeping gypsy and traveller sites within the Green Belt and the rationale for this, as well as covering where other inspectors have taken a different approach elsewhere. Chapter 3 sets out the strategic exceptional circumstances case for Green Belt release in the district with chapter 4 focusing on the specific sites proposed for allocation and the exceptional circumstances at the site-specific level.

## 2. The proposed approach to Gypsy and Traveller sites in the Green Belt

- 2.1 The Local Plan proposes the allocation of 37 gypsy and traveller pitches either within or as extensions to existing sites, all within the Green Belt. It is proposed that these sites continue to be washed over by Green Belt and therefore will not result in an alternation to Green Belt boundaries in these locations. This will enable the council to minimise the impact of these developments in these rural locations by ensuring that only the specified number of pitches allocated (informed by site specific needs) are considered acceptable. Accordingly, Policy SA4 of the emerging plan confirms the following:

*“As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan”.*

- 2.2 The same approach was considered sound by the Inspector examining the Council’s 2018 Site Allocations Document (SAD) and subsequently has seen 5 of the pitches allocated in the SAD come forward, as well as an additional 23 pitches in the Green Belt on unallocated sites. The 2018 SAD was examined against the 2015 Planning Policy for Travellers Sites (PPTS), and even though there has been a subsequent update the PPTS, the requirements around Green Belt remain unchanged in the current version of the PPTS.
- 2.3 Therefore, given the above **it is not considered that Green Belt release is required for policy SA4 to be deliverable and for the proposed Gypsy and Traveller allocations to come forward.**
- 2.4 However, the Council is equally aware that para 17 of the PPTS does allow for limited alternation to the defined Green Belt boundary to meet an identified need for traveller sites, and that inspectors have recently found plans sound where traveller sites have been removed from the Green Belt, for example the recently adopted [Dartford Borough Local Plan](#).
- 2.5 The relevant paragraph 17 of the PPTS states the following:

*“17. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.”*

2.6 Notwithstanding that, the council considers its proposed approach in the submitted Local Plan to be sound and in accordance with Section 20(2) of the Planning and Compulsory Purchase Act 2004 (as amended). However, should the inspector consider that gypsy and traveller sites should be removed from the Green Belt, then the council consider there are exceptional circumstances for the sites release. The following Chapter 3 sets out the strategic case for Green Belt release for gypsy and traveller sites.

### 3. Exceptional circumstances – strategic considerations.

#### The need for additional gypsy and traveller pitches

- 3.1 The evidence of need that has informed allocations for gypsy and traveller sites in the Local Plan (allocated through Policy SA4) is set out in our Gypsy and Traveller Accommodation Assessment 2024.
- 3.2 The GTAA (2024) undertook a review of data gathered for the 2021 GTAA as well as further primary data gathering in the form of face-to-face interviews and proxy interviews with Gypsy and Traveller families with 143 interviews achieved representing a 85% response rate. The GTAA (2024) identifies 36 sites/yards within the district with a total of 167 pitches/plots. The vast majority of these (22 sites, 133 pitches) are on privately run sites with permanent planning permission.
- 3.3 As was the case with the 2021 GTAA, needs were broken down by those households who met the planning definition of a gypsy and traveller as well as a separate need figure for those who did not meet the planning definition. In addition, an assumed need figure was derived for those undetermined households/individuals (i.e. where an interview was not achieved). The need for gypsies and travellers who met the planning definition was for 142 pitches as set out below:

Years	0-5	6-10	11-15	16-18	TOTAL
	2024-28	2029-33	2034-38	2039-42	
	92	16	19	15	142

- 3.4 The large element of this need is as a result of expected household formation, teenagers on sites who will require a pitch during the plan period and existing concealed/over-crowded households. Only a very small proportion of the need (2 pitches) is from in-migration. The 2024 GTAA identified a need potentially up to an additional 20 pitches from undetermined households where interviews were not achieved, resulting in a **potential overall need figure of 162 pitches up to 2042**.
- 3.5 The 2024 GTAA also identified a need for 18 pitches from those households who did not meet the planning definition.
- 3.6 For travelling showpeople, the 2024 GTAA identified a need solely based upon new household formation from the one existing travelling showperson site within the district. This identified a need for **4 additional plots for travelling showpeople**, however this need only starts to emerge from 2029 onwards.

#### Exploring supply options

- 3.7 The council has consistency welcomed call for sites proposals through preparation of the Local Plan and undertaken ongoing engagement with the gypsy and traveller community including a request for alternative site suggestions as part of the Regulation 18 Preferred Options consultation when it became apparent that there was

a shortfall against our needs. Unfortunately, this process has only resulted in site suggestions come forward in the Green Belt, predominantly on or as extensions to existing sites. This is unsurprising given that 80% of the district is washed over by Green Belt. Equally all existing traveller sites in the district are in the Green Belt and traveller families understandably often wish for their emerging family needs to be met on or near to the family site.

- 3.8 Recognising that the Local Plan was likely to require Green Belt amendments, South Staffordshire Council wrote to all neighbouring and Great Birmingham and Black Country Housing Market Area authorities in January 2021 (Appendix A) to seek view on whether they were in a position to provide additional housing supply that could reduce or avoid Green Belt release in the district. This letter did not elicit any responses which suggested the district would be able to reduce its housing target.
- 3.9 The Council also wrote to Duty to Cooperate partner authorities in January 2022. In the letter we asked if there were options to either accommodate some or all of these unmet needs on existing public sites within the administrative areas of Duty to Cooperate authorities, or whether new public sites could be created. In total 14 authorities were written to with 11 responses received. Following this, a further letter was sent to the same Duty to Cooperate partners to update the Council's position following further exploration of supply options in August 2022, with a further 9 responses received. No respondents indicated that they were able to assist in supplying additional pitches to meet our unmet needs. Further details of these correspondence and how the Council has sought to minimise or avoid locating gypsy and traveller sites in the Green Belt through Duty to Cooperate arrangements can be found in the [Gypsy and Traveler Topic Paper 2024](#).
- 3.10 Further supply options have also been explored throughout plan preparation of the including a review of Council owned land set out in the [Gypsy and Traveller Public Sites Search – November 2021](#), which included a substantial number of non Green Belt parcels. No sites suitable sites were identified through this assessment.
- 3.11 A further assessment was also undertaken of land owned by Staffordshire County Council that had previously been suggested to housing through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. The [Gypsy and Traveller site assessment – Staffordshire County Council owned land \(September 2022\)](#) assessed large farmsteads which were broken down into 10 separate parcels for assessment. The assessment identified significant initial concerns for the vast majority of sites, including 2 non-Green Belt sites, often on access/connectivity grounds. Only one site, 'parcel 6 – Land south of Langley Road' was identified as potentially suitable for a public gypsy and traveller site, however this site was located in the Green Belt, and further correspondence from Staffordshire County Council confirmed that they do not consider the site would be acceptable or viable unless as part of a wider strategic development area / site allocation and comprehensive master-planning exercise. As none of these parcels have been assessed as suitable for housing allocation through our site assessment process, and there is not a willing landowner to deliver them as a



standalone gypsy and traveller site, none of the parcels assessed are considered deliverable.

- 3.12 In addition to considering publicly owned land, the Council contacted site promoters for proposed housing allocations in March 2022 to confirm if in principle they would be willing to transfer a proportion of their site to be run as a public gypsy and traveller site. These included proposed non Green Belt allocations. In total responses from 14 site promoters were received but none of them responded confirming they would be willing to transfer part of their existing proposed allocation for use as a public gypsy and traveller site. Miller Homes promoting 'land off Holly Lane, Great Wyrley' (Ref: 536a) were open to exploring if a gypsy and traveller site could be accommodated, although this was contingent on additional green belt release for housing on land they were promoting adjacent to their allocation. However, this wider land parcel had been assessed through our Housing Site Assessment Topic Paper as unsuitable.
- 3.13 This chapter has demonstrated that the evidence confirms that the need for gypsies and travellers in South Staffordshire is significant and that all reasonable options have been explored to increase the supply of suitable sites to meet this need. This has included exploring all options in an attempt to both meet our needs, but also to identify sequentially preferable sites outside of the Green Belt. This has involved inviting new sites suggestions through call for sites and Local Plan consultations, exploring district and county council owned land, exploring options to deliver new pitches as part of residential allocations and exploring the potential to meet some of our needs in neighbouring areas via Duty to Cooperate arrangements. Exploring these supply options has not enabled the Council to identify suitable sites outside of the Green Belt, and as a result all 37 pitches proposed for allocation in Policy SA4 are currently in the Green Belt. As a result, **the Council consider that exceptional circumstances exist to justify the release of Green Belt to meet gypsy and traveller needs at the strategic level.** The Council has not received any objections from gypsy and traveller families or their representatives through Local Plan consultation to the methodology or outcome of our GTAA (2024) or site selection process.

## 4 Exceptional Circumstances – site specific considerations.

4.1 Having concluded that exceptional circumstances exist to justify the release of Green Belt land to meet gypsy and traveller needs at a strategic level, this section sets out the exceptional circumstances case for removing Gypsy and traveller sites from the Green Belt on a site-by-site basis.

### Sites with proposed allocations

4.2 Policy SA4 proposes the allocation of 37 pitches on nine existing permanent gypsy and traveller sites, representing pitch intensification of these sites within established red line boundaries. A current and/or 5 year need has been identified within each of these sites through the GTAA (2024)<sup>1</sup> from family members who meet the Planning Policy for Traveller Sites (PPTS) definition of a traveller. The capacity to accommodate the proposed number of allocations has been confirmed through an assessment of site capacity contained in the Pitch Deliverability Study 2021, and subsequently updated through the Gypsy and Traveller Topic Paper 2024.

4.3 The sites specific factors in support of amending the Green Belt boundaries for each site are set out below.

#### 4.4 **New Acre Stables, Penkridge (Site Ref GT01)**

##### **Proposed allocation: 4 pitches**

- GTAA 2024 identified a current need from family members on the site of 2 pitches, and an additional need for 2 pitches as a result of families occupying two temporary pitches on site, and who are in need of a permanent pitch.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper confirmed site capacity to meet the total 5 year need of 4 pitches.
- Red line boundary for the site established through previous consent (REF: APP/C3430/A/10/2127110)
- Site is an existing authorised site and is defined by strong defensible boundaries
- Subsequent to the April 2024 Publication Plan consultation, 4 pitches granted a permanent consent within the identified red line boundary.

#### 4.5 **The Spinney (Site Ref GT06)**

##### **Proposed allocation: 2 pitches**

- GTAA 2024 identified a current need from family members on the site of 2 pitches as a result of two unauthorised pitches on site.

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<sup>1</sup> See Figure 14 from GTAA 2024

- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 2 pitches.
- Site is an existing authorised site and is defined by strong defensible boundaries with neighbouring traveller site to the north and a strong boundary treatment in place to the south.
- Red line boundary for the site established through previous consent (REF: 87/00007)

#### 4.6 **The Bungalow, Coven (Site Ref GT07)**

##### **Proposed allocation: 3 pitches**

- GTAA 2024 identified a current need from family members on the site of 3 pitches and a 5 year need for an additional 2 pitches.
- Site assessed as suitable for allocation of 3 pitches through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper confirmed site capacity to accommodate 3 of the 5 pitches needed to meet the total 5 year need.
- Site is an existing authorised site and is defined by strong defensible boundaries, with strong boundary treatment along all edges of the site.
- Red line boundary for the site established through previous consent, and most recently confirmed through consent ref 18/00606/VAR.

#### 4.7 **Brinsford Bridge, Coven Heath (Site Ref GT08)**

##### **Proposed allocation: 7 pitches**

- GTAA 2024 identified a current need from family members on the site of 4 pitches and a 5 year need for an additional 2 pitches, with the need for 1 additional pitch as a result of an existing unauthorised pitch on the site.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 7 pitches.
- Red line boundary for the site established through previous consent (ref 11/00125/FUL)

#### 4.8 **Brickyard Cottage, Essington (Site Ref GT14)**

##### **Proposed allocation: 4 pitches**

- GTAA 2024 identified a current need from family members on the site of 1 pitch and a 5 year need for an additional 3 pitches.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 4 pitches.

- Site is an existing authorised site.
- Existing red line boundary established through previous consents (ref 87/00305 and 18/00789/COU), It is proposed that the site boundary is extended to accommodate the proposed allocation on land to the north of the existing site, and owned by the same family.

#### 4.9 **The Stables, Upper Landywood (Site Ref GT17)**

##### **Proposed allocation: 3 pitches**

- GTAA 2024 identified a current need from family members on the site of 3 pitches.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 3 pitches.
- Site is an existing authorised site with strong boundary treatment defining the site.
- Red line boundary for the site established through previous consent (ref: 11/00810/VAR and 16/00413/VAR).

#### 4.10 **Park Lodge, Wombourne (Site Ref GT18)**

##### **Proposed allocation: 2 pitches**

- GTAA 2024 identified a 5 year need from family members on the site for 1 pitch, with the need for 1 additional pitch as a result of an existing unauthorised pitch on the site.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 2 pitches.
- Site is an existing unauthorised site, however was allocated for one pitch in the Site Allocations Document (2018).
- Red line boundary for the site established through previous temporary consent (ref: 15/00729/VAR).

#### 4.11 **Glenside, Slade Heath (Site REF GT23)**

##### **Proposed allocation: 3 pitches**

- GTAA 2024 identified a 5 year need from family members on the site for 2 pitches, with the need for 1 additional pitch as a result of an existing unauthorised pitch on the site.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Pitch Deliverability Study 2021 and Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 3 pitches.
- Site is an existing authorised site
- Red line boundary for the site established through previous consent (ref: 14/00601/LUE)

#### 4.12 Kingswood Colliery, Great Wyrley (Site REF GT32)

##### Proposed for allocation: 9 pitches

- GTAA 2024 identified a current need form family members of 8 pitches and a 5 year need from family members for an additional pitch.
- Site assessed as suitable for allocation through the Gypsy and Traveller Topic Paper 2024 with no overriding constraints identified.
- Gypsy and Traveller Topic Paper 2024 confirmed site capacity to meet the total 5 year need of 9 pitches.
- Site is an existing authorised site and is defined by strong defensible boundaries, with strong boundary treatment along the northern, eastern and southern edges of the site in particular.
- Red line boundary for the site established through previous consent (ref: APP/C3430/C/15/3130029 (consented on appeal))

#### Existing permanent travel sites with no new allocations proposed

4.13 The Local Plan has sought to identify new pitches on existing sites where a 5 year need has been identified and where there is physical capacity to accommodate this need. There are however a number of other existing Gypsy and Traveller sites in the district with a permanent consent, where there is either no need identified or no capacity to accommodate the need. **It is the Council's view that should it be accepted that the permanent sites with proposed allocations should be removed from the Green Belt and that exceptional circumstances exist for this, then this should apply equally to these other permanent sites.** This would ensure a consistent approach is taken to permanent traveller sites in the Green Belt and avoid a situation where some established permanent sites are washed over by Green Belt, with others having been removed. In principle, windfall pitches may be acceptable within the boundaries of these sites should, for example, the layout of pitches on site be reconfigured, potentially resulting in additional capacity. Proposed Policy HC9 already states:

*"Site intensification or extensions resulting in additional pitches may be considered acceptable in principle, subject to it being for a proven existing local family need, and acceptable in terms of other planning policies and licencing requirements."*

4.14 Given this, it is the Council's view therefore that even with the existing permanent sites washed over by Green Belt that development within their boundaries may be acceptable, subject to conformity with other planning policies and site licencing requirements. However, it is acknowledged that removing all permanent sites from the Green Belt could lead to a more proactive approach from the site owners to reconfigure/intensity their sites which could potentially result in more windfall supply coming forward within site boundaries in the future.

4.15 The other sites in the district with permanent pitches consented are set out in the table below:

Reference	Permanent site name	Number of permanent pitches consented <sup>2</sup>	5 year need identified in GTAA 2024 (Figure 14)
GT02	High House, off Poplar Lane,	5	3
GT03	New Stables, off Poplar Lane,	2	4
GT04	Pool House Barn	7	0
GT09	Oak Tree Caravan Park, Featherstone	23	8
GT10	St James Caravan Park, Featherstone	9	1
GT11	Fishponds Caravan Park, Featherstone	5	0
GT13	Hospital Lane Site, Cheslyn Hay	10	3
GT15	Long Lane, Newtown	4	4
GT16	Clee Park, Newtown	15	10
GT19	1a Stafford Road, Coven Heath	1	0
GT20	Land at rear of Hordon Park, Ball Lane, Coven Heath,	2	0
GT30	Rose Meadow Farm, Prestwood	2	1
GT33	Fairhaven, Shaw Hall Lane, Coven Heath	4	0
GT34	Anvil Park, Essington	2	0
GT38	The Willows, Dark Lane, Cross Green	1	0
GT40	Land east of Teddesley Road	1	3
GT43	Land north east of Essington Primary School, Essington	2	n/a
GT49	65 Long Lane, Newtown	1	n/a
TS01	Dobsons Yard, Travelling Showperson site	3 plots (tolerated site)	

4.16 The exceptional circumstances for the release of the above sites are set out below:

- The significant districtwide need for gypsies and travellers and the strategic case for exceptional circumstances detailed in Chapter 3.
- All of the above sites are established sites with consented permanent pitches and appear to be previously developed land, with the sites characterised by build development.

<sup>2</sup> Excludes permission for transit pitches, temporary pitches and unauthorised pitches.

- Their removal from the Green Belt would ensure consistency with the sites proposed for allocation (see paragraphs 4.4-4.12) should the inspector deem it necessary that these sites are removed from the Green Belt.
- Their removal from the Green Belt could potentially see more windfall pitches come forward should site owners consider reconfiguring their site in the future.

## 5 Conclusions

- 5.1 This topic paper has set out the Council's proposed approach through the Local Plan on keeping Gypsy and Traveller sites with proposed pitch allocations in the Green Belt. This reflects the approach in the Council's adopted Site Allocations Document (SAD) 2018. This is considered a justified approach and has resulted in additional supply coming forward on a number of allocated sites since the SAD was adopted.
- 5.2 However, the Council is equally aware that through other Local Plan examinations removing Gypsy and Traveller sites from the Green Belt has been deemed an appropriate approach. Therefore, notwithstanding the Council's firm view that the proposed approach represents a sound and tested approach, the Council considers that there are exceptional circumstances for Green Belt release, should the examining inspector consider this is required in order to make the plan sound.
- 5.3 This topic paper has set out these exceptional circumstances with there being both a strategic and site specific case for removing the gypsy and traveller sites from the Green Belt. In summary these are:
- The latest evidence (GTAA 2024) demonstrates a need for up to 162 gypsy and traveller pitches up to 2041, and a need for 4 travelling showperson plots.
  - The council has explored all reasonable supply options including through call for sites, exploring public sector landholdings, and exporting need through Duty to Cooperate arrangements, however none of these avenues has led to any deliverable site options being identified outside of the Green Belt.
  - The Council has identified all suitable Green Belt sites to accommodate 37 pitches in total. All these are existing sites and involves pitch intensification of these sites.
  - All sites proposed to be removed from the Green Belt (if requested) set out in Chapter 4 are existing traveller sites, with the sites boundaries established through previous permanent planning consents.
  - All sites appear to be previously developed land with hardstanding and pitches on site and are therefore already characterised by built development.
  - Their removal from the Green Belt could potentially see more windfall pitches come forward should site owners consider reconfiguring their site in the future.



**Appendix A: South Staffordshire Council letter to neighbouring and Great Birmingham and Black Country Housing Market Area authorities - January 2021**



Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: [e.fox@sstaffs.gov.uk](mailto:e.fox@sstaffs.gov.uk)

8<sup>th</sup> January 2021

Sent via email

Dear Sir/Madam,

## **South Staffordshire Council Local Plan Review – Review of Green Belt**

As you will be aware South Staffordshire is currently undertaking a review of its Local Plan. One of the key reasons for this is an existing Local Plan Review policy (Policy SAD1) which was adopted by the Council in its Site Allocations Document 2018. This requires the District to review housing supply options to meet both the District's own housing needs and potentially unmet cross-boundary needs from the Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.

As a result of these pressures, the District is currently considering meeting ambitious housing targets through its emerging Local Plan Review, proposing to accommodate approximately 8,845 dwellings in the 2018 to 2037 period as set out in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation. This level of growth includes what the District believes to be a proportionate contribution of 4,000 dwellings to the unmet needs of the GBHMA, based on the current evidence of unmet needs in the GBHMA up to 2038<sup>1</sup> and the GBHMA-wide evidence base provided by the GBHMA Strategic Growth Study 2018. However, even if South Staffordshire delivered all current housing allocations, permissions and safeguarded sites for housing land, the District's most recent consultation suggests that only around 3,800 dwellings would be delivered in the District between 2018 – 2037. This is evidently well short of the level of growth the District is seeking to achieve in the Local Plan Review.

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<sup>1</sup> As set out in the 'Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)' and the 'Black Country Urban Capacity Review December 2019'





The Council will continue to review its housing land supply to inform its 2020 Preferred Options consultation. However, due to the District's rural nature and the lack of any towns or cities in South Staffordshire, it is unlikely that achievable density uplifts to existing suitable land supply will significantly alter the capacity on existing sites. Whilst there are some areas of land beyond the Green Belt in the District, the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and the GBHMA Strategic Growth Study both suggest that it is unlikely to be sustainable or deliverable to focus all new housing allocations in the District on the limited area of Open Countryside in South Staffordshire. The District therefore considers that evidence to date suggests it is highly likely that South Staffordshire will need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBHMA's unmet housing needs.

Given the above, and in order to ensure the District meets its duties under paragraph 137 of the NPPF, would welcome your Council's latest position on the following matters, acknowledging that this may be subject to change through emerging national changes to strategic housing matters (the Planning for the Future White Paper);

- Whether or not your authority is able to assist with the unmet housing needs of the GBHMA, in particular those arising from the Black Country
- Whether or not your authority is able to provide sufficient additional housing supply to enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target
- What your authority would be prepared to agree with South Staffordshire District Council in a statement of common ground covering strategic housing needs in the District and GBHMA

To ensure we can progress these discussions in a timely manner, we would welcome a response from yourselves on the above by no later than 26<sup>th</sup> February 2021. If you would like to meet the Council's officers to discuss this further before this date, then please get in touch.

We look forward to hearing from you on this matter.

Yours faithfully,

**Kelly Harris**  
Lead Planning Manager

