

Part B – Please use a separate sheet for each representation

Name or Organisation: **CPRE Staffordshire**

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

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.

CPRE Representation Number 5

Housing Policies and provision for overspill

We are supportive of Policies HC1 to HC5 (inclusive) but wish to ensure that the needs of the overspill authorities are taken into account under the Duty to Co-operate. (We are not suggesting that different standards should be applied.)

Background

The following are extracts taken from ['The Countryside next door: State of the Green Belt 2021 February 2021'](#).

CPRE, the countryside charity, led the campaign for the creation of the Green Belts. To date, they have been a great success in terms of protecting the countryside near to many of our towns and cities and reducing the damage of urban sprawl to both people and the environment. However, Green Belts continue to be threatened by development, decreasing the ability of this land to provide for nature, reduce the impacts of climate change, and people's access to green spaces.

Analysis of completed developments

Our analysis continues to show that developments on the Green Belt continue to build executive homes, and not the affordable housing that people need. The vast majority of these are also built on land which was previously greenfield and at very low densities. The unsuitability and inefficiency of these developments is making poor use of this land, and not contributing to solving the housing crisis.

Affordability

We need to build new homes but, more importantly, the new homes that people actually need. Housing that is being built in the Green Belt is not providing the affordable homes communities are crying out for. Table 1 shows that of all the homes that have been developed on greenfield Green Belt since 2015/16, only 10.1% of these have been affordable by the NPPF's definition.

The following are extracts from CPRE's report [Recycling Our Land: State of Brownfield 2021](#).

Extracts

Our plentiful supply of brownfield land – land that has previously been built on – is an opportunity to develop the homes we need, where we need them, without destroying green fields. Harnessing this resource for housing development means that our precious countryside and green spaces can continue to provide crucial services for nature and the climate, as well as for people's health and wellbeing.

Our key findings include:

- Between 2006 and 2017, the proportion of brownfield land being used for residential development has decreased by 38%, whilst the use of greenfield land has increased by 148% in the same period.*
- Brownfield land continues to be perpetually regenerating resource with the current capacity now standing at 1.16 million new homes, an increase of 101,624 or 9.5% since we last reported in 2020. This capacity comes from 21,566 sites on 26,256 hectares.*
- Analysis of sites that have been removed from brownfield land, due to moving to an advanced stage of development, also show a further 150,000 capacity on brownfield for homes, bringing this total to 1.3 million.*
- Brownfield land can be found in high supply in all regions of England, with particular hotspots in the North west (167,461), Yorkshire and the Humber (108,790) and the West midlands (99,600).*
- We identified that there has been a substantial decrease in the proportion of housing units with planning permission, down to 44% from 53% in 2020 and the lowest since registers began*

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

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.

Modifications Requested

We remain opposed to the provision of overspill housing for the reasons given in the representations of CPRE West Midlands. However if this is not accepted by the Inspector we would ask that:

1. It be made clear that the policies of the Plan including HC1 to HC5, inclusive, shall apply to the housing for overspill homes as well as for South Staffordshire's population.
2. The element of the affordable housing for overspill should be available to qualifying people from the authorities seeking the overspill provision.
3. In considering more detailed proposals for Strategic Sites, South Staffordshire Council should agree to take into account the expressed needs of the overspill authorities.
4. We would prefer the overspill sites only to be brought forward under the basis of brownfield first, greenfield only if essential. The release of the overspill should be after 2028 and at a controlled rate agreed under the Duty to Co-operate.
5. We request that the overspill numbers should be separated from South Staffordshire's own requirements and that it be made clear that the 5 year supply test in NPPF is only to be applied to the South Staffordshire requirements under the New Standard Method.

(Without this South Staffordshire would be required to demonstrate planning permissions for around 500 dwellings p.a. - roughly twice its existing requirement. It would immediately be penalised for not having the required level of housing supply with planning permission and this would result in yet more permissions being granted on greenfield land in the Green Belt).

(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:

Only if the Inspector considers that the issue should be part of a hearing session and believes that our attendance would be useful.

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.