

# clearthinking

COMMERCIAL PROPERTY ADVICE



## **SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION HEARING STATEMENT**

---

### **MATTER 9: HOUSING LAND SUPPLY**

**On Behalf Of:**  
Redrow Homes

**Prepared By:**  
John Pearce, BSc (Hons) MTPL MRTPI  
Harris Lamb | 4<sup>th</sup> Floor | 4 Brindley Place | Birmingham | B1 2LG  
Telephone: 0121 455 9455 Facsimile: 0121 455 6595 E-mail: john.pearce@harrislamb.com

Job Ref: P1631

Date: 11<sup>th</sup> April 2025

**SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION**

**HEARING STATEMENT**

**MATTER 9: HOUSING LAND SUPPLY**

---

**Main Contributors**

**John Pearce, BSc (Hons) MTPL MRTPI**

---

**Issued By**

**Signature:**

A handwritten signature in black ink, appearing to read 'J Pearce', with a large, sweeping underline that extends to the left and then curves back under the signature.

**Print Name: John Pearce**

**Date: 11<sup>th</sup> April 2025**

---

# **CONTENTS**

**1.0 INTRODUCTION**

**2.0 RESPONSE TO INSPECTOR'S MATTERS AND ISSUES**

## **1.0 INTRODUCTION**

- 1.1 We are instructed by Redrow Homes ("**RH**") to submit written responses to the Inspector's matters and issues identified in respect of Matter 9 of the South Staffordshire Local Plan examination.
- 1.2 RH are promoting land at Castlecroft Farm as a proposed residential led development to accommodate approximately 600 homes. The land at Castlecroft Farm is located in close proximity to the built up edge of Wolverhampton City and is being promoted on the basis of either meeting the needs arising within South Staffordshire or meeting unmet needs arising within the wider housing market area. Our response to the Inspector's matters and issues should be read with that objective in mind and we set out our detailed response to the questions below.

**2.0 RESPONSE TO INSPECTOR'S MATTERS AND ISSUES**

**2.1 Question 1 – What is the relevant 5-year period on adoption and what is the 5-year housing land requirement?**

2.2 If the Local Plan is adopted in early 2026 the 5 year period would be from 1<sup>st</sup> April 2026 to 31<sup>st</sup> March 2031

**2.3 Question 2 – Does the trajectory identify the components of housing land supply across the plan period with sufficient clarity? Is it based on up to date evidence?**

2.4 The Council has provided a Local Plan trajectory (CD Ref: **SST/ED7C**) which is dated March 2025. The Council's response to the Inspector's questions on housing land supply (CD Ref: SST/ED7A) confirms that the base date for the trajectory is 1<sup>st</sup> April 2024. As we have just entered the new monitoring year, there is a further year of data that is not yet captured. As such, the trajectory is not currently based on up to date evidence.

**2.5 Question 3 – For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, lapse rates, timing and annual rates of delivery? What is the basis for these assumptions, are they realistic and justified and supported by evidence:**

- a) **Sites with planning permission and under construction;**
- b) **Sites with planning permission and not started (split by outline and full permissions);**
- c) **Sites identified in Land Availability Assessment;**
- d) **Sites identified in the brownfield register and with permission in principle;**

**e) Adopted Development Plan housing allocations without planning permission; and**

**f) Windfall sites?**

2.6 In order to respond to the question we have had regard to the Council's Housing Monitoring and 5 Year Housing Land Supply Report (1<sup>st</sup> April 2024) ("**the 5YLS Report**") which is appended at **Appendix 1** as it is not included in the examination library.

2.7 The 5YLS Report comments on lapse rates at paragraph 6.2 confirming that no lapse rate is applied to any of the allocated sites in the Plan. At allocation stage not enough detailed work has been undertaken to confirm the exact number of dwellings that are capable of being developed on the site and that ultimately the application will deliver. A generally accepted approach is that there is typically a 10% lapse rate between the total allocations and the eventual delivery of housing on site. RH contend that a 10% lapse rate should be applied to the proposed allocations.

2.8 If the 10% lapse rate were applied to 3,556 dwellings identified as allocations without permission on the Council's trajectory (CD Ref: SST/ED7B) this would reduce the overall supply by 356 dwellings.

2.9 The 5YLS Report does not specify lead in times nor annual delivery rates per se, although these were discussed by Officers as part of the SHELAA panel meeting in 2017. The minutes of which are attached at Appendix 3 of the 5YLS Report. At paragraph 4.3 the lead in times are suggested as:

<b>Number of Units</b>	<b>Planning Times</b>
50 – 99	As proposed
100 – 499	3 years to secure planning permission and 1 year to begin on site

500+	4 years to secure planning permission and 1 year to begin on site
------	---

2.10 The build out rates are suggested as:

Number of Units	Dwellings Per Annum
50 – 99	35 dpa
100 – 499	40 dpa
500 – 999	80 dpa (based on 2 outlets)
1000+	120 dpa (based on 3 outlets)

2.11 The assumption on lead in times and delivery rates have also been considered as part of Lichfield’s “Start to Finish Report” a copy of which is attached at **Appendix 2**. The Lichfield Report has information on the length of time it takes for first completions following the submission of a planning application. It is informed by an assessment of 297 sites in England and Wales ranging in size from 50 dwellings to in excess of 3,000 dwellings. In respect of larger sites of 1,000 dwellings it identified that it took on average 5 years to obtain detailed planning permission and a further 1.3 to 1.6 years to deliver the first dwellings. The report also highlighted that for sites less than 100 units it typically took an average of 1.5 years to secure planning permission and further 2.3 years for the first deliveries to be completed. On sites of 100 to 499 units this increased to 2.8 years for planning approval to be granted and a further 3.2 years to delivery of the first units.

2.12 The findings of the Lichfield Report in respect of lead in times indicate that for sites of up to 100 dwellings it took just under 4 years for the first completions and for sites of between 100 – 499 dwellings it took about 5 years to deliver the first completions. The SHELAA panel group by comparison concluded that for sites of between 100 – 499 first completions would be delivered in 4 years i.e. a year less than the Lichfield report concluded.

2.13 It is of note that the Council has signed Statements of Common Ground (“**SoCG**”) for the allocated sites with the developers/promoters of these which

indicate a willingness on behalf of the developers/promoters to bring these forward. Where a SoCG has been signed, this would indicate that there is evidence that these sites will come forward as expected.

**2.14 Based on the housing trajectory, how many dwellings are expected to be delivered in the first 5 years following adoption of the Local Plan? How many dwellings would come from each source of supply?**

2.15 The Local Plan Trajectory (CD Ref: **SST/ED7B**) confirms that 2,487 dwelling are expected to be delivered in the five years between 2025/26 and 2029/30. We have a number of concerns with some of the identified sources of supply.

2.16 In respect of small sites, the definition of deliverable in the annex framework confirms that sites which do not involve major development should be considered deliverable until permission expires. On the basis that planning permission is granted for 3 years, any sites being delivered by the time the permission has expired is to be considered as deliverable. The Council have included **26 dwellings** coming forward on small sites in years 4 and 5 in the trajectory. These should be removed.

2.17 In respect of windfalls, the Council have included windfalls within year 3. Windfalls are usually only identified from years 4 and 5 and therefore the allocation in year 3 should be deleted. This would remove **40 dwellings** from the supply.

2.18 Having regard to the lead in times set out in response to Question 3, if these are applied to allocated sites without permission such as land east of Bilbrook (Site 519) and land north of Penkrudge (Sites 010, 470, 584) it would push delivery back by a year and in doing so would remove **190 dwellings** from the supply. Whilst we are aware that applications have been submitted on certain part of these allocated sites, they remain undetermined at present and therefore the suggested lead in times for commencing on site are as per the tables above.

- 2.19 The absence of a SoCG for Site 139 (Pool View, Church Bridge) and Site 313 (land off Himley Lane, Swindon) would indicate that there is a question mark over the intentions of the developer to bring the sites forward. As such, a further **55 dwellings** should be removed from the supply.
- 2.20 Applying a 5 year time period, as per the conclusions of the Lichfield Report, to those sites included in the supply that are proposed for more than 100 dwellings, but which do not currently have planning applications submitted, would remove a further **135 dwellings** from the supply (sites 419A & B and 239 both are shown to contribute to the supply in years 4 and 5).
- 2.21 The Lichfields Report also concludes that the mean annual delivery rate of sites of between 50 and 99 units was 20 dpa. The Council has applied a rate of 35dpa. If the Lichfields build out rate is applied to those allocations in the Council's supply that propose more than 20 dpa, this would remove a further **240 dwellings** from the supply (a figure of 20dpa has been applied to each of these site and 255 is the net reduction) (sites 224, 119a, 536a, 005, 006, 617, 274, 416, 036c).
- 2.22 Having regard to the Council's own evidence and that in the Lichfield Report RH contend that there are **686 dwellings** that should be removed from the 5 year supply.
- 2.23 The Council state in its Response to the Inspector's questions on housing land supply (March 2025) (CD Ref: **SST/ED7A**) that it has a supply of 5,234 dwellings which represent 28% headroom above the South Staffordshire need and 11% headroom above the overall plan housing target. If the 651 dwellings were removed from the supply, this would represent a shortfall of 178 dwellings against the overall housing requirement.
- 2.24 **Question 5 – Are the assumptions about deliverability realistic, including where there is a reliance on significant strategic infrastructure?**

- 2.25 The Council's Infrastructure Delivery Plan (April 2024) (CD Ref: **CD11**) identifies the relevant infrastructure required as part of the Local Plan. Sections 5.22 and 5.23 identify specific infrastructure required for the two allocations at land east of Bilbrook and land north of Penkridge. The key area of delivery of infrastructure relates to the provision of new schools on both sites. The timing of delivery is to coincide with the provision of the new schools to ensure that the proposed developments have sufficient educational capacity for the new development. Both schools are stated to be required from 2025 onwards and to be secured through a Section 106 agreement. The timing of delivery of the school and the start of commencement of development on these sites will need to be carefully considered particularly in light of the first completions on sites not predicted to come forward until 2027/28 as per the housing trajectory. The Infrastructure Delivery Plan indicates that both schools are still subject to feasibility work and that funding for them is not yet secured which is not surprising since planning permission has yet to be granted and a Section 106 signed.
- 2.26 The Infrastructure Delivery Plan highlights a number of other areas and items of infrastructure that need to be delivered where the funding of these is yet to be determined whilst some still have no preferred design, funding or business case approved for them as yet. These are essential to the delivery of new housing and this could preclude or delay of housing coming forward.
- 2.27 Question 8 – Where sites in the housing trajectory do not have planning permission is there clear evidence that housing completions will begin within 5 years?**
- 2.28 As noted above, the Council has entered into SoCGs with promoters/developers of the proposed housing allocations. We have highlighted the two exceptions to this on sites 139 and 313 where there is no SoCG signed at the current time. At present there is no clear evidence that either of these sites would deliver as anticipated.

# clearthinking

COMMERCIAL PROPERTY ADVICE



BUILDING  
CONSULTANCY



COMMERCIAL  
INDUSTRIAL AGENCY



CORPORATE  
SUPPORT



DEVELOPMENT AND  
RESIDENTIAL LAND



ENVIRONMENTAL  
CONSULTANCY



INVESTMENT



LEASE  
ADVISORY



LICENSED AND  
LEISURE



PLANNING



PROPERTY  
MANAGEMENT



RATING



RECEIVERSHIP  
AND RECOVERIES



RETAIL, LEISURE  
AND ROADSIDE



VALUATION