

Matter 3 – Issue 1

Question 3.

Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realised through their implementation?

The proposed policies in the Local Plan will not deliver the strategic objectives. Strategic Objective 2 states that the plan will “*meet the needs of the district whilst making a proportionate contribution towards unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area. New housing will be focused on sustainable locations within the district, with a particular focus on the district’s most sustainable Tier 1 settlements”.*

As set out in separate responses to Matters 4 and 5, South Staffordshire District Council (‘SSDC’) has failed to justify their proposed contribution to the Greater Birmingham and Black Country Housing Market Area (‘HMA’) shortfall and demonstrate that it is proportionate. The proposed 640 dwelling contribution is only 0.59% of the total 108,906 dwelling HMA shortfall to 2042 which was identified at the time the Regulation 19 plan was drafted. This is not a ‘proportionate contribution’. Additionally, SSDC has not sufficiently justified their proposed strategy and the direction of growth away from the Black Country conurbation or properly assessed the implications of reducing their housing contribution on economic growth as jobs and housing are inextricably linked. Therefore, the proposed policies and growth strategy are not reflected Strategic Objective 2.