

South Staffordshire Local Plan examination – matter 4 (development needs and requirement)

Bellway Homes Limited (sites at Orton Lane and Strathmore Crescent, Wombourne)

April 2025

Introduction

1. This statement is submitted on behalf of Bellway Strategic Land ('Bellway') in response to the Inspector's matters, issues and questions to the South Staffordshire Local Plan.
2. Bellway is promoting two sites at Wombourne for residential development, land off Orton Lane (site ref: 416) and land west of Strathmore Crescent (site ref: 708). Details regarding both sites can be found in Bellway's representations to the reg 19 publication plan.
3. Land off Orton Lane is identified as safeguarded land in the adopted Site Allocations Document (September 201) and is currently subject to a full planning application (ref: 24/00241/FULM). This application is well advanced and is expected to be presented to Planning Committee with a recommendation for approval on 20 May 2025.
4. We have responded to the questions most relevant to Bellway's interests at Wombourne.

Issue 1 Questions

Q1: what is the minimum number of new homes needed over the plan period calculated using the standard method? Has the calculation of Local Housing Need been undertaken appropriately using the standard method and correct inputs reflecting the methodology and advice in the PPG?

5. South Staffordshire's local housing need ('LHN') established by NPPF 2024 is 651 dwellings per annum (dpa). Under the transitional arrangements at NPPF 2024 para 234 the plan is submitted with a proposed LHN of circa 262dpa, this only represents circa 40% of the district's current NPPF 2024 LHN (i.e. a significant 389dpa (60%) less).

Q2: are there any circumstances where it is justified to set a housing figure that is higher than the standard method indicates?

6. Both NPPF 2023 and 2024 para 11b state that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any need that cannot be met within neighbouring areas.
7. The GBBCHMA Statement of Common Ground ('SoCG') regarding housing shortfall (November 2024, agreed by officers only) (SST/ED11) establishes the shortfall across the HMA of **76,327 homes between 2023-2042**, predominantly arising from Birmingham, Dudley, Sandwell and Wolverhampton.

8. The above is based on the NPPF 2023 LHN, which established a total need of 14,337 dwellings per annum (dpa) across the GBBCHMA. Following the introduction of NPPF 2024 the total need has increased across the GBBCHMA to 15,861 dpa. As such the shortfall of 76,327 homes up to 2042 should be treated as a minimum. This is also based on accepting each Council's claimed supply without any interrogation.
9. **This represents a significant and substantial shortfall.** There are no signs or evidence the HMA will get anywhere near meeting this shortfall. Para 4.33 of SST/ED11 refers to potential contributions to the shortfall of 4,290 from four different authorities (including South Staffordshire). Since SST/ED11 was published Shropshire Council has agreed to withdraw its local plan following the recommendation of Inspectors¹ reducing the contribution to 2,790 homes. Telford and Wrekin's proposed contribution of 1,650 homes also lacks credibility given it arises from a reg 18 local plan consultation from November 2023 (that plan has not been advanced since). This would reduce the total contribution to just 1,140 homes.
10. South Staffordshire's original reg 19 publication plan (Nov 2022) (PC1) planned for a total of 9,089 homes between 2020-2039, 4,363 more homes than the plan subject to examination (although the plan periods do not completely align). This included a contribution of 4,000 homes towards the GBBCHMA unmet need. The plan identified land to meet this need as the district had sufficient capacity to do so. Indeed, the 2022 Sustainability Appraisal ('SA') underpinning that publication plan (EB3) confirmed at table N.3 (p.N17) that growth option C for circa 9,130 homes (along with growth option B to meet circa 7,030) was the most sustainable growth option.
11. This version of the plan and the associated evidence demonstrate that the district has sufficient environmental and infrastructure capacity to deliver at least 9,130 homes. With such a significant and substantial unmet need arising from the wider HMA and no clear indication of how it can be met, South Staffordshire has already evidenced its ability to make a much more significant contribution towards it. Based on the plan's proposed housing requirement, the plan could contribute circa 5,000 homes towards the unmet need.
12. This represents sufficient justification for setting a housing requirement higher than the NPPF 2023 LHN.

Q3: in policy DS4 the Local Plan identifies a minimum housing requirement of 4,726 homes over the period 2023-2041. Is this justified? If not, what should the housing requirement be?

13. This plan was submitted before 12 March 2025. NPPF 2024 paras 234 and 235 therefore establish the plan is to be examined "*...under the relevant previous version of the Framework*". Whilst this is the case, NPPF 2023 para 35 requires the plan to be positively prepared and accommodate unmet need from neighbouring areas, and to be justified and comprise an appropriate strategy, which takes into account reasonable alternatives.
14. The 2024 SA (EB2) demonstrates that the plan's now preferred strategy of 4,726 homes scores the same as the previous preferred strategy of 9,130 homes (as advocated by the original reg 19 publication plan (Nov 2022) (PC1).
15. Mindful of NPPF 2024 paras 236 and 237, if adopted as proposed, the requirement is significantly less than 80% of NPPF 2024 LHN, therefore the Council is expected to have a new plan submitted

¹ <https://newsroom.shropshire.gov.uk/2025/03/local-plan-to-be-withdrawn-in-response-to-inspectors-letter/>

for examination by 12 June 2026. As a minimum this is a policy that should be written into the plan.

16. Notwithstanding the above, South Staffordshire's current development plan already contains a policy requiring an early review of its plan (policy SAD1). That policy required the review to be submitted for examination by the end of 2021, yet this plan was not submitted until 2024, three years later and approx. 13 years after the CS was adopted). The result of this is that South Staffordshire cannot currently demonstrate a five year housing land supply ('5YHLS'), by the Council's own calculation the supply stands at 1.17 years.
17. Given the above, it is a significant risk for South Staffordshire to again rely on an immediate review of the plan, to ensure it is able to maintain a 5YHLS over more than a five year period post adoption of its plan. For the plan under examination to be considered justified and positively prepared, it should be planning for greater growth, which aligns with the NPPF 2024 LHN, now.
18. Failing this, the plan should at least be identifying land to be removed land from the Green Belt and safeguarded for future development needs (as per Bellway's Matter 6 hearing statement), as the current development plan does. This will at least provide a 'backstop' should South Staffordshire not advance a review of its plan within the timescales prescribed by the NPPF.

Q4: the housing requirement figure includes an approximate 10% additional number of homes to ensure plan flexibility. Is this figure justified?

19. The housing requirement figure **does not** include an approximate 10% buffer for flexibility.
20. The minimum housing requirement identified by the plan is 4,726 homes across the plan period. This is made up of South Staffordshire's pre NPPF 2024 LHN of 227dpa (p14 of the plan) totalling 4,086 homes, plus a contribution to the GBBCHMA unmet need of 640 homes. This is also made clear in the Council's response to the inspector's questions on housing land supply (SST/ED7A).
21. The plan does not confirm the total proposed supply, however SST/ED7A indicates the total supply is 5,234 homes across the plan period. This provides a circa 11% buffer on the proposed housing requirement.
22. The supply therefore provides a certain level of flexibility against the proposed housing requirement, it is however a separate question as to whether this is the correct requirement that should be planned for.

Q5: The housing requirement includes an additional 640 dwellings to contribute towards the unmet needs of the Greater Birmingham and Black Country Housing Market Area. Is this justified? If not, what should the figure be and why?

23. As per our response to Q2, the contribution should be significantly higher given South Staffordshire's evidenced environmental and infrastructure capacity.

Q6. In terms of the capacity of housing site allocations is the approach to calculating the minimum capacity for each housing allocation sound?

24. No comment.