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SENT BY E-MAIL AND POST

12<sup>th</sup> February 2016

Dear Sir / Madam

**SOUTH STAFFORDSHIRE SITE ALLOCATIONS DOCUMENT (SAD) -  
PREFERRED OPTIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and appear at future Examination Hearing Sessions to discuss these matters in greater detail.

This Preferred Options consultation sets out the strategy position, proposed Core Strategy up dates, methodology for site selection, housing sites to be allocated and Green Belt & open countryside boundary amendments.

The National Planning Policy Framework (NPPF) requires that :-

- A Local Planning Authority (LPA) should prepare a Local Plan for their area (para 153). The Local Plan should be positively prepared (para 157) including policies to deliver the homes needed in their area (para 156) ;
- A LPA should have a clear understanding of housing needs (para 159) based on up to date evidence (para 158) ;
- The Local Plan should preferably be drawn up over a 15 year time horizon to take account of longer term development requirements (para 157).

Furthermore the National Planning Practice Guidance (NPPG) sets out that :-

- The Government's preference is for a single Local Plan document. If a separate SAD is prepared there should be a justification for doing so (ID 12-012020140306) ;
- The Local Plan should be informed by evidence which is kept up to date. If key studies on which the Plan is reliant are a few years old then evidence should be up dated using the latest information available. If necessary as a consequence of this evidence the Plan should be changed before submission for examination (ID 12-014-20140306) ;
- The Local Plan should be updated in whole or in part at least every five years because for example a revised Strategic Housing Market Area Assessment (SHMAA) effects all authorities in that Housing Market Area (HMA) irrespective of the status of an individual Local Plan (ID 12-008020140306).

The Black Country Core Strategy was adopted in 2011 focussing on a strategy of urban regeneration. The South Staffordshire Core Strategy adopted in December 2012 is described by the Council as a counter point to the Black Country Core Strategy by focussing on rural regeneration for local needs only to reduce out migration from the urban conurbation to the rural Shires. The South Staffordshire adopted Core Strategy provides for 3,850 dwellings (175 dwellings per annum) between 2006 – 2028. However both Core Strategies were prepared pre-NPPF and in the case of the Black Country adopted pre-NPPF therefore neither Plan is based on evidence which calculates objectively assessed housing needs (OAHN) instead housing figures are derived from the former Regional Spatial Strategy (RSS) figures which are now revoked.

It is the vision and objectives of the adopted Core Strategy based on constrained RSS figures rather than OAHN which the SAD seeks to deliver by site specific proposals and policies for the use of land. The SAD also seeks to identify safeguarded land for the period 2028. Therefore the SAD proposes to allocate 993 residual dwellings (consultation document para 7.10) and safeguarded land for 1,750 dwellings (175 dwellings per annum multiplied by 10 years) and to retain the status of this safeguarded land until after a review of the adopted Core Strategy (consultation document para 7.17) which is not expected to be in place until 2022 (consultation document para 6.5).

Therefore the Council's current proposals mean there will not be a reviewed Core Strategy until 2022 which is 10 years after adoption of the Core Strategy rather than 5 years recommended in the NPPG. By the time the SAD is adopted only circa 10 years will remain before the end of the plan period rather than the 15 year time horizon specified in the NPPF. If the Council is to plan for new housing development and its longer term housing needs there should be a review of the adopted Core Strategy sooner rather than later and the amalgamation of the reviewed Core Strategy and SAD into one document as preferred in the NPPG with an end date beyond 2028 to encompass a longer 15 year time horizon.

This approach would also allow a comprehensive rather than piecemeal review of all Core Strategy policies including those proposed to Policy EQ5 as a consequence of the outcomes of the housing standards review. In this context proposed amendments to Green Belt and open countryside boundaries prepared on the basis of an out of date Core Strategy housing provision rather than meeting longer term housing needs will also become out of date very quickly after adoption of the SAD. If these boundaries are drawn too tightly the Plan will lack flexibility and inhibit sustainable development from coming forward.

Moreover the Council's proposed allocation of sites to meet a housing figure of only 175 dwellings per annum and not to release safeguarded land until post 2022 will not meet OAHN of South Staffordshire nor contribute to unmet needs arising elsewhere in the HMA. These proposals will not significantly boost housing supply.

It is acknowledged that South Staffordshire is part of the Greater Birmingham HMA. The latest evidence on OAHN is set out in "Greater Birmingham & Solihull Local Enterprise Partnership and Black Country Local Authorities Strategic Housing Needs Study Stage 3 Report" by Peter Brett Associates dated August 2015. The latest demographic projections for South Staffordshire identify an OAHN of 208 dwellings per annum. As these demographic projections represent just the starting point for the calculation of OAHN (NPPG ID 2a-015-20140306) the figures may be even higher after further consideration of other factors to support economic growth, upward adjustment for worsening trends in market signals and meeting affordable housing needs (NPPG ID 2a-018-20140306 -2a-020-20140306).

This latest figure of 208 dwellings per annum is for South Staffordshire only excluding any unmet needs from Birmingham and / or the Black Country so the statement in para 6.6 of the consultation document is incorrect. From 2011 there is the potential for at least 33 dwellings per annum of unmet needs from South Staffordshire accruing. If South Staffordshire is not meeting its own needs there are implications of failing to meet in full OAHN in the HMA for other authorities in the Greater Birmingham HMA. Moreover as South Staffordshire Council forms part of the Greater Birmingham HMA the Council also has a role to play in the resolution of at least 40,000 dwellings of unmet housing needs arising from Birmingham city over the period 2011 – 2031.

The Duty to Co-operate (S110 of the Localism Act 2011 which introduced S33A into the 2004 Act) requires the Council to co-operate with other prescribed bodies to maximise the effectiveness of plan making by constructive, active and on-going engagement. In satisfactorily discharging the Duty it is important to consider the outcomes arising from the process of co-operation and the influence of these outcomes on the Local Plan. One of the required outcomes is the delivery of full OAHN for market and affordable housing in a HMA as set out in the NPPF (para 47) including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (NPPF para 182).

As set out in the NPPF and NPPG the Council cannot just ignore this new evidence on OAHN which demonstrates a figure higher than 175 dwellings per annum is needed. When allocating additional housing sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets.

In conclusion for the South Staffordshire SAD to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and compliant with national policy. The Council should re-consider its proposals as set out in this Preferred Options consultation in order to avoid preparing a Plan which is unsound by failing to be consistent with national policy, positively prepared, properly justified and so ultimately ineffective. It is hoped that these representations are of assistance to the Council in preparing the next stages of the South Staffordshire SAD. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



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