SOUTH STAFFORDSHIRE SITE ALLOCATIONS DOCUMENT

MATTER 2: LOCAL PLAN STRATEGY (SAD 2)

PEGASUS PLANNING GROUP ON BEHALF OF:
RICHBOROUGH ESTATES
BLOOR HOMES LTD
TOUCH COVEN/FOUR ASHES ROAD
1.1 Introduction

1.2 This statement has been prepared by Pegasus Group on behalf of Richborough Estates Limited, Bloor Homes Ltd and Touch Coven/Four Ashes Road Ltd who all have land interests within South Staffordshire District. This statement provides a response to questions 2.2a, b, c, d and e and should be read in conjunction with representations submitted to the ‘publication’ Site Allocations Document [SD20].

1.3 Is the approach to housing provision consistent with national policy in the NPPF and PPGs and policies in the adopted Core Strategy, including positively seeking opportunities to meet identified housing needs with sufficient flexibility to adapt to change?

1.4 The adopted Core Strategy housing requirement of 175 dwellings per annum is a minimum figure and represents a constrained number based on the, now revoked, West Midlands Regional Spatial Strategy. It therefore does not represent the objectively assessed housing need (OAHN) for the District.

1.5 The latest 2017 Black Country and South Staffordshire SHMA [SD80] calculates the OAHN for South Staffordshire as 270 dwellings per annum. In addition, the Government’s standard methodology, set out in the ‘Planning for the right homes in the right places’ consultation document, calculates the housing need as 290 dpa based on the most up-to-date demographic data available (2014 SNHP), albeit this is then capped at 245 dpa. It should be noted that the Government’s standard methodology excludes any necessary uplift in respect of economic growth aspirations.

1.6 In addition, there are also identified unmet needs across the wider HMA of which South Staffordshire District is a part. These unmet needs are quantified as 37,500 dwellings in Birmingham and 22,000 dwellings within the Black Country.

1.7 Whilst the SAD fails to allocate housing sites in accordance with the OAHN, it is clear that land needs to be taken out of the Green Belt as soon as possible to significantly boost and enable a continuous supply of housing to meet needs in the short term. In addition, a number of judgments, including the recent Cooper Estates and Royal Tunbridge Wells judgment [2017] EWHC 224 (Admin), supports the Council’s approach. This judgment, handed down on 14th February 2017, reiterates the point previously established that a Site Allocations Document needs only to be in conformity with the Core Strategy, and that evidence of additional needs and a requirement for the Core Strategy to be reviewed should not prevent a Site Allocations Document proceeding. Therefore, the production of
the SAD provides the most expeditious route and sound approach to significantly boosting housing land supply in line with Government policy.

1.8 The Council, through Policy SAD1, recognises the need to review the Local Plan to ensure local housing needs are satisfied and to deal with any cross-boundary requirements. An early review, brought forward without delay, is therefore fundamental to ensuring an up to date plan is put in place for the District to ensure the ‘full, objectively assessed needs for market and affordable housing in the housing market area’ can be met. This is a matter considered further in a separate statement.

1.9 In terms of flexibility, the proposed allocations set out in Policy SAD2 are assumed to be capable of delivering a minimum of 891 homes. Taken at face value and as set out in the Council’s latest land supply position [SD0102], the proposed allocations provide an oversupply of 923 dwellings over the plan period in comparison to the Core Strategy housing requirement. However, in reality some of these allocations may not result in a start or could be delayed to such an extent that delivery is pushed back beyond the plan period. For example, landowners may not be willing to sell a site as the price that can be achieved is not what they want; a developer cannot secure finance or meet the terms of an option; there are supply chain constraints that hinder a site; or, there are unexpected constraints that render a site undeliverable.

1.10 In addition, consideration of a 5-year housing land supply for ‘decision taking’ will be considered against the objectively assessed housing need for the District which is significantly higher than the 175 dpa established through the Core Strategy. To ensure development within the District remains plan-led it is essential to ensure an uplift in the supply of housing land through the Site Allocations Document. The scale of such uplift should ensure a rolling five-year supply against the OAHN until at least 2022; the date by which the Council commits to putting a new plan in place.

1.11 The SAD provides an opportunity to provide a robust contingency to not only ensure delivery of the housing requirement established through the Core Strategy, but also to provide an uplift in housing delivery, over and above the minimum requirement established in the Core Strategy. This opportunity would provide the benefit of identifying additional housing land at a much earlier point in time than that which would result through a review of the Local Plan, providing much needed flexibility in the supply and ensuring a plan led approach can be
maintained in light of the OAHN for the District until a new Local Plan is in place. Further contingency should be introduced through a mechanism allowing the early release of safeguarded sites in the event that the Council is unable to demonstrate a 5 year supply of deliverable housing land. This approach is required to ensure planning decision remain plan-led in the period of time prior to the adoption of a new Local Plan where the application of the OAHN will influence the 5YHLS calculation as opposed to the Core Strategy requirement.

1.12 **Is the proposed spatial distribution of proposed housing land provision, including the amounts of new housing allocated to each settlement, consistent with the adopted Core Strategy (Policies CP1 & CP6), the sequential approach to development and the availability of sites and capacity of each settlement?**

1.13 Core Policy 1 establishes the Spatial Strategy for South Staffordshire and identifies a settlement hierarchy for the distribution of growth. Core Policy 6 is explicit is establishing minimum housing requirements for each of the Main and Local Service Villages.

1.14 Paragraph 7.7 of the submitted Site Allocations Document [SD20] provides the residual minimum requirement remaining in each of the villages to ensure delivery of the spatial strategy established by CP1 and CP6. A comparison between the residual requirements and the minimum yield from the proposed allocations is set out below:

<table>
<thead>
<tr>
<th>Locality 1</th>
<th>Residual minimum requirement</th>
<th>Proposed allocation yield</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Penkridge</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Huntington</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Locality 2</th>
<th>Residual minimum requirement</th>
<th>Proposed allocation yield</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brewood</td>
<td>53</td>
<td>53</td>
<td>0</td>
</tr>
<tr>
<td>Coven</td>
<td>34</td>
<td>40</td>
<td>+6</td>
</tr>
<tr>
<td>Wheaton Aston</td>
<td>12</td>
<td>15</td>
<td>+3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Locality 3</th>
<th>Residual minimum requirement</th>
<th>Proposed allocation yield</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheslyn Hay</td>
<td>63</td>
<td>63</td>
<td>0</td>
</tr>
<tr>
<td>Great Wyrley</td>
<td>87</td>
<td>95</td>
<td>+8</td>
</tr>
<tr>
<td>Essington</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Featherstone</td>
<td>43</td>
<td>60</td>
<td>+17</td>
</tr>
</tbody>
</table>
1.15 The above table highlights that the proposed allocations within Policy SAD2 reflect the overall amount and spatial distribution of growth as determined by the Core Strategy (Policies CP1 and CP6), however it does highlight the marginal flexibility in provision against the minimum requirements set out in CP6, with an assumed yield only 58 dwellings above the minimum residual requirement for the main and service villages. This equates to a buffer of just 5.7%. A lack of flexibility within the Main and Local Service Villages could result in the spatial strategy set out in the Core Strategy not being fully implemented.

1.16 It is noted that the Council published a Strategic Housing Land Availability Assessment (SHLAA) in 2016 [SD79]. This provides a stark picture in respect of the lack of available derelict land and brownfield sites in the Main and Local Service Villages across the District. In addition, this evidence demonstrates other opportunities are limited due to both Green Belt and Open Countryside policy restrictions. As all of the Main and Local Service Villages are restricted by the presence of Green Belt it is unsurprising that there is a need in villages, where there is a residual housing requirement to satisfy CP6, to release Green Belt.

1.17 Is the overall amount and spatial distribution of proposed housing land deliverable and developable within the current plan period, will it ensure that there is a 5-year supply of housing land throughout the plan period, and does it provide sufficient choice and flexibility of sites to meet current and future housing needs?

1.18 The adopted spatial development strategy, as set out in the Core Strategy, disperses growth to a wide range of Main and Local Service Villages that are located across each of the four identified locality areas. Therefore geographically, the proposed allocations ensure choice through provision in all local housing market areas.
1.19 However, whilst the overall amount of proposed deliverable housing land could be argued to provide a 5 year housing land supply upon adoption, concern is raised that insufficient flexibility exists to provide confidence that a 5 year housing land supply can be maintained throughout the plan period when set against the OAHN for the District. The need for this plan to demonstrate a rolling 5 year housing land supply is particularly important for the early years, prior to a new Local Plan being adopted.

1.20 The scale of flexibility should be informed by the evidence that is available. The most up to date information that is currently published is that which is contained within the Black Country and South Staffordshire District Strategic Housing Market Assessment, albeit this evidence remains untested. In addition, the Government's ‘planning for the right homes in the right places’ outlines a standard method for determining housing needs, which under the proposed transitional arrangements, would be relevant to South Staffordshire District. Utilising the SHMA, the untested OAHN for the District is 270 dpa. It is considered that this level of uplift can be provided within the District, without undermining the spatial development strategy set out in the adopted Core Strategy.

1.21 This uplift could be met through the identification of additional allocations within the Main and Local Service Villages, consideration of an increase in yield within the proposed allocations, or by simply incorporating increased flexibility through a mechanism for early release of ‘safeguarded land’ if required. The latter approach would allow these sites to come forward in circumstances where the Council is unable to demonstrate a five-year supply of deliverable housing land, in locations consistent with the adopted spatial development strategy.

1.22 Does the SAD take sufficient account of previously developed/brownfield land, windfall sites, completions and commitments in its proposed housing provision, and has it fully assessed and maximised the use of all reasonable and realistic non-Green Belt land?

1.23 The SAD takes sufficient account of previously developed/brownfield land, windfall sites, completions and commitments. Account of these sources of supply are set out in the Council’s Housing Background Topic Paper [SD30] and has informed the determination of the residual minimum housing requirement to be met in each of the Main and Local Service Villages.

1.24 It is considered that the Council has maximised the use of all reasonable and realistic non-Green Belt land.
1.25 The latest evidence on housing land supply [SD102] confirms that, at present, the Council can demonstrate a housing supply of only 4.39 years, based on the most recent objective assessment of housing need for South Staffordshire (270dw/year) [SD080]. What implications does this have for the SAD, and will the Council be able to demonstrate a 5-year supply of housing land when the SAD is adopted?

1.26 The Council’s latest housing land supply position demonstrates that the Council is unable to demonstrate a 5-year supply of deliverable housing land. However, it is noted that the proposed allocations contained within Policy SAD2 are rightfully excluded from the supply.

1.27 Removal of land from the Green Belt, through the allocation of housing sites within the Site Allocations Document, represents the only opportunity to boost supply in the short term and remedy the current shortfall in supply. The adoption of the SAD will significantly boost the supply of deliverable and developable housing land; however, concern is raised that insufficient flexibility is built in to the SAD to ensure a rolling five year supply of land is provided in the period of time before a new Local Plan is put in place based on current evidence of housing need.

1.28 To assist this discussion, it would be helpful for a trajectory to be published to incorporate delivery timescales for the proposed allocations, set against the objectively assessed housing need for the District. This would allow for further scrutiny on this issue.

1.29 To remedy a lack of flexibility in supply within the District a mechanism for early release of the safeguarded sites should be incorporated within the SAD to assist on occasions where the Council is unable to demonstrate a 5YHLS against the relevant housing need figure.