

# HEARING STATEMENT

MATTER 9: HOUSING LAND SUPPLY

BLOOR HOMES LTD, CAMERON HOMES LTD, LOVELL HOMES LTD, FOUR ASHES ROAD LTD

# 1. ISSUE 1

On the premise that the housing requirement is sound, whether the Local Plan is justified, effective and consistent with national policy in relation to demonstrating the housing land supply position throughout the plan period.

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

- 1.1 It is noted that the Council has provided information for 2025-2030 and 2026-2031.

*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?*

- 1.2 The trajectory identifies all components of housing supply across the Plan period.

*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*

- 1.3 There can be a level of certainty that the major sites identified as under construction will continue to be built out in line with the trajectory.

*b. Sites with planning permission and not started (split by outline and full permissions)*

- 1.4 It is noted that no lapse rates are applied to large sites with planning permission and not started. No evidence has been provided in respect of non-implementation of large sites.

*e. Adopted development plan housing allocations without planning permission*

- 1.5 The vast majority of the remaining sites identified in the Site Allocations Document (SAD) now have the benefit of planning permission. The two remaining sites are subject to live planning applications.

*Question 5: Are the assumptions about deliverability realistic, including where there is a reliance on significant strategic infrastructure*

- 1.6 The assumptions in respect of both SDLs are considered realistic and reflect an agreed position with Bloor Homes.

*Question 6: Does the evidence demonstrate that at least 10% of the housing requirement set out in the Plan would be delivered on smaller sites?*

- 1.7 The trajectory does not provide evidence to demonstrate that at least 10% of the housing requirement set out in the Plan would be delivered on small sites. Whilst the trajectory identifies a supply of 463 dwellings from small sites, this relies heavily on small windfalls and the Plan is not positively prepared in this regard

*Question 7: What assessment has been made of any potential impacts on delivery of small sites in South Staffordshire?*

- 1.8 The Council applies a 19% non-implementation rate to small windfall sites not yet started. It is noted that this was agreed with the SHLAA Panel back in 2017. No recent evidence appears to have been published to support this figure.

*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?*

- 1.9 In respect of both SDLs (Bloor Homes), Site 136 (Cameron Homes), Site 617 (Four Ashes Road), Site 459 (Lovell) and Site 562/459 (Lovell), applications are currently pending determination. In addition, in respect of Site 082 (Cameron Homes) pre-application community engagement has been undertaken.

*Question 10: Does the Plan provide appropriate contingency to ensure a sufficient pipeline supply of homes? What flexibility is there within the Local Plan should some of the housing allocations not come forward in line with the expected timescales?*

- 1.10 The trajectory demonstrates a lack of planned supply for the latter years of the plan period relying on completions from three sites from 2033 to the end of the plan period. There is zero planned supply in the last four years of the Plan period.

*Question 11: Does the evidence demonstrate that the Plan, taken together with completions, commitments and allocations in the existing development plan for the area, and windfall allowance will provide:*

*b. A supply of specific, developable or broad locations for growth for years 6-10 and, wherever possible years 11-15 of the plan period?*

- 1.11 Due to the nature of the proposed allocations, the trajectory identifies a boost in housing delivery in the early years of the Plan period and a significant lack of delivery in the last 5 years of the plan period. The trajectory identifies an inability

for the Council to demonstrate a rolling 5 year housing land supply across the Plan period.

*Question 14: Are any modifications required to either trajectory and, if so, would other modifications be necessary to the Plan?*

- 1.12 Changes to the trajectory maybe required if a prolonged EiP results in the adoption of a new Local Plan beyond the beginning of 2026.

