



**South Staffordshire Local Plan Examination
Response to Matter 4: Development Needs and Requirement**

Wain Estates

April 2025

Introduction

This statement Matter 4 (Development Needs and Requirement) of the examination of the South Staffordshire Local Plan Review (SSLPR) is submitted by Wain Estates (Land) Ltd ('Wain Estates'). Separate representations have been submitted in respect of the following Matters:

- Matter 2: Duty to Co-operate
- Matter 3: Vision and Strategic Objectives
- Matter 5: Spatial Strategy
- Matter 7: Site Allocations
- Matter 8: Delivering the Right Homes
- Matter 9: Housing Land Supply
- Matter 12: Building a Strong Local Economy
- Matter 14: Protecting and Enhancing the Natural Environment
- Matter 16: Enhancing the Historic Environment

It follows representations submitted on behalf of Wain Estates (by Emery Planning) to the (Regulation 19) Pre-submission Draft of the South Staffordshire Local Plan Review in May 2024 in respect of our land interests at Penkridge Road, Acton Trussell which we are promoting for residential development. For reference, the representations comprised those identified under the following Representation IDs by the Council: AGT24-016-02-01 to AGT24-016-02-14.

The National Planning Policy Framework [NPPF] outlines that during the examination process, a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector's questions which set out why Wain Estates considers changes to the are necessary to ensure the soundness of the plan.

The Plan was submitted on the 11th December 2024 and thus the December 2023 NPPF is wholly applicable for the purposes of assessing this plan, in accordance with paragraph 234 to 236 of the revised December 2024 NPPF. Reference is therefore made to the December 2023 NPPF in response to the Inspector's questions, unless otherwise stated.

This Statement has been prepared in line with the Guidance Note for the Examination (SST/ED8).

Matter 4: Development Needs and Requirement

Issue 1: Whether the identified future housing development need and requirement set out in the Plan are justified, effective and consistent with national policy.

Questions:

1. 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?

No comment.

2. Are there any circumstances where it is justified to set a housing figure that is higher than the standard method indicates?

Please see our response to Question 5

3. 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?

As noted in our response to Question 5 below and in our submissions on Matter 2: Duty to Cooperate, we do not consider a minimum housing requirement of 4,726 homes to be justified and consider that the proposed contribution towards meeting the unmet needs of the GBBCHMA should be increased significantly.

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

No comment.

5. 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?

Whilst we support the principle of a proposed contribution towards meeting the unmet needs of the GBBCHMA, we consider that the proposed contribution towards meeting these unmet needs should be far higher.

In the context of the NPPF requirement to 'plan positively' (paragraph 16) and the Government's stated objective of 'significantly boosting the supply of homes' (paragraph 60), it is disappointing that the Council has sought to amend the plan from the previous Regulation 19 version, to reduce the housing requirement substantially. This would appear to be indicative of a negative approach and the opposite of 'significantly boosting the supply of homes'.

As we have set out in our submissions on Matter 2: Duty to Cooperate, the plan's proposed contribution to meeting the GBBCHMA's unmet needs – just 640 dwellings in the proposed plan

period to 2041 – does not come close to meeting the unmet needs in full and is not part of any coherent or justified strategy for meeting that objective. This is despite it being practical to do so and sustainable sites such as the site we are promoting at Penkridge Road, Acton Trussel, which is suitable, available and deliverable, being omitted.

In the Publication Local Plan (paragraph 5.10) the Council acknowledges that the unmet needs from the GBBCHMA to 2036 are potentially 78,415 homes. There may well be an even greater need for housing given that the standard method makes no attempt to predict the impact of changing economic circumstances, and the existing evidence base for housing need across the GBBCHMA does not properly consider whether there will be sufficient labour to meet the economic growth ambitions of the sub-region.

In addition, there is insufficient evidence to demonstrate that the housing land supply within the GBBCHMA is robust. In our view, the housing land supply may have been over-stated, meaning that the actual level of shortfall across the GBBCHMA is even higher than the figures referred to at paragraph 5.10 of the Publication Plan.

We also note that this plan period extends to 2041, meaning that the shortfall to 2036 is not the end of the issue and unmet need may be higher by 2041, assuming that it is not addressed by authorities such as South Staffordshire making meaningful contributions to addressing the shortfall.

The ‘Statement of Common Ground Regarding Housing Shortfall Position in the GBBCHMA at 29 November 2024’ (SST/ED11) identifies the following shortfall for Birmingham City and the four Black Country Authorities at paragraph 4.32:

“Table 1 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes”.

It notes at paragraph 5.1 that this figure is based on the published evidence to date, that at present such shortfalls have not been subject of examination, and this shortfall could change as more local plan reviews progress. The actual shortfall may well therefore be higher.

In terms of contributions to this shortfall, the November 2024 SOCG notes at paragraph 4.33:

“Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country’s needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA’s unmet needs (e.g. from South Staffordshire and Cannock Chase Councils)”.

The contributions currently proposed, including South Staffordshire’s contribution of 640 homes, fall way below the shortfall identified.

The November 2024 SOCG also notes the following at paragraphs 6.1 and 6.2:

“The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018

Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited and refreshed when the updated Growth Study is published and has been agreed”.

Once this work has been undertaken it may well be the case that the GBBCHMA shortfall increases significantly. However, based on the evidence available to date, the Local Plan’s proposed contribution to meet the GBBCHMA’s needs – just 640 dwellings to 2041 – does not come close to meeting the unmet needs in full.

The previous version of the plan proposed a contribution of 4,000 homes to addressing unmet needs. However, the Council now proposes to only contribute 640 homes to meet those needs. The justification for this specific figure is not clear. A reduction in the contribution from 4,000 dwellings to just 640 is extremely negative and wholly unjustified. The approach is also not effective in the context of paragraph 35 of the NPPF, which requires plans to address cross-boundary strategic matters, rather than defer them.

The Council should revert to the previously proposed contribution of 4,000 dwellings, and for this to be agreed through a Statement of Common Ground. Even if the precise extent of the shortfall cannot be established, the plan should seek to deliver thousands more homes based upon the acknowledged shortfall across the GBBCHMA.

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

No comment.