



South Staffordshire Local Plan Review Examination

Matter 4: Development Needs and Requirement

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

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?

- 1.1.1** As set out in our Regulation 19 representation (AGT24019-01-01), Gladman was disappointed by the Council's sudden change in direction regarding the proposed contribution to the unmet housing needs of the GBBCHMA. Our position has not shifted on this critical matter, and we do not seek to repeat those comments in this statement.
- 1.1.2** Although this Plan is being examined under a previous version of the Framework, it is nonetheless important to recognise that events have moved on further since the Regulation 19 consultation, with the publication of the revised National Planning Policy Framework (NPPF24) and the introduction of the new Standard Method (SM3) in December 2024.
- 1.1.3** For South Staffordshire, SM3 establishes a local housing need of 644dpa, a significant increase above the Plan's proposed annualised housing requirement. Furthermore, on current available evidence, there unsurprisingly remains a substantial unmet housing need stemming from the GBBCHMA of between c.42,800-56,300 dwellings up to 2042¹.
- 1.1.4** Weighing up the circumstances, it is Gladman's position that a pragmatic and reasonable course of action in this instance is for this Plan to include an immediate review mechanism policy, with that Review addressing the implications of SM3 for both South Staffordshire and the unmet housing needs of the wider region.
- 1.1.5** There would be distinct benefits gained from an approach of this nature. It would ensure the earlier delivery of new housing/employment allocations and the provision of an up-to-date framework to guide development in the district. It would also enshrine in policy that the Council will need to immediately start preparing a new Local Plan to address the sizeable housing need shortfall resulting from SM3.

¹ The range in unmet need is dependent on those LPAs in the GBBCHMA that currently meet the transitional arrangements set out in NPPF24.

- 1.1.6 To ensure that any review mechanism policy is effective, it will need to have consequences. The following wording is put forward for the Inspectors consideration:

“The Local Planning Authority will undertake a review of the Local Plan immediately following the adoption of this plan. An updated or replacement plan will be submitted for examination no later than 30 months after the date of adoption of the plan.

The replacement plan will secure levels of growth that accord with government policy, serve to build stronger working relationships with adjoining and nearby authorities and accommodate any apportionment of unmet housing and employment needs that have been agreed

In the event that this submission date is not adhered to, the policies in this Local Plan Review which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework.”

- 1.1.7 In undertaking the next round of plan-making, Gladman would urge the Council to fully review its settlement hierarchy and identify those settlements with a strong offering of services and facilities that should be placed higher in the hierarchy, and as such could make a greater contribution to delivering the new homes required within the district. The Council should also ‘future proof’ its Green Belt evidence by identifying and appraising land which is defined as Grey Belt under the NPPF 2024.