

South Staffordshire Local Plan Examination

Response to Matter 3: Vision and Strategic Objectives

St Philips (Wedges Mills)

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Contents

1.0	Introduction	1
2.0	Matter 3: Vision and Strategic Objectives	2
	Issue 1	2

1.0 Introduction

- 1.1 This statement to Matter 3 (Vision and Strategic Objectives) of the examination of the South Staffordshire Local Plan Review (“the LPR”) is submitted by Lichfields on behalf of St Philips in relation to their land interests at Wolverhampton Road, Wedges Mills Cannock. Please refer to the full introduction included within St Philips Matter Statement 2 in respect of Wolverhampton Road, Wedges Mills Cannock.
- 1.2 Separate representations have been submitted in respect of the following Matters:
- Matter 2 – Duty to Cooperate;
 - Matter 4 – Development Needs and Requirement;
 - Matter 5 – Spatial Strategy;
 - Matter 6 – Green Belt.
- 1.3 This Statement has been prepared in line with the Guidance Note (SST/ED8) for the Examination.

2.0 **Matter 3: Vision and Strategic Objectives**

Issue 1

Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy and positively prepared.

Q. 1. Is the Vision of the Plan for South Staffordshire ambitious, and yet realistic in terms of its scope and deliverability?

- 2.1 No. St Philips considers that South Staffordshire Council's ("the Council") Vision and Strategic Objectives, as set out in the LPR, do not have sufficient regard to and provide ambitiously for, the identified unmet needs in neighbouring areas.
- 2.2 The NPPF is clear that the Government's objective is to significantly boost the supply of housing (Para 60). It is also clear that local plans should provide a "*positive vision for the future*" for the area (Para 15), should be "*prepared positively, in a way that is aspirational but deliverable*" (Para 16b), and "*prepared with the objective of contributing to the achievement of sustainable development*" (Para 16a). However, it is also clear that development plans "*must include strategic policies to address each local planning authority's priorities for the development and use of land in its area*" (Para 17). It also requires plans to contain strategic policies which should, as a minimum, provide for objectively assessed needs [OAN] for housing and other uses and those that cannot be met within neighbouring areas (Para 11b).
- 2.3 In this regard, St Philips considers that the Council's current approach to its Vision and Strategic Objectives is unambitious, not positively prepared, and does not appropriately provide for the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area [GBBCHMA]. In addition, the Council's 'Vision' is not ambitious, as it does not reference the need for the Council to meet its resident's housing needs, and no reference is given to addressing the unmet housing needs of the GBBCHMA.
- 2.4 This is plainly at odds with the NPPF; it is neither positive, aspirational, ambitious, nor seeking to boost the supply of homes. Instead, the St Philips considers that it highlights the Council's cynicism towards housing development and Green Belt release in general, alongside its desire to prepare an LPR designed specifically to limit housing growth and the District's role in addressing the unmet needs of the GBBCHMA.
- 2.5 Indeed, the above view aligns with Walsall Metropolitan Borough Council's ("Walsall") view of the LPR. As set out – in summary – within the 'Duty to Cooperate Topic Paper Addendum (2024)' (DC1) [DtCTPA], Walsall considers that the LPR "*does not align well with the test of soundness requiring plans to be positively prepared*". Moreover, both Birmingham City Council and Lichfield District Council have expressed 'disappointment' with the Council's proposed unmet housing needs contribution reducing from 4,000 dwellings in the previous Regulation 19 LPR, to the now proposed 640 dwellings. This emphasises St Philips' view that the Council's approach is fundamentally failing to accommodate an appropriate and evidence-based proportion of the unmet needs of neighbouring authorities.

- 2.6 As discussed further in the St Philip’s response to Matters 2 and 4, there will be acute unmet housing needs up to 2042 within the GBBCHMA, arising from the Black Country Authorities [BCAs]. Indeed, the Council’s own ‘Green Belt Exceptional Circumstances Topic Paper (April 2024)’ (EB6) (“the GBES Topic Paper”) estimated the GBBCHMA’s unmet housing needs to be in the order of c.31,000 dwellings up to 2042, as a minimum (DC1). However, Lichfields’ analysis of the current position arising from the BCAs advancing their Local Plans, suggests that this this unmet housing need would equate to c.42,800 homes up to 2042, as result of the transitional arrangements¹ set out in the revised 2024 NPPF.
- 2.7 This is a substantial amount, and contrary to the Council’s suggested approach of a nominal and arbitrary contribution until such time as an update to the Strategic Growth Study (2018) (EB28) [SGS] has been prepared, these needs should be positively addressed now based on the current evidence. Even if the BCAs are able to make provision for further land within their Green Belt, the extent of the unmet housing needs arising up to 2042 is likely to remain acute and severe and would suggest an unmet need contribution within the LPR in excess of the nominal 640 dwellings proposed.
- 2.8 St Philips has made representations to the Council consistently on this matter, even when the Council’s previous LPR Regulation 19 consultation – undertaken in December 2022 – included a c.4,000 dwelling contribution. Whilst St Philips welcomes the Council’s commitment to addressing part of the GBBCHMA’s unmet needs through the LPR, St Philips continues to hold the view that the Council’s approach has not been underpinned by appropriate or up to date evidence and is therefore not ‘justified’ (Para 35b).
- 2.9 As a consequence of this, St Philips considers that the Council’s proposed markedly reduced contribution towards the GBBCHMA’s unmet housing needs is unacceptable and unjustified, and that the Council should defer to its previously proposed contribution (i.e. 4,000 dwellings) – as a minimum – within the LPR, or otherwise fail the tests of soundness in relation to the Duty to Cooperate [DtC] (i.e. Paras 24 and 27 of the NPPF).
- 2.10 In the context of the NPPF’s requirements and given the critical need to address these unmet housing needs, St Philips considers that the Council’s Vision and Strategic Objective 2 are neither ambitious nor positively prepared. They should explicitly refer to the critical need for new development, growth and meeting the housing needs of the area in full, alongside placing a greater emphasis on the wider GBBCHMA context and the need to meet unmet housing needs now. It should also be a more ambitious plan and set out a positively prepared long-term vision for the area in accordance with the NPPF, one of the fundamental purposes of good plan-making.

Q. 3. Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realised through their implementation?

- 2.11 No. Strategic Objective 2 refers to “*making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area*”, however, St Philips strongly consider that the proposed contribution (i.e. 640 dwellings) – as defined in Policy DS4 (Development Needs) – does not adequately address these needs – this is set out in more detail within St Philip’s response to Matters 2 and 4. In essence, St Philips

¹ Paragraphs 234-235, NPPF 2024

considers that Policy DS4 is therefore not making a 'proportionate contribution' to addressing the unmet needs of the GBBCHMA, and therefore, that the thrust of Strategic Objective 2 has not been sufficiently reflected in Policy DS4 so that the Vision may be realised.

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