

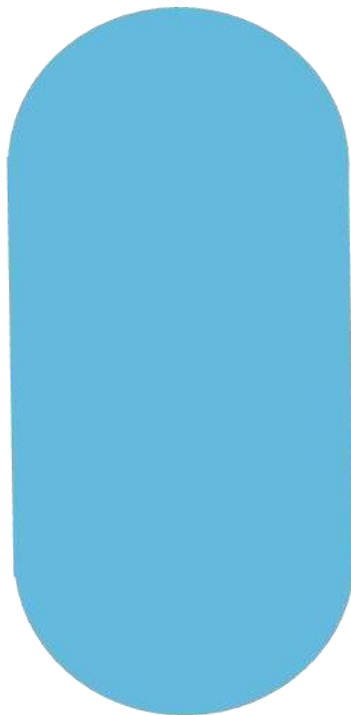


 Part of Shakespeare Martineau

Statement in Respect of the South Staffordshire Local Plan Examination

**Matter 4 – Development Needs and
Requirement**

On Behalf of Catesby Estates



1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of Catesby Estates with respect to Matter 4 - Development Needs and Requirement.

2. 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.

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?

- 2.1 Catesby Estates consider that the proposed housing requirement of 4,726 dwellings is not justified.
- 2.2 Firstly, given the requirement set out in the National Planning Policy Framework (NPPF, December 2023) at Paragraph 22 for strategic policies to look ahead over a minimum period of 15 years from adoption, Catesby Estates are concerned that the Local Plan lacks sufficient flexibility to ensure it can maintain compliance with the NPPF. Clearly the Local Plan has now progressed to Examination and there is a credible prospect that it could be adopted by 2026, however given soundness concerns raised by Catesby Estates on a number of Matters, this should be kept under review.
- 2.3 Taking into account responses provided to Questions 4 and 5 below relating to an appropriate buffer and the contribution towards unmet needs arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), and on the basis of extending the Plan period to 2043 to allow for flexibility as described above, Catesby Estates consider that, in order for the Local Plan to be considered positively prepared and thus meet the tests of soundness with reference to NPPF

Paragraph 35 a), the minimum housing requirement should be 10,248 dwellings as set out in Table 1 below:

Table 1: Housing Requirement Calculation

Standard Method 2023-2043 (227 x 20)	4,540
GBBCHMA Contribution	4,000
20% Buffer	1,708
Housing Requirement	10,248

Q4: The housing requirement figure includes an approximate 10% additional number of homes to ensure plan flexibility. Is this figure justified?

- 2.4 Table 8 of the Local Plan reports a total housing supply of 5,199 dwellings which represents a buffer of circa 10% against the proposed minimum housing requirement of 4,726 dwellings. Catesby Estates note that the proposed flexibility is within the supply, rather than being dealt with as an embedded increase to the housing requirement in Policy DS4.
- 2.5 Catesby Estates also note that the level of flexibility in the Local Plan reduced from the 2022 Publication version of the Local Plan which reported a buffer of circa 13%.
- 2.6 In any case, Catesby Estates consider a 20% buffer would be more appropriate. The Local Plans Expert Group recommended to Government in 2016 that a further allowance should be made, equivalent to 20% of the Housing Requirement, in developable reserve sites to provide extra flexibility to respond to change¹. The more recent introduction of the Standard Method for calculating Local Housing Need does not invalidate this advice, nor does the way the Standard Method calculated take it into account.
- 2.7 A 20% buffer would provide flexibility across housing supply to ensure local housing needs can be met even in circumstances where assumed supply does not come forward as anticipated. To ensure it is effective,

¹ Local Plans Expert Group (2016) *Report to the Communities Secretary and to the Minister of Housing and Planning*. Available at: [Local-plans-report-to-government.pdf](#) (Accessed 8th April 2025).

the 20% buffer should be embedded within the housing requirement calculation rather than assumed through flexibility in the supply.

- 2.8 The failure to incorporate a sufficient buffer within the Local Plan housing requirement means the Local Plan is not justified and thus unsound in line with NPPF Paragraph 35 b).

Q5: The housing requirement figure 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?

- 2.9 As set out in their Matter 2 Hearing Statement, Catesby Estates consider that the proposed contribution of 640 dwellings towards unmet needs arising from the GBBCHMA is insufficient and therefore not justified.
- 2.10 Catesby Estates contend that the Local Plan should make provision for at least 4,000 dwellings to assist with GBBCHMA unmet needs, in line with the level proposed in the 2022 Publication version of the Local Plan Review.
- 2.11 As it stands, the Local Plan's approach to the Duty to Cooperate and contribution to unmet needs arising from the GBBCHMA fails to satisfy the NPPF Paragraph 35 a) positively prepared test of soundness.

Reiss Sadler
Marrons
10th April 2025

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