



HEARING STATEMENT

in respect of
South Staffordshire Local Plan Examination **Matter 3**
on behalf of
UKLD Ltd

10 April 2025
Client Reference: RCA1028c-P
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1. Introduction

- 1.1. This hearing statement is made by RCA Regeneration Ltd on behalf of UKLD Ltd to the South Staffordshire Local Plan (SSLP) EIP.
- 1.2. This statement relates to Matter 3 – Vision and Strategic Objectives.
- 1.3. We have not provided answers to all questions under this heading and have only offered answers where we consider it to be necessary.

2. 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

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

- 2.1. We do not agree that the Vision is ambitious nor realistic in terms of its scope and deliverability.
- 2.2. Strategic Objective 2 (one of the means by which the Vision is to be delivered) states that the plan will *'Meet the housing and employment needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area.'* It is not clear what the Council means by 'proportionate' given that the 4,000 dwellings of unmet need was also considered to be a 'proportionate contribution' in the same Strategic Objective in the earlier iteration of the publication plan¹ (Nov 2022).
- 2.3. We also consider that the words 'in full' should be added after 'housing and employment needs' for clarity.
- 2.4. We do not consider that the Council's intention to take 640 dwellings of unmet need to be a realistic approach, nor a proportionate contribution given its relationship with neighbouring Councils. The failure to address what has long been seen as an ongoing and increasingly desperate situation within the GBBCHMA does not make the South Staffordshire Local Plan in any way ambitious.
- 2.5. Further, the plan would not 'boost significantly' the supply of housing in the area, contrary to Section 5 (and more specifically) para's 60 and 67 of the NPPF. If anything it will suppress housing delivery within the HMA for a considerable time to come.

¹¹ https://www.sstaffs.gov.uk/sites/default/files/2023-02/publication_plan_2022.pdf

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