



HEARING STATEMENT

in respect of
South Staffordshire Local Plan Examination Matter 4
on behalf of
UKLD Ltd

10 April 2025

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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 4 – Development Needs and Requirement.
- 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 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

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

- 2.1. Absolutely.
- 2.2. Having regard to the Housing Topic Paper¹ para 2.4 sets the scene for worsening affordability in the area:
- 2.3. *'House prices have significantly increased in the district over the last ten years. The average house price has increased from £215,134 in April 2013 to £337,761 in March 2023, representing a 57% rise (Hometrack)'*
- 2.4. South Staffordshire also has a lower than regional and national % of social rented housing overall within its existing housing stock at 14%. This demonstrates a lack of housing choice for existing residents.
- 2.5. The topic paper goes on to set out that:
- 2.6. *'Private rent levels are also high in South Staffordshire and have risen rapidly in recent years. Between April 2018 and March 2023, median two bedroom rent levels increased by 25%, from £598 to £750 per month (Hometrack). Similarly, three bedroom rents increased from £741 to £897 per month, representing a 21% rise.'*
- 2.7. The affordability ratios at median and lower quartile levels are at around 10 times, meaning that South Staffordshire is one of the least affordable places to live in the West Midlands region.
- 2.8. At para 4.3 of the topic paper, it is stated that:
- 2.9. *'Since the adoption of the 2012 Core Strategy (up to 31 March 2023), a total of 428 social rented homes have been secured through this route'.*
- 2.10. Whilst the Council may have been successful in adding some new affordable homes, conversely, there is no data on how much of the existing housing stock was lost permanently under right to buy/right to acquire over the same term – and this is not mentioned at all in the evidence. So there is no 'net' figure of exactly how the Council is performing on affordable housing delivery.
- 2.11. So whilst it is not completely clear just how dire the affordable housing situation is, but there is significant worsening affordability. It is therefore even more concerning that Council do not know how many affordable homes have been permanently lost under right to buy and yet they have chosen to deliberately reduce its overall housing requirement for the next plan period. We consider this is an incorrect approach and that there is clear evidence that the Council should set a housing figure that is higher than the standard method.
- 2.12. Further, as of July 2026, the Council will need to add a 20% buffer to its housing requirement as per the transitional arrangements set out in the new NPPF (Dec 2024) because the Council's housing requirement is below 80% of the housing requirement under the new NPPF.

¹ https://www.sstaffs.gov.uk/sites/default/files/2024-04/affordable_housing_and_housing_mix_topic_paper_2024.pdf

Question 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?

- 2.13. The evidence base that underpins the plan, including the approach to unmet need from the neighbouring GBBCHMA has shifted over the timeframe of plan preparation. This has made it very difficult for participants in the plan-making process to follow and understand.
- 2.14. The plan now proposes to deliver over 3,000 fewer homes, despite there being very little in the way of a major shift in national planning policy over the timeframe that the evidence was collected. The GBBCHMA growth needs have not 'gone away', but this plan seems to have taken to heart the need to somehow find a way to suppress housing growth in the Borough, but without having compelling evidence to do so.
- 2.15. We do not consider the 640 figure is adequately justified. Moreover, it is not clear what proportion of the 640 would meet the need of the Black Country boroughs versus what would meet Birmingham's need. It would have been helpful to the nearest neighbours (in particular Dudley and Wolverhampton) who share considerable boundaries with South Staffordshire with their plan-making process.
- 2.16. Para 7.16 of the Wolverhampton Local Plan (publication version) which is now subject to examination states:
- 2.17. *'The Black Country FEMA has identified areas of strong economic transaction with South Staffordshire and Birmingham, and identified areas of moderate economic transaction with Wyre Forest, Bromsgrove, Solihull, Tamworth, Lichfield and Cannock Chase. Wolverhampton's strongest FEMA relationships with authorities outside the Black Country, based on net migration patterns, are with South Staffordshire, Birmingham, Telford & Wrekin and Shropshire.'* (our emphasis)
- 2.18. This 'strong relationship' simply has not extended to realistic and meaningful cooperation over taking unmet need. Wolverhampton's plan is subject to examination where the Council know they can only meet about 50% of their housing requirement. The balance of approximately 10,000 dwellings are currently in the 'ether', compounded by the serious failings² of the Shropshire Plan which have been identified by the examining Inspectors. It is looking increasingly likely that the Shropshire Plan may have to be withdrawn, leaving 1,500 homes to meet the needs to the Black Country boroughs potentially unmet.
- 2.19. Similarly, there will now be delays associated with the blending of the Stratford on Avon Local Plan Review with the Warwick Local Plan to form the South Warwickshire Local Plan, which has only just passed issues and options consultation stage. Stratford on Avon was due to take some unmet need from the GBBCHMA area (albeit acknowledging that the district overlaps with the Coventry HMA as well) and this is now an unknown.
- 2.20. This is not constructive and active engagement – it is a poorly coordinated effort where the evidence on cross-boundary issue of housing delivery has been known for some years, but because the unmet need conflicts with the Council's apparent strategy and objectives of self-containment, almost nothing is being done to address the huge unmet housing need of the GBBCHMA.

² <https://www.shropshire.gov.uk/media/29362/id47-inspectors-findings-following-stage-2-hearing-sessions-dec-24-received-by-sc-060125.pdf>

- 2.21. None of this assists Birmingham or the Black Country authorities. It just simply results in massive housing requirements never being met.
- 2.22. As already set out in our hearing statement for Matter 2 (The Duty to Cooperate) it is clear that there remains some objection to the approach South Staffordshire Council have taken by other Councils in the HMA. However, neighbouring authorities appear to have been careful with their words in that regard.
- 2.23. It also seems clear that there is a degree of 'deferral' when it comes to addressing unmet need. The need exists now - it cannot and should not be addressed through future plan-making (which could be delayed for years to come) and it is evident that both South Staffordshire and its neighbours are deliberately postponing difficult decisions in areas where new housing growth is a major political football.
- 2.24. Given the significant reduction in the quantum of housing now proposed in the plan, it is apparent that the council have not done all it reasonably could to maximise the effectiveness of plan making.
- 2.25. The issues arising from not meeting the GBBCHMA unmet need to the degree they once planned for is a decision South Staffordshire Council have deliberately and consciously taken. There is no evidence this was a mutually agreed reduction in numbers that its neighbours are clearly happy with. The lack of information provided to demonstrate what has happened and how the 640 figure has been arrived at is further testament to this.

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

- 2.26. It is not clear whether the Council have taken account of the requirement to accommodate 10% Biodiversity Net Gain on brownfield sites. Given the difficulties now being experienced by many developers (particularly on such sites), it would be helpful to know whether the Council can categorically say that the 10% BNG requirement will not impact on the minimum capacity figures for each of the proposed housing allocations in the plan which contain previously developed land. There are a number of these types of sites proposed as allocations in the Tier 1 settlements. In responding to this, we have also considered the content of the Viability Appraisal evidence by Dixon Searle Partnership – where this is not clear for previously developed sites.

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