

Matter 9 – Issue 1

Question 1.

What is the relevant 5-year period on adoption and what is the 5-year housing land requirement?

If the Plan is adopted in early 2026 – a base date of 1st April 2025 to 31st March 2030 should be used.

Question 2.

Does the trajectory identify the components of housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?

The housing requirement that South Staffordshire District Council ('SSDC') are currently proposing is 4,726 dwellings over the plan period 2023-2041. This equates to 263 dwellings per annum (on average).

Although we acknowledge that the 2023 National Planning Policy Framework ('NPPF') and standard method is the correct version of the NPPF to examine the plan against, it is still important to acknowledge that the emerging plan is only seeking to deliver c.40% of the 2024 requirement (651 dwellings per annum). A significant difference.

Question 3.

For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, lapse rates, timing and annual rates of delivery? What is the basis for these assumptions, are they realistic and justified and supported by evidence:

- a) Sites with planning permission and under construction;
- b) Sites with planning permission and not started (split by outline and full permissions);
- c) Sites identified in land availability assessments;
- d) Sites identified in the brownfield register and with Permission in Principle;
- e) Adopted development plan housing allocations without planning permission; and
- f) Windfall sites.

SSDC should be required to justify their claimed housing position at the point of adoption (document references ED7A, ED7B and ED7C). There must be clear evidence that the Sites included meet the NPPF definition of 'deliverable'. They are claiming that there will be a significant improvement in their housing supply position from their current position of 1.17 years (at the 1st April 2024) to 8.68 years as of 1st April 2025 which is considered to be a very optimistic position.

Question 4.

Based on the housing trajectory, how many dwellings are expected to be delivered in the first 5 years following adoption of the Local Plan? How many dwellings would come from each source of supply?

See response to Question 3.

Question 5.

Are the assumptions about deliverability realistic, including where there is a reliance on significant strategic infrastructure?

See response to Question 3.

Question 8.

Where sites in the housing trajectory do not have planning permission is there clear evidence that housing completions will begin within 5 years?

We do not agree that clear evidence has been provided to demonstrate their deliverability and they should therefore be removed from the proposed supply.

Question 10.

Does the Plan provide appropriate contingency to ensure a sufficient pipeline supply of homes? What flexibility is there within the Local Plan should some of the housing allocations not come forward in line with the expected timescales?

SSDC is only proposing a 10% buffer between their requirement and proposed supply. SSDC's calculation of their supply is onerous given it provides exactly 10% above their requirement.

Question 11.

Does the evidence demonstrate that the Plan, taken together with completions, commitments and allocations in the existing development plan for the area, and windfall allowance will provide:

- a) **A 5 year supply of deliverable housing land on adoption of the Local Plan?**
- b) **A supply of specific, developable or broad locations for growth for years 6-10 and, wherever possible years 11-15 of the plan period?**

See response to Question 3.

Question 14.

Are any modifications required to either trajectory and, if so, would other modifications be necessary to the Plan?

If SSDC cannot sufficiently evidence that the sites within their housing supply position are deliverable, additional residential sites are required in order for the plan to be able to demonstrate a 5YHLS at the point of adoption and throughout the plan period.

Barratt West Midlands' land interests to the north and south of Dunsley Road, Kinver (site references 549 and 550) could be considered for allocation.