

## **South Staffordshire Local Plan Review**

### **Response to Inspector's Matters Issues and Questions (MIQs) on behalf of Clowes Developments**

**Representor ID: AGT24-037-02**

#### **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.**

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

South Staffordshire's local housing need has been calculated using the standard methodology for calculating housing need. The PPG is clear that this sets the minimum housing need and does not produce a housing requirement figure (PPG Reference ID: 2a-002-20190220). The Council should therefore present evidence as to why its proposed housing figure does not require any additional uplift or buffering, due to economic growth for example.

The policy states there is a 10% buffer, but this just comprises the proposed 640 dwelling contribution to the GBBCHMA. This is not considered to provide any buffer and is reliant on all of the proposed supply (Table 8, page 31 of the Regulation 19 consultation document) to be delivered, which only amounts to 5,199 dwellings. This is far from being aspirational, as per NPPF (2023) paragraph 16, or demonstrating evidence of the plan being positively prepared as required by NPPF (2023) paragraph 35.

**3. 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?**

No - this is not justified. The housing requirement should take account of a need for affordable housing and economic uplift (as set out in the SHMA).

It should also be considered that the revised Standard Method represents such a large step change in the minimum housing requirement that it should be considered now, in this plan period how this can be dealt with. Although it technically does not need to be dealt with at this point, it is short sighted to ignore the inevitable consequences of this increase in housing requirement. The housing requirement is therefore not positively prepared, justified or effective, as required by paragraph 35 of NPPF (2023).

**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?**

The proposed contribution has not been justified (NPPF paragraph 35). SSDC has not demonstrated in their evidence base how the 640 dwellings figure has been calculated or why they are only proposing to meet 0.59% of the identified 108,906 dwelling shortfall to 2042.



This is nowhere near proportionate to the significant administrative and functional relationships that South Staffordshire shares with the Black Country, principally Dudley and Wolverhampton – two LPA within the same HMA and FEMA as South Staffordshire.

SSDC have demonstrated through the 2022 Publication Plan and its 2022 evidence base that the District can accommodate more than 640 dwellings as they previously tested (and found appropriate) a proposed contribution of 4,000 dwellings. Therefore, it is clear the District can accommodate more growth than it is currently planning for. The 4,000 dwelling contribution was informed by evidence i.e. the GBBCHMA Strategic Growth Study 2018 (Document reference EB28) unlike the current 640 dwelling figure which has been onerously calculated and not suitably justified.