

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. On behalf of Taylor Wimpey, Emery Planning has undertaken a detailed review of South Staffordshire District Council's ('SSDC') claimed housing position at the point of adoption (document references ED7A, ED7B and ED7C).

SSDC currently claim to be able to demonstrate a housing land supply of just 1.17 years at 1st April 2024 but anticipates it will be 8.68 years as of 1st April 2025. Emery Planning has concluded that SSDC will only be able to demonstrate **2.83 year supply** at 1st April 2025.

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 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.

Emery Planning has identified that SSDC has overestimated how many dwellings will be completed per annum. For various reasons, Emery Planning conclude that a deduction of 1,623 dwellings is required for the large sites identified by SSDC. Based on past trends, 81 dwellings can be expected to come forward on unknown windfall sites in the five-year period (350 – 269 = 81). This results in a further reduction of 39 dwellings from the Council's supply.

Emery Planning conclude that a total of 1,662 dwellings should be deducted from the supply leaving a 783 dwelling supply which equates to just 2.83 years at the point the plan is adopted.

For those sites with full planning application pending determination, if kept in the supply (although we do not consider they should be included presently), it would increase the supply to 1,168 dwellings but SSDC would still only have 4.22 year supply.

Based on the evidence currently available, SSDC will not be able to demonstrate a 5YHLS at the point of adoption. In a District which is constrained by Green Belt, there will be limited windfall opportunities of scale which can come forward before the Local Plan is reviewed. The plan should, at the very least, make provision for a sufficient number of residential sites and ensure that a 5YHLS is achievable at the point of adoption.

A detailed overview of Emery Planning's assessment can be provided to the Inspectors should you find it helpful.

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 above response to Question 3.

Question 5.

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

See above 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. Emery Planning has deducted 515 dwellings from the supply on 8 large sites which do not have planning permission.

Question 9.

What is the compelling evidence to show that windfall sites will provide a reliable source of supply as anticipated in the Plan?

See above response to Question 3.

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 above response to Question 3.

Question 14.

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

Due to Emery Planning's findings above, 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.

As land at Cross Green (Policy SA2 of Publication Plan 2022) and Linthouse Lane (Policy SA3 of Publication Plan 2022) have previously been proposed as allocations, there is sufficient evidence available, without SSDC having to do significant work, to demonstrate that these sites are suitable, available and deliverable for development. Both sites should be allocated in order to increase SSDC's supply at the point of adoption.