

Peveril Securities Limited

Matter 4: Hearing Statement

Respondent Reference Numbers:

AGT24-048-01-01, AGT24-048-01-02 and AGT24-048-01-03

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PLANNING

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1.0 Introduction

CarneySweeney are acting on behalf of Peveril Securities Limited in making representations to the emerging South Staffordshire Local Plan (SSLP), with representations having been made to the previous Regulation 19 consultation stage in relation to two sites within Peveril Securities Limited's ownership: land north-west of Featherstone and land south of Hilton Cross Strategic Employment Site.

Our previous representations are not repeated here but should be read in conjunction with this Hearing Statement to the Inspectors' Matters, Issues and Questions for Matter 4.

As requested, we have provided separate Hearing Statements for the following Matters:

- Matter 4 – Development Needs and Requirement
- Matter 2: Duty to Co-operate
- Matter 12: Building a Strong Local Economy
- Matter 14: Protecting and Enhancing the Natural Environment

This document covers Matter 4 – Development Needs and Requirement with responses provided in respect of housing and employment development.



2.0 Matter 4 – Development Needs and Requirement

Respondent Reference Numbers: AGT24-048-01-01, AGT24-048-01-02 and AGT24-048-01-03

Issue 1

Whether the identified future housing development need and requirement set out in the Plan are justified, effective and consistent with national policy.

Questions:

- 1. What is the minimum number of new homes needed over the plan period calculated using the standard method? Has the calculation of Local Housing Need been undertaken appropriately using the standard method and correct inputs reflecting the methodology and advice in the PPG?*

It is noted that the Council are due to provide a response through submission of their Hearing Statement, following a review of which, we may wish to make comments during the Hearing Session.

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

A housing figure higher than the standard method should be planned for in the SSLP to address the identified shortfall in housing provision across the Greater Birmingham Black Country Housing Market Area (GBBCHMA). A shortfall of 76,427 dwellings is identified in Table 1 of the 'Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA Officer Agreed Version Statement of Common Ground Regarding Housing Shortfall Position at 29 November 2024' (Examination Document Ref. SST/ED11). Given these circumstances, a figure higher than the standard method can be justified.

- 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?*

The minimum figure of 4,726 homes over the plan period cannot be justified given the identified shortfall in housing provision across the GBBCHMA. Currently the SSLP proposes to apportion only 640 dwellings to the GBBCHMA.

In preparing Policy DS4, there has been an over-reliance on the revisions to paragraph 145 of the NPPF published in December 2023 removing the requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. The resulting removal of Green Belt release sites from the emerging SSLP and the associated reduction in the minimum housing requirement in Policy



DS4 means the key tests of 'soundness' in NPPF (December 2023) paragraph 35 are not met. In particular, Policy DS4 has not been positively prepared as the Council has not demonstrated the minimum housing requirement has been informed by co-operation with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so. The aforementioned Statement of Common Ground covers the apportionment of 640 dwellings amongst the GBBCHMA to address unmet housing need arising from neighbouring authorities but not the principle of only providing 640 dwellings in the SSLP, as opposed to a higher figure, has not been addressed under the duty to co-operate.

The District immediately adjoins Wolverhampton where the city's emerging Local Plan, which has been submitted for Examination in March 2025, proposes to deliver less than half of the minimum housing requirement for Wolverhampton City. The number of houses to be delivered in South Staffordshire to meet any shortfall arising from Wolverhampton has reduced from 2,900 homes set out in the previous 2022 Regulation 19 South Staffordshire Local Plan, to 234 homes forming part of the 2024 Regulation 19 South Staffordshire Local Plan submitted for Examination.

South Staffordshire is well located to deliver housing to meet a larger portion of the GBBCHMA housing shortfall, particularly having regard to existing commuting and migration patterns; transport infrastructure; and proposed strategic employment allocations within the M54 corridor which runs along the boundary between South Staffordshire and Wolverhampton.

4. *The housing requirement figure includes an approximate 10% additional number of homes to ensure plan flexibility. Is this figure justified?*

Whilst we have no comments on this question at this stage, it is noted that the Council are due to provide a response through submission of their Hearing Statement, following a review of which, we may wish to make comments during the Hearing Session.

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?*

A figure of 4,000 dwellings was proposed in the 2022 Regulation 19 South Staffordshire Local Plan consultation to contribute to addressing unmet needs of the GBBCHMA. This figure should be viewed as a minimum, particularly given the UK Government has recently announced plans to build 1.5 million additional homes over the next 5 years and published a revised standard housing method, which results in an extra 3,106 dwellings across the 17 signatories to the aforementioned Statement of Common Ground. The GBBCHMA is likely to be subject to increased housing requirements due to the new



changes and/or transitional arrangements, and therefore, the local planning authorities in the GBBCHMA should be ensuring that any existing unmet need arising from across the GBBCHMA can be addressed positively. Additional sites should be allocated close to, or within the M54 corridor to meet part of the minimum 4,000 dwelling contribution. This location is considered to be particularly appropriate given its proximity to Wolverhampton where a significant housing shortfall will arise if the Wolverhampton Local Plan is adopted in its current form, and to meet an anticipated increase in demand for housing associated with the employment allocations in the corridor.

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

Whilst we have no comments on this question at this stage, it is noted that the Council are due to provide a response through submission of their Hearing Statement, following a review of which, we may wish to make comments during the Hearing Session.

