
SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION

West Midlands CPRE

MATTER 4

April 2025

Matter 4: Development Needs and Requirement (When responding to the questions please qualify your answers).

At the Regulation 19 stage, West Midlands CPRE commissioned an independent report on housing numbers in the plan (attached) That work suggested that:

- a. The housing need in South Staffordshire could reasonably be set at 4,086.
- b. The current total supply in the plan (including new allocations and discounting 360 homes for oversupply from 2019-2022) should be at least 6,378, including a reasonable assumption for windfalls, of which 4,534 are already allocated or delivered.
- c. On the basis of the current plan there would be 2,292 homes provided above local need, 448 if only current allocations and safeguarded land are included.
- d. There was, therefore, no numerical need for any additional new housing allocations, especially in Green Belt where exceptional circumstances are required, and only sites already allocated or delivered need be included.
- e. At the same time, the unmet need in the Black Country and in Birmingham was subject to considerable uncertainty and much of it may not exist. The CENSUS and up-to-date supply data both point to considerably lower shortfalls. Even if the Black Country shortfall were correct over-provision in Shropshire and Telford should account for significant amounts of that housing need.

Taking this into account (and particular conclusion c) the Council should review its housing numbers. This would lead to one of three potential responses to the surplus of 2,292 homes.

The Council could:

- a. remove both or either of the strategic sites from the plan
- b. remove some or all the green belt allocations from the plan

- c. retain its current level of housing provision and increase the amount of that housing identified as meeting Black Country needs.

WM CPRE has not examined these options in detail, and defers to CPRE Staffordshire in regards to specific sites. However, we generally questioned whether this led to 'exceptional circumstances' for the release of Green Belt (which we address in our response to Matter 6 and whether other policy restraints should have been considered with regard to the current new allocations.

That remains our general position but the following comments update the position in terms of housing need, and should be read alongside our comments in Matter 9 on housing supply.

Issue 1: Whether the identified future housing development need and requirement set out in the Plan are justified, effective and consistent with national policy. [Focus: Policy DS4] 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?**

The plan is being tested under the NPPF transitional using the old Standard Methodology. A review is the correct place to consider the implications of the New Standard Methodology. The most up to date (2023 affordability figure) for South Staffordshire is 223 dwellings per annum (dpa), marginally lower than the 2022 figure so does not materially impact on our concerns.

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

We do not consider there are circumstances to justify a higher figure, especially considering the sensitive Green Belt nature of much of the authority.

- 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 current figure should be 4,014, which is marginally lower.

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

Our report considers the level of supply and particularly windfalls. We conclude that there should be an additional 900 windfalls included in the plan and as a result, there

is a 35% oversupply of housing even with some Black Country overspill. In other words, the flexibility is significantly beyond what is required.

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 need to address unmet need was originally based on figures from the now defunct Black Country plan which are out of date. Some of the Black Country Plans (Dudley/Wolverhampton and Sandwell) are being progressed to Examination. However, Walsall's has not been.

It was also based on shortfalls in Birmingham based on their Issues and Option position which we challenged based on the unrealistic need position in Birmingham and the severe under-estimate of likely windfalls in the city.

The three plans at Examination will be reviewed under the old SM but Walsall and Birmingham will both be subject to the new SM. While the new SM increases need in many local authorities, it drastically reduces them in some, notably Coventry and Birmingham. In Birmingham's case the dpa reduces from 7174 to 4448, or 54,520 less dwellings over 20 years (2023 affordability base). This is a dramatic shift and to an extent corrects the enormously inflated figures under the old SM (albeit not by intention). It may also lead to Birmingham being in a position to be a net importer of housing within the conurbation.

So, while some of the authorities in the conurbation have greater shortfalls under the new SM, if one takes Birmingham and the Black Country, overall need reduces by 1,443 dpa, and 3,129 if one includes all the authorities in the Combined Authority (adding Coventry and Solihull).

Not only is the unmet need increasingly uncertain, it may be severely reduced or eliminated as plans come forward, most notably Birmingham's.

It is also worth noting that while Telford's housing need (which is referred to in the report) increases under the new standard methodology, even then, it is significantly over-providing above its need which could potentially accommodate housing for needs in the conurbation.

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

As set out in our report we consider the density for brownfield sites could be increased (to at least 40 dph) but have not examined that issues in more detail.