

---

# SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION

## West Midlands CPRE

### MATTER 9

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 those 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 supply, and should be read alongside our comments in Matter 4 on housing need.

Issue 1: On the premise that the housing requirement is sound, whether the Local Plan is justified, effective and consistent with national policy in relation to demonstrating the housing land supply position throughout the plan period.

**Questions:**

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

As set out in the report we commissioned we consider there is a serious under-counting of windfalls and that the evidence supports 100 dpa. Alongside increasing minimum densities this would significantly increase the supply of housing.

- 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?**

The increase in assumed windfalls would increase the supply in the first five years by at least 200 dwellings. There is no need for discounting as windfalls are calculated based on completions not permissions.

5. Are the assumptions about deliverability realistic, including where there is a reliance on significant strategic infrastructure?
6. Does the evidence demonstrate that at least 10% of the housing requirement set out in the Plan would be delivered on smaller sites?
7. What assessment has been made of any potential impacts on delivery of small sites in South Staffordshire?
8. Where sites in the housing trajectory do not have planning permission is there clear evidence that housing completions will begin within 5 years?
9. What is the compelling evidence to show that windfall sites will provide a reliable source of supply as anticipated in the Plan?

As set out in the report we commissioned we consider there is a serious under-counting of windfalls and that the evidence supports 100 dpa. Alongside increasing minimum densities this would significantly increase the supply of housing.

This is based on historic rates of windfalls in line with the NPPF, along with the general qualitative evidence which would support future windfalls, such as change of use rule changes and likely reduced future office and retail requirements. It includes both small and large windfalls in line with the definition in the NPPF.

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?
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?
12. Has a trajectory been produced to demonstrate a 5 year supply of Gypsy, Traveller and Travelling Showpeople been prepared?
13. What is the implication of the proposed shortfall in supply of site provision for Gypsy, Traveller and Travelling Showpeople and how can this be addressed?
14. Are any modifications required to either trajectory and, if so, would other modifications be necessary to the Plan?