

SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION

Hearing Statement

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| Representor ref number | STA24-015-01 Dudley MBC |
| Matter | 4 – Development Needs and Requirement - Whether the identified future housing development need and requirement set out in the Plan are justified, effective and consistent with national policy. |
| Relevant issue | Issue 1 |
| <p>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?</p> <p>No comment.</p> <p>2. Are there any circumstances where it is justified to set a housing figure that is higher than the standard method indicates?</p> <p>Yes. A higher housing requirement figure than the standard method indicates is appropriate in the case of the South Staffordshire Local Plan to help meet the housing needs of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This is in accordance with paragraphs 35, 61 and 67 of the Framework (December 2023) which all require plan making authorities to consider the unmet housing needs of neighbouring areas in addition to the local housing need figure identified via the standard method.</p> <p>The approach of the South Staffordshire Local Plan towards the local housing requirement and the unmet housing needs of the GBBCHMA is supported, as detailed further within the Statement of Common Ground (SoCG) between South Staffordshire Council and Dudley Borough Council (September 2024) (Document Reference DC9) and the ‘officer agreed’ GBBCHMA SoCG Regarding Housing Shortfall (November 2024) (Document Reference SST/ED11). The latter sets out the evidence for the strategic geography of the GBBCHMA (at section 3) of which South Staffordshire is a part (in accordance with the Planning Practice Guidance Paragraph: 018 Reference ID: 61-018-20190315). At section 5 of the SoCG, further details of the functional migration relationships between South Staffordshire and Birmingham and the Black Country Authorities are set out to inform the apportionment of the housing contributions. This</p> | |

evidence on the strategic housing market area and South Staffordshire's specific functional relationships with the local planning authorities experiencing housing shortfalls justifies a contribution to the GBBCHMA unmet housing needs within the South Staffordshire Local Plan housing requirement.

The housing requirement is therefore considered to be justified and positively prepared, in accordance with paragraph 35 of the Framework.

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 housing requirement of 4,726 homes over the plan period is supported as it includes a contribution of 640 homes towards the unmet housing needs of the GBBCHMA. Please also see our response to question 2 above.

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

No comment.

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?

Please also see our response to question 2 above in terms of why we consider the 640 dwellings contribution is justified.

There is no nationally prescribed policy guidance setting out how much of the housing shortfall generated within a neighbouring Local Plan area should be met. It is, therefore, a matter of judgement, and for the plan-making authorities concerned to agree what is appropriate.

It is understood that the contribution of an additional 640 homes towards the unmet housing needs of the wider housing market area has been identified following a capacity-led strategy i.e., the capacity of the district to accommodate additional growth once its own local housing needs have been met, or the 'surplus' supply. The principle of this approach is supported. On the basis that the overall housing requirement is a 'minimum' figure it is assumed that the contribution to the unmet housing needs is also a 'minimum' i.e., any delivery of additional capacity above the minimum housing requirement over the plan period would further contribute to unmet housing needs in the wider housing market area.

Whilst the contribution is justified, to ensure the plan is 'positively prepared' and 'effective' we consider paragraph 5.61 of the South Staffordshire Local

Plan should include additional text as part of the policy justification to reflect that the apportionment of the contribution to unmet housing needs between specific local authorities has been agreed under the Duty to Cooperate via Statements of Common Ground. The agreed apportionment approach is set out within section 5 of the 'officer agreed' GBBCHMA SoCG Regarding Housing Shortfall (November 2024) (Document Reference SST/ED11). As detailed within this SoCG, the agreed apportionment approach is based on net migration flows. This amendment would provide further certainty for the progression of the Local Plans of the recipient authorities, including Dudley MBC. It would help inform our ongoing Duty to Cooperate engagement with other relevant local planning authorities and their Local Plans to continue addressing unmet housing needs arising across the GBBCHMA.

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

No comment.