

SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION

Hearing Statement

Representor ref number	STA24-049-01 Walsall Council
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>The Publication Plan which is the subject of the examination correctly states the local housing need has been calculated in accordance with the standard method (issued in 2018) that was in place at the time the document was prepared. This indicated a need of 227 dwellings per annum starting from the 2023/24 monitoring year.</p> <p>The revised standard method was announced on 12 December 2024, the day after submission of the Plan. This increases the annual housing need for South Staffordshire to 651 dwellings per year, based on the 2024-25 year. The transitional arrangements in the December 2024 NPPF state that the policies in the relevant previous version of the Framework will apply where the plan has been submitted on or before 12 March 2025. This previous version of the NPPF (December 2023) does not however make it clear (in paragraph 61) which version of the standard method should be used. The transitional arrangements do not state that the method to be used should be the one that was in place at the date of the relevant NPPF.</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 considered 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</p>	

unmet housing needs of neighbouring areas in addition to the local housing need figure identified via the standard method.

The approach of the South Staffordshire Local Plan towards the local housing requirement and the unmet housing needs of the GBBCHMA is detailed further within the Statement of Common Ground (SoCG) between South Staffordshire Council and Walsall Council (September 2024- document reference DC18) and the 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 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 SoCG (document reference DC18) highlights that Walsall has long had disagreement with SSDC regarding the release of green belt land. Previous drafts of the Plan have demonstrated that it is practical and consistent with achieving sustainable development to increase the housing supply in the Plan to include a contribution of 4,000 homes to meet the needs of Birmingham and the Black Country.

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 housing requirement of 4,726 homes over the plan period is supported as a minimum as it includes a contribution of 640 homes towards the unmet housing needs of the GBBCHMA. Also see our response to question 2 above however and our representation on the Publication Plan where we argue that the reduction from the previous proposed contribution of 4,000 does not align well with the test of soundness requiring plans to be positively prepared.

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

We have no comment on this question.

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?

Also see our response to questions 2 and 3 above in terms of why we consider the 640 dwellings contribution is justified but may not demonstrate the plan to be positively prepared.

It is noted that there is no nationally prescribed policy guidance on how to determine how the extent of any shortfall generated within another Local Plan areas should be met. It is, therefore, a matter of judgement for plan-making authorities 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 could serve to further contribute to unmet housing needs.

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 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 Walsall. 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?

We have no comment on this question.