

## Opening Statement

Good morning everyone and thank you for this opportunity to open the hearing sessions. I am Annette Roberts; I am the Corporate Director of Place and Communities at South Staffordshire District Council. This is a role that I have held since April 2020. I have been responsible for the service when the key decisions on plan progression have been made. I am a Chartered Town Planner and was elected a Member of the Royal Town Planning Institute in July 2000. I would like to set out some background on the district of South Staffordshire, as well as the journey we've been on to date to reach the final submitted Local Plan.

South Staffordshire is a rural district on the north western edge of the West Midlands conurbation, and is often described as a 'community of communities'. This very much reflects the settlement pattern of a rural area made up of villages of varying sizes with no one dominant settlement. The district is around 80% Green Belt, 16% Open Countryside beyond the Green Belt, and 4% built settlements.

Often our residents rely on the services provided in neighbouring towns and cities outside the district to access employment and higher order services. South Staffordshire shares strong functional links with neighbouring authorities, particularly with the Black Country authorities that the district directly adjoins. Accordingly, South Staffordshire sits in the Greater Birmingham and Black Country Housing Market Area. Balancing development pressures with protecting and enhancing the character of the district is a key challenge, and this is reflected in the plan's vision and strategic objectives.

Arguably, the Council's most significant challenge relates to meeting housing and employment needs, both the quantum and distribution, as well as considering South Staffordshire's role in contributing to wider unmet needs. You will hear that many representors feel we should be planning for greater levels of development with a higher contribution to unmet housing needs. Whilst this had been proposed earlier in the plan-making process, plan preparation was paused in early 2023 due to uncertainty around the direction of national policy. This was in response to a consultation on changes to the NPPF, including relating to Green Belt. This pause to plan preparation meant it was no longer possible to submit the 2022 Regulation 19 draft plan which had an end date of 2039, and meet the national policy requirement to have the plan run for 15 years post adoption.

It was therefore necessary for the Council to undertake a second Regulation 19 consultation. At this point the Council took stock, also considering significant objection from local communities and environmental organisations to the level of development previously proposed, changes to Green Belt policy and the age of the evidence base underpinning the previous strategy. In order to produce a plan that was legally

compliant and in accordance with the framework, it was considered necessary that the Council test alternative strategies. Through this process, we tested what became the preferred strategy; one which does release Green Belt to meet needs, but limits Green Belt release to the district's most sustainable Tier 1 settlements which are those villages well served by public transport. The quantum of housing development planned for meets our own needs, plus a 640 home contribution to wider unmet needs. This arises from the capacity of sites aligned to this spatial approach. The Council is confident this will lead to a sustainable pattern of development in the context of the national policy that this plan is being examined under, and represents an appropriate strategy.

The Council considers its strategy for growth is positively prepared, taking a proactive approach of choosing to release land from the Green Belt at the district's most sustainable settlements; particularly given that the relevant NPPF is explicit that this is an authority's choice. This is a positive approach particularly in the wider context of neighbouring authorities, including those declaring unmet needs, many of whom are choosing not to review their Green Belt to meet their own needs.

The Council is alive to the fact that under the transitional arrangements in the 2024 NPPF, the Council will need to review this plan immediately in a very different national policy context to the one that this plan is examined under. There is clearly uncertainty as to what the unmet needs across the HMA will be moving forward, particularly with Birmingham's housing needs reducing considerably, as well as the impact that the introduction of grey belt will have on the supply. The Council will not shy away from this challenge, and is already engaged in evidence gathering for the next plan, including being a commissioning authority for a refreshed Strategic Growth Study and Green Belt Review.

Throughout plan preparation, the Council has always sought to take a positive approach to growth, whilst balancing these opportunities with the environmental and sustainability constraints impacting the district. Clearly, during this process there have been significant changes to national planning policy which have made plan-making very challenging. However, the Council has repeatedly sought to navigate and respond to these in accordance with the relevant framework and taking wide ranging representative views into consideration. There are a number of objectors who feel that despite the considerable time and resource that has gone into preparing this plan to date, that the post submission changes to the NPPF in December 2024 means that we should abandon this plan, and move to an immediate review instead. As already explained, the new plan is underway, but the council feels passionately that progressing this plan is the responsible thing to do. We know we are better to have a plan in place than not. To be in control of our own destiny and growth agenda, and ensure that development comes forward in a planned and managed way with the appropriate infrastructure,

whilst moving quickly with preparing a new local plan, is in the best way forward to manage growth whilst protecting South Staffordshire's character and communities. In this context, the Council look forward to a positive and constructive examination.