

Matter 4: Development Needs and Requirements - introduction

Through Policy DS4 of the submitted Plan the Council sets out its development needs and requirement for both housing and employment land.

For housing, South Staffordshire's Local Housing Need of 4,086 homes was calculated using the latest Standard Method in accordance with the PPG, at the point of our Regulation 19 consultation in April 2024. The housing requirement of 4726 homes up to 2041 is based on a bottom up capacity led strategy, which provides a 640 home contribution to unmet needs of the Greater Birmingham and Black Country Housing Market Area.

In terms of where the proposed 640 home contribution to the GBBCHMA is derived from. As discussed yesterday, as part of the plan process the Council considered a range of residential growth options (8 options ranging from no contribution to the HMA to a 20,000 contribution) and a range of Spatial options (nine options ranging from no contribution to the HMA to a 4,000 contribution). This included Option I which took a capacity based approach to contribute 640 dwellings. The positives and negatives of these spatial options are set out in detail in the council's Spatial Strategy Topic Paper [EB14]. As set out at paragraph 1.2 of the council's Spatial Strategy Topic Paper [EB14], Option I (which would become the Council's preferred option) is: 'a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport'.

Undertaking the individual site assessment process as set out in chapters 2,3 and 4 of the Housing Site Selection Topic Paper [EB20], which took into account the council's preferred spatial strategy, the council allocated what it considers are all suitable sites as set out in the individual site assessment proformas [EB20c].

The result of allocating all suitable sites, alongside extant permissions from the start of the Plan period (April 2023), is an anticipated supply of 5199 homes. The 5199 supply figure is set out in its different elements in Table 8 of the Submission Plan [DC1] and is the total of these elements. It is also set out in Appendix 3 (under Option I) of the Spatial Strategy Topic Paper [EB14b] with the total 5199 supply figure included within that table.

The 5199 supply was discounted by 10% to allow for plan flexibility, which results in a figure of 4726. Once the council's own OAN of 4086 is taken into account, this leaves an excess of 640 homes which is the proposed contribution to the unmet needs of the GBBCHMA.

We recognise that a number of representors would wish to see an uplift to our Local Housing Need, or the cross boundary contribution increased. However, the Council firmly believe that the housing requirement proposed is the product of an appropriate

strategy that will deliver a sustainable pattern of development, and is a positively prepared strategy.

The supply of housing over the plan period set out in Table 8 of the Plan is 10% above the plans housing requirement, based upon housing supply information at 1st April 2023. When considering housing supply data at 1st April 2024 then this increases to 11% above the housing requirement, as set out in in document reference SST/ED7A. Given that the vast majority of site allocations are unconstrained greenfield sites, and the Council's track record for delivering major schemes with numbers exceeding minimum figures, the Council considers this to represent appropriate plan flexibility to mitigate the risk of any sites not coming forward.

For employment land, the level of need has been directly informed by the Council's Economic Development Needs Assessment Update, document reference EB44. This results in a gross need for the district of 62.4ha excluding need associated with West Midland Interchange, increasing to 81.2ha gross when including need associated with West Midlands Interchange. The employment land requirement to 2041 incorporates a 45.2ha gross contribution, excluding WMI, to the Black Country FEMA, resulting in an overall employment land requirement of 107.6ha gross, excluding WMI. When factoring in the proportion of WMI attributable to South Staffordshire this requirement increases to 126.4 gross hectares.

A number of representors have suggested that the approach taken to determining employment land needs in the EDNA is flawed. However, the Council is firmly of the view that the EDNA is in accordance with the PPG and undertakes a thorough and robust approach to considering supply and demand to arrive a justified need figure for South Staffordshire, as well as a significant contribution to unmet needs of the Black Country FEMA that has been agreed with those authorities through a signed Statement of Common Ground.

In summary, the Council therefore consider that the approach to arriving our and need and requirement, for both housing and employment land, to be sound.