

Strategic Planning Team
South Staffordshire District Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

SENT BY EMAIL ONLY TO
localplanreview@sstaffs.gov.uk

12 December 2019

Dear Sir / Madam

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW (LPR) – SPATIAL HOUSING STRATEGY CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions in the Council's consultation document.

Question 1: Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?

If the evidence base used to inform the Council's Spatial Housing Options is to be robust then it must be up to date. As set out in the 2019 National Planning Policy Framework (NPPF), the determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). As set out in the National Planning Practice Guidance (NPPG), the LHN figure is calculated at the start of the plan-making process however this number should be kept under review and revised when appropriate (ID 2a-008-20190220). The LHN figure may change as inputs are variable and this should be taken into consideration.

In this consultation, the Council proposes to contribute an additional 4,000 dwellings towards unmet housing needs in the Greater Birmingham Housing Market Area (GBHMA). The HBF note that the Council will proportionately reduce its contribution to the meeting of unmet needs of other authorities if there is evidence that the extent of the housing shortfall across the GBHMA has significantly reduced prior to the LPR's submission for examination. Conversely



the Council has failed to confirm that if the unmet housing needs increase then its contribution will also proportionately increase.

Question 2: Do you agree that taking account of housing land supply (HLS) from the start of the new plan period (1 April 2018) is the correct approach?

The spatial strategy set out in the LPR's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver a housing requirement which meets the District's LHN and assists in meeting unmet housing needs arising in the GBHMA. This sufficiency of supply should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements.

It is noted that the proposed housing requirement of 8,845 dwellings is based on a LHN for the District of 254 dwellings per annum over 18 years (2019/20 – 2036/37) plus 273 completions in 2018/19. This calculation incorrectly confuses housing need / housing requirement and HLS together.

From the start of the new plan period (1st April 2018) account should be taken of existing sources of HLS (planning permissions, completions and adopted allocations). All Housing Spatial Options assume that existing sources of HLS after the start of the new plan period will contribute to the level of development proposed in each broad location. The Council's estimate of delivery of approximately 2,217 dwellings in the District between 2019/20 – 2036/37 from existing sources of HLS should be based on correct and realistic assumptions about lapse rates, non-implementation allowances, lead in times and delivery rates. These assumptions should be supported by parties responsible for delivery of housing from these existing sources of HLS.

Question 3: Do you agree that all Safeguarded Land identified in the Site Allocations Document (SAD) should be released as a priority and should be delivered at an average density of 35 dwellings per hectare?

As proposed by the Council Safeguarded Land Allocations set out in Policy SAD3 of the adopted SAD should be released.

The HBF support the efficient use of land and the setting of density standards in accordance with the 2019 NPPF (para 123) whereby in the circumstances of an existing or anticipated shortage of land to meet identified housing needs then a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. It should not be assumed that all Safeguarded Land Allocations will be delivered at an average density of 35 dwellings per hectare. Although the GBHMA Strategic Growth Study recommended a density of 35 dwellings per hectare on existing non-Green Belt HLS to minimise Green Belt release elsewhere, the HBF suggest that the Council's approach to densities in the LPR should be more nuanced and flexible. The inter-relationship between density, house size (any

implications from the introduction of optional space and accessible / adaptable homes standards), house mix and developable acreage should be considered in viability assessments. Moreover, the impact on provision of a variety of typologies to meet the housing needs of different groups should also be considered. A range of densities specific to different areas of the District may be necessary to ensure that any proposed density is appropriate to the character of the surrounding area. Even if a minimum residential development density of 35 dwellings per hectare is sought, then further consideration on a case by case basis should be permissible to determine if a lower or higher density is more appropriate in a particular location. The effect of such a flexible policy approach means that Safeguarded Land Allocations may not deliver 1,651 dwellings during the plan period as estimated by the Council.

Question 5: Do you agree that the seven Spatial Housing Options are appropriate options to consider?

As set out in the 2019 NPPF the LPR should include strategic policies which address the Council's identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set out an overall strategy for the pattern, scale and quality of development (para 20).

It is agreed that using any one spatial option as previously set out in the Council's Issues & Options consultation will not achieve the proposed planned level of housing growth. The proposed spatial distributions as set out in the Council's seven Spatial Housing Options involve all or some of the previous scoping options, which will set the context for site selection. All Spatial Housing Options (except Option A) involve release of Green Belt adjacent to urban area of Black Country and most Options involve growth in the District's larger and more sustainable rural settlements. For each Spatial Housing Option, the Council has set out indicative levels of growth and key advantages / disadvantages. These seven Spatial Housing Options are :-

- Housing Option A - Maximising Open Countryside release ;
- Housing Option B - Prioritising Green Belt land release in areas of lesser Green Belt harm ;
- Housing Option C - Carry forward existing Core Strategy strategic approach to distribution ;
- Housing Option D - Maximising sites in areas identified in the GBHMA Strategic Growth Study ;
- Housing Option E - Addressing local affordability issues and settlements with the greatest needs ;
- Housing Option F - Giving first consideration to Green Belt land which is previously developed or well-served by public transport ; and
- Housing Option G - Infrastructure-led development with a garden village area of search beyond the plan period.

Of the seven Spatial Housing Options, Option A is not considered to be an appropriate option because this Option fails to meet the housing needs of the District and fails to contribute towards unmet housing needs of the GBHMA.

Likewise, Options B, C and D are considered less appropriate than Options E, F and G because displacement of households from the wider GBHMA is not minimised.

Question 6: Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?

The approach of Spatial Housing Option G meets the housing needs of the District and contributes towards unmet housing needs of the GBHMA. It is noted that the proposed Spatial Housing Options are not mutually exclusive. There are similarities between Option E - Addressing local affordability issues and settlements with the greatest needs, Option F - Giving first consideration to Green Belt land which is previously developed or well-served by public transport and Option G - Infrastructure-led development with a garden village area of search beyond the plan period. Between Spatial Housing Options E, F and G there are only small percentage differences in the indicative levels of housing growth distributed to Tier 1 & 2 Villages (48%, 52% & 54% respectively) and Tiers 3 & 4 Villages (57%, 58% & 62% respectively) and urban extensions North & West of Black Country (36%, 35% & 35.5% respectively), South of Stafford (0%, 2% & 2% respectively) and adjacent to Cannock (5%, 3% & 0%).

Whichever Spatial Housing Option is the Council's preferred choice, a HLS above the minimum housing requirement should be provided. The HBF always advocates as large a contingency as possible to provide maximum flexibility to response to changing circumstances as well as providing greater choice and competition in the land market. There is no numerical formula to determine a contingency quantum but where the HLS is highly dependent upon one or relatively few large strategic sites and / or localities then greater numerical flexibility is necessary than if the HLS is more diversified. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is optimised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The HLS should include a short and long-term supply of sites by the identification of strategic and non-strategic allocations for residential development. As set out in the 2019 NPPF (para 68a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. The Council should confirm that this national policy requirement will be achieved. The HBF suggests that larger urban extensions adjacent to Black Country, Stafford and Cannock are complimented by smaller non-strategic sites in Villages in Tiers 1 - 4.

Question 7: Do you agree that we should continue to explore options for a new settlement?

The option for a new settlement should continue to be considered as part of a wide package of Spatial Housing Options. This should ensure delivery of housing growth over both the short and long term. Any proposal for a new settlement will take a long time to come to fruition and its gestation period will extend beyond the plan period of LPR.

Question 8: What other information (if any) should we consider before concluding that Green Belt release is justified?

The Council should consider consistency with Chapter 13 of the 2019 NPPF in concluding that Green Belt release is justified.

Question 9: Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?

The key criteria for the identification of sites as set out in Appendix 6 are reasonable. The Council is reminded that viability assessment is a key component in confirming deliverability.

Question 10: Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?

The HBF have no comment on the selection of individual sites to deliver the Council's preferred Spatial Housing Option. As set out in answer to Question 8 above, the Council should consider consistency with Chapter 13 of the 2019 NPPF in concluding that Green Belt release is justified.

Conclusion

It is hoped that these responses will assist the Council in informing the next stages of the South Staffordshire LPR. If the Council requires any further information or assistance, please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans