



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW  
Date: 13 December 2021  
Please ask for: Christine Williams  
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Dear Strategic Planning Team

### **South Staffordshire Local Plan Review – Preferred Options Consultation 2021**

Thank you for consulting the Black Country authorities on the South Staffordshire Local Plan (SSLP) Review Preferred Options. This letter sets out the response of the Association of Black Country Authorities (ABCA) to this consultation.

Complementary responses to specific consultation questions are set out in the Appendix to this letter. A separate consultation response will also be provided by City of Wolverhampton Council, following Cabinet approval on 8 December 2021.

The following principles underpin our response, with more detailed comments provided in italics:

#### **Duty to Cooperate and Statements of Common Ground**

- Acknowledgment that the BCA and SSDC have been working together constructively on planning issues of mutual interest and that this is expected to continue, not only in respect of development proposals, but also on infrastructure and delivery;
- Expectation that, as the BCP and SSLP both move towards Publication Plan (Regulation) 19 consultation in summer 2022, the BCA and SSDC will aim to reach agreement on all relevant cross-boundary issues and reflect this agreement in draft Statements of Common Ground to support each Regulation 19 Plan;

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- Support for the preferred housing growth option of local housing need plus 4,000 homes to meet HMA need up to 2038;
- Given detailed evidence provided by the Draft BCP that the Black Country has a very significant housing shortfall up to 2039, and the close geographical, migration and commuting links between the Black Country and South Staffordshire, request that the full 4,000 homes should be specifically allocated to meet Black Country housing needs;

*It is welcome that SSDC continue to be committed to offering 4,000 homes to meet the shortfall in the wider HMA. Given the proximity of the Black Country to South Staffordshire, strong migration and commuting links, the location of a number of proposed growth sites close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country it is reasonable to claim all of the 4,000 homes being offered by SSDC towards meeting Black Country housing needs. The Preferred Options proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. This would represent a crucial contribution towards the estimated Black Country shortfall of 28,239 homes up to 2039, which is now clearly demonstrated through the Draft BCP and supporting evidence. We request that this allocation is clearly referenced in the Publication Plan.*

- Support the longer-term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;
- Request that the South Staffordshire HEDNA is completed, with due regard to the Black Country EDNA (2021), the West Midlands Interchange Apportionment Study (2021) and West Midlands Strategic Employment Sites Study (2021), and shared with the BCA as soon as possible to determine how far the SSLP will be able to contribute towards significant unmet employment land needs in the Black Country.

*The SSLP has the potential to make a significant contribution towards addressing the large shortfall of 210 ha employment land evidenced by the Draft BCP and supporting 2021 EDNA. Therefore, it is of concern that no specific contribution can be offered because the employment land needs of South Staffordshire have not yet been established through the updated EDNA. This crucial piece of evidence must be completed as soon as possible, so that the figures generated can be used to inform the Publication BCP, SSLP and supporting Statements of Common Ground between the Black Country Authorities and SSDC.*

*We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs including the Black Country. We request that this work is progressed as quickly as possible and welcome any opportunity to engage in this work through the Duty to Cooperate.*

*In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below.*

### **Site allocations and cross-boundary infrastructure**

- Noting the scale and location of the proposed extensions to the Wolverhampton urban area and to commit to require further work on infrastructure requirements and assurances that close joint working on all relevant planning issues will continue throughout the Plan preparation process, SPD preparation, pre-application and planning application processes;
- Request that a Supplementary Planning Document (SPD) and Infrastructure Delivery Strategy is also prepared for the Langley Road site;
- Request that the affordable housing secured on the Linthouse Lane, Cross Green and Langley Road sites is allocated through nomination rights for Wolverhampton residents, and that this requirement is set out in the Publication Plan;
- Request that the combined impact of SSLP and BCP developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, that effective sustainable transport solutions are provided to connect essential trips to the local network, and that developments seek to minimise trip generation through all available mechanisms;
- Support for the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP.

*The Preferred Options set out in the SSLP proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that*

*these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. There is also a strong case for Wolverhampton residents to secure nomination rights for the 30% affordable housing proposed on these sites.*

*The Cross Green mixed use development will help meet the employment land needs of the Black Country in a location close to significant employment opportunities at the i54 and ROF Featherstone strategic employment sites. The development will help deliver Brinsford Strategic Park and Ride site which will increase access to the rail network and also addresses the HMA Strategic Growth Study recommendation for a strategic housing site in this locality.*

*However, the proposed allocations adjoining Wolverhampton raise cross-boundary infrastructure issues, particularly given the location of Draft BCP housing allocation in the north east of the City which will also impact on local infrastructure. If infrastructure impacts are not fully assessed and mitigated through the contributions of developers and infrastructure providers these developments could have negative impacts on Wolverhampton infrastructure, including transport, public open space, education and health services. The developments could also have negative impacts on the environmental quality and amenity of immediately adjoining residential areas if not properly planned. Therefore, each development, including Langley Road, needs to be carefully masterplanned, based on sufficient detailed evidence, and it is vital that close joint working between SSDC and CWC continues on all relevant issues throughout the Plan preparation, SPD preparation and planning application processes.*

*In terms of transport infrastructure implications, close engagement will be required with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.*

*Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton*

*highways network can be mitigated through a viable and deliverable package of developer funded improvements.*

Finally, ABCA welcome and support the constructive work which is on-going between the Black Country authorities and South Staffordshire Council, on planning issues of mutual interest. We fully expect this close joint working and partnership approach to continue throughout the Plan preparation process as the South Staffordshire Local Plan is developed in parallel with work on the Black Country Plan, particularly with respect to development proposals on the edge of the Black Country and the cross-boundary infrastructure and delivery issues which these may raise.

We trust that you will find our comments helpful, and we look forward to further engagement with South Staffordshire Council on these matters before the next stage in the plan process.

Yours faithfully



Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council



Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council



Councillor Kerrie Carmichael  
Leader  
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council

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### Chapter 3

**Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?**

No

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs, including those arising in the Black Country. **We request that this work is progressed as quickly as possible** and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below (under Question 3).

**Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?**

No

See answer provided to (b) below.

However, we support the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP

**(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?**

Yes

#### **Transport Infrastructure**

In terms of transport infrastructure implications, close engagement will need to continue with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into

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the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

Dudley Council will be keen to understand the highway impact of additional trips associated with the residential development sites, particularly on the A449 and A491 corridors around Wall Heath and Kingswinford.

**Question 3: a) Have the correct vision and strategic objectives been identified?**

No

We welcome the references in table 4 of the document to the need for the Plan to 'support the economies of adjoining areas and pressure to release land to meet a proportion of their unmet needs'. We also note the acknowledgement that the Black Country in particular has a significant unmet need for employment in the Local Plan period, and the need for the Plan to consider South Staffordshire's role in meeting any cross-boundary needs. This thinking is based on evidence in the form of the 2018 South Staffordshire EDNA and the 2017 Black Country EDNA, the latter subject to an update in 2021.

For consistency, **we request that the opportunity for the Plan to make a contribution towards wider unmet employment land needs is reflected in the Economic Vibrancy section of the Strategic Objectives of the Plan.** This would ensure consistency with the approach taken in Strategic Objective 2 which is related specifically to meeting unmet housing needs from the Greater Birmingham Housing Market Area.

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### **Addressing the Black Country Employment Land Shortfall**

Para 4.55 of the document confirms the Black Country Plan employment land shortfall of 210ha – the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the Plan should seek to provide for around 30% of B8 activity and 70% E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. Applying this apportionment to the delivery of the employment land supply identified in the draft Black Country Plan would suggest B8 supply of some 106ha and E(g)(ii)(iii)/B2 supply of 247ha.

Using this approach, and before taking into account any potential contributions through the Duty to Cooperate the shortfall by use class is therefore some 64-70ha B8 and 149-163ha E(g)(ii)(iii)/B2.

In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>). This suggests that a minimum of some 72ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be satisfied by this site should the South Staffordshire EDNA update confirm a surplus of employment land against local needs. We therefore request that this work is fully considered as part of the EDNA Update referred to above.

In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, and we are engaging with other emerging Local Plans through the Duty to



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Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford.

We also draw your attention to the West Midlands Strategic Employment Sites Study (WMSESS) (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>) published in 2021. The Report was produced by Avison Young and Arcadis consultants and commissioned by three of the West Midlands Local Enterprise Partnerships (the Black Country, Greater Birmingham and Solihull and Coventry Warwickshire) and Staffordshire County Council. The Study updates the 2015 West Midlands Strategic Employment Sites Study which identified a demand for strategic employment sites in the West Midlands, but a lack of suitable sites.

The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.

The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.

There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. We therefore **request that the Council engage with the Black Country and other relevant West Midlands local authorities in the follow-up work recommended in the WMSESS** and that this is reflected in the EDNA update.

In summary, we welcome the commitment in principle for the Local Plan to assist with meeting unmet employment land needs arising in the Black Country. The

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EDNA update will provide critical and timely evidence on the extent of any surplus from the existing supply, and whether additional opportunities would need to be considered both within the District and / or in adjacent areas having regard to the recommendations of the WMSESS.

**Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?**

Yes

We support the longer term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

**Chapter 5**

**Question 7:**

**b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?**

Yes

However, the Langley Road site should also be subject to this approach, given the significant cross-boundary infrastructure and design implications of this development.