

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></p>
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**Name of the Local Plan to which this representation relates:**

**South Staffordshire Council  
Local Plan 2018 - 2039**

**Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022**

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Vicki"/>	<input type="text"/>
Last Name	<input type="text" value="Popplewell"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Planning Policy Manager"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Dudley Metropolitan Borough Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="Planning Policy- Regeneration and Enterprise"/>	<input type="text"/>
Line 2	<input type="text" value="Dudley Council"/>	<input type="text"/>
Line 3	<input type="text" value="4 Ednam Road"/>	<input type="text"/>
Line 4	<input type="text" value="Dudley"/>	<input type="text"/>
Post Code	<input type="text" value="DY1 1HL"/>	<input type="text"/>
Telephone Number	<input type="text" value="01384 816941"/>	<input type="text"/>
E-mail Address	<input type="text" value="Vicki.popplewell@dudley.gov.uk"/>	<input type="text"/>



(where relevant)

**Part B – Please use a separate sheet for each representation**

Name or Organisation: Dudley Metropolitan Borough Council

3. To which part of the Local Plan does this representation relate?

Paragraph	Duty to Co-operate & Legal Compliance	Policy	DS4	Policies Map	N/A
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Legal Compliance**

Dudley Council has no concerns in respect of whether the South Staffordshire Local Plan (SSLP) is legally compliant.

**Duty to Cooperate**

Dudley Council and South Staffordshire District Council have been working together effectively, constructively and on an ongoing basis on strategic planning issues of mutual interest to the authorities. Such collaborative work is expected to continue as both authorities progress their respective local plans.

Previously Dudley Council has engaged with South Staffordshire District Council in partnership with the four Black Country Authorities (Sandwell



Council, Walsall Council and City of Wolverhampton Council) particularly in relation to the Black Country Plan (BCP). Following the decision to withdraw from the BC, Dudley Council will progress with its own individual Local Plan and will continue to work with South Staffordshire on strategic/cross boundary planning matters.

Dudley Council therefore considers that the SSLP has been prepared in a manner which is legally compliant and meets the Duty to Cooperate. However, we consider that further work needs to be progressed to ensure that the Plan is effective and identifies the apportionment of the unmet housing need across the GBBCHMA and employment land across the South Staffordshire FEMA.

### **Housing requirements and supply**

We support the level of housing provision within the policy. We support the approach taken in relation to addressing unmet housing needs to 2039.

The draft Statement of Common Ground between South Staffordshire District Council (DC) and Dudley Metropolitan Borough Council (MBC), which forms part of the evidence base to the Publication Local Plan, refers to further work to be undertaken on how the 4,000 dwellings contribution can be attributed to individual local authorities in the Black Country (including Dudley MBC) and Birmingham City Council.

Dudley MBC will continue to work with South Staffordshire DC and other relevant authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) on how the 4,000 dwellings contribution to unmet housing needs should be attributed to ensure a co-ordinated approach. Work will continue towards preparation of a GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls from the GBBCHMA.

At paragraph 5.48 of the supporting text to the policy, it states '*the extent of land adjacent to Dudley Metropolitan Borough Council has also informed the level of growth allocated in this area, as Dudley MBC has a relatively limited unmet housing need and significant Green Belt opportunities within its own administrative boundaries to address this need.*'



This position will remain the subject of ongoing Duty to Cooperate discussions. As the Dudley Local Plan, and its supporting evidence base progresses over the coming months, it will become clearer whether Dudley will generate a residual housing shortfall. If this is evidenced, Dudley would seek some apportioning of the SSLP housing contribution to the GBBCHMA. As the BCP is no longer progressing it is recommended that through the Duty to Cooperate the authorities seek to agree the apportionment of the additional housing provision to the individual Black Country Authorities and Birmingham City Council so that this can be clearly set out within the SSLP.

### **Employment Land requirements and supply**

We support the level of employment land provision within the policy. We support the approach taken to unmet employment land needs and welcome the contribution to the unmet employment land needs of the Black Country (36.6 hectares of general employment land and 67 hectares of employment land arising from the West Midlands Interchange (WMI)).

The draft Statement of Common Ground between South Staffordshire DC and Dudley MBC, which forms part of the evidence base to the Publication Local Plan, refers to further work to be undertaken to establish the minimum proportion of employment land oversupply that can be attributed to the Black Country (including Dudley MBC). As the BCP is no longer progressing it is recommended that through the Duty to Cooperate the authorities seek to agree the apportionment of the additional employment land to the individual Black Country Authorities so that this can be clearly set out within the SSLP.

This will involve the authorities continuing to work together to prepare a separate Statement of Common Ground to address strategic employment needs, which will cover the South Staffordshire Functional Economic Market Area. This will also address the authorities' stance on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

### **Gypsy and Travellers Provision**

We support the level of gypsy and traveller pitches provision within the policy.



The draft Statement of Common Ground between South Staffordshire DC and Dudley MBC, which forms part of the evidence base to the Publication Local Plan, notes how discussions on this matter to date confirm Dudley MBC is unlikely to be able to contribute towards the unmet needs of South Staffordshire for gypsy and traveller sites. This is based upon a review of site availability in Dudley MBC to date. South Staffordshire DC and Dudley MBC have agreed to keep this matter under review as the Dudley Local Plan progresses.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See main body of representation

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

Yes

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:



We would be willing if requested by the Inspector to participate in hearing sessions to explain the content of our above representations with regards to the discussions around Duty to Cooperate and to seek an agreement on the apportionment of the additional employment land and the 4,000 dwelling provision.

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

**Data Protection**

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX