



Local Plan
Publication Stage
Representation Form

Ref:

**(For
official
use only)**

Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

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, Council House"/>	<input type="text"/>
Line 3	<input type="text" value="1 Priors Road"/>	<input type="text"/>
Line 4	<input type="text" value="Dudley"/>	<input type="text"/>
Post Code	<input type="text" value="DY1 1HF"/>	<input type="text"/>
Telephone Number	<input type="text" value="01384 816941"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="Planning.policy@dudley.gov.uk"/>	<input type="text"/>



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 Policy Policies Map

4. Do you consider the Local Plan is :

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

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.

Housing requirements and supply

Dudley MBC supports the level of housing provision within the policy and the overall approach taken in relation to addressing unmet housing needs.

However, we consider elements of the policy to be ‘unsound’ as currently drafted. The policy text currently refers to the delivery of a ‘minimum’ of 4,726 homes, consisting of the local housing need of 4,086 homes and a 640-home contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which is supported. We note however that the policy identifies a supply that includes 10% additional homes for plan flexibility (circa 5,200 homes in total). We would expect the delivery of any additional homes over the plan period to go towards the unmet housing needs of the GBBCHMA as per the capacity- led strategy of the Publication Plan which has identified the contribution to unmet needs to date. Therefore, we consider that the policy should explicitly express the contribution to unmet housing needs as a ‘minimum’ to be considered sound.

The most recent Draft Dudley Local Plan (Regulation 18, 2023) and its supporting evidence indicates that Dudley Borough can accommodate most of its own housing need within its urban area, leaving a shortfall of 1,078 homes to be addressed via contributions from relevant local authorities under the Duty to Cooperate. We envisage the shortfall in Dudley’s housing supply will be clarified as Duty to Cooperate discussions progress at the Regulation 19 stage of the Dudley Local Plan.



It is noted the draft Statements of Common Ground (which form part of the evidence base to the Publication Local Plan) are to be updated and Dudley MBC will continue to engage with South Staffordshire DC under the Duty to Cooperate. It is expected the Black Country and other GBBCHMA authorities will seek to apportion the contribution to unmet housing needs to specific local authorities via these Statements of Common Ground. Reference should be made to this process within the justification text to the policy to ensure the plan is sound.

Work will also 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.

(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.

Bullet point a) should be amended to read as follows (additional text in **bold**):

*4,726 homes over the period 2023-2041 to meet the district's housing target, whilst providing approximately 10% additional homes to ensure plan flexibility. This housing target includes the district's own housing requirement of 4,086 homes, plus a **minimum** 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area. The council will seek to demonstrate a 5 year housing land supply upon adoption of the plan.*

At paragraph 5.61 additional text should be included within the policy justification to reflect that the apportionment of the contribution to unmet housing needs between specific local authorities will be undertaken under the Duty to Cooperate via Statements of Common Ground.

These modifications will ensure the Local Plan is sound in terms of being 'positively prepared' and addressing the unmet need from neighbouring areas.

(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, 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:

To fully represent Dudley MBCs position in relation to contributions towards unmet housing needs.

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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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