

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage Representation Form</h3>	<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 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)
<i>*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.</i>	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone Number	
E-mail Address (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  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" value="√"/>	No	<input type="text"/>
(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.

### Employment Land requirements and supply

Dudley MBC considers the policy to be sound and supports 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 (45.2 hectares of general employment land and a minimum of 67 hectares of employment land arising from the West Midlands Interchange (WMI)).

We particularly support the text which identifies the contribution from the WMI to be a minimum and the acknowledgement that this contribution may increase as other authorities confirm whether they require their proportion of strategic employment land from the WMI (as set out in 'West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper- Whose need will the SFRI serve? (Stantec, Feb 2021)).

Dudley forms part of the Black Country Functional Economic Market Area (FEMA) and has a functional economic relationship with several local authorities including South Staffordshire. The most recent Black Country Employment Development Needs Assessment (EDNA) 2023<sup>1</sup> provides an overall target figure for the Black Country FEMA from 2020 to 2041 of 470 hectares (ha) or 22.38ha per annum, which increases to 533ha

<sup>1</sup> <https://www.dudley.gov.uk/media/scfdohle/black-country-employment-land-needs-assessment-edna-2023.pdf>

when taking into account the need for the replacement of employment land losses. An employment land supply of 380ha is identified within the Black Country at present, leaving a shortfall of 153ha.

Offers of employment land from local authorities with functional economic links including Shropshire (30ha) and South Staffordshire (112.2ha) which are being progressed through local plan reviews will serve to reduce this evidenced shortfall. Around 11ha of the Black Country FEMA shortfall would remain based on the contributions identified to date.

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. We would note that the current drafts in relation to employment land identify that Stafford Borough Council do not require their WMI strategic employment land share (of 8 hectares). As per the text within Policy DS4, we would expect these 8 hectares to be added to meeting the unmet employment needs of the Black Country (to be confirmed via updated draft Statements of Common Ground).

### **Gypsy and Travellers Provision**

Dudley MBC considers the policy to be sound and supports the level of gypsy and traveller pitches provision within the policy, and the approach taken to identifying future site supply.

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. Discussions to date confirm Dudley MBC is unable 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, as set out in Dudley's recent Local Plan Regulation 18 consultation and associated evidence base (November-December 2023).

(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.

(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:

**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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX