

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

Date: 4th June 2024

Dear Kelly,

Regulation 19 Draft South Staffordshire Consultation

1. Introduction

- 1.1. Thank you for inviting Shropshire Council to engage in the Regulation 19 (pre-submission) consultation on the Publication Plan for South Staffordshire. This represents a continuation of the positive Duty to Cooperate (D2C) engagement that has occurred between our two Local Planning Authorities during the preparation of the draft Shropshire Local Plan, which is currently the subject of examination, and during the South Staffordshire Local Plan Review.
- 1.2. Please be aware that the views expressed within this response represent officer views only. They have been informed by an overarching consideration of the Publication Plan for South Staffordshire, focused on identifying any potential strategic cross-boundary issues between our two Local Planning Authorities.
- 1.3. We would welcome further positive D2C engagement, including with regard to the matters raised within this response, following the conclusion of your current consultation.

2. Housing

Local Housing Need

- 2.1. We understand that within the Publication Plan for South Staffordshire, you are proposing to meet the entirety of the local housing need calculated for the South Staffordshire District Council administrative area. This principle is supported.

Unmet Housing Needs within the Greater Birmingham and Black Country Housing Market Area

- 2.2. South Staffordshire District Council forms part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The Publication Plan for South Staffordshire recognises that an unmet housing need is forecast to arise within the GBBCHMA during the proposed plan period.



- 2.3. As a result, it is understood that within the Publication Plan for South Staffordshire, it is proposed that a contribution of some 640 dwellings towards the unmet housing needs of the GBBCHMA. This principle of contributing to the unmet housing needs forecast to arise in the GBBCHMA is supported.
- 2.4. With regard to the extent of the contribution proposed within the Publication Plan for South Staffordshire, this is ultimately a matter for the D2C process between yourself and the GBBCHMA Authorities. However, we would note:
- a. South Staffordshire District Council forms part of the GBBCHMA within which an unmet housing need is forecast to arise.
 - b. It is most sustainable to meet housing needs within the Local Planning Authorities where the need arises and where this is not possible within their HMA, as this represents the same 'area of search' for these households.
 - c. The proposed contribution is substantially lower than the 4,000 dwelling contribution previously proposed.
 - d. Whilst the NPPF now stipulates that "*once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated.*" it also specifies that "*Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified.*"
- 2.5. As you are aware, Shropshire Council does not form part of the GBBCHMA. Despite this, recognising the functional relationship that exists to the Black Country (which forms part of the GBBCHMA), we are proposed a contribution of 1,500 dwellings towards their unmet housing need within the draft Shropshire Local Plan (which is currently the subject of examination).

Gypsy & Travellers

- 2.6. We note that your Gypsy and Traveller Accommodation Assessment (2024) (GTAA) identified a need to 2042 for 162 pitches for families that meet the planning definition of Gypsies and Travellers and a further 18 pitches for those families not meeting the planning definition of Gypsies and Travellers.
- 2.7. The Publication Plan for South Staffordshire describes the approach taken in seeking to identify appropriate sites to accommodate this need. We understand that this approach entailed:
- a. Looking at options to extend/intensify existing sites, which identified capacity for 37 pitches, sites for which are proposed to be allocated within the Publication Plan for South Staffordshire.
 - b. Subsequently looking at opportunities to provide for a public site on proposed allocations or for a public site on publicly owned land, which identified no additional capacity.



- 2.8. We would note that the Planning Policy for Traveller Sites (PPTS) includes a particular emphasis on the potential for private provision to meet need. We consider that such opportunities should be considered in full where an unmet need for Gypsy and Traveller Pitches has been identified.
- 2.9. We would also note that a number of sites were previously identified as suitable to be released from the Green Belt and allocated to provide for housing needs. Many of these sites are no longer considered necessary to achieve the proposed strategy. It is unclear what consideration has been given to the potential for these sites to accommodate Gypsy and Traveller Pitches to meet the identified need.

3. Employment

Local Employment Land Need

- 3.1. We understand that within the Publication Plan for South Staffordshire, you are proposing to meet the entirety of the local employment land need calculated for the South Staffordshire District Council administrative area. This principle is supported.

Unmet Employment Land Needs in Adjoining and Closely Related Local Planning Authorities

- 3.2. We understand that within the Publication Plan for South Staffordshire, you have recognised that:
- a. 10ha of employment land on the West Midlands Interchange (WMI) site is 'required' by Cannock Chase District Council to support the achievement of their employment land needs.
 - b. 112.2ha of surplus strategic employment land in South Staffordshire is available to the Black Country Authorities to support the achievement of their employment land needs.
- 3.3. These principles are supported.

4. The M54/A5 Corridor

- 4.1. The M54/A5 corridor is of strategic significance to both Shropshire and South Staffordshire District Council's administrative areas. We support the recognition of this within the Publication Plan for South Staffordshire.

Kind Regards

Edward West

Planning Policy and Strategy Manager

Shropshire Council

