

# SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION

## Hearing Statement

<b>Representor ref number</b>	STA24-012-01 City of Wolverhampton Council
<b>Matter</b>	4 – Development Needs and Requirement
<b>Relevant issue</b>	Issue 2 - Whether the identified employment development need and requirement set out in the Plan is justified, effective and consistent with national policy.
<p><b>1. In terms of overall employment development need and requirement:</b></p> <p><b>a. How has the overall level of need from within the district and the unmet needs beyond been calculated?</b></p> <p>The South Staffordshire Economic Development Needs Assessment (EDNA) update (2024)(ref EB44) provides the basis on which the employment land need has been calculated. This uses a labour demand approach, adjusted for flexibility, anticipated growth in key sectors, past take up trends and frictional vacancy. The balance between the objectively assessed local need and pipeline supply has provided the basis for the contribution to meeting wider needs. The contribution is further increased by the inclusion of the additional allocation set out in the Regulation 19 Plan, ensuring a closer alignment between the total land supply and past trends. The EDNA update includes a specific reference to the apportionment of the consented land at West Midlands Interchange towards meeting needs arising in South Staffordshire.</p> <p><b>b. Does the Plan clearly set out a requirement for the internally derived need and does this seek to make provision to fully address that requirement?</b></p> <p><b>c. How has the proposed contribution to address unmet employment needs beyond the district been identified?</b></p> <p>See response to (a) above.</p> <p><b>d. How do the supply figures set out in part (b) of Policy DS4 relate to the figures stated in the preceding paragraph?</b></p> <p>For the purposes of the Black Country, Policy DS4 confirms the South Staffordshire contribution of 112.2ha of employment land. This consists of the 45.2ha referenced in the first paragraph of the Policy, added to the 67ha minimum contribution from West Midlands Interchange.</p>	

**e. Are the overall employment development needs and requirements clearly set out in the Plan and are they justified?**

City of Wolverhampton Council support the findings and recommendations of the South Staffordshire EDNA in terms of the total employment land requirement and the approach used to determine a contribution towards meeting needs arising in the Black Country. This is consistent with para 11b of the NPPF (December 2023) where strategic policies are required to provide for objectively assessed needs for housing and other uses, as well as any needs arising in other areas.

It is noted that there is no nationally prescribed policy guidance on how to determine how the extent of any shortfall generated within another Local Plan areas should be met. It is, therefore, a matter of judgement for plan making authorities to agree what is appropriate.

This contribution is considered to be proportionate, based on the evidence set out in the EDNA, and consistent with the overarching Local Plan strategy. It should not be expected that South Staffordshire should be responsible for addressing the Black Country shortfall in full.

City of Wolverhampton Council recognise that taking into account the South Staffordshire contribution, there remains a significant shortfall of employment land if the needs of the Black Country are to be met in full.

The Black Country Council's will continue to engage with all local authorities with which the Black Country has an evidenced physical and functional relationship to close out the shortfall in the most sustainable manner. This involves engagement in current Local Plan activity, and through the preparation of new Local Plans and Spatial Development Strategies as set out in the Planning and Infrastructure Bill 2025.