

CITY OF  
WOLVERHAMPTON  
COUNCIL

13 May 2019

Gemma Davies  
Assistant Director Economic Growth  
Shropshire Council  
Shirehall Abbey  
Foregate  
Shrewsbury  
Shropshire SY2 6ND

Dear Gemma,

Thank you for your letter of 26<sup>th</sup> April.

We are encouraged by the Council's decision to engage positively with the Black Country local authorities with a view to explore the opportunity to accept a proportion of our unmet housing and employment land needs. In this context, we are grateful of being given the opportunity to provide additional evidence to enable you to make a positive recommendation to members to allocate land at M54 junction 3 for employment-led mixed use development.

Your letter seeks information on five specific issues and our response is set out below:

1. Green Belt Study. The Black Country local authorities and South Staffordshire Council commissioned a Green Belt Study and Landscape Sensitivity Assessment from LUC consultants in September 2018. This work has been completed in draft form and we anticipate the final Report being completed in May of this year. The Black Country authorities have also commissioned a Historic Landscape Characterisation Assessment and a suite of Conservation Area appraisals to support this work and these studies should be completed to the same timescale. This work will provide a comprehensive and detailed assessment of the scale of environmental constraints across the Black Country green belt in the light of the need to explore opportunities to meet our housing and employment land requirements.
2. Alternative approaches. The Black Country has a significant level of unmet need in the order of 22,000 homes and 300ha of employment land up to 2036. Meeting this need is a key challenge for the Black Country Plan and we are addressing it through a combination of understanding new opportunities within the Black Country administrative area but outside the existing urban area and ongoing discussions with neighbouring authorities through the Duty to Cooperate. The status of this work is summarised below.

The status of the Black Country Green Belt Study and associated work is summarised above. At this stage, it is not possible to advise on the extent to which the work will identify additional housing or employment land capacity to accommodate the shortfall. However, I draw your attention to the February 2018 Greater Birmingham HMA Strategic Growth Study which includes a strategic green belt assessment and sought to identify broad areas of search for future housing growth. The Study confirms that, at this strategic level, the majority of the Black Country green belt makes a principal contribution towards green belt purposes, and its capacity to accommodate large scale development is limited. The Study can be accessed via the following link - <http://blackcountrycorestrategy.dudley.gov.uk/t2/>

Through the Duty to Cooperate, in July 2018 ABCA wrote to all local authorities within the Birmingham and Black Country Housing Market Area (HMA), and those other local authorities which have a functional or physical relationship with the Black Country to understand if they would consider accommodating some of our unmet housing and employment land needs. The responses to this letter are published on the Black Country Plan website (<http://blackcountrycorestrategy.dudley.gov.uk/t1/p5/>). The responses to this letter were mixed, and no local authorities have made a binding commitment to contributing towards addressing the shortfall. A number confirmed that they would be testing their ability to make a contribution through the Local Plan preparation process – most notably South Staffordshire and Shropshire. In addition, and since replying to this letter, both Lichfield and Cannock Chase Councils have progressed their Local Plans by publishing consultation documents which include a potential contribution to meeting wider HMA needs.

The South Staffordshire Local Plan Issues and Options Report (2018) includes a preferred housing target which is based on a 4,000 home contribution towards the HMA, the Lichfield Local Preferred Options Consultation (2019) includes a proposal to test between 3-4,500 homes to meet the needs of the HMA, and the approved Cannock Chase Local Plan Issues and Options consultation (2019) proposes that the Plan will test accommodating between 500 and 2,500 homes of unmet need from the HMA. In total, these proposals could deliver up to 11,000 homes over and above locally generated needs towards the unmet needs of the HMA. However, this contribution would not necessarily be exclusive to the Black Country and would need to have regard to any shortfalls across the HMA as a whole, including needs arising in Birmingham. This 'discounting' would reduce the contribution towards the Black Country, and a significant shortfall would remain.

With the exception of Shropshire, and those areas summarised above, other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs.

In this context, the strategic opportunity at M54 J3 of some 50ha of employment land, supported by provision of 3,000 homes to contribute towards meeting both the employment and housing needs of the Black Country would therefore make significant quantitative headway in addressing unmet needs for both employment land and housing in the Black Country.

3. Statement of Common Ground. I confirm that the Black Country see a Statement of Common Ground as an appropriate mechanism to formalise any issues of strategic cross-boundary significance including housing and employment land.
4. We are encouraged that the M54 corridor is identified as a strategic opportunity in the West Midlands Combined Authority Strategic Investment and Delivery Plan (SIDP). The SIDP was approved by the WMCA Housing and Land Board in February 2019, which includes the four Black Country as constituent members. Our response to the Shropshire Preferred Sites consultation recognised the opportunity for further investment in this location to strengthen the role of the M54 Corridor and to complement nationally significant clusters of aerospace and high technology manufacturing activity in the Black Country around M54 Junction 2.
5. The 2019 West Midlands Strategic Employment Study (WMSES) is anticipated to be completed in May-June of this year with publication to follow. The work flows from the 2015 Strategic Employment Sites Study which found that the Black Country and Southern Staffordshire has a severe lack of strategic employment land on sites of a minimum of some 25ha in size to meet demand for large industrial units. This conclusion is consistent with the technical work undertaken to support the Black Country Plan, in particular the 2017 Economic Development Needs Assessment (EDNA).

I trust you find this information helpful and if you require any further details please contact me.

Yours sincerely,

Ian Culley  
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City Of Wolverhampton Council (on Behalf of the Black Country Authorities)

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