



Association of Black Country Authorities
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW
Date: 30 September 2020
Please ask for: Christine Williams
Direct Line: 01922 652089

Via email : Planningpolicy@Shropshire.gov.uk

Dear Colleagues

Shropshire Local Plan – Regulation 18 Consultation

Thank you for giving the opportunity for the Association of Black Country Authorities (ABCA) to respond to the Shropshire Local Plan Regulation 18 consultation. This letter provides our formal response to the consultation.

Background

ABCA have engaged with all previous stages of the Local Plan review in a constructive and cooperative manner. Our principal issue relates to the opportunity for the Local Plan to respond positively to help address the identified shortfall of land to meet housing and employment land needs arising in the Black Country, while at the same time helping to drive forward the realisation of Shropshire's economic growth ambitions.

In this context, we responded to the Local Plan Strategic Sites consultation in September 2019, strongly supporting the opportunity at Junction 3 of the M54 to provide a new mixed-use community including some 3,000 homes, 50ha of employment land with associated open space and community facilities. We specifically noted that this opportunity was well placed to meet needs arising in the Black Country given the strong physical and functional relationship.

We note that the Regulation 18 Plan does not include the allocation of land at junction 3, but recognise that the Regulation 18 Plan does respond to the Duty to Cooperate, particularly in relation to housing. We are disappointed that there is no equivalent proposal in respect of employment land, and so ABCA must object to the Regulation 14 Plan on this basis. We would welcome the opportunity to work with the Council in understanding the approach taken in the Regulation 18 Plan towards employment land, including evidence submitted by the promoters of the Junction 3 site as part of the Black Country Plan Call for Sites in August of this year.

We set out our detailed response to the consultation below.

Housing

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darwall Street, Walsall, WS1 1TP.
Tel: 01922 650000
Web: www.walsall.gov.uk

to accommodate all of our identified housing needs within the urban area of the Black Country.

We therefore strongly support the Local Housing requirement of 30,800 homes as set out in Policy SP2 of the Regulation 18 Local Plan in terms of it incorporating 1,500 dwellings to support the housing needs of the emerging Black Country Plan. We agree that this reflects a positive approach to cross-boundary cooperation and responds to the functional relationship between the two areas.

We note that this contribution will be accommodated through the distribution of development proposed in the Regulation 18 Plan, and consider that allocations in the principal settlements in the eastern areas of the County closest to the Black Country including Shifnall and Bridgnorth are well placed to meet this need.

However, we are concerned that the Local Plan does not contain a mechanism which would allow the Council to trigger a partial review of the Plan in the light of the rate and location of housing delivery or in the event of a greater need for additional housing - either associated with meeting the needs of Shropshire, or adjacent housing market areas including the Black Country. We would be happy to work with you to explore these mechanisms in more detail.

Employment land

Turning to employment land, the Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 305 ha of land, leaving a shortfall of between 263 ha and 500 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area but this exercise will not make a significant impact upon addressing our unmet need.

We are therefore concerned that the Regulation 18 Plan does not seek to make a contribution to meeting employment land needs arising in the Black Country. The evidential basis of the Local Plan employment target of 300ha as set out in Policy SP2 is not clear and so it is not possible to determine whether within this requirement, there exists any 'headroom' above locally generated needs and / or associated with the housing contribution, that could be attributed to meeting needs arising in the Black Country without the need for additional allocations. This evidential gap should be addressed through the commissioning of an Economic Development Needs Assessment (EDNA) consistent with the guidance contained in the Governments Planning Practise Guidance (PPG) - <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>.

We also note information prepared by the Bradford Estate in relation to the Junction 3 site as submitted to the Black Country Call for Sites in August of this year. This includes an assessment of the need for Strategic Employment Land to serve the M54 and wider sub-region, recognising the opportunity of an employment-only scheme at Junction 3 to address this need.

We request further engagement with the Council through the Duty to Cooperate to explore how the Local Plan can respond to these issues.

Minerals and Waste issues

The welcome the approach set out in Policies DP31-DP35 in relation to minerals and waste management infrastructure. There is evidence that facilities in Shropshire provide for both minerals and waste requirements arising in the Black Country. The availability of aggregates is currently in excess above minimum guidelines and the Plan does not propose any additional site allocations. Turning to waste management, existing consented facilities are anticipated to provide sufficient capacity to accommodate forecast throughput negating the need for additional facilities.

Summary

In summary, we consider that the Regulation 18 Plan is responding to the Duty to Cooperate in relation to housing and minerals and waste issues. But we advise that further work and dialogue with the Black Country is required in relation to employment land. We suggest that a meeting is convened as soon as possible to scope out this work by contacting Ian Culley (Lead Planning Manager, Regional Strategy) at the City of Wolverhampton Council. (ian.culley@wolverhampton.gov.uk).

Yours sincerely



Councillor Patrick Harley
Leader
Dudley Metropolitan Borough Council



Councillor Mike Bird
Leader
Walsall Metropolitan Borough Council



Councillor Maria Crompton
Deputy Leader
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield
Leader
City of Wolverhampton Council