



District Council House, Frog Lane
Lichfield, Staffordshire WS13 6YU

Direct Line 01543 308710
Customer Services 01543 308000

18 December 2023

Dudley Local Plan - Regulation 18 Public Consultation

Thank you for the opportunity to respond to the draft Dudley Local Plan - Regulation 18 Public Consultation. Lichfield District Council welcomes the opportunity to provide comments on the draft plan at this emerging stage.

As you will be aware Lichfield District Council (LDC) withdrew its emerging local plan from examination in October 2023. The decision to do so was taken by Full Council, having regard to a wide range of matters including the ongoing uncertainty around the plan-making system in England. LDC is undertaking the preparatory work in relation to progressing a new local plan and will continue to work with all partners as this plan progresses.

The comments below focus on several specific areas relating to employment and housing provision. Should you wish to discuss these comments further I would be more than happy to arrange a meeting to do so.

Housing

Lichfield District Council notes that the proposed housing requirement for the Dudley Local Plan is 11,954 homes between 2023-2041 as detailed within Policy DLP1 Development Strategy and Table 5.1 of the Issues and Options consultation document. This is based on the Standard Method used to calculate Local Housing Need (LHN) for Dudley.

It is acknowledged that the Dudley Local Plan aims to deliver 10,686 new homes within the borough primarily through a 'brownfield first' approach, with 96.4% of the supply on brownfield land and 3.6% of the supply on greenfield land. This leaves a shortfall of 1,078 homes that the plan states cannot currently be delivered within Dudley's own administrative area and will need to be exported through the Duty to Cooperate. It is also acknowledged that that Dudley Metropolitan Borough Council (DMBC) is not currently looking to deliver any of this shortfall through a review of its Green Belt boundaries, as noted at Policy DLP49 Green Belt and Policy DLP3 Paragraph 5.

This shortfall must be considered in the context of wider housing needs across the housing market area. As you will know, the Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



www.lichfielddc.gov.uk



[/lichfielddc](https://www.facebook.com/lichfielddc)



[lichfield_dc](https://twitter.com/lichfield_dc)



MyStaffs App

authorities published an updated Housing Needs and Supply Position Statement Addendum in April 2023. Further to this, in late 2022 Birmingham City Council formally commenced the review of its plan and estimated a shortfall of 78,415 homes to 2042 in its Issues and Options document based on the Standard Method. This is in addition to the significant unmet need which had previously been identified in the draft Black Country Local Plan, upon which work stopped in 2022. Since that time, the draft Sandwell Local Plan Regulation consultation identified a shortfall of 18,606 homes to 2041. These are significant figures and therefore all HMA authorities must continue to work effectively with the other partners in the GBBCHMA to address this emerging shortfall.

The approach towards calculating Dudley's own local housing requirement and the site selection process is noted, Lichfield District Council is conscious that the Dudley Local Plan only provides options to partially meet Dudley's own local need and is not proposing to contribute to meeting the wider GBBCHMA shortfall.

It is acknowledged that the Dudley Local Plan adopts a brownfield-first approach to maximise delivery of development within the urban area and that the Council is working with the West Midlands Combined Authority to ensure that brownfield land is prioritised for development and funding intervention. It is widely acknowledged that brownfield developments often have significant delivery constraints. Given the scale of potential unmet need within the HMA, including Dudley identifying unmet need at this stage, it is important that the Dudley Local Plan seeks to provide as much of its housing requirement within its own administrative area and considers all options to do so.

Employment

It is noted at paragraph 9.16 of the Dudley Local Plan that there is an employment land shortfall of 47 hectares that is to be exported to authorities within the Functional Economic Market Area (FEMA) through the ongoing Duty to Co-operate process and Statements of Common Ground. This employment land shortfall represents 65% of the overall employment land need for Dudley (total 72ha).

It is noted that the total target figure of 72ha is increased to 98ha by adding in 26ha associated with those sites comprising existing operational employment land which are proposed to be re-allocated for housing. Such an approach places an even greater reliance on the unmet need for employment land to be accommodated by other authorities FEMA. Figure 9.1 provides details of the FEMA and it is noted that Lichfield District is assessed as having only moderate economic transactions with Dudley. It should be noted that work on the now withdrawn Local Plan 2040 identified that there is a limited supply of employment sites within Lichfield District and as such LDC was not able to assist in meeting unmet employment land needs.

Green Belt

In addition to the above, the draft plan states that DMBC are not proposing to review its Green Belt boundaries or allocate any development sites or proposals within the Green Belt at this stage. The rationale for this is set out within draft Policy DLP49 Green Belt.

As you will be aware, the NPPF enables local authorities to consider changes to their Green Belt boundaries through their plan-making processes. Given the significant scale of the unmet needs within the HMA and FEMA it is important that potential options for accommodating need, including within the Green Belt, are considered and explored. There are limited areas beyond the Green Belt within the HMA and FEMA and should all authorities determine not to consider their Green Belt boundaries this could significantly limit the ability of the authorities to address these shortfalls.

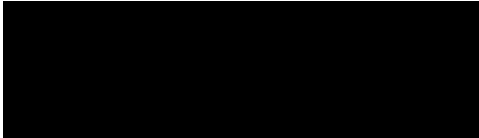
Given Dudley's links to the HMA, particularly the Black Country Authorities, who had previously identified a significant shortfall of 28,239 homes, Lichfield District Council would like to stress the importance of authorities proactively exploring all options to meet need within their administrative boundaries



including potential sites from all sources, including the consideration of Green Belt release, where appropriate and evidenced to ensure growth is delivered closest to where need arises.

Lichfield District Council welcomes continuing a positive dialogue with Dudley MBC through the Duty to Co-operate process as the Dudley Local Plan progresses, both through the HMA working group and DMBC independently.

Yours sincerely



www.lichfielddc.gov.uk



[/lichfielddc](https://www.facebook.com/lichielddc)



[lichfield_dc](https://twitter.com/lichielddc)



[MyStaffs App](#)