

23 January 2024

### **Dudley Local Plan – Draft Plan consultation**

This letter contains the response of the City of Wolverhampton Council to the Draft Dudley Local Plan (DLP) and Duty to Co-operate letter of 11<sup>th</sup> December 2023. This response was approved by the Councils Cabinet on 17 January 2024

It is welcome that good progress has been made with the DLP under the current Plan system, that it is underpinned by work undertaken to prepare the Black Country Plan (BCP), particularly the shared evidence base and associated policy development, and that the DLP timetable is aligned with the emerging WLP and Plans for other neighbouring authorities. This is important given the need to progress a regional solution to addressing unmet housing and employment land needs, a proportion of which originate in Dudley.

It is recognised that Dudley Council have fully explored all opportunities within the Borough to maximise development capacity, including increased densities and sites in centres, whilst protecting viable employment land and premises as necessary, given the evidenced shortfall of employment development land across the Black Country Functional Economic Market Area (BC FEMA). In the context of the revised NPPF, it is accepted that it will not be possible to meet all development needs within the Borough, and that it is necessary for Dudley to ask other authorities if they are able to contribute towards meeting Dudley needs through the allocation of land in their Local Plans.

The current Wolverhampton position on housing and employment land need and supply is set out in the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) 2022, the Black Country Economic Development Needs Assessment (BC EDNA) 2023 and the Draft BCP (2021). On the basis of the December 2022 consultation version of the National Planning Policy Framework (NPPF), the Leader of the Council committed to excluding any green belt land from development allocations in the emerging Wolverhampton Local Plan (WLP).

Taking into account potential capacity on non-green belt land in the Draft BCP, and an extended Plan period to 2042, the WLP is likely to generate a shortfall of around 11,500 homes and 50 ha of employment development land.

In terms of employment development land, the BC EDNA concludes that the BC FEMA as a whole has a shortfall of 152ha, however contributions secured through current Statements of Common Ground between the BC FEMA authorities and Shropshire and South Staffordshire Councils have potential to provide 133.6 ha towards BC FEMA needs, which would reduce that shortfall to 18.4 ha.

Given the existing housing and employment development land shortfalls set out above, Wolverhampton will not be in a position to provide land within the emerging WLP to meet either housing needs arising in Dudley, or employment development land need arising in the BC FEMA.

Regarding housing, it is recommended that Dudley Council continues to engage with the work of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) officer group and the programme of work contained within the Statement of Common Ground as circulated by South Staffordshire Council in 2022. Any solution should be based on an understanding of the pattern of functional and physical relationships across the GBBCHMA including migration and travel to work data so that, where practicable, needs are addressed as close as possible to where they arise.

Regarding employment development land, it is recommended that Dudley should continue to work together with the other BC authorities to close the BC FEMA employment development land shortfall through ongoing DtC activity, with a focus on those areas having a strong or moderate functional economic relationship with the Black Country (as defined in the BC EDNA), and other areas where there is evidence of a functional relationship.

The City Council is a member of the West Midlands Resource Technical Advisory Body (WMRTAB) which helps member authorities to meet their DtC obligations regarding strategic waste management. WMRTAB has submitted responses to the Dudley Local Plan consultation on behalf of the member authorities which cover technical issues regarding strategic waste management.

We trust that these comments are helpful and will be considered by Dudley Council as part of the preparation of the next stage of the Local Plan.

Yours sincerely,