

**Appendix 1: City of Wolverhampton Council
Response to Sandwell Local Plan
Issues and Options Consultation**

The Planning Policy Team
Sandwell Council
PO Box 2374
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Dear Planning Policy Team,

Sandwell Local Plan – Issues and Options consultation

This letter contains the response of the City of Wolverhampton Council to the Issues and Options Consultation on the Sandwell Local Plan. This response was approved by the Councils Cabinet on 26 April 2023.

In summary, we welcome the progress made with the new Local Plan, and the way in which the document has been informed by the work undertaken as part of the Black Country Plan (BCP) – particularly the shared evidence base and associated policy development. We also note and welcome that the programming of the Local Plan is broadly aligned with the Wolverhampton Local Plan as set out in the Local Development Scheme approved by the Council in February 2023 <https://www.wolverhampton.gov.uk/planning/planning-policies/local-development-scheme-lds> . This is important given the need to progress a regional solution to addressing strategic housing and employment land needs which form a key element of the consultation.

At this stage, our comments are focussed on the assessment of housing and employment land need, and how these needs could be addressed. We look forward to further and ongoing engagement with Sandwell Council through the Duty to Cooperate as the Plan progresses, and the individual policies and site-specific proposals are further developed.

Strategic housing and employment land issues

Page 35 of the Issues and Options consultation document identifies a Sandwell Local Housing Need of 30,300 homes to 2041. The anticipated housing land supply is 9,492, resulting in a shortfall of 20,808 homes. This is broadly consistent with the work undertaken through the Black Country Plan and is recognised by the City of Wolverhampton Council.

The document points to several options in dealing with this, including increased densities on new sites. We encourage Sandwell Council to continue to fully explore all opportunities

within the Borough to maximise development capacity, but highlight the need to prevent the loss of viable employment land and premises given the evidenced shortfall of land across the Black Country Functional Economic Market Area (FEMA). While this work may identify some additional capacity, we accept the conclusion that it will not be possible to meet all needs within the Borough, and endorse the suggestion that it will be necessary to ask adjacent Councils if they are able to contribute towards meeting Sandwell needs through the allocation of land in their Local Plans.

For this reason, we recommend that Sandwell 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. Clearly, given the scale of the Sandwell shortfall, a regional approach is required, and the reference to approaching only adjacent Local Plan areas for assistance will be too limiting given acknowledged housing shortfalls arising in and across the Black Country as a whole and in Birmingham. 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 is possible to where they arise.

In the case of Wolverhampton, our current position on housing and employment land need and supply is as set out in the Draft BCP, published for consultation in 2021. The Draft BCP identified a shortfall of some 28,000 homes to 2039 across the four Council areas. For Wolverhampton, the housing shortfall was substantial at some 7,700 homes to 2039.

On the basis of the December 2023 consultation version of the National Planning Policy Framework, the Leader of the City of Wolverhampton Council has committed to excluding any sites which are currently located within the green belt as development allocations within the emerging Wolverhampton Local Plan. This will further increase the 2039 City housing shortfall to some 8,700 homes. The new Local Plan will also have a Plan period extending to 2041, which could further increase this shortfall. For this reason, Wolverhampton will not be in a position to provide land within the Local Plan to meet needs arising in Sandwell.

Turning to employment land, the document identifies an employment land need of 205.5ha arising in Sandwell, and a corresponding forecast supply of 69.9ha, resulting in a shortfall of 135.5ha. Again, we recognise this level of need and anticipated supply given its basis in the jointly commissioned Black Country Economic Development Needs Assessment (EDNA) update, published alongside the Issues and Options consultation.

In the first instance, needs arising within the Black Country FEMA should be addressed within the FEMA itself. The EDNA update recommends that collectively, the employment land 'need' across the FEMA is some 512ha, and that the corresponding shortfall is some 22.4ha after taking into account current proposed contributions from neighbouring Local Plan areas – namely Shropshire and South Staffordshire. The Report recommends that the closing of this gap should be addressed through ongoing Duty to Cooperate activity with a focus on those areas having a strong or moderate functional economic relationship with the Black Country (as defined in the 2017 EDNA), and other areas where there is evidence of a functional relationship. In the case of Wolverhampton, the Report advises that employment land need and anticipated supply are finely balanced, and it is highly unlikely that additional land will be identified through the new Local Plan which could make

significant headway into addressing the shortfall arising across the FEMA as a whole. We therefore support the continuation of Duty to Cooperate engagement with neighbouring Local Plan areas to address the shortfall, with a focus on the areas identified in the 2017 EDNA.

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

Yours sincerely,

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