

Appendix 2

Interim Officer Response to Stafford Local Plan Preferred Options Consultation

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Dear Strategic Planning Team,

Stafford Borough Council New Local Plan 2020-2040 – Issues and Options consultation

This letter contains the officer response on behalf of the City of Wolverhampton Council to the Preferred Options Consultation. The Council's Cabinet will be considering this response at their meeting on 14th December and I hope to be able to confirm this officer response following that meeting.

In summary, the Council welcomes the progress made with the new Local Plan, and the positive approach which it takes to the Duty to Cooperate in responding to the unmet housing and employment land needs of neighbouring Local Plan areas. In the context of this broad support, we have a number of points which we wish to raise on specific issues. Our detailed response is set out below.

Background

A Representation was submitted to the previous stage (Issues and Options) of the Plan preparation process in 2021 on behalf of the City Council through the Association of Black Country Authorities (ABCA). This representation requested that the Local Plan should promote growth options in excess of local needs in order to provide housing and employment land which could meet needs arising in the Black Country, given the shortfall across the area as a whole as identified through work on the Black Country Plan (BCP). The representation specifically highlighted the role of a proposed new settlement at Meecebrook as being well-placed to meet these needs subject to significant infrastructure investment in order to enhance its accessibility. The ABCA 'request' was for the provision of some 1,500-2,000 homes and 35-40ha of employment land to meet needs arising in the Black Country.

As you may be aware, in September 2022 the Leader of Dudley Council announced that he wished to withdraw the Council from involvement in the BCP. The four Black Country Councils subsequently agreed to prepare individual local plans and the associated Local Development Schemes (LDSs) are in the process of being brought into effect.

The Wolverhampton Local Plan

The Wolverhampton LDS was adopted by Cabinet on 26th October (<https://wolverhampton.moderngov.co.uk/documents/s223167/Appendix%201%20-%20Wolverhampton%20Local%20Development%20Scheme%20Oct%202022.pdf>), confirming the commitment of the Council to continue to prepare an up to date Local Plan in a robust and timely manner. There is an Issues and Preferred Options consultation on the

Wolverhampton Local Plan programmed for February 2023, followed by a Regulation 19 consultation in summer 2023.

The Local Plan will build on the work progressed on the BCP and subsequent evidence. Our current position on housing and employment land need and supply is as set out in the Draft BCP, published for consultation in 2021. In the case of housing, the Draft BCP identified a shortfall of some 28,000 homes to 2039 across the four Council areas. For Wolverhampton, the housing shortfall is substantial at some 7,900 homes.

Turning to employment land, the Planning Practice Guidance encourages strategic Plan-making authorities to identify needs on a Functional Economic Area (FEMA) basis. In the case of Wolverhampton, the City is located within the Black Country FEMA as identified in the Black Country Economic Development Needs Assessment (EDNA) published in 2017. Across the FEMA as a whole, the BCP identifies a shortfall of some 210ha of employment land to 2039, this being the sum of shortfalls across the four Council areas. The EDNA confirms that the Wolverhampton element of this shortfall is between 40ha to 80ha.

While the Council will be updating land supply as part of the preparation of the Local Plan, we do not anticipate that the work will reveal any significant sources of additional land to meet housing or employment needs. The Wolverhampton Local Plan will have a Plan period extending to 2040, adding a further one year of housing and employment land demand which may have the effect of increasing the shortfalls outlined above.

For these reasons, we are strongly of the view that the Wolverhampton housing shortfall identified in the Draft BCP remains and could potentially rise further. The ABCA representation to the Issues and Options consultation identified a strong functional relationship between the Black Country and Stafford, and highlighted the relationship with Wolverhampton in particular as being a strong one. On this basis, the Council consider that not only is there compelling evidence of a housing shortfall arising in Wolverhampton, but also that Stafford is well placed to make a contribution towards addressing this shortfall through the current Local Plan.

The Preferred Options consultation

The Preferred Options document sets out to deliver 10,700 (535 per year) new homes between 2020 and 2040. This consists of 435 dwellings each year to meet Stafford's identified housing need with 100 homes per year to meet unmet housing needs from other authorities. However, it is proposed that the Plan should provide sufficient land supply to deliver a total of 12,580 homes. This surplus of 1,880 homes, which amounts to 15% of the housing requirement, is intended to provide a 'buffer', to allow for the potential non-implementation of some of the sites identified in the Plan. However, the evidential basis for this buffer is not clear and any of the buffer not required to allow for non-implementation could be added to the offer made to other authorities. It is understood that the majority of the Stafford Local Plan housing supply will be on greenfield land with few constraints, and that some brownfield sites have not been counted in supply because of concerns regarding their deliverability. In comparison, the Draft BCP provided an evidenced buffer of only 5% for a primarily brownfield housing land supply, including some sites with constraints. Therefore, a buffer of 5% is suggested to be more appropriate, subject to evidence which should be prepared to support the Regulation 19 Plan.

Notwithstanding our observations on the 'buffer' issue, the Preferred Options consultation document has responded positively to the ABCA representation by including the provision of

2,000 homes over and above local needs through the housing target set out in Policy 1, and through the reference in para 1.4 to meeting needs arising in 'other authorities' in the region.

This figure is based on the development of the Meecebrook garden community which is allocated in the Local Plan. The 'other authorities' are not defined but as discussed above, Wolverhampton has a functional relationship with Stafford in terms of migration patterns and travel to work data and should be recognised as one of those 'other authorities'.

The principle of the 2,000 contribution to meeting wider needs is therefore welcomed. However, in order to provide certainty for the progression of the Wolverhampton Local Plan and to inform our ongoing Duty to Cooperate engagement with other neighbouring Local Plans, it is critical that a Wolverhampton element of the 2,000 homes contribution is confirmed as soon as possible.

Migration patterns form a sound evidential basis to approach this issue but in calculating an appropriate and reasonable apportionment, it is also important to have regard to shortfalls arising in other areas which have a relationship with Stafford, notably the Black Country Councils and Birmingham, which has also published evidence of a housing shortfall of some 78,000 homes through the initial stages of the Birmingham Local Plan review. Analysis of migration patterns between the Black Country / Birmingham and Stafford over an extended time period (2002-19) shows that Wolverhampton movements account for some 27% of flows, Walsall having the largest share at some 33%, Birmingham 18%, Sandwell 12% and Dudley 1%.

However, whereas Wolverhampton and Sandwell have housing need figures which far outstrip the housing capacity identified in the Draft BCP, it is not currently clear if either the Dudley Local Plan or the Walsall Local Plan will generate a residual housing shortfall. The Draft BCP evidence shows that there is sufficient urban land in Dudley to meet Dudley local housing needs. This means that there is currently no evidenced shortfall in Dudley, and also that green belt sites, such as those consulted on in the Draft BCP, could provide additional housing to meet the needs of other authorities with a clear shortfall, such as Wolverhampton. The Walsall Local Plan preparation process is not due to commence until later in 2023 and any future shortfall has the potential to be met through contributions from the Shropshire and Lichfield Local Plans, which are at an advanced stage and have agreed contributions towards the Black Country as a whole. On this basis, it would be appropriate for the Stafford Local Plan contribution to be divided between Wolverhampton, Sandwell and Birmingham in proportion to their share of net migration inflows, with Wolverhampton allocated at least 47%, or 940 homes if applied to 2,000 homes.

The 2,000 contribution is based on the delivery of 3,000 homes at the Meecebrook site as part of a phased programme which will extend beyond the current Plan period. If development is in excess of this figure, (or through the review of the 'buffer' allowance a high housing land supply is identified) then potentially the 2,000 offer and the Wolverhampton share of it could be increased.

The Council is supportive of the Meecebrook allocation (Policy 1) as the principal basis for the contribution to meeting wider needs. The Council echoes the previous ABCA response which recognised the benefits of this strategic opportunity through its ability to create a new sustainable settlement providing a rich mix of new homes, employment opportunities and services. We note that in order to fully realise its potential, significant infrastructure

enhancements will be required and the Council is supportive of all efforts to secure the funding which will be necessary to deliver this project.

Turning to employment land, the Local Plan does not include an equivalent 'offer' but does contain significant 'headroom' of employment land supply (150ha) against the demand target of 80ha. This supply includes some 15ha at the Meecebrook site which is of a scale designed to address the employment needs of new residents in order to secure a degree of self-containment. Given that Meecebrook is identified as meeting needs arising in neighbouring areas, then as a minimum, it is requested that the employment land element of the development should be considered to be capable of meeting needs arising in Wolverhampton and the Black Country FEMA given the functional relationship outlined above.

In the context of the levels and location of growth set out in the Local Plan, CWC is committed to work together with Stafford District Council, other authorities across the region and Natural England, on the potential combined impact of Local Plan developments on Special Areas of Conservation (SAC), including: through the Cannock Chase SAC Partnership regarding visitor impacts on Cannock Chase SAC; and through on-going work to address potential air quality impacts on SACs across the region. The Council is therefore supportive of proposed Policy 48: Cannock Chase Special Area of Conservation (SAC) which provides protection to the SAC through the requirements of any development within a 15km radius of the SAC providing appropriate avoidance and/or mitigation of any adverse effects.

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