



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

Our Ref: HP/CW  
Date: 8 February 2019  
Please ask for: Christine Williams  
Direct Line: 01922 652089

Shropshire Council  
Planning Policy & Strategy Team  
Shirehall  
Abbey Foregate  
Shrewsbury  
SY2 6ND

By email - [planningpolicy@shropshire.gov.uk](mailto:planningpolicy@shropshire.gov.uk)

Dear Sir/Madam

**Shropshire Local Plan Review:  
Preferred Sites Consultation: November 2018**

Thank you for consulting the Black Country authorities on the Local Plan Review.

This letter contains the response of the Association of Black Country Authorities (ABCA) to the Preferred Sites Consultation.

You will recall that we wrote to you in July last year regarding the issue of housing and employment need across the Black Country and how it could be met. In summary, our most recent evidence tells us that we cannot accommodate all of our identified needs within the urban area of the Black Country. This view is supported by our current work reviewing the urban capacity of the Black Country (<http://blackcountrycorestrategy.dudley.gov.uk/t2/>) and the Birmingham and Black Country HMA study. Even by increasing densities and looking to other sources of urban land supply we estimate that we have a shortfall in the region of 22,000 dwellings and 300ha of employment land.

The letter asked for information on your Plan-making programme and to understand the opportunity for housing and employment development proposals identified in your Plan to meet needs arising from the Black Country. Your response to this letter recognised a functional economic relationship between Shropshire and the Black Country and that there may be an opportunity for a proportion of the Local Plan housing allocations to be attributed to meeting needs arising in the Black Country whilst at the same time achieving Shropshire's strategic growth aspirations.

Within this context our comments on the Preferred Sites consultation document are set out below:

1. We support the references in the Preferred Development Strategy to 'supporting the growth aspirations of neighbouring areas' and within this context the spatial focus on

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the north and east of the County. For the reasons set out above, this approach builds on existing physical and functional relationships between the Black Country and Shropshire, and recognises the opportunity for the Plan to accommodate mutually supportive cross-boundary growth needs in a sustainable manner.

2. We understand that the Council has commissioned a Study into the economic potential of the M54 Corridor and that this work will inform the next stage of the Local Plan review. We await the findings of this Study with interest. The Corridor has been long-recognised as a strategic growth opportunity and it may be appropriate to refer to it directly within the Preferred Development Strategy. This would be particularly the case if the Corridor contains strategic housing and employment sites which we understand will be the subject of a subsequent consultation.
3. Para 4.35 refers to opportunities in the Cosford area for major mixed-use strategic development and we are aware of aspirations for large scale development being promoted in this location. We recognise the important role of RAF Cosford and the opportunity for further investment in this location to strengthen the economic role of the M54 Corridor and support the nationally significant clusters of aerospace and high technology manufacturing activity in the Black Country around M54 Junction 2. The area benefits from strong physical connections to the Black Country in the form of the M54 and rail line and could be well placed to directly meet a proportion of the unmet employment land and housing needs arising from the Black Country and wider HMA.

We trust you find these comments helpful and look forward to further discussions with you as the work progresses, especially around opportunities in the M54 Corridor. In the meantime, if you would like to discuss any of our responses please contact Ian Culley, Lead Planning Manager at Wolverhampton Council on 01902 555636 or via email [ian.culley@wolverhampton.gov.uk](mailto:ian.culley@wolverhampton.gov.uk).

Yours faithfully

Councillor Qadar Zada  
Leader  
Dudley Metropolitan Borough Council

Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council

Councillor Steve Eling  
Leader  
Sandwell Metropolitan Borough Council

Councillor Roger Lawrence  
Leader  
Wolverhampton City Council

CITY OF  
WOLVERHAMPTON  
COUNCIL

13 May 2019

Gemma Davies  
Assistant Director Economic Growth  
Shropshire Council  
Shirehall Abbey  
Foregate  
Shrewsbury  
Shropshire SY2 6ND

Dear Gemma,

Thank you for your letter of 26<sup>th</sup> April.

We are encouraged by the Council's decision to engage positively with the Black Country local authorities with a view to explore the opportunity to accept a proportion of our unmet housing and employment land needs. In this context, we are grateful of being given the opportunity to provide additional evidence to enable you to make a positive recommendation to members to allocate land at M54 junction 3 for employment-led mixed use development.

Your letter seeks information on five specific issues and our response is set out below:

1. Green Belt Study. The Black Country local authorities and South Staffordshire Council commissioned a Green Belt Study and Landscape Sensitivity Assessment from LUC consultants in September 2018. This work has been completed in draft form and we anticipate the final Report being completed in May of this year. The Black Country authorities have also commissioned a Historic Landscape Characterisation Assessment and a suite of Conservation Area appraisals to support this work and these studies should be completed to the same timescale. This work will provide a comprehensive and detailed assessment of the scale of environmental constraints across the Black Country green belt in the light of the need to explore opportunities to meet our housing and employment land requirements.
2. Alternative approaches. The Black Country has a significant level of unmet need in the order of 22,000 homes and 300ha of employment land up to 2036. Meeting this need is a key challenge for the Black Country Plan and we are addressing it through a combination of understanding new opportunities within the Black Country administrative area but outside the existing urban area and ongoing discussions with neighbouring authorities through the Duty to Cooperate. The status of this work is summarised below.

The status of the Black Country Green Belt Study and associated work is summarised above. At this stage, it is not possible to advise on the extent to which the work will identify additional housing or employment land capacity to accommodate the shortfall. However, I draw your attention to the February 2018 Greater Birmingham HMA Strategic Growth Study which includes a strategic green belt assessment and sought to identify broad areas of search for future housing growth. The Study confirms that, at this strategic level, the majority of the Black Country green belt makes a principal contribution towards green belt purposes, and its capacity to accommodate large scale development is limited. The Study can be accessed via the following link - <http://blackcountrycorestrategy.dudley.gov.uk/t2/>

Through the Duty to Cooperate, in July 2018 ABCA wrote to all local authorities within the Birmingham and Black Country Housing Market Area (HMA), and those other local authorities which have a functional or physical relationship with the Black Country to understand if they would consider accommodating some of our unmet housing and employment land needs. The responses to this letter are published on the Black Country Plan website (<http://blackcountrycorestrategy.dudley.gov.uk/t1/p5/>). The responses to this letter were mixed, and no local authorities have made a binding commitment to contributing towards addressing the shortfall. A number confirmed that they would be testing their ability to make a contribution through the Local Plan preparation process – most notably South Staffordshire and Shropshire. In addition, and since replying to this letter, both Lichfield and Cannock Chase Councils have progressed their Local Plans by publishing consultation documents which include a potential contribution to meeting wider HMA needs.

The South Staffordshire Local Plan Issues and Options Report (2018) includes a preferred housing target which is based on a 4,000 home contribution towards the HMA, the Lichfield Local Preferred Options Consultation (2019) includes a proposal to test between 3-4,500 homes to meet the needs of the HMA, and the approved Cannock Chase Local Plan Issues and Options consultation (2019) proposes that the Plan will test accommodating between 500 and 2,500 homes of unmet need from the HMA. In total, these proposals could deliver up to 11,000 homes over and above locally generated needs towards the unmet needs of the HMA. However, this contribution would not necessarily be exclusive to the Black Country and would need to have regard to any shortfalls across the HMA as a whole, including needs arising in Birmingham. This 'discounting' would reduce the contribution towards the Black Country, and a significant shortfall would remain.

With the exception of Shropshire, and those areas summarised above, other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs.

In this context, the strategic opportunity at M54 J3 of some 50ha of employment land, supported by provision of 3,000 homes to contribute towards meeting both the employment and housing needs of the Black Country would therefore make significant quantitative headway in addressing unmet needs for both employment land and housing in the Black Country.

3. Statement of Common Ground. I confirm that the Black Country see a Statement of Common Ground as an appropriate mechanism to formalise any issues of strategic cross-boundary significance including housing and employment land.
4. We are encouraged that the M54 corridor is identified as a strategic opportunity in the West Midlands Combined Authority Strategic Investment and Delivery Plan (SIDP). The SIDP was approved by the WMCA Housing and Land Board in February 2019, which includes the four Black Country as constituent members. Our response to the Shropshire Preferred Sites consultation recognised the opportunity for further investment in this location to strengthen the role of the M54 Corridor and to complement nationally significant clusters of aerospace and high technology manufacturing activity in the Black Country around M54 Junction 2.
5. The 2019 West Midlands Strategic Employment Study (WMSES) is anticipated to be completed in May-June of this year with publication to follow. The work flows from the 2015 Strategic Employment Sites Study which found that the Black Country and Southern Staffordshire has a severe lack of strategic employment land on sites of a minimum of some 25ha in size to meet demand for large industrial units. This conclusion is consistent with the technical work undertaken to support the Black Country Plan, in particular the 2017 Economic Development Needs Assessment (EDNA).

I trust you find this information helpful and if you require any further details please contact me.

Yours sincerely,

Ian Culley  
Lead Planning Manager – Regional Strategy  
Planning  
City Of Wolverhampton Council (on Behalf of the Black Country Authorities)

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