



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

Our Ref: HP/CW  
Date: 18 December 2019  
Please ask for: Christine Williams  
Direct Line: 01922 652089

Strategic Planning Team  
South Staffordshire Council  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 1PX  
By email : [localplanreview@sstaffs.gov.uk](mailto:localplanreview@sstaffs.gov.uk)

Dear Strategic Planning Team,

**South Staffordshire Local Plan Review:  
Spatial Housing Strategy and Infrastructure Delivery Consultation 2019**

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

This letter sets out the response of the Association of Black Country Authorities (ABCA) to the South Staffordshire Local Plan Spatial Housing Strategy and Infrastructure Delivery Consultation. Complementary responses to specific consultation questions are set out in the Appendix to this letter. A separate consultation response will also be provided by City of Wolverhampton Council, subject to Cabinet approval on 22 January 2020.

ABCA again wish to express support for the preferred housing growth option, which will provide enough new homes to meet local housing need and also make a 4,000 home contribution towards meeting the needs of the wider Greater Birmingham and Black Country Housing Market Area (HMA).

Given the close proximity of the Black Country to South Staffordshire, the location of a number of potential growth sites forming part of preferred spatial housing option G on or close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country, we feel it is reasonable that all of these additional 4,000 homes should be allocated towards meeting Black Country housing needs, rather than housing needs from other parts of the HMA. We request that this allocation is clearly referenced in the Local Plan.

The Black Country has provided detailed evidence in the form of an Urban Capacity Review Update 2019 to support the case that there is a significant housing shortfall of around 26,900 homes in the Black Country up to 2038 which cannot be met in the

urban area. Migration and commuting evidence also supports the strong links between South Staffordshire and the Black Country.

It should also be noted that the HMA Strategic Growth Study confirms that, at a 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.

Market deliverability will also limit the capacity of the Black Country Green Belt up to 2038. In the case of the Birmingham Plan, the Peter Brett Associates (PBA) Delivery Study<sup>1</sup> concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan<sup>2</sup>. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands. As the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for delivery of housing, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham may well reasonably conclude that these two nominal housing market areas could only be expected to deliver up to 5,000 homes each over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities.

ABCA support the preferred spatial housing Option G, and the Infrastructure Delivery Plan, subject to:

- ensuring that sites selected for development are carefully located and planned to avoid areas of environmental sensitivity and green belt harm, and minimise impacts on infrastructure;
- ensuring that any urban extensions provide all necessary local shops, community facilities and primary school places on-site and that the needs of smaller sites on the South Staffordshire boundary can be met without putting additional pressure on infrastructure in neighbouring authorities.

In terms of the site selection process, we support the use of the jointly prepared South Staffordshire and Black Country Green Belt and Landscape Sensitivity Studies to prioritise sites for selection. However, we suggest that the appropriate threshold should be a combination of 'very high' green belt harm and 'moderate to high' or 'high' landscape sensitivity, rather than use of 'very high' green belt harm alone. This would make full use of the findings of the two studies and facilitate a consistent cross-boundary approach.

---

<sup>1</sup> [https://www.birmingham.gov.uk/downloads/file/1750/pg3\\_housing\\_delivery\\_on\\_green\\_belt\\_options\\_2013pdf](https://www.birmingham.gov.uk/downloads/file/1750/pg3_housing_delivery_on_green_belt_options_2013pdf)

<sup>2</sup>

[https://www.birmingham.gov.uk/downloads/file/1211/strategic\\_housing\\_market\\_assessment\\_2013\\_housing\\_targets\\_2011\\_to\\_2031\\_technical\\_paper](https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper)

ABCA request that the impact of new Plan allocations on the wider transport network are assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, and that developments minimise trip generation through all available mechanisms.

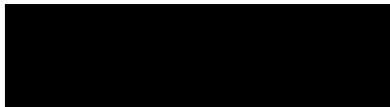
ABCA support the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan.

ABCA also request that consideration is given through the site selection process to the importance of protecting brick clay resources and active mineral workings in the Cheslyn Hay, Great Wyrley and Essington areas, as these are important brick clay resource areas which are a source of supply to Black Country brickworks.

Finally, ABCA welcome and support the constructive work which is on-going between the Black Country authorities and South Staffordshire Council, on planning issues of mutual interest, and fully expect this close joint working and partnership approach to continue throughout the Plan preparation process as the South Staffordshire Local Plan is developed in parallel with work on the Black Country Plan, particularly with respect to development proposals on the edge of the Black Country and the cross-boundary infrastructure and delivery issues which these may raise.

We trust that you will find our comments helpful, and we look forward to further engagement with South Staffordshire Council on these matters before the next stage in the plan process.

Yours faithfully



Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council



Councillor Yvonne Davies  
Leader  
Sandwell Metropolitan Borough Council



Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council



Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council