

**Supplementary Note to the South Staffordshire Local Plan Examination 2025 –
Action 4.5 and 4.6**

This note has been produced by South Staffordshire Council to supplement the Examination of the South Staffordshire Local Plan. It directly responds to Action 4.5 and 4.6. The response sets out proposed amendments to the Local Plan as track changes to address the actions, including amendments to the support text of Policy DS4: Development Needs.

Action 4.5 – Council to ensure that the policy wording of DS4 is clear that the development requirements (employment and types of housing) are a minimum

Action 4.6 – Council to update the employment land requirement to reflect the contributions to be made to the Black Country and Cannock Chase and review the indigenous need requirement in terms of the WMI site.

Employment

The district’s employment needs

- 5.50
- It is the role of the Local Plan to consider the district’s employment needs and plan for employment growth over the plan period, taking account of the evidence of need and the existing pipeline of employment land. A partial update of the Economic Development Needs Assessment (EDNA) was published in 2024 to inform the emerging Local Plan and was an update to a previous EDNA published in 2022.
- 5.51
- The EDNA 2022 and 2024 Update, in accordance with the PPG, analysed the socio-economic landscape of the district (including around employment, business development, demographics and labour markets) and concluded that the local economy in South Staffordshire was healthy and was still benefiting from investment particularly as a result of strategic site delivery in the district. The EDNA also analysed which authorities South Staffordshire had the strongest economic links with, and from this identified a Functional Economic Market Area (FEMA) comprising of South Staffordshire, Cannock, Dudley, Stafford, Walsall and Wolverhampton.
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- The study’s main focus was to draw together the market intelligence, economic forecasts and other relevant data to conclude on the employment land needs of the district up until 2041. The study included detailed analysis of employment projections on a sector-by-sector basis utilising data from the three main forecasting houses. The study adjusted the Experian forecast to arrive at a ‘LEP based Growth Scenario’ and following a series of further adjustments (e.g. building in plan flexibility such as projected employment losses and an increased margin for frictional vacancy), arrived at **an objectively assessed employment land need figure for South Staffordshire of 81,2ha up to 2041.**

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5.53 The study also undertook analysis on the impact of West Midlands Interchange (WMI) on the district, including on the demand for employment, as well as considering the proportion of WMI that could contribute towards the supply of employment land for South Staffordshire given the strategic nature of the site. This concluded that 18.8ha of WMI would contribute towards the district's supply of employment land to meet the projected demand.

5.54 The EDNA [Update 2024](#) undertook further analysis by examining the supply/demand balance for the district, in order to inform the amount of employment land that would need to be allocated through the Local Plan. It considered the supply of employment land at the base date of April 2023 (circa 90ha, excluding WMI)) and explored how this would likely be split between strategic and non-strategic employment land supply. Following consideration of the supply/demand balance specifically for strategic sites, it was concluded what proportion of the surplus strategic employment land could be attributed to providing towards sub regional supply and what proportion could be considered providing towards South Staffordshire's supply, informed by the labour demand forecasts. It concluded that in terms of strategic employment land, 27.6ha of surplus land (excluding WMI) could reasonably be attributed to cross boundary unmet needs in the Black Country FEMA. This increases further to 45.2ha ([excluding WMI](#)) when factoring in an additional strategic allocation at M6 Junction 13, Dunston (17.6ha). [Increasing the supply of employment land by allocating this site positively responds to the EDNA recommendations and](#) boosts the supply pipeline to ensure plan flexibility and that the pipeline of sites more closely reflect recent take up. Meanwhile, the supply-demand balancing exercise that could be attributed to South Staffordshire, taking on board both strategic and non-strategic employment land, concluded there is sufficient supply to meet the council's employment needs based on South Staffordshire's forecast labour demand, with supply/demand broadly in balance. Overall, the district can meet its own employment land needs, together with making a proportionate contribution to unmet needs in the Black Country.

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Unmet employment needs from the wider functional economic area

5.55 National planning practice guidance requires authorities consider the 'most appropriate geography' to prepare policies for employment and require authorities to define their 'best fit' Functional Economic Market Area. Given this, it is over the South Staffordshire FEMA geography that it is considered the most appropriate basis for considering our role in meeting cross boundary employment needs.

5.56 Of the other authorities within the South Staffordshire FEMA, Cannock Chase District Council (CCDC) are also in the process of preparing their new Local Plan. In February 2024 they consulted on their Pre-Submission (Regulation 19) consultation which indicated that up to 74ha of employment land will be provided over the plan period up to 2040 to meet Cannock's employment needs. **There is currently no indication that Cannock are unable to meet this need within their administrative boundary, with the exception being confirmation that they require 10ha from WMI.** Stafford

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Borough consulted on their Preferred Options document in October 2022 which confirmed around 156ha of employment land supply over their emerging plan period. There is no indication to date that Stafford will not be able to meet its own development needs.

5.57 The Black Country authorities of Dudley, Sandwell and Wolverhampton are also currently preparing their Local Plans and their employment evidence has identified a self-contained Black Country FEMA covering the four Black Country authorities, albeit with strong and moderate links to a number of neighbouring authorities, including strong links with South Staffordshire. The Black Country authorities latest Employment Land Needs Assessment (October 2023) identifies a shortfall of 153ha of employment land. That study recommends that the Black Country local authorities should continue to engage through the Duty to Cooperate with neighbouring authorities that have a strong or moderate functional economic relationship with the Black Country to consider this shortfall.

5.58 Site assessment of employment site options (existing sites with available land parcels and new site options) have been undertaken, which has re-confirmed that those sites assessed as part of the supply/demand exercise in the EDNA Update (2024) and that did not have full or reserved matters planning permission at the base date of April 2023 are suitable for allocation. As such, the findings of the supply/demand exercise and the conclusion in the EDNA update (2024) that 27.6ha (excluding WMI and M6 Junction 13, Dunston) of strategic employment land is available for unmet cross boundary needs has been confirmed. In addition, WMI represents a significant supply of employment land within the district that will come forward within the plan period. As confirmed through the EDNA 2022 and 2024 update, South Staffordshire requires 18.8ha of WMI within our supply to meet our forecast labour demand for logistics, including an additional allowance to correspond with expectations for job creation identified through the DCO process. This leaves a considerable proportion of the site available to meet cross boundary needs. The Black Country authorities commissioned a report considering the proportion of WMI that could be considered towards their needs based upon projected population change. This identified a minimum 67ha 'claim' from WMI for the Black Country authorities, which when taken alongside the 45.2ha¹ surplus of strategic employment land means that **112.2ha of employment land in South Staffordshire is available for cross boundary unmet needs from the Black Country (circa 153ha shortfall)**, subject to agreement through a Statement of Common Ground. Drawing this together, this results in an employment land requirement of 203.4ha, with the supply of employment land to meet this requirement set out in Table 9 of the Local Plan. This employment land requirement/supply is broken down as follows:

	<u>Breakdown of employment land requirements/supply to 2041</u>	<u>Hectares (gross)</u>
	<u>South Staffordshire</u>	

¹ 27.6ha (identified as surplus in the EDNA update) + 17.6ha (M6 Junction 13, Dunston) = 45.2ha.

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A	<u>South Staffordshire objectively assessed employment land need (excluding WMI)</u>	<u>62.4</u>
B	<u>Proportion of WMI attributable to South Staffordshire</u>	<u>18.8</u>
C	<u>Total requirement/supply for South Staffordshire (A+B)</u>	<u>81.2</u>
Black Country FEMA		
D	<u>South Staffordshire contribution to unmet needs of the Black Country FEMA (excluding WMI)</u>	<u>45.2</u>
E	<u>Proportion of WMI attributable to the Black Country FEMA</u>	<u>67</u>
F	<u>Total proportion of employment land requirement/supply attributable to the Black Country FEMA (D+E)</u>	<u>112.2</u>
Cannock Chase		
G	<u>Proportion of WMI attributable to Cannock Chase</u>	<u>10</u>
TOTAL EMPLOYMENT LAND REQUIREMENT (C+F+G)		<u>203.4</u>

Strategic Employment Sites

- 5.59 The issue of strategic employment delivery across the wider West Midlands region has started to be explored most recently through the West Midlands Strategic Employment Sites Study (WMSESS) 2021. The WMSESS 2021 was commissioned by Staffordshire County Council, Black Country LEP, Greater Birmingham and Solihull LEP and Coventry and Warwickshire LEP with local planning authorities in the region not directly involved in the study. In this context, the study's primary focus was around engagement with the private sector to gauge market demand for new strategic employment sites, to examine recent take up, and to identify broad areas of market demand. It did not provide a full assessment of need (in terms of floorspace) that could be attributable across the study area, however it did conclude that there was considerable demand for strategic employment site opportunities across the region and identified a number of broad locations around key junctions, including junctions on the M6 and M54 in South Staffordshire.

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Development Needs & Spatial Strategy to 2041

- 5.60 The development needs set out in Policy DS4, and spatial strategy set out in Policy DS5, describe how the district will meet its housing, Gypsy and Travellers and employment needs up to 2041; whilst sensitively managing other uses such as retail, agriculture and tourism. These are key strategic policies that set the framework for delivering growth through the Local Plan and provide details of how windfall

developments will be considered that are proposed outside the Local Plan allocations process.

Policy DS4: Development Needs

During the plan period up to 2041, the council will promote the delivery of:

- a) ~~A minimum of~~ 4,726 homes over the period 2023-2041 to meet the district's housing ~~requirement~~, whilst providing approximately 10% additional homes to ensure plan flexibility. This housing ~~requirement will meet~~ the district's own housing ~~need~~ of 4,086 homes, plus a 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area. The council will seek to demonstrate a 5 year housing land supply upon adoption of the plan.

- b) ~~A minimum of 203.4ha~~ of employment land over the period 2023-2041. ~~This employment requirement includes the district's own employment needs of 81.2ha, plus a 112.2ha contribution to unmet needs of the Black Country Functional Economic Market Area (FEMA), and a 10ha contribution towards Cannock Chase Council.~~

~~Of the 112.2ha of employment land provided to the Black Country FEMA, 67ha is from the consented West Midlands Interchange (WMI), and this contribution from the site is a minimum and may increase depending on the employment land position of other local authorities in the site's market area. The 10ha contribution to Cannock Chase Council is also from WMI.~~ The remaining land supply of ~~WMI~~ will be considered with related authorities through the Duty to Co-operate.

- c) ~~A minimum of~~ 37 new Gypsy and Traveller pitches. This is the number of pitch options that have been assessed as deliverable against a larger need of 162 pitches, primarily to meet the future needs of existing families within the district. The council has explored numerous options to meet this unmet need, including through ongoing Duty to Co-operate engagement with neighbouring authorities and promoters of residential site allocations, as well as assessing the suitability of publicly owned land. The council will continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals that accord with Policy HC9.

Policies DS5, MA1, SA1, SA2, SA3, SA4 and SA5 set out how the above development needs will be delivered in a sustainable way that enhances the vitality of communities across South Staffordshire, supports economic growth, and which conserves and enhances the district's environmental assets. Delivery of new development will be monitored in line with the monitoring framework and the

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development needs set out above will be kept under review to inform whether a review of the Local Plan is required.