

# SANDWELL LOCAL PLAN EXAMINATION

## Hearing Statement

<b>Representor ref number/ Representor</b>	51- Dudley MBC
<b>Matter</b>	2 – Vision, Objectives, Sandwell's Housing and Employment Needs, and the Plan's Overall Scale of Growth
<b>Relevant issue</b>	Issue 2d – Whether the assessment of employment need and the plan's overall scale of employment growth is justified, positively prepared, effective, and consistent with national policy.
<p><b>Q2.8 Is the plan's approach of maintaining ongoing provision of around 1,221 hectares of allocated employment land soundly based? Including:</b></p> <p>a) Do the key evidence base documents for economy and employment (ECON 001 to ECON 007 with Topic Paper summary SA/ED18) provide a robust and sufficiently up to date assessment of employment needs in Sandwell over the plan period?</p> <p>b) On what basis has the figure of 1,221 hectares been derived and do the evidence base documents justify this level of provision in the plan?</p> <p>c) Does the plan include sufficient site allocations to meet its requirement to maintain the ongoing provision of 1,221 hectares of allocated employment land?</p> <p>d) Have all reasonable options for meeting the identified need for employment land, and reducing the shortfall over the plan period, been robustly explored?</p> <p>e) Overall, is the plan's employment requirement justified and positively prepared?</p> <p><b>Q2.9 In terms of this issue, are any main modifications necessary for soundness?</b></p> <p>Dudley Council's Regulation 19 representations submitted in November 2024 provided support for the use of a shared evidence base related to employment land needs across the Black Country (at the time of the submitted representations this was the Economic Development Needs Assessment for the Black Country Authorities (EDNA) October 2023). The response also supported an update to the Black Country Authorities Employment Land Supply Paper (2023).</p>	

Since this representation an updated EDNA from 2024 has been prepared and published by the Black Country Authorities (document ECON 002A). The Black Country Authorities have also produced an updated Black Country Employment Land Supply Paper (November 2024) [ECON 006A] which provides the most up to date supply position.

These updated evidence base documents have informed proposed modifications to the Sandwell Local Plan in respect of employment land needs and supply (within document SA/ED3).

Dudley Council supports the use of the updated shared evidence base to inform modifications to the Sandwell Local Plan. This is consistent with the approach taken by Dudley Council within the Dudley Local Plan (at examination).

We would note that in relation to proposed modification PAM1 (Challenges and Issues page 29 (c)), an additional text amendment to the relevant paragraph would appear to be required to reflect the updated EDNA as follows:

*Including the level of windfall / churn land available, Sandwell is ~~169~~185ha short of its need figure.*