

South Staffordshire Council

Local Plan Review

Preferred Options

Duty to Cooperate

Topic Paper

November 2021

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1.0 Introduction

- 1.1 The Government recognises that many social, environmental and economic issues can only be effectively addressed at a larger than local scale, and has therefore introduced the Duty to Co-operate to help ensure that cross boundary strategic issues are being considered. The Duty to Co-operate was introduced through the Localism Act 2011, with Section 110 of the Act requiring Council's and public bodies to 'engage constructively, actively and on an ongoing basis' in the preparation of Local Plan documents, including in the preparation of evidence to underpin those documents.
- 1.2 The Duty relates to strategic matters that cross administrative boundaries, where co-operation is required. The NPPF requires that strategic policy-making authorities should collaborate to identify strategic matters which they need to address in their plans. It also emphasises that effective and on-going joint working between strategic policy-making authorities and relevant bodies will be needed. Emphasis is placed on joint working to determine where additional infrastructure is required and to address unmet development needs.
- 1.3 This Duty to Co-operate schedule provides an overview of what is required under Duty to Co-operate and a summary of how strategic issues have been addressed to date, whilst acknowledging where further work may be required prior to finalising the Local Plan Review. Where relevant it indicates the local authorities or bodies are affected and what action is proposed to address the issue and the timescales involved. The Duty to Co-operate schedule in section 6 of this paper will act as a 'live document', and as such will be updated as and when new strategic issues arise or to reflect new actions required.

2.0 What Arrangements Do We Need To Put In Place?

Who will the Council need to co-operate with?

- 2.1 The Duty to Co-operate requires the Council to undertake co-operation bi-laterally and jointly with neighbouring authorities and statutory bodies. A starting point for co-operation with neighbouring authorities should be the strategic issues that need to be examined, and from this it can then be determined which authorities are affected by the issue, and will therefore need to co-operate to address these. For South Staffordshire Council, the neighbouring authorities who border South Staffordshire, and therefore need to be engaged in order to meet the requirements of the Duty to Co-operate, are:

County Councils

- Staffordshire County Council
- Worcestershire County Council

Unitary authorities

- Shropshire Council
- Telford and Wrekin Borough Council
- Wolverhampton City Council
- Walsall Metropolitan Borough Council
- Dudley Metropolitan Borough Council

District/Borough Councils

- Stafford Borough Council
- Cannock Chase District Council
- Wyre Forest District Council
- Bromsgrove District Council

2.2 It may also be appropriate to engage and co-operate with other nearby local authorities that do not directly adjoin South Staffordshire but have links, depending on the issue to be addressed; for example, authorities within our Housing Market Area, or Local Authorities in the Cannock Chase SAC Zone of Influence.

2.3 The Council is also required to demonstrate joint working with ‘prescribed bodies’ as set out in Part 2 of the Town and Country Planning Act 2012. The prescribed bodies relevant to South Staffordshire are:

- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Homes England
- Clinical commissioning groups and NHS Commissioning Board
- Office of the Rail Regulator
- The Highways Authority (Staffordshire County Council) & National Highways
- Integrated Transport Authority (Transport for West Midlands)

2.4 The NPPF also requires Local Planning Authorities to have cooperate with:

- Local Enterprise Partnerships
- Local Nature Partnerships
- Other infrastructure providers
- Elected Mayors and combined authorities

2.5 Determining which of the above local authorities or bodies need to be engaged will depend on the strategic issue to be addressed, and therefore will need to be considered from the outset of plan preparation. Whilst one local authority may take the view that there is no cross-boundary work required to address a particular issue, another authority may have a conflicting view. The Council will therefore need to

engage constructively with neighbouring authorities and /or prescribed bodies at an early stage to determine which issues will require joint working. This is set out in Appendix A.

3.0 Demonstrating We Have Met the Duty to Co-operate Requirements

- 3.1 Local planning authorities will be expected to demonstrate evidence of having complied with the Duty to Co-operate and effectively co-operated to plan for issues with cross-boundary impacts when their Local Plan documents are submitted for independent examination.
- 3.2 There is no fixed format for how this evidence of the Duty to Co-operate should be presented, although both the NPPF and Planning Practice Guidance stress a number of key points for local authorities to address.
- 3.3 A key requirement set out in national policy and guidance is the need to produce, maintain and update one or more statement(s) of common ground throughout the plan-making process. Such documents should include the area covered by the statement, key strategic matters being addressed, plan-making authorities and other bodies responsible for joint working in the statement, governance arrangements for co-operation, the process for agreeing the distribution of unmet needs and records or where agreements have/haven't been reached on key strategic matters. Guidance indicates that these documents should take the form of a single agreement across the most appropriate functional geographical area to gather evidence and develop policies to address the strategic matter in question, based on demonstrable cross-boundary relationships.
- 3.3 Aside from preparing any statements of common ground, it is also important that strategic policy-making authorities consider producing or commissioning joint research and evidence to address cross-boundary matters, agreeing strategic policies affecting more than one authority area to ensure development is co-ordinated. These activities, and other areas of joint working, can then be documented in any final statement of common ground.

4.0 Policy Context

National Planning Policy Framework (NPPF)

- 4.1 The NPPF 2021 sets out further detail on how the provisions of the Localism Act 2011 should be implemented. Paragraphs 25-27 state that local planning authorities should:
- Collaborate to identify the relevant strategic matters which they need to address in their plans
 - Engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities
 - Joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere
 - Statements of Common Ground should be prepared and maintained, documenting the cross-boundary matters being addressed and progress in cooperating to address these
 - Statements of Common Ground should be made publicly available throughout the plan-making process to provide transparency

South Staffordshire Core Strategy & Site Allocations Document 2018

- 4.2 The South Staffordshire Core Strategy is the first part of the Local Plan for South Staffordshire and sets out the vision for the district up until 2028. It contains a range of policies to guide development. After numerous consultations and discussions/workshops with neighbouring authorities and service and infrastructure providers, the Core Strategy was adopted in December 2012.
- 4.3 The second part of the Local Plan is the Site Allocations Document (SAD) 2018. This was a 'Tier 2' plan in that it set out the housing, employment and Gypsy and Traveller allocations to deliver the development requirements and spatial strategy set out in the previous 2012 Core Strategy but did not revise the strategic policies already set out in that document. In preparing the SAD South Staffordshire worked with Duty to Co-operate bodies, particularly the Black Country, to ensure that the SAD addressed strategic cross-boundary matters where relevant and within the scope of the plan. This led to the delivery of additional employment land allocations at the District's freestanding strategic employment sites justified on the basis of unmet needs from the Black Country and West Midlands Region. It also led to the adoption of a Local Plan Review policy (Policy SAD1), which required an immediate review of the District's Local Plan to address strategic matters beyond the scope of the 2018 SAD.

The emerging Local Plan Review

- 4.4 In light of these pressures, the District Council commenced a Local Plan Review in 2018, to cover the period from 2018 (when the review commenced) through to

2037/38. Amongst other matters, the Local Plan Review was required to address the potential for housing supply within the District to address unmet needs from within the GBHMA and the potential for employment land to contribute to wider unmet employment needs.

- 4.5 The Local Plan Review has currently been through two previous Regulation 18 consultations. The first of these was the 2018 Issues and Options consultation, which considered differing approaches to addressing unmet housing and employment needs, as well as broad site typologies to be considered. The next was the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation, which considered future spatial housing strategy options to address identified development needs across the District. The current 2021 Preferred Options consultation now seeks to allocate housing, employment and Gypsy and Traveller sites to meet identified development needs over the plan period, whilst making contributions to the unmet needs of wider areas where appropriate.
- 4.6 At each stage of the Local Plan Review's preparation, the Council has sought to be informed by the most up-to-date Duty to Co-operate position available at that point in time, having regard to the most recent joint evidence and correspondence available at those points in time.

5.0 Strategic Issues to be Addressed

5.1 This section sets out the issues that will need to be considered under the Duty to Co-operate, progress made to date on addressing these issues and which neighbouring authorities and other bodies we will need to engage with in these matters. The functional geographies relevant to each strategic issue are also shown using relationship maps, although it should be noted that each map only identifies the principal authorities that we believe are required to work together, and Duty to Co-operate solutions may require other bodies' involvement. Furthermore, through discussions and new evidence coming to light, the authorities identified may change through the plan making process.

Housing

- 5.2 South Staffordshire sits within the wider Greater Birmingham Housing Market Area (GBHMA), which contains 14 local authorities¹ that collectively function as a single housing market area, although there are close functional relationships to some local authorities beyond this boundary also. This geography was originally identified through the 2014 Strategic Housing Needs Study: Stage 2 report and was endorsed through subsequent local plan examinations.
- 5.3 Unmet housing needs have been identified within the GBHMA for a number of years, with the 2017 Birmingham Development Plan (BDP) establishing a substantial unmet need of 37,900 dwellings arising from Birmingham by 2031. The BDP indicated that the City Council would progress a joint study to provide a strategy for accommodating the shortfalls across the GBHMA². Shortly after in 2017, the first consultation on the Black Country's emerging Draft Plan established an unmet need of 21,670 dwellings, which the most recent (August 2021) Draft Plan consultation now indicates has risen to 28,239 dwellings, despite some emerging Green Belt release.
- 5.4 In light of the above issues the local authorities in the GBHMA resolved to prepare a Strategic Growth Study, which was completed in 2018. This examined the extent of unmet housing needs across the GBHMA (including Birmingham and the Black Country) up to both 2031 and 2036, recognising that local plans within the HMA were even then likely to be planning beyond the 2031 Birmingham Development Plan end date. Spatial growth recommendations for new settlements, urban extensions and broad areas capable of accommodating dispersed housing growth were then identified to address these shortfalls.
- 5.5 To date the Council has used the GBHMA Strategic Growth Study recommendations as the basis for its contributions to unmet GBHMA housing needs, seeking to ensure the emerging housing target is proportionate to the findings of that study. It has also repeatedly communicated its use of the study in setting its housing target to other authorities in the GBHMA since the Issues and Options consultation in 2018, including

¹ Birmingham, Wolverhampton, Walsall, Sandwell, Dudley, South Staffordshire, Cannock, Lichfield, Tamworth, North Warwickshire, Solihull, Stratford-upon-Avon,

² Paragraph 4.7 of the Birmingham Development Plan 2017

as recently as June 2021 correspondence with all neighbouring and GBHMA authorities. This has been done to allow the opportunity for other authorities to interrogate the Council's position and to offer comments on how the approach may be refined or altered.

- 5.6 To date there has been broad support for South Staffordshire's housing target from many local authorities across the GBHMA, including from both Birmingham and the Black Country. Whilst not all local authorities in this area are adopting the same approach as South Staffordshire in addressing the GBHMA Strategic Growth Study's recommendations, no Duty to Cooperate body has yet suggested the use of an alternative GBHMA-wide evidence base to replace this study. To address this the Council will continue to engage with other local authorities through the Duty to Co-operate to ensure these strategic growth locations are delivered through local plans, or are offset by more sustainable alternative site proposals that may arise through the local plan preparation process. The District Council has also indicated to Birmingham City Council earlier this year that there may be a need for an update to this study in response to increased development pressures that could emerge from the Birmingham Development Plan review and will continue to be an active participant in any cross-boundary evidence to address this issue, as and when the opportunity emerges.

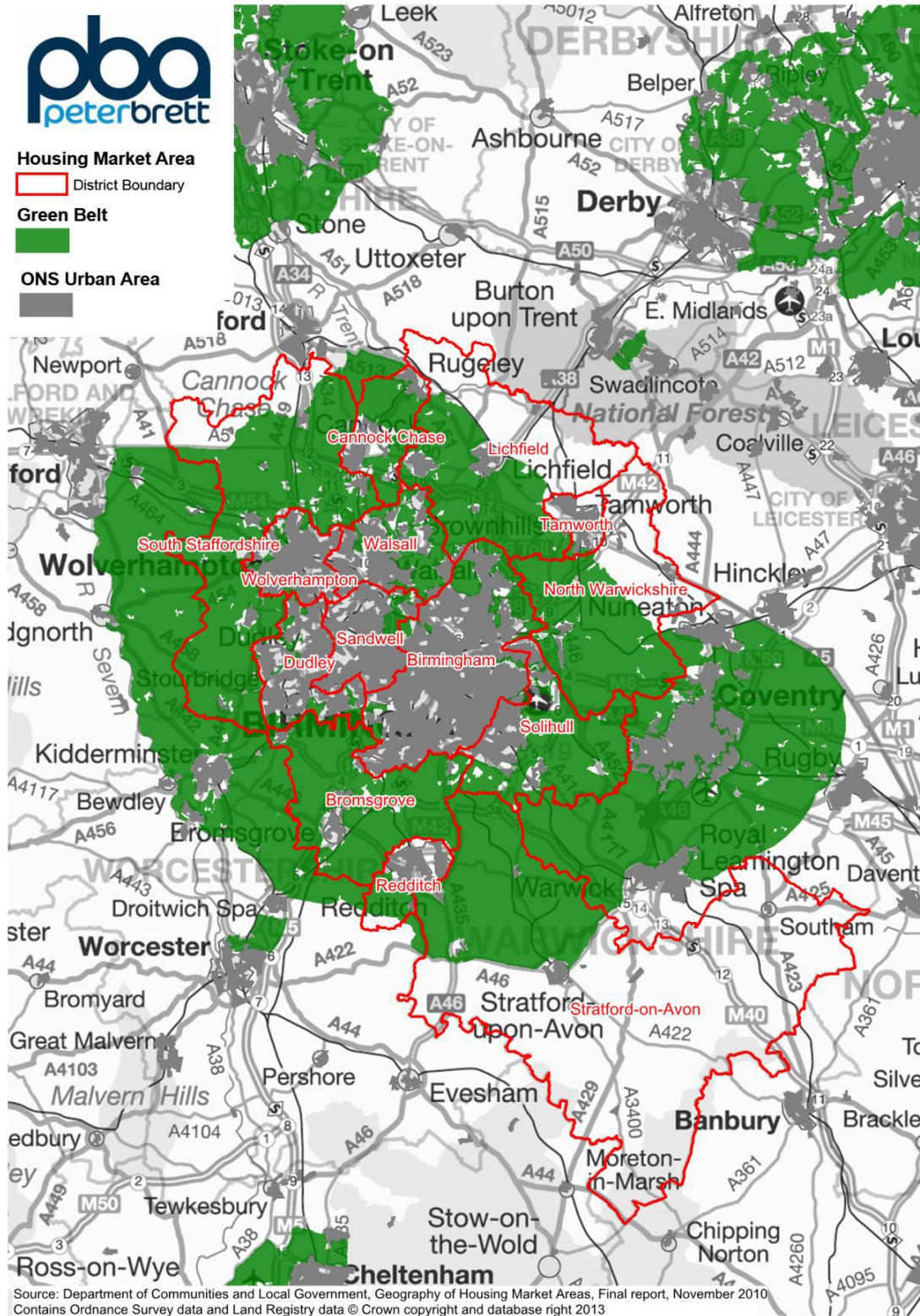


Figure 1: Greater Birmingham Housing Market Area
 Source: GBSLEP and Black Country Authorities Strategic Housing Needs Study: Stage 3 Report

Gypsies, Travellers and Travelling Showpeople

- 5.7 The nomadic lifestyle of Gypsies and Travellers and Travelling Showpeople means that they will often move between different local authority areas and therefore sharing information between local authorities as to gypsy families' travel patterns can be useful. The Council commissioned an update to the Gypsy and Traveller Accommodation Assessment (GTAA) in 2020, with a Pitch Deliverability Study following on recently in 2021 to identify how far the District could meet its own pitch needs. This evidence suggests that, despite the Council's best efforts to meet its own needs, there continues to be a shortfall against the figures set out in the latest GTAA. Prior to the Local Plan Review Publication Plan consultation in 2022 the District will work with other local authorities in the surrounding area to ensure opportunities to deliver unmet needs on public sites in the surrounding area are maximised and will reflect this work in future stages of the Local Plan Review.

Employment

- 5.8 Employment is a clear cross boundary issue for South Staffordshire, which sits in a functional economic market area (FEMA) with Cannock, Walsall, Wolverhampton and Dudley. The 2017 Economic Development Needs Assessment produced by the Black Country authorities also identifies South Staffordshire and Birmingham as 'Areas of Strong Economic Transactions with the Black Country' and Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest being identified as 'Areas of Moderate Economic Transactions with the Black Country'.
- 5.9 This overlap in functional areas is important as the Black Country Draft Plan indicates that there is an unmet need of around 210ha of employment land arising from its administrative area. Notably, the Council has participated in joint work with the Black Country historically through the sub-regional Employment Land Study 2015. This study concluded that it is not for South Staffordshire to meet the entirety of this shortfall, as a significant part of the identified need originates from Sandwell where there is little travel to work connectivity with South Staffordshire. This appears consistent with the overlapping, but differing, FEMAs identified in more recent evidence for both the Black Country and South Staffordshire. The Council will continue to work with the Black Country authorities, and areas of strong and moderate economic transactions with the Black Country³, to address these shortfalls through a joint Statement of Common Ground.
- 5.10 Alongside the Black Country's unmet needs there is emerging regional evidence of unmet market demand for regional employment sites⁴ set out in the West Midlands Strategic Employment Sites Study 2021. This study was produced by Staffordshire County Council and the three LEPs in the remaining West Midlands Region. Unlike previous regional employment studies, it has not been led by local planning authorities in the region and it is currently unclear how the study's recommendations align with the separately evidenced needs within local authorities' evidence bases

³ See Figure 3

⁴ Defined as sites containing Grade A new / modern floorspace of 9,290 sqm (100,000 sqft) or greater

within the region (such as the Black Country's). However, the Council will continue to participate in any follow-on work from this study progressed with the involvement of all 24 authorities covered by the initial study area, which may be progressed through the GBHMA officers group, whilst including officers from other West Midlands authorities.



Figure 2: The South Staffordshire Functional Economic Market Area. Source: South Staffordshire Economic Development Needs Assessment 2018

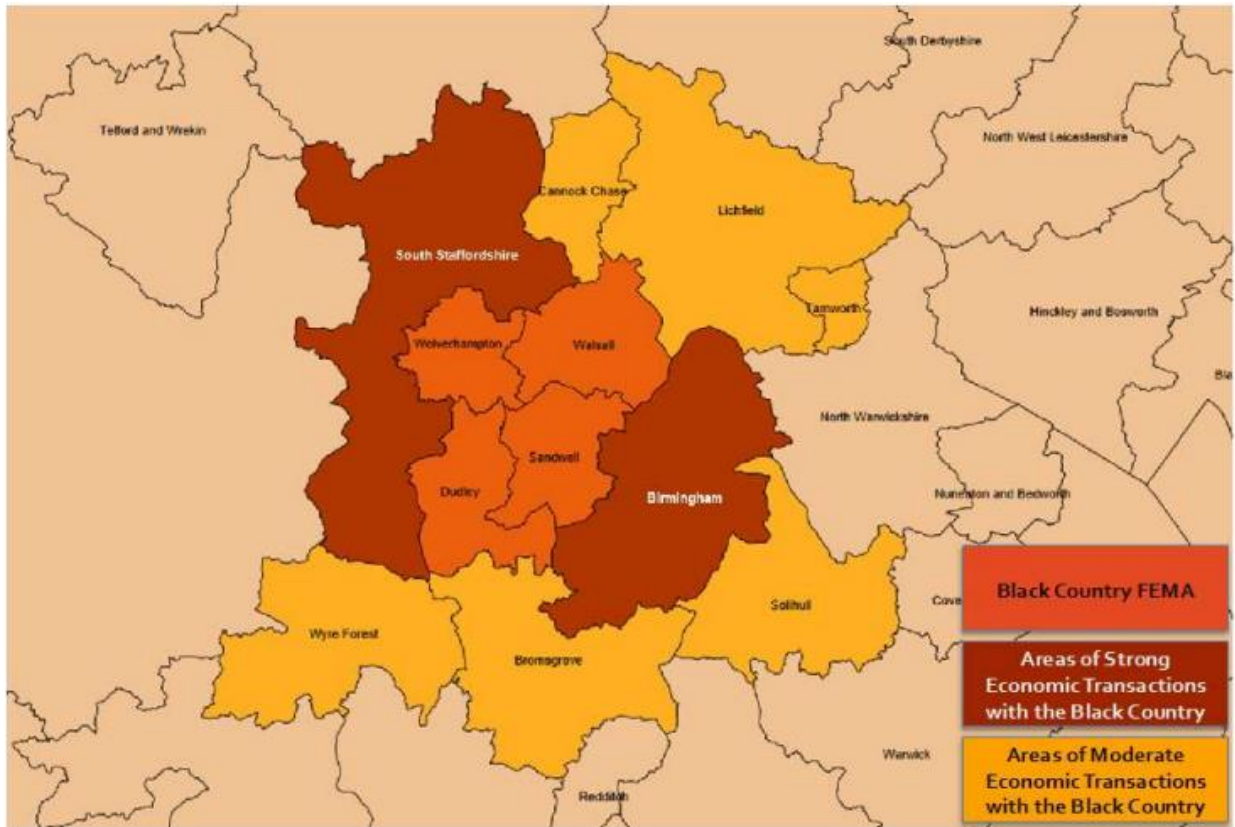


Figure 3: The Black Country Functional Economic Market Area and Areas of Strong/Moderate Economic Transactions. Source: Black Country Economic Development Needs Assessment 2017

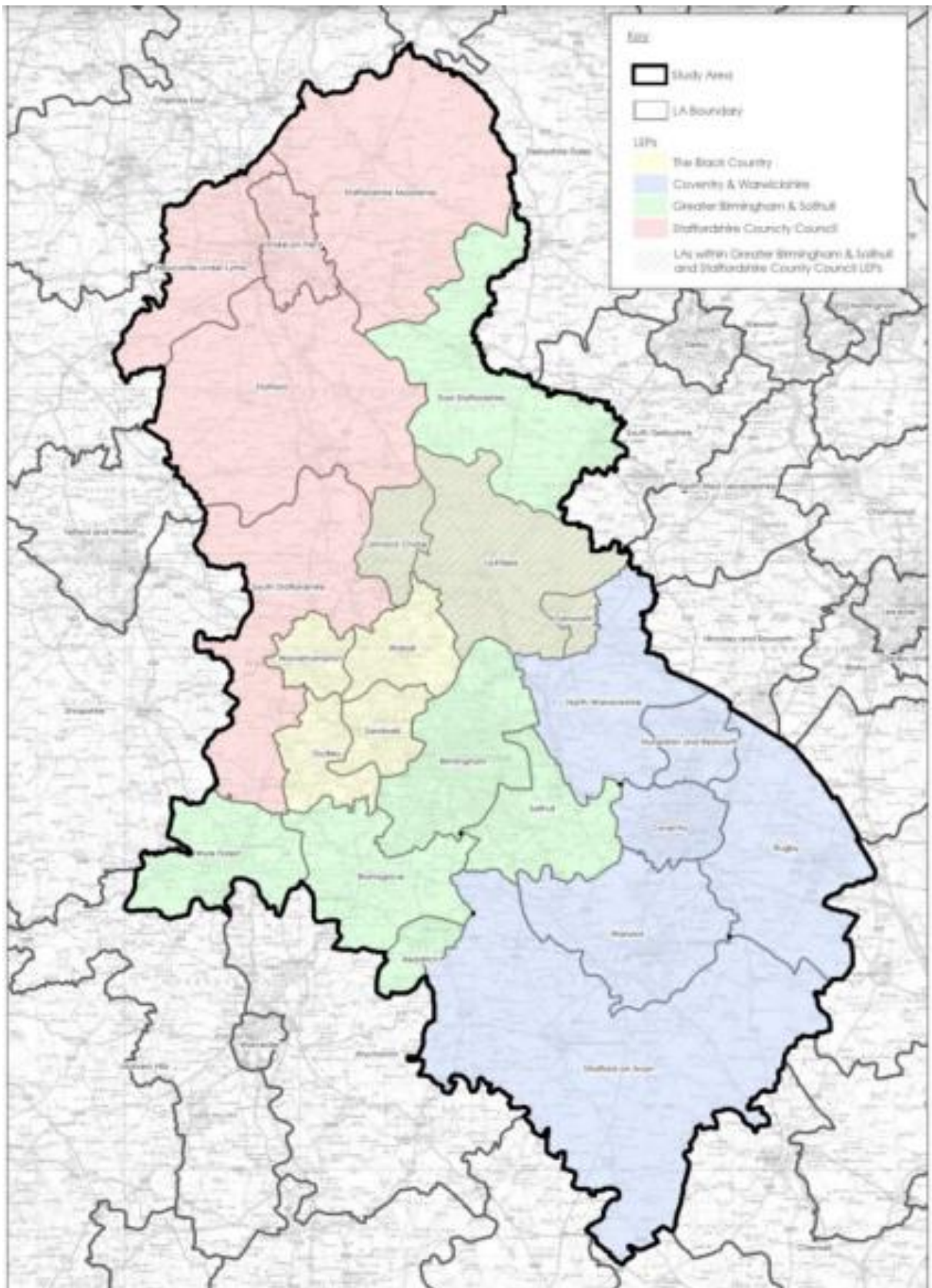


Figure 4: West Midlands Strategic Employment Sites Study 2021 geography. Source: West Midlands Strategic Employment Sites Study – Final Report 2021

Transport

- 5.11 The Council will continue to engage with Staffordshire County Council as the Local Transport Authority in ensuring that the local transport infrastructure can accommodate development on the sites to be taken forward through our Local Plan Review. Co-operation between both authorities in ensuring there is adequate transport infrastructure throughout South Staffordshire will be ongoing and will involve engagement with National Highways and neighbouring Local Transport Authorities/Highways Authorities where appropriate.
- 5.12 Staffordshire County Council has previously worked with the District to produce an Integrated Transport Strategy (2017) for South Staffordshire. This details local challenges and opportunities, lists of projects that will achieve desired outcomes, together with the justification, value for money and any committed/possible funding and delivery mechanisms. To identify future transport infrastructure required to support growth in the Local Plan Review, the District has engaged with both Staffordshire County Council, National Highways and neighbouring authorities to begin the process of identifying future mitigation measures required for future site allocations set out in the Council's Preferred Options consultation. The contents of the emerging Infrastructure Delivery Plan and future Integrated Transport Strategies will reflect these Duty to Co-operate discussions.

Education

- 5.13 Throughout the preparation of the Local Plan Review the Council will engage with Staffordshire County Council, as the Local Education Authority, to ensure existing schools within the District can accommodate increases in housing and general population growth and that new education facilities are provided where necessary. The District's Preferred Options consultation and the Black Country Draft Plan consultation also propose a number of housing sites in close proximity to the border between the two Education Authorities. The District will work with the adjacent Black Country authorities to ensure that housing growth across both areas is coordinated with sufficient education infrastructure and will set out any cross boundary assumptions in a future Statement of Common Ground between the relevant parties. This will also help inform where new provision/improvements to educational facilities should be included in the Council's emerging Infrastructure Delivery Plan.

Health

- 5.14 Throughout the preparation of the Local Plan Review the Council will work with the adjacent Black Country authorities, CCGs and NHS representatives to ensure that housing growth across both areas is coordinated with sufficient health infrastructure and will set out any cross boundary assumptions in a future Statement of Common Ground between the relevant parties. This will also help inform where new improvements to health facilities should be included in the Council's emerging Infrastructure Delivery Plan.

Cannock Chase Special Area of Conservation (SAC)

- 5.15 The wider area known as Cannock Chase in the north east of the District is covered by Area of Outstanding Natural Beauty (AONB) status, but there is also small part of rare heathland within the AONB which is designated as a Special Area of Conservation (SAC), which is a European protected designation. The SAC is significant for its dry heathlands, valley mires, broadleaved woodland and invertebrate assemblages particularly on old trees, fungi and bare sand. There are a number of important species, including the main British population of a hybrid bilberry, important populations of butterflies and beetles and breeding nightjars.
- 5.16 Successive evidence bases dating back to the 2007 West Midlands Regional Spatial Strategy (RSS) have raised concerns that additional housing near Cannock Chase SAC could lead to increased visitors, which could adversely affect the integrity of the SAC.
- 5.17 A partnership of authorities in close proximity to the SAC was originally set out in 2007 to gather evidence on potential harm and mitigation measures. Evidence showed that there are a number of factors to which the site is vulnerable, including water abstraction, air quality, and bracken invasion as well as increased recreation pressure. As a result of these concerns, further evidence gathering was required under the Habitats Regulations to ensure that future development would not have an adverse impact on the integrity of the protected site.
- 5.18 South Staffordshire Council along with a number of authorities within Staffordshire and the Black Country are part of a SAC Partnership to assess the impact of visitors on the Cannock Chase SAC and determine appropriate measures to mitigate against harm. Historically, this evidence base has established a 15km zone of influence around the SAC, within which likely significant effects may arise from new housing development upon the SAC. This evidence base is currently being updated by SAC Partnership authorities to reflect planned growth in Local Plans in the 15km zone of influence surrounding the SAC up to 2040 and to ensure that appropriate measures are in place to avoid any adverse effects on the SAC. The agreement of the SAC Partnership authorities (including South Staffordshire) to these measures will be secured through an updated Memorandum of Understanding (MoU) with the relevant authorities.

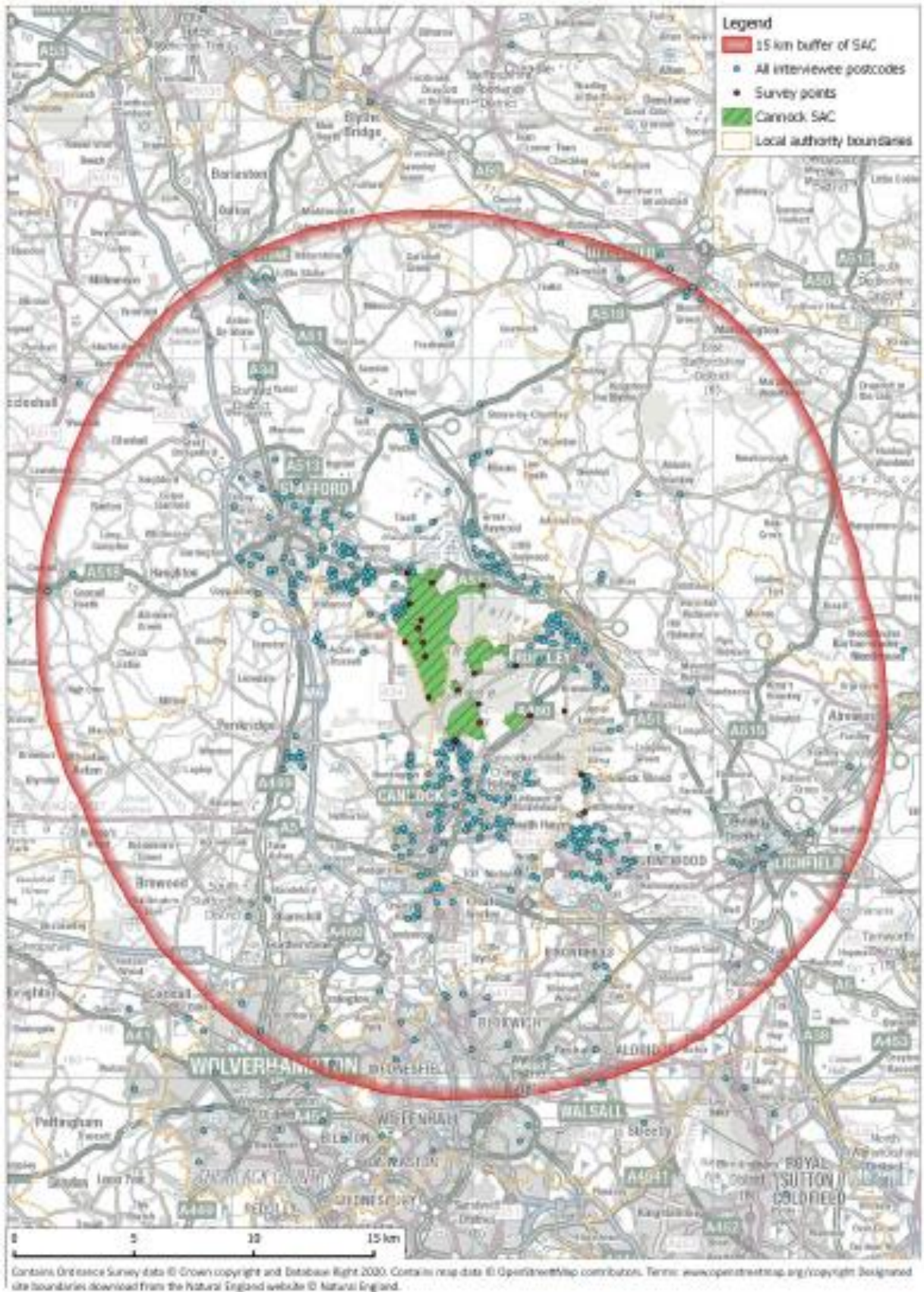


Figure 5: Cannock Chase SAC 15km Zone of Influence Source: Cannock Chase SAC Planning Evidence Base Review Stage 2

Green Belt

5.19 The Council was an active participant in the 2018 GBHMA Strategic Growth Study. Part of this study involved a consistent strategic review of the Green Belt across the housing market area, using the Green Belt purposes set out in the National Planning Policy Framework. The Site Allocations Document 2018 also committed the Council to undertaking a joint Green Belt Review with the neighbouring Black Country authorities. This was undertaken using a consistent cross-boundary methodology in 2019, which also involved consultation with neighbouring authorities. Both cross-boundary studies informed the spatial options set out in the District’s 2019 Spatial Housing Strategy & Infrastructure Delivery consultation and the site selection process in the 2021 Preferred Options consultation. The scale of the spatial options recommended in the 2018 GBHMA Strategic Growth Study (informed by strategic Green Belt review) has also informed the Council’s proposed approach to contributing to unmet housing needs of the GBHMA.

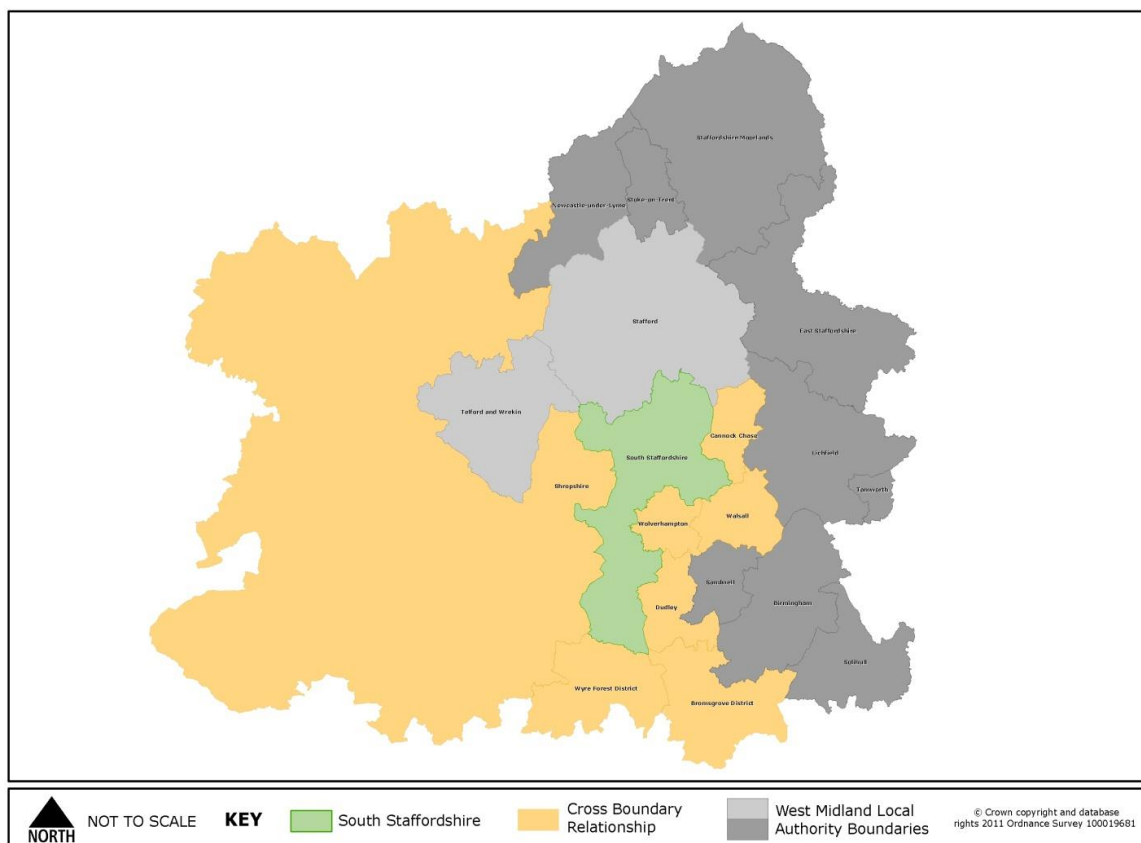


Figure 6: Green Belt relationship map

Flood risk and water management

5.20 Water issues such as flood risk, the water cycle and surface water management often cross administrative boundaries and therefore, where appropriate, the Council will work with neighbouring authorities to ensure that water issues are suitably addressed. All of the southern Staffordshire authorities commissioned consultants in 2019 to

undertake a revised Strategic Flood Risk Assessment (SFRA), which can be seen on our website. Following on from this, the Council has also engaged the Lead Local Flood Authority (Staffordshire County Council) in the site assessment process, to ensure that any site-specific surface water flood risk issues can be avoided/mitigated.

- 5.21 The Council has also worked to update its Water Cycle Study, with the latest 2020 draft available online. The Council will have a continuing dialogue with Severn Trent Water Limited and South Staffs Water to identify where investment and upgrades will be required, having regard to planned future growth.

Waste and Minerals

- 5.22 Staffordshire County Council is the Local Planning Authority for Waste and Minerals and therefore South Staffordshire Council will commit to working with the County Council, and where appropriate other neighbouring authorities, in addressing any issues relating to waste and minerals as they arise. The Council has had regard to previous consultation responses received by Staffordshire County Council and other adjoining minerals planning authorities in the Black Country when preparing the development strategy, as both bodies have noted the need to protect brick clay resources and active mineral workings in the Cheslyn Hay, Great Wyrley and Essington areas, due to their importance to the supply of brickworks in the surrounding area and the national scarcity of Etruria Marl.

Appendix A - Duty to Co-operate Schedule

Proposed co-operation with prescribed bodies (Local Authorities)

The table below sets out the cross strategic planning issues that we will need to consider and the local authorities relevant to that strategic matter. It sets out engagement on each issue to date and proposed next steps. Each of these authorities will be consulted at each statutory stage of the plan making process. However, whilst we acknowledge that the Council has a statutory duty to engage with appropriate bodies, this does not mean that that cross boundary work will be required with all bodies at all times. Therefore, the Council will undertake meaningful engagement with the correct bodies at the correct time.

This table will act as a 'live document' and therefore will be updated on a regular basis.

Relevant Duty to Co-operate bodies	Summary evidence of having met the Duty to Co-operate	Future proposed action
Unmet housing needs arising from Black Country and Birmingham		
<p>Greater Birmingham Housing Market Area (GBHMA) authorities <u>(Birmingham CC, City of Wolverhampton Council, Walsall MBC, Dudley MBC, Sandwell MBC, Solihull MBC, Cannock Chase DC, Lichfield DC, Tamworth BC, North Warwickshire DC, Stratford-upon-Avon DC, Bromsgrove DC, Redditch BC)</u></p>	<p>Participation in the GBHMA Strategic Growth Study 2018, and review of the Local Plan to test the study’s recommendations, as evidenced via the final study, GBHMA officer group minutes and subsequent Local Plan Review consultations.</p> <p>Ongoing participation in the GBHMA officer group, providing forum to discuss emerging Local Plan approaches to issue and monitor extent of the shortfall, as evidenced through meeting minutes 2018-2021.</p> <p>Meetings and email correspondence with neighbouring GBHMA authorities (e.g. the Black Country, Cannock, Lichfield) to discuss approaches to unmet need contributions and approach to plan preparation.</p> <p>Separate formal correspondence with individual GBHMA authorities, particularly Birmingham and the Black Country authorities, seeking views on South Staffordshire’s approach to unmet housing needs, the potential need to release Green Belt to deliver proposed housing targets and encouraging authorities generating shortfalls to prepare Statements of Common Ground/monitoring information/updates to strategic HMA-wide evidence to address these issues.</p> <p>Local Plan consultation responses sent to other GBHMA authorities and received from other GBHMA authorities to the 2018 and 2019 Local Plan Review consultations, many of which addressed the approach taken to GBHMA shortfalls in light of the latest available evidence at the relevant point in time.</p>	<p>Engage Leaders/Lead Cabinet Members of each GBHMA authority in a Statement of Common Ground which agrees South Staffordshire’s contribution to unmet needs or identifies areas of disagreement with the proposed approach, allowing consideration of whether an alternative approach should be considered.</p> <p>Continue to facilitate delivery of the growth locations recommended in the GBHMA Strategic Growth Study 2018 in order for the HMA shortfall to be appropriately considered, and encourage other authorities to do the same, or find other similarly sustainable locations within their administrative areas</p> <p>Participate in an update to the GBHMA Strategic Growth Study to reflect increasing growth pressures within the region (particularly from the review of the Birmingham Development Plan). Encourage participants to participate in a joint governance structure to seek agreement to</p>

Relevant Duty to Co-operate bodies	Summary evidence of having met the Duty to Co-operate	Future proposed action
		and delivery of any subsequent spatial recommendations.
Unmet employment needs arising from Black Country FEMA		
<p><u>Association of Black Country Authorities (ABCA), Birmingham CC, Cannock Chase DC, Lichfield DC, Tamworth BC, Solihull MBC, Bromsgrove DC, Wyre Forest BC</u></p>	<p>Local Plan consultation responses sent to and received from the Black Country regarding their unmet employment needs.</p> <p>Email correspondence with Black Country authorities regarding the potential contribution that could be made by strategic employment sites to Black Country shortfalls and employment land technical papers.</p> <p>Participation in Duty to Co-operate meetings organised by the Black Country to clarify the extent of the functional economic market area over which the shortfall should be distributed, amongst other matters.</p>	<p>Complete an update of our Economic Development Needs Assessment to establish the contribution South Staffordshire can make to the unmet needs of neighbouring areas through surplus supply.</p> <p>Request ABCA lead on preparing a Statement of Common Ground to distribute their unmet needs over areas of strong and moderate economic transactions with the Black Country.</p>
Regional employment demand within the wider West Midlands region		
<p><u>Authorities within the West Midlands Strategic Employment Sites Study (WMSESS) 2021 area</u> <u>(Birmingham CC, City of Wolverhampton Council, Walsall MBC, Dudley MBC, Sandwell MBC, Solihull MBC, Cannock Chase DC, Lichfield DC, Tamworth BC, North Warwickshire DC, Stratford-upon-Avon DC, Bromsgrove DC, Redditch BC, Stafford BC, Newcastle-under-Lyme BC, Stoke-on-Trent CC, Staffordshire Moorlands DC, East Staffordshire BC, Wyre Forest DC, Nuneaton and</u></p>	<p>Meetings with the GBHMA officer group (which shares the majority of this geography) to set out options to deliver the next steps and recommendations set out in the WMSESS 2021.</p>	<p>Agree programme and scope of potential follow-on work with the GBHMA officer group, in consultation with wider West Midlands local authorities covered by the WMSESS geography.</p>

Relevant Duty to Co-operate bodies	Summary evidence of having met the Duty to Co-operate	Future proposed action
<u>Bedworth BC, Coventry CC, Rugby BC, Warwick DC</u>		
Unmet Gypsy and Traveller needs from South Staffordshire		
<u>Neighbouring local authorities</u>	Consulted on a cross-boundary GTAA 2017, jointly prepared to a consistent methodology with the Black Country local authorities. This has been subsequently updated to reflect the date of the original assessment.	Communicate the findings of the GTAA (2021) and Pitch Deliverability Study (2021) to neighbouring local authorities, setting out the maximum capacity of South Staffordshire's own need that is likely to be accommodated within its own administrative area. Seek contributions to meeting any remaining unmet need from neighbouring authorities.
Infrastructure provision (including cross boundary)		
<u>Black Country authorities, Staffordshire County Council, local Clinical Commissioning Groups (CCGs)</u>	Meetings and follow up email correspondence with Black Country officers and CCG/NHS colleagues to agree joint approaches to cumulative assessment of key infrastructure needs and provision for proposed growth locations. Evidenced through 2021 meeting minutes and email correspondence.	Work alongside Black Country authorities and CCG/NHS on identified follow on work and ultimately agree indicative commuted sums likely to be required from new development. Agree final shared position in Statement of Common Ground.
<u>Staffordshire County Council and National Highways</u>	Agreed approach to highways modelling of proposed growth locations delivered through the Local Plan Review. Evidenced through 2021 email correspondence between Staffordshire County Council, South Staffordshire District Council and National Highways.	Use highways modelling of large sites to engage Staffordshire County Council and neighbouring authorities in agreeing indicative transport mitigation to inform Local Plan Review. Confirm acceptability of modelling outputs with National Highways .

Relevant Duty to Co-operate bodies	Summary evidence of having met the Duty to Co-operate	Future proposed action
		Agree final shared position in Statement of Common Ground.
<u>Black Country planning and education authorities, Staffordshire County Council</u>	Meetings and follow up email correspondence with Wolverhampton and Staffordshire Education Authorities to understand where additional school places will be accommodated in each area and to agree any cross-boundary school places “push back”. Evidenced through 2021 meeting minutes and email correspondence.	Work alongside both education authorities to agree site specific education mitigation likely to be required from new development. Agree final shared position in Statement of Common Ground.
Cannock Chase SAC		
<u>Cannock Chase Special Area of Conservation (SAC) Partnership</u> (<u>Staffordshire County Council, Cannock Chase DC, East Staffordshire BC, Lichfield DC, Stafford BC, Wolverhampton CC and Walsall MBC</u>) & <u>appropriate advisory bodies</u> (Natural England, Cannock Chase AONB Partnership, Forestry Commission)	Regular SAC officer group meetings to commission evidence, co-ordinate monitoring information and prepare recommendations for the Joint Strategic Board to consider. Participation with these bodies in preparing updated Cannock Chase SAC joint evidence base documents , providing a framework for individual plans’ Habitat Regulations Assessments. These include: - 2017 Cannock Chase SAC – Planning Evidence Base Review - 2018 Cannock Chase SAC Visitor Survey update - 2020 Cannock Chase SAC, Strategic Access Management & Monitoring Measures Detailed Implementation Plan: Site User Infrastructure, Education and Engagement - 2020 Cannock Chase SAC, Strategic Access Management & Monitoring Measures Detailed Implementation Plan: Car Parking - 2021 Cannock Chase SAC Planning Evidence Base Review Stage 2 Minutes of Joint Strategic Board meetings , setting out key agreements in progressing the Cannock Chase SAC evidence base.	Progress agreement of an updated Memorandum of Understanding across the SAC Partnership, setting out updated mitigation measures for new housing development across the SAC Zone of Influence. Continue participation in the SAC officer group and Partnership to respond to any other habitat regulations issues that arise through local plan preparation.
Green Belt		

Relevant Duty to Co-operate bodies	Summary evidence of having met the Duty to Co-operate	Future proposed action
<p><u>Black Country authorities</u> (<u>Wolverhampton CC, Sandwell BMC, Walsall MBC and Dudley BMC</u>)</p>	<p>Jointly prepared cross-boundary Green Belt harm and landscape sensitivity studies to inform Local Plan Reviews in 2019.</p> <p>Corresponded on appropriate threshold to constrain site options based solely on Green Belt harm/landscape sensitivity, as set out in Black Country consultation response to 2019 SHSID consultation.</p>	<p>Review each authorities' site selection process alongside Black Country colleagues and address concerns/queries as required.</p>
<p><u>Greater Birmingham Housing Market Area authorities</u> (<u>Birmingham CC, City of Wolverhampton Council, Walsall MBC, Dudley MBC, Sandwell MBC, Solihull MBC, Cannock Chase DC, Lichfield DC, Tamworth BC, North Warwickshire DC, Stratford-upon-Avon DC, Bromsgrove DC, Redditch BC</u>)</p>	<p>Participated in joint consistent strategic green belt review through the GBHMA Strategic Growth Study 2018, assessing the form and strategic function of the Green Belt against the purposes of Green Belt policy consistently across the entire GBHMA area.</p>	<p>Continue to progress the local plan in line with the spatial recommendations of this evidence base and encourage other GBHMA authorities to take a similar approach.</p>
<p>Flood Risk and Water Quality</p>		
<p><u>Environment Agency, Lead Local Flood Authority (LLFA), Severn Trent Water (STW) and South Staffs Water</u></p>	<p>Completed Southern Staffordshire joint Strategic Flood Risk Assessment, in consultation with the Environment Agency and Severn Trent Water (amongst others).</p> <p>Comments on all site options from LLFA with respect to surface water flood risk included in the site selection process, as set out in the relevant topic papers.</p> <p>Correspondence with STW on policy wording and to establish the likely scale of mitigation required for surface and foul drainage on site options.</p>	<p>Consult with the Environment Agency, LLFA, STW and South Staffs Water on any future growth options and ensure any additional requirements or mitigation proposals are included in the final Publication Plan.</p>
<p>Minerals and Waste</p>		
<p><u>Staffordshire County Council</u></p>	<p>Correspondence received from minerals authority stressing need to protect brick clay mineral safeguarding areas.</p>	<p>Address any future concerns raised through consultation and meet with relevant officers if needed.</p>

Relevant Duty to Co-operate bodies	Summary evidence of having met the Duty to Co-operate	Future proposed action
<u>Association of Black Country Authorities</u>	Correspondence received from adjoining minerals authority stressing need to protect brick clay mineral safeguarding areas.	Consider Black Country authority mineral responses to Local Plan consultations.