

**Local Plan Review**

# **Publication Plan**

## **Duty to Cooperate Topic Paper**

**November 2022**

## Contents

	Page
1. Introduction	1
2. What Arrangements Do We Need To Put In Place?	1
3. Demonstrating We Have Met the Duty To Cooperate Requirements	3
4. Policy Context	4
5. Strategic Issues to be Addressed	6
Housing	6
Gypsies, Travellers and Travelling Showpeople	9
Employment	9
Transport	13
Education	13
Health	13
Cannock Chase Special Area of Conservation (SAC)	14
Green Belt	16
Flood risk and water management	16
Waste and minerals	17
Appendix A. Duty to Cooperate Schedule	
Appendix B. GBHMA Development Needs Group Draft Statement of Common Ground	
Appendix C. South Staffordshire FEMA Draft Statement of Common Ground	
Appendix D. Statements of Common Ground with individual adjoining and HMA local authorities	
Appendix E. Summary of key Duty to Cooperate events relating to housing and employment with the Black Country authorities and Birmingham	

## 1. 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 Cooperate to help ensure that cross boundary strategic issues are being considered. The Duty to Cooperate 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 Cooperate schedule provides an overview of what is required under Duty to Cooperate 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 Cooperate 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. What Arrangements Do We Need to Put in Place?

### Who will the Council need to Cooperate with?

- 2.1 The Duty to Cooperate 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 Cooperate 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 Cooperate, 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 Cooperate 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
- Integrated Care Boards 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. Demonstrating We Have Met the Duty to Cooperate Requirements**

- 3.1 Local planning authorities will be expected to demonstrate evidence of having complied with the Duty to Cooperate and effectively Cooperated 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 Cooperate 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.
- 3.4 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. 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 Cooperate 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 been through three previous Regulation 18 consultations prior to the Regulation 19 Publication Plan consultation. 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. Then the 2021 Preferred Options consultation set out allocations for 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 Cooperate position available at that point in time, having regard to the most recent joint evidence and correspondence available at those points in time.

## 5. Strategic Issues to be Addressed

- 5.1 This section sets out the issues that will need to be considered under the Duty to Cooperate, 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 Cooperate 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 authorities<sup>1</sup> 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. It has recently been reconfirmed as the most appropriate geography over which to plan for strategic housing needs in the Birmingham Housing and Economic Development Needs Assessment 2022, although this is yet to be examined.
- 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 GBHMA<sup>2</sup>. 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. Whilst the Black Country Plan is no longer being progressed, the evidence base behind it, including the evidence on urban capacity and housing, remains relevant to the authorities in the housing market area.
- 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.

---

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

<sup>2</sup> Paragraph 4.7 of the Birmingham Development Plan 2017

- 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, and has stressed the role of this study in determining the Council's contribution especially in correspondence to Birmingham City Council and the Black Country Authorities<sup>3</sup>. 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 prepared or achieved agreement to the principle of an alternative GBHMA-wide evidence base. To address this the Council will continue to engage with other local authorities through the Duty to Cooperate 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
- 5.7 The GBHMA authorities are now in the process of agreeing a SoCG across the entire geography and related authorities to deliver a review of the 2018 GBHMA Strategic Growth Study to support the changing position on housing shortfalls across the housing market area. This SoCG has been drafted and is in the process of being signed off across the GBHMA. The Council has played a leading role in drafting this SoCG and coordinating the Duty to Cooperate meeting which agreed the key principles behind it and will continue to be an active participant in any cross-boundary evidence to address this issue, as and when the opportunity emerges.
- 5.8 This SoCG describes the areas of agreement within the GBHMA relating to strategic cross-boundary housing needs and areas where agreement is yet to be reached. It also sets out a programme of agreed principles to inform an update of the Strategic Growth Study to reflect the changing position on housing shortfalls within the GBHMA. It also includes agreed key governance principles for a Member Board across the GBHMA to oversee development, implementation and monitoring of joint work and provide advisory decisions on cross boundary strategic matters relating to housing and employment. This SoCG has been agreed in draft (see Appendix B) and is currently being circulated for formal signing across all participant authorities. Key correspondence with Birmingham and the Black Country on cross boundary housing shortfalls from these key areas is set out in Appendix E.

---

<sup>3</sup> For example, most recently in June 2022 duty to cooperate correspondence with the Black Country set out how South Staffordshire had sought to fully deliver housing growth recommendations in each of the areas recommended for growth in the 2018 Strategic Growth Study



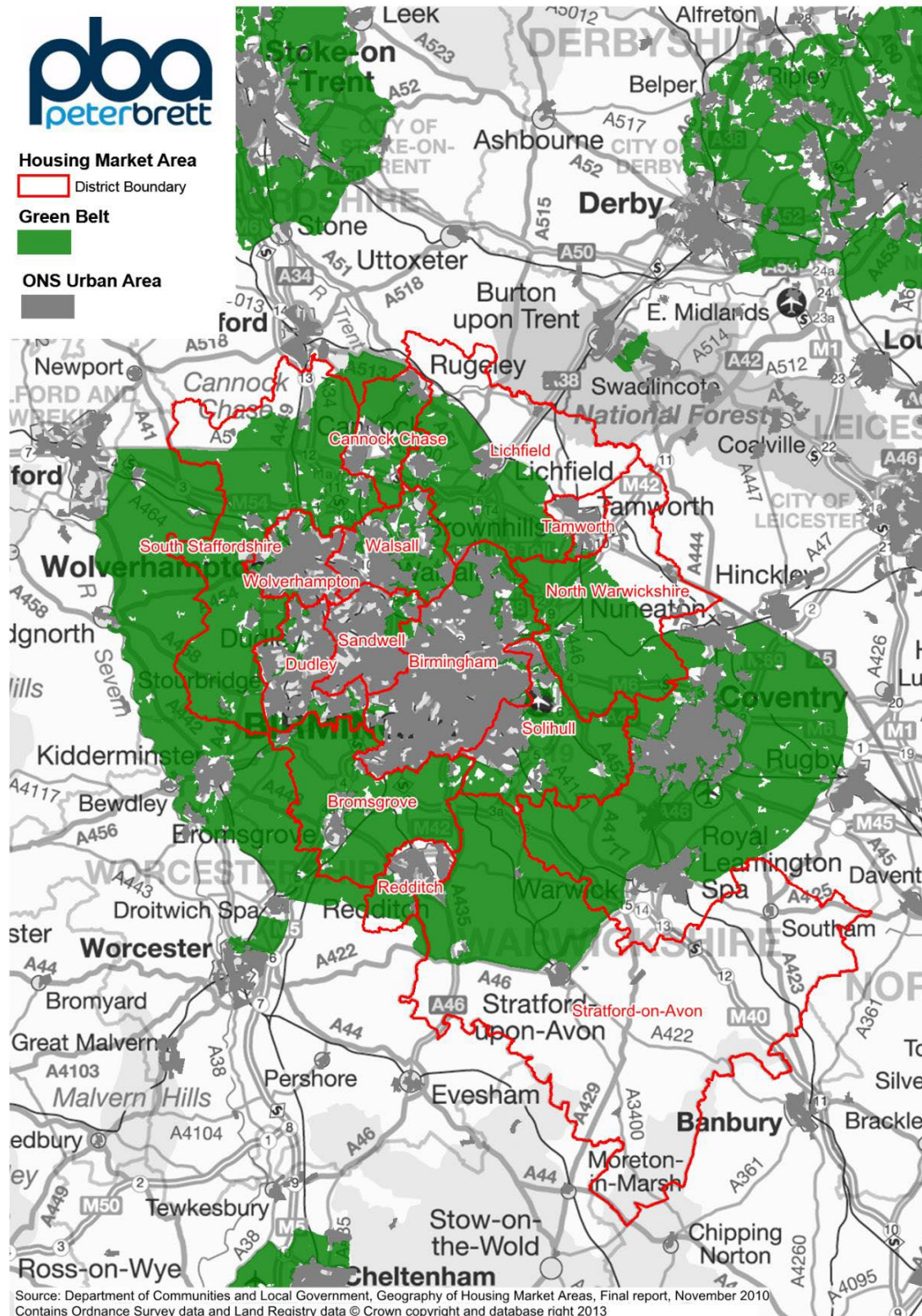


Figure 1: Greater Birmingham Housing Market Area

Source: GBSLEP and Black Country Authorities Strategic Housing Needs Study: Stage 3 Report

### Gypsies, Travellers and Travelling Showpeople

- 5.9 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, arising from the needs of specific existing Gypsy and Traveller families within the District who do not have suitable land options to sufficiently expand or intensify their existing sites.
- 5.10 Recognising the need to explore additional public pitch provision to meet these needs, the Council undertook a thorough survey of all Council and County Council owned land options within South Staffordshire. However, this did not produce any deliverable or developable public site options to remove or reduce the District's shortfall due to the constraints affecting the Council's land portfolio. The Council has also corresponded with HMA and neighbouring authorities to understand whether they have taken similar steps to examine the potential for additional public sites towards the Council's unmet need, but has had limited evidence or confirmation to date to suggest that such extensive steps have been taken by other Councils. As such it will continue to work with other local authorities under the Duty to Cooperate to address its remaining pitch shortfall on new or expanded public site options. Duty to cooperate correspondence on the District's unmet pitch needs to date is set out in its Gypsy and Traveller Topic Paper 2022. The latest draft statements of common ground prepared with officers from each HMA and adjoining local authority are attached in Appendix D of this document.

### Employment

- 5.11 Employment is a clear cross boundary issue for South Staffordshire, which sits in a functional economic market area (FEMA) with Cannock, Stafford, 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'.
- 5.12 This overlap in functional areas is important as the evidence base behind the 2021 Black Country Draft Plan indicated that there is an unmet need of around 210ha of employment land arising from its administrative area. The Council has also 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.

- 5.13 The Council has therefore repeatedly requested that the Black Country authorities establish a SoCG with areas of strong and moderate economic transactions with the Black Country<sup>4</sup>, to address the shortfalls arising from the emerging Black Country Plan. However, following the suspension of the Black Country Plan in late 2022 the Council has had to prepare a SoCG across its own FEMA and the four Black Country local authorities. This SoCG indicates the Black Country authorities will offer their view on whether South Staffordshire's contribution to its unmet employment needs is supported through its response to the District's Regulation 19 plan consultation. It also indicates that the Black Country authorities will continue to work with other local authorities with strong or moderate functional economic links identified in the Black Country's urban area to address its remaining employment land shortfall.
- 5.14 Alongside the Black Country's unmet needs there is emerging regional evidence of unmet market demand for regional employment sites<sup>5</sup> 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 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. It has confirmed its willingness to participate and willingness to contribute towards the funding of such work in correspondence with the Black Country local authorities, which have led on the commissioning of the study's update.
- 5.15 The latest draft of the South Staffordshire FEMA SoCG is attached in Appendix C of this document, reflecting joint efforts to agree a draft document at officer level. It is anticipated this will now be progressed to formal agreement with each of the individual local authorities. Key correspondence with Birmingham and the Black Country on cross boundary employment shortfalls from these key areas is set out in Appendix E.

---

<sup>4</sup> See Figure 3

<sup>5</sup> Defined as sites containing Grade A new / modern floorspace of 9,290 sqm (100,000 sqft) or greater



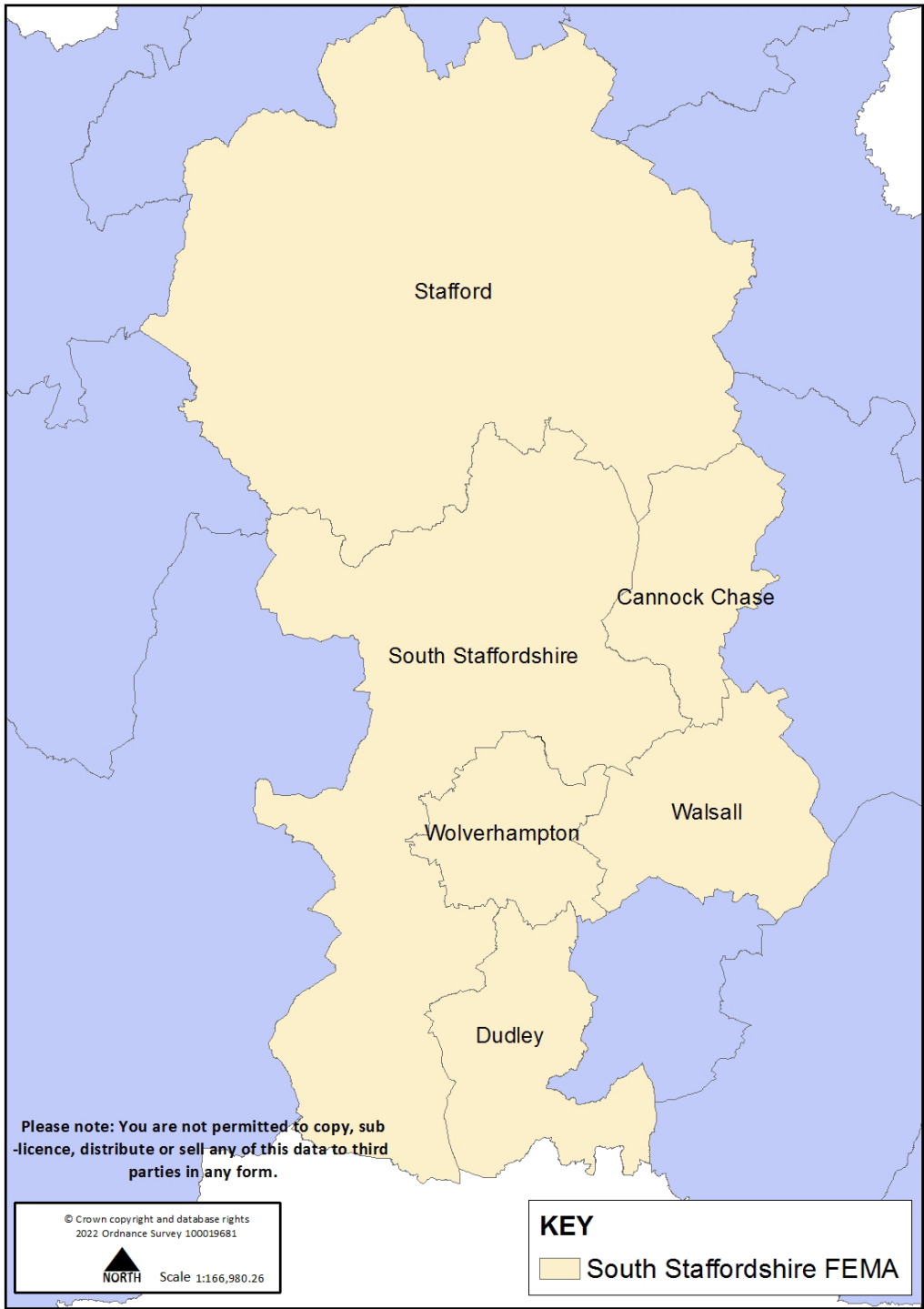


Figure 2: The South Staffordshire Functional Economic Market Area

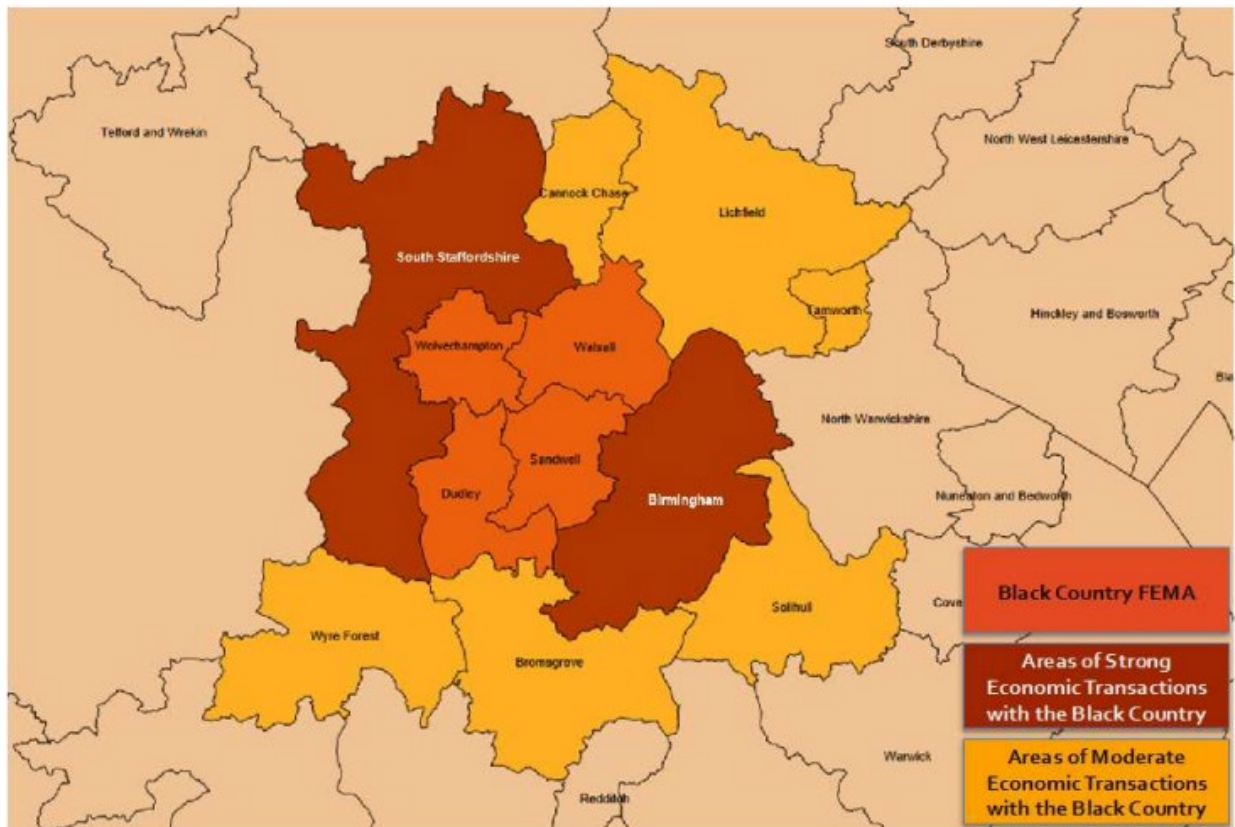


Figure 3: The Black Country Functional Economic Market Area and Areas of Strong/Moderate Economic Transactions. Source: Black Country Economic Development Needs Assessment 2017

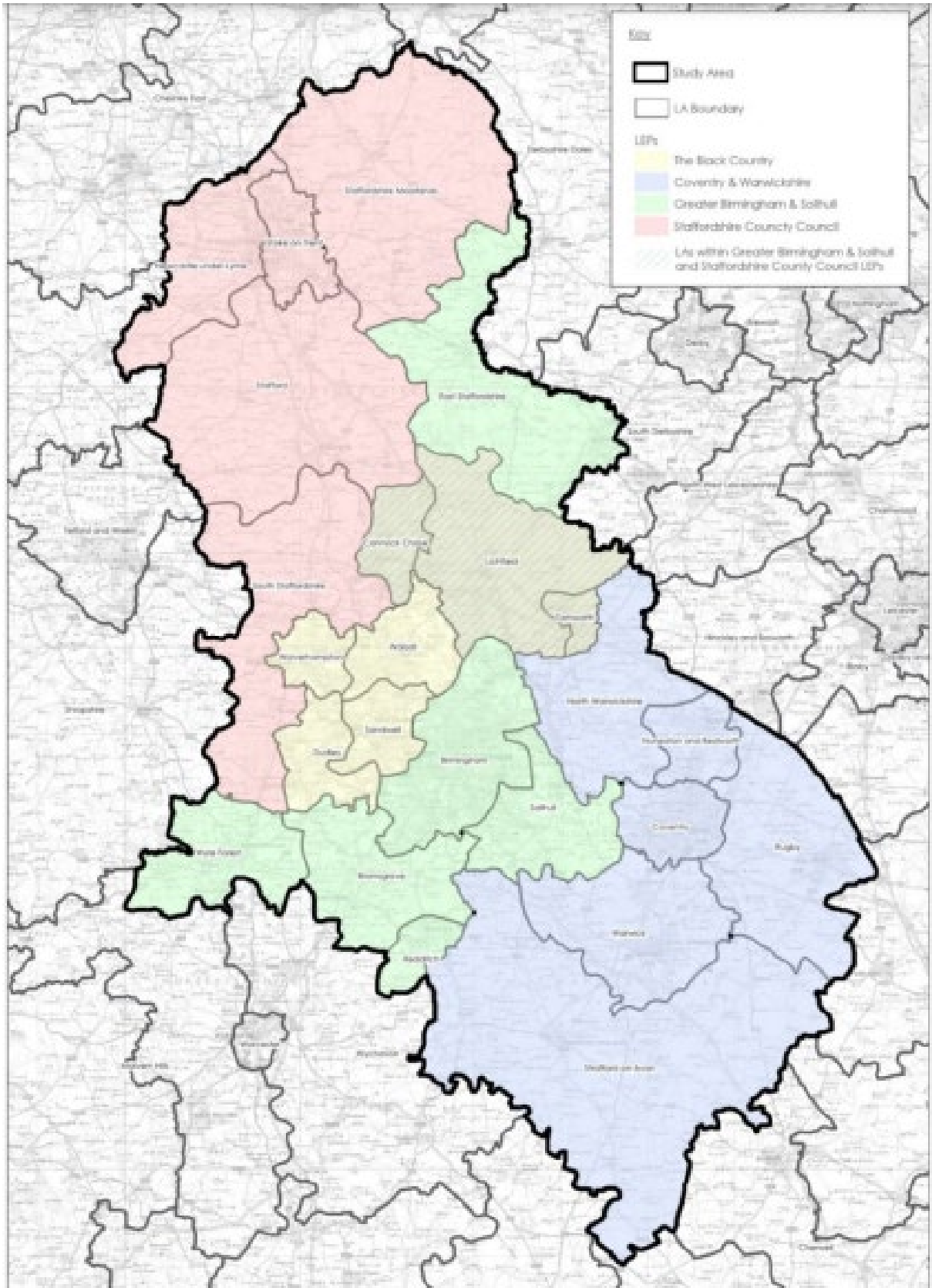


Figure 4: West Midlands Strategic Employment Sites Study 2021 geography. Source: West Midlands Strategic Employment Sites Study – Final Report 2021

## Transport

- 5.16 The Council has worked 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 has been ongoing and has involved engagement with National Highways and neighbouring Local Transport Authorities/Highways Authorities (specifically City of Wolverhampton Council) where appropriate.
- 5.17 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 Publication Plan consultation.
- 5.18 Initial work to identify the scale and type of highways impacts and likely mitigation strategies has taken place alongside the preparation of the Publication Plan. Key outputs from this work include the four Strategic Transport Assessments and work to assess cumulative transport impacts on the Strategic Road Network. The Council will continue to work towards a statement of common ground with National Highways, Staffordshire County Council and City of Wolverhampton Council on transport impacts arising from the local plan to accompany the final Submission Plan document.

## Education

- 5.19 Throughout the preparation of the Local Plan Review the Council has engaged 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 Publication Plan also propose a number of housing sites in close proximity to the border between the two Education Authorities of Staffordshire County Council and City of Wolverhampton Council. The District has worked with both parties to ensure that housing growth across both areas is coordinated with sufficient education infrastructure. Specifically, both authorities have been involved in initial masterplanning work for the four strategic housing sites proposed in the District's Publication Plan to ensure appropriate education infrastructure is scoped into the infrastructure requirements and viability testing of each site from the earliest opportunity.

## Health

- 5.20 Throughout the preparation of the Local Plan Review the Council has met and corresponded with Black Country authorities, ICBs and NHS representatives to ensure that housing growth across both areas is coordinated with sufficient health infrastructure. This has led to an agreed approach to developer contributions towards health infrastructure which in turn has supported viability testing of local plan development sites to ensure deliverability.

## Cannock Chase Special Area of Conservation (SAC)

- 5.21 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.
- 5.22 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.
- 5.23 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.
- 5.24 South Staffordshire Council along with a number of authorities within Staffordshire and the Black Country are part of the SAC Partnership to assess the impact of visitors on the Cannock Chase SAC and determine appropriate measures to mitigate against harm. This evidence base has established a 15km zone of influence around the SAC, within which likely significant effects may arise due to new housing development's increase in recreational visitors to the SAC. This evidence base regarding visitor recreation impacts and how to successfully avoid/mitigate these has been updated through joint working on the part of all SAC Partnership authorities and now reflects planned growth in Local Plans in the 15km zone of influence surrounding the SAC up to 2040. This has led to the preparation and agreement of new joint guidance<sup>6</sup> to mitigate impacts of residential development within the 15km zone of influence and an

---

<sup>6</sup> Cannock Chase Special Area of Conservation (SAC) Guidance to Mitigate the Impact of New Residential Development (March 2022)

updated memorandum of understanding<sup>7</sup> to implement this guidance across the SAC Partnership authorities. South Staffordshire has also continued to work with Natural England and partners in the SAC Partnership to identify work necessary to assess and mitigate for air quality impacts on European protected sites.

---

<sup>7</sup> Available here:

<https://www.sstaffs.gov.uk/doc/183240/name/26April2022%20SAC%20Partnership%20MoU%202022%20FINAL%20version%20SIGNED%20LPAs%20complete%20Redacted.pdf/>

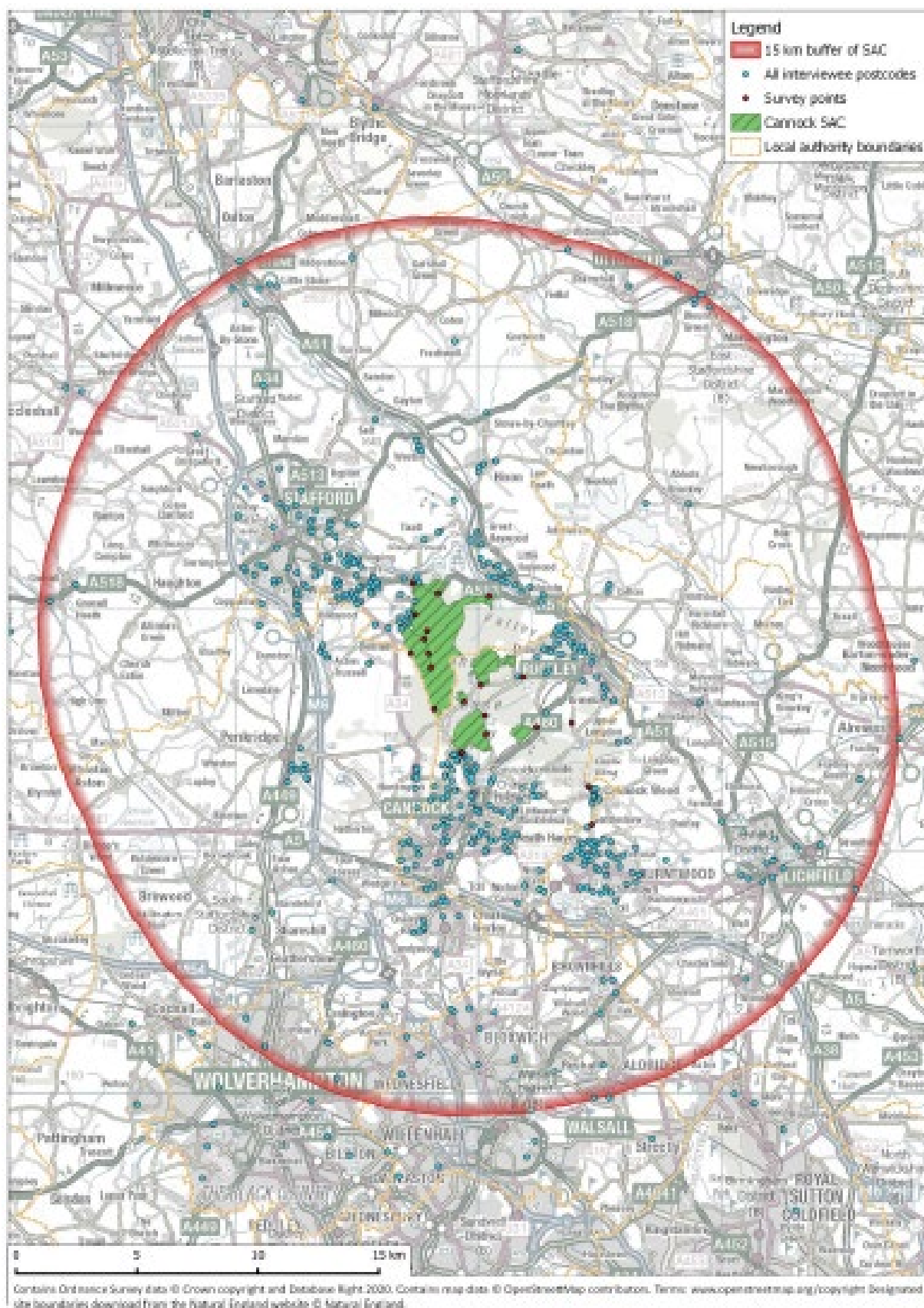


Figure 5: Cannock Chase SAC 15km Zone of Influence Source: Cannock Chase SAC Planning Evidence Base Review Stage 2

## Green Belt

- 5.25 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.

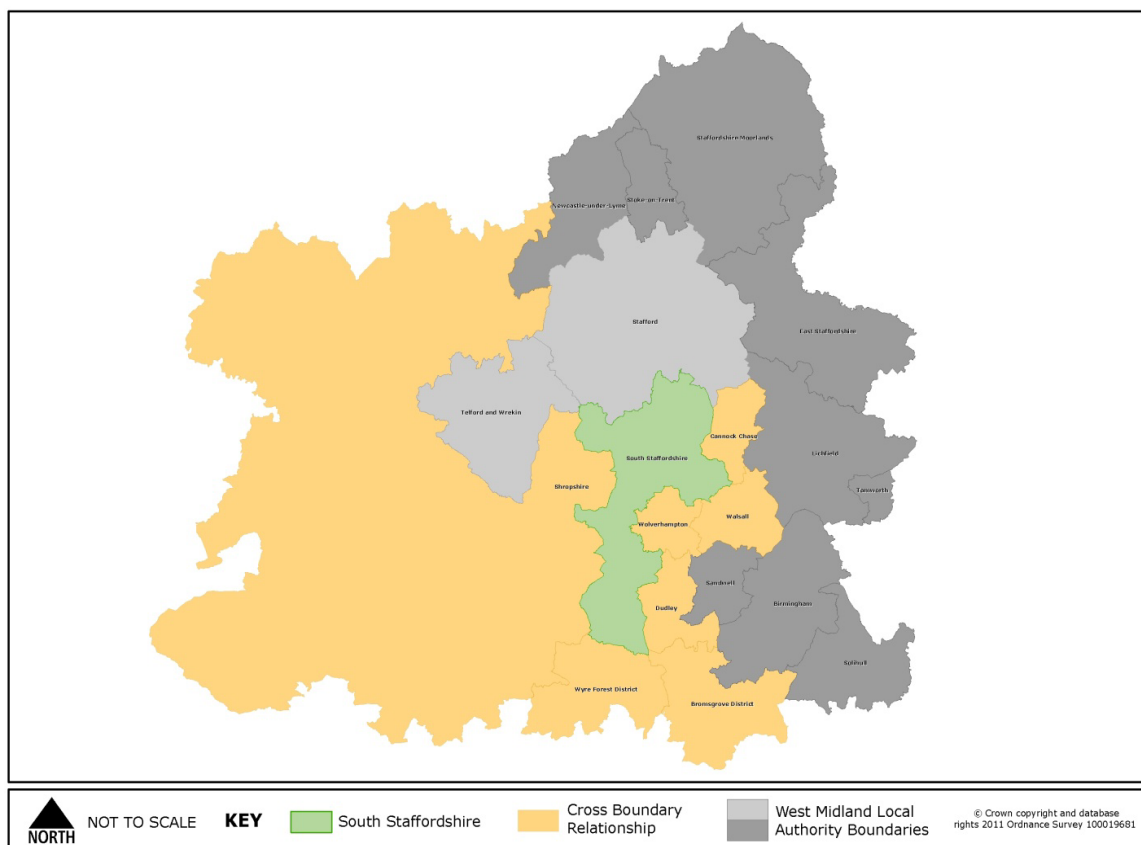


Figure 6: Green Belt relationship map

## Flood risk and water management

- 5.26 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.

- 5.27 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. The Council has also recently carried out a SFRA level 2 under the advice and guidance of the Environment Agency to ensure flood risk is fully considered and mitigated as proposed allocation sites are progressed.

#### Waste and Minerals

- 5.28 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 Cooperate 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 as the plan progresses.

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
Unmet housing needs arising from Black Country and Birmingham		
<p><b>Greater Birmingham Housing Market Area (GBHMA) authorities</b>  <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 <b>GBHMA Strategic Growth Study 2018</b> in 2017/18 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 <b>GBHMA officer group</b>, 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><b>Meetings and email correspondence with neighbouring GBHMA authorities</b> (e.g. the Black Country, Cannock, Lichfield) to discuss approaches to unmet need contributions and approach to plan preparation.</p> <p>Separate <b>formal correspondence with individual GBHMA authorities</b> between 2018 and 2022, 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><b>Local Plan consultation responses</b> 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</p>	<p>Proposed a 4,000 dwelling contribution to the GBBCHMA based on the number, location and scale of the strategic growth locations proposed in South Staffordshire the GBBCHMA Strategic Growth Study 2018.</p> <p>Support for the proposed housing target (South Staffordshire's LHN + 4,000 dwellings towards the GBBCHMA) given by Birmingham and the Association of Black Country Authorities (ABCA) in consultation responses to the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and 2021 Preferred Options consultation.</p> <p>No objections to the proposed housing target received from other GBBCHMA authorities, although some have indicated that the methodology used by South Staffordshire would not be appropriate in all GBBCHMA authority areas and other local evidence.</p> <p>ABCA repeatedly requested that the whole of the 4,000 dwelling contribution is attributed to the Black Country and requested that this is changed in the local plan, but did not provide evidence to justify this when making this request or indicate any details of Duty to Cooperate discussions with other GBBCHMA local authorities generating shortfalls to support this stance being used on a consistent basis. South Staffordshire officers have communicated to ABCA officers that it is happy to work with Black Country local authorities and Birmingham jointly on any approach to apportionment going forward.</p>

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
	<p>GBHMA shortfalls in light of the latest available evidence at the relevant point in time.</p> <p><b>December 2021 meeting with GBBCHMA and key related authorities</b> to address emerging and existing housing shortfalls from the Black Country authorities and Birmingham, individual local authorities' positions on and proposed contributions towards these shortfalls. Involved discussion and agreement on future joint work programmes to address outstanding issues and need for additional governance arrangements to achieve further agreement where possible.</p> <p><b>Drafting a SoCG across GBBCHMA and key related authorities</b> to set out current known positions on shortfalls, proposed contributions and justifications for these and future work programme and governance arrangements across the participating authorities to address these. This is in the process of being signed off by participating authorities.</p>	<p>Agreed high level work programme in draft SoCG with GBBCHMA and related authorities for updating the 2018 Strategic Growth Study to reflect changing housing need and shortfalls within the HMA and to ensure that any spatial approach to redistributing shortfalls is fully informed by consistent evidence on constraints, Green Belt, sustainability and transport infrastructure.</p> <p>Agreed principles for future governance structure in draft SoCG with GBBCHMA and related authorities to ensure greater consistency and buy-in to approaches to distributing HMA unmet needs in future.</p>
<b>Cross-boundary unmet employment needs within the South Staffordshire FEMA and Black Country FEMA</b>		
<p><b><u>Association of Black Country Authorities (ABCA), Birmingham CC, Cannock Chase DC, Lichfield DC, Tamworth BC, Solihull MBC, Bromsgrove DC, Wyre Forest BC, Stafford BC</u></b></p>	<p><b>Local Plan consultation responses</b> sent to and received from the Black Country regarding their unmet employment needs over the 2017-2021 period.</p> <p><b>Email correspondence with Black Country authorities</b> regarding the potential contribution that could be made by strategic employment sites to Black Country shortfalls and employment land technical papers. Communicating the need for the Black Country authorities to prepare a SoCG covering the Black Country FEMA and areas of strong and moderate functional economic links to this FEMA and responding to evidence relating to the cross-boundary implications of the strategic West Midlands Interchange site.</p>	<p>Proposed a 36.6ha surplus of strategic employment land is available for unmet cross boundary needs through strategic employment land (other than West Midlands Interchange) and confirmed this is to be attributed to the Black Country authorities in a draft SoCG across the South Staffordshire and Black Country FEMA authorities.</p> <p>Established an additional minimum of 67ha of employment land from the West Midlands Interchange site which could contribute towards Black Country authorities' employment land shortfalls. Also established that this contribution from land in South Staffordshire may increase if other local authorities in the travel to work area do not require the land attributed to them from West Midlands Interchange.</p>

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
	<p>Participation in <b>Duty to Cooperate meetings</b> 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>Drafting a <b>SoCG across the South Staffordshire FEMA</b> (including all four Black Country FEMA local authorities) to set out current known positions on shortfalls, proposed contributions and justifications for these. Includes next steps for the Black Country authorities to continue to work with authorities under the DtC to ensure remaining employment shortfalls can be addressed.</p>	<p>Areas of agreement and future areas to be agreed set out in a draft SoCG across the South Staffordshire FEMA and Black Country FEMA. This indicates that the Black Country will consider whether it can support the level of employment growth proposed in the South Staffordshire Local Plan Review in its response to the Publication Plan consultation and will continue to engage with other local authorities to seek opportunities to address the remaining shortfall.</p>
<b>Regional employment demand within the wider West Midlands region</b>		
<p><b><u>Authorities within the West Midlands Strategic Employment Sites Study (WMSESS) 2021 area</u></b>  <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 Bedworth BC,</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>Brief for follow up work agreed with GBHMA officer group and progressed to tender through Dudley MBC's procurement system.</p>

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
Coventry CC, Rugby BC, Warwick DC)		
<b>Unmet Gypsy and Traveller needs from South Staffordshire</b>		
<b><u>Neighbouring local authorities</u></b>	<p><b>Consulted on a cross-boundary GTAA 2021 and Pitch Deliverability study 2021</b> through local plan review consultations, which set out a substantial pitch shortfall even after Green Belt sites were examined.</p> <p><b>Wrote to neighbouring and HMA local authorities in January and August 2022</b>, setting out steps undertaken to establish the District's pitch needs, the extent to which all available site options (including Green Belt) had been examined and the shortfall that nonetheless remained.</p> <p><b>Responses received back from neighbouring authorities to South Staffordshire's January and August 2022 letters</b>, setting out their inability to assist with the District's pitch provision through new or expanded public site provision and reasoning for the stances taken.</p> <p><b>Draft statements of common ground</b> prepared with the officers of individual adjacent local authorities and HMA authorities, which clarify each authority's position on the District's pitch shortfall and their reasoning for a lack of a contribution to date.</p>	<p>South Staffordshire's pitch shortfall, evidence base and site search for additional pitches have been consulted on and communicated at length to all neighbouring and HMA authorities in local plan consultations and multiple Duty to Cooperate letters.</p> <p>To date, no local authority contacted by South Staffordshire has offered additional provision on public sites in response to the January or August 2022 duty to cooperate letters. Reasons for this have varied between authorities, but limited evidence has been provided to suggest that local authorities have explored options for new public sites in particular.</p>
<b>Infrastructure provision (including cross boundary)</b>		
<b><u>Black Country authorities, Staffordshire County Council, local Integrated Care Boards (ICBs)</u></b>	<p><b>Meetings and follow up email correspondence</b> with Black Country officers and ICB/NHS colleagues to agree joint approaches to cumulative assessment of key infrastructure needs and provision for proposed growth locations. Evidenced through 2021 and 2022 meeting minutes and email correspondence.</p>	<p>Agreed approach to education mitigation with City of Wolverhampton Council and Staffordshire County Council, indicating that education impacts of housing growth from South Staffordshire housing sites will be addressed without the need for cross-boundary school capacity improvements.</p>

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
		Agreed approach to commuted sums towards primary health care infrastructure with colleagues from Staffordshire and Black Country ICBs.
<b><u>Staffordshire County Council and National Highways</u></b>	<p>Agreed approach to highways modelling of proposed growth locations delivered through the Local Plan Review. Evidenced through 2021 &amp; 2022 <b>email correspondence and meeting minutes</b> between Staffordshire County Council, South Staffordshire District Council and National Highways.</p> <p>Preparation of <b>joint evidence</b> (strategic transport assessments) for each of the four strategic housing sites, using scoping methodologies agreed with Staffordshire County Council, South Staffordshire District Council, City of Wolverhampton Council and National Highways.</p>	Strategic transport assessments of large sites undertaken with input of Staffordshire County Council, National Highway and neighbouring authorities to demonstrate that no unmitigable highways impacts are present from strategic sites (individually or in-combination with other planned development) and to provide indication of transport mitigation necessary to inform Local Plan Review.
<b><u>Black Country planning and education authorities, Staffordshire County Council</u></b>	<b>Meetings and follow up email correspondence</b> 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 and 2022 meeting minutes and email correspondence.	Agreed site specific education mitigation strategies for larger strategic housing sites contained in the Publication Plan likely to be required from new development.
<b>Natural Environment (including Cannock Chase SAC and other international protected sites)</b>		
<b><u>Cannock Chase Special Area of Conservation (SAC) Partnership</u></b> (Staffordshire County Council, Cannock Chase DC, East Staffordshire BC, Lichfield DC, Stafford BC, Wolverhampton CC and Walsall MBC) <b>&amp; appropriate advisory bodies</b> (Natural England, Cannock	<p>Regular <b>SAC officer group meetings</b> to commission evidence, co-ordinate monitoring information and prepare recommendations for the Joint Strategic Board to consider.</p> <p>Participation with these bodies in preparing updated Cannock Chase SAC <b>joint evidence base documents</b>, providing a framework for individual plans’ Habitat Regulations Assessments. These include:</p> <ul style="list-style-type: none"> <li>- 2017 Cannock Chase SAC – Planning Evidence Base Review</li> <li>- 2018 Cannock Chase SAC Visitor Survey update</li> </ul>	<p>Emerging joint approach traffic and air quality evidence base to ensure appropriate avoidance and mitigation measures for cumulative planned development within the Cannock Chase SAC Partnership.</p> <p>Joint agreed approach to mitigation of recreational impacts of new housing development on Cannock Chase SAC based on up to date evidence base.</p>



Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
<u>Chase AONB Partnership, Forestry Commission)</u>	<ul style="list-style-type: none"> <li>- 2020 Cannock Chase SAC, Strategic Access Management &amp; Monitoring Measures Detailed Implementation Plan: Site User Infrastructure, Education and Engagement</li> <li>- 2020 Cannock Chase SAC, Strategic Access Management &amp; Monitoring Measures Detailed Implementation Plan: Car Parking</li> <li>- 2021 Cannock Chase SAC Planning Evidence Base Review Stage 2</li> </ul> <p><b>Securing a 2022 updated Memorandum of Understanding</b> across the Cannock Chase SAC Partnership, setting out updated mitigation measures for new housing development across the SAC Zone of Influence.</p> <p><b>Agreeing a shared scope of work for joint transport and air quality evidence</b> with other Cannock Chase SAC Partnership authorities to support mitigation approach taken to address cumulative effects arising from new development, evidenced through email correspondence with the relevant SAC Partnership authorities.</p> <p><b>Minutes of Joint Strategic Board meetings</b>, setting out key agreements in progressing the Cannock Chase SAC evidence base.</p>	
<b>Green Belt</b>		
<u><b>Black Country authorities</b></u> <u>(Wolverhampton CC, Sandwell BMC, Walsall MBC and Dudley BMC)</u>	<p>Jointly prepared cross-boundary <b>Green Belt harm and landscape sensitivity studies</b> to inform Local Plan Reviews in 2019.</p> <p>Corresponded on <b>appropriate threshold to constrain site options based solely on Green Belt harm/landscape sensitivity</b>, as set out in Black Country consultation response to 2019 SHSID consultation.</p>	<p>Reviewed each authorities' site selection process in consultation responses to emerging local plans and highlighted concerns/queries as required.</p>
<u><b>Greater Birmingham Housing Market Area authorities</b></u>	<p>Participated in <b>joint consistent strategic green belt review</b> through the GBHMA Strategic Growth Study 2018, assessing the form and strategic</p>	<p>Support for the District's approach to HMA unmet housing needs (including recommended level of Green Belt release) from</p>

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
( <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>function of the Green Belt against the purposes of Green Belt policy consistently across the entire GBHMA area.</p> <p><b>Drafting a SoCG across GBBCHMA and key related authorities</b> to set out future work programme for assessing strategic growth options to address emerging shortfalls, including assessing future Green Belt release options.</p>	<p>Association of Black Country Authorities and Birmingham City Council in 2019 and 2021 local plan consultations.</p> <p>Emerging shared approach for establishing shortfalls and where additional Green Belt release might be required in the GBBCHMA in future set out in draft SoCG with GBBCHMA and key related authorities.</p>
<b>Flood Risk and Water Quality</b>		
<b><u>Environment Agency, Lead Local Flood Authority (LLFA), Severn Trent Water (STW) and South Staffs Water</u></b>	<p>Completed Southern Staffordshire <b>joint Strategic Flood Risk Assessment (SFRA)</b>, in consultation with the Environment Agency and Severn Trent Water (amongst others).</p> <p><b>Comments on all site options from LLFA</b> with respect to surface water flood risk included in the site selection process, as set out in the relevant topic papers.</p> <p><b>Correspondence with STW</b> on policy wording and to establish the likely scale of mitigation required for surface and foul drainage on site options.</p> <p><b>Completed SFRA level 2</b> in consultation with the Environment Agency following consultation responses received to previous Regulation 18 consultation.</p>	<p>Joint evidence base working with key stakeholders to ensure that drainage and flood risk issues can be satisfactorily mitigated.</p>
<b>Minerals and Waste</b>		
<b><u>Staffordshire County Council</u></b>	<p>Consultation responses received from minerals authority stressing need to protect brick clay mineral safeguarding areas.</p>	<p>Site selection methodology updated to reflect brick clay safeguarding areas as an important constraint when considering if sites should be allocated.</p>

Relevant Duty to Cooperate bodies	Summary evidence of having met the Duty to Cooperate	Outcomes of the cooperation
<b><u>Association of Black Country Authorities</u></b>	Consultation responses received from adjoining minerals authority stressing need to protect brick clay mineral safeguarding areas.	Site selection methodology updated to reflect brick clay safeguarding areas as an important constraint when considering if sites should be allocated.

## **Appendix B – GBHMA Development Needs Group Draft Statement of Common Ground**

The draft Statement of Common Ground contained in this appendix has been prepared with officers of the GBHMA officer group following a Duty to Cooperate meeting between all authorities (including member representatives) in December 2021. At this stage the statement is in draft and is being put through the formal agreement procedures of individual local authorities, which are at varying stages of progress.

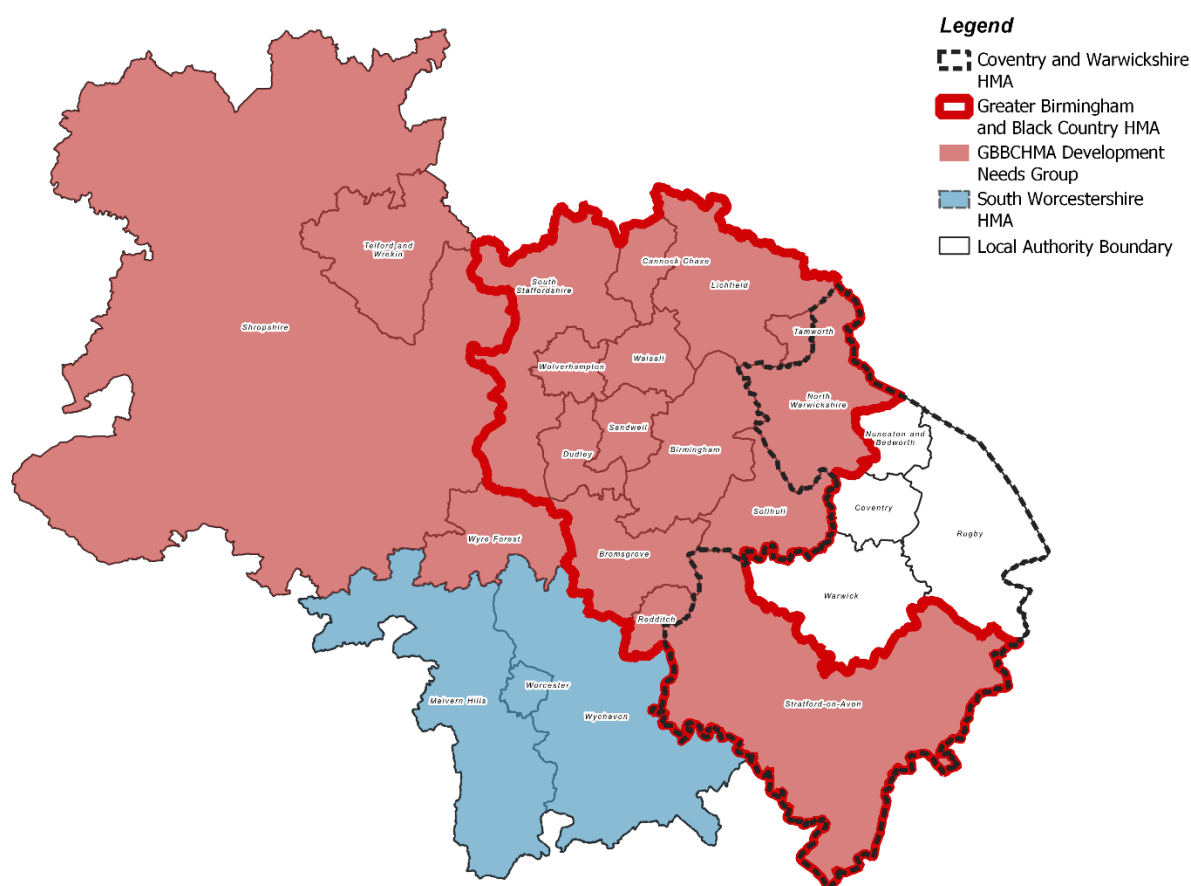
## **GBBCHMA Development Needs Group**

### **Draft Statement of Common Ground**

**August 2022**

## 1. Purpose and list of Parties involved in this Statement of Common Ground

- 1.1 This Statement of Common Ground (SoCG) has been prepared to facilitate and record cross-boundary engagement between local authorities in addressing existing and emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It records cooperation and progress to date in addressing this strategic issue, demonstrating that the participating authorities have engaged constructively, actively and on an ongoing basis under the Duty to Cooperate.
- 1.2 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises the local planning authorities set out below. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.



### Local planning authorities within the GBBCHMA

- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council

- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council

Other related local planning authorities outside of the GBBCHMA

- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

**2. Signatories to this Statement of Common Ground:**

- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council
- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

**3. Strategic Geography**

- 3.1 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) comprises 14 local authorities: Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford-on-Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council.
- 3.2 This geography was defined through two published studies commissioned from Peter Brett Associates (now Stantec) in accordance with guidance at the time based on

analysis of migration flows and commuting patterns and was subsequently endorsed by all authorities.

3.3 As part of the review of the Birmingham Development Plan (BDP), the City Council has tested whether this geography is still valid. A draft Housing and Economic Development Needs Assessment (HEDNA) report, which has been subject to engagement with neighbouring authorities through the GBBCHMA group, confirms that this is still a reliable geography using more recent data where available. The draft HEDNA has yet to be tested through examination in public. It also confirms that other authorities beyond the GBBCHMA have close functional relationships with it, based on commuting and migration flows, as listed below:

- Shropshire
- Telford & Wrekin
- Wyre Forest
- Worcester City
- Coventry City

3.4 Based on the findings of this report, Shropshire Council, Telford & Wrekin and Wyre Forest were invited to be signatories to this Statement of Common Ground, recognising the close functional relationships these areas have with the GBBCHMA (or parts of it) and authorities generating shortfalls within it. Worcester City Council and Coventry City Council were not invited to be signatories, because these are constrained urban areas that have historically relied on other neighbouring authorities to meet their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the housing needs of the GBBCHMA.

3.5 At this time, expansion of the GBBCHMA is not advocated but it is acknowledged that there are potentially cross boundary matters, particularly in relation to migration patterns, which need to be addressed in order to ensure compliance with the Duty to Cooperate.

3.6 The strategic geography and scope of this Statement of Common Ground reflects current emerging evidence regarding the functional relationships between the GBBCHMA and surrounding areas. This scope will be updated to reflect the finalised Birmingham HEDNA report and any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.

3.7 It should be noted that both North Warwickshire and Stratford-on-Avon fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA. In respect of Stratford-on-Avon District, the Fosse Way is an accepted boundary between the two HMAs reflecting the geographic proximity to the HMAs of this large rural district.



#### 4. Strategic Matter - Meeting Housing Need

##### 2011 – 2031 period

- 4.1 All post NPPF adopted development plans for the GBBCHMA authorities which cover the period 2011-2031 sought to meet their own Objectively Assessed Need (OAN). Those unable to meet their own needs are as follows:

Plan	Adopted	Details of shortfall
Birmingham Development Plan, 2011-2031	January 2017	The Birmingham Development Plan identified an Objectively Assessed Need of 89,000 homes with a shortfall of 37,900 homes which could not be met in the plan area. Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with.
Cannock Chase Local Plan, 2012-2028	June 2014	The Cannock Chase Local Plan identified a shortfall of 500 homes, which was met in the Lichfield Local Plan (adopted 2015). The Cannock Chase Local Plan review identifies no shortfall over the period 2018-38 therefore this shortfall does not now need to be addressed.
Redditch Local Plan, 2011 – 2030	January 2017	The Redditch Plan identified a shortfall of 3,400 homes. The plan was prepared and examined in parallel with the Bromsgrove Local Plan (adopted 2017), which identified capacity to accommodate all of this shortfall.
Tamworth Local Plan, 2006 – 2031	February 2016	The Tamworth Plan identified a shortfall of 1,825 homes. The North Warwickshire Local Plan (adopted 2021) meets 913 homes of this shortfall. The Lichfield Local Plan (adopted 2015) meets 500 homes of this shortfall and a statement of common ground signed in 2018 agreed to increase this contribution to 912 homes. The Lichfield Local Plan review does not make a specific contribution to Tamworth.

##### Birmingham Policy context

- 4.2 Policy TP48 of the Birmingham Development Plan (BDP) states that:

*“The Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city. This will focus on:*

- *The progress of neighbouring Councils in undertaking Local Plan reviews to deliver housing growth to meet Birmingham’s needs.*
- *The progress of neighbouring Councils in delivering the housing targets set out in their plans.*

- *The extent to which a 5-year housing land supply is maintained in neighbouring areas.”*

4.3 Policy TP48 goes on to state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham’s capacity by means of a full or partial BDP review after three years. In acknowledgement of the BDP shortfall, those authorities that preceded it included review mechanisms to address the shortfall. Commitments to review in adopted plans are set out in Appendix 1.

4.4 January 2020 signalled three years since adoption of the BDP. In December 2019 Birmingham City Council published an updated Local Development Scheme (LDS)<sup>8</sup> which concluded that an early review was not required. This stated that:

*“...the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022’*

4.5 The Birmingham LDS was updated in June 2021, providing a timetable for the BDP review. That review has now commenced, and technical work is being undertaken. An Issues and Options document is due to be published in Autumn 2022.

#### Joint studies commissioned to address strategic housing shortfalls

4.6 Work commissioned to date by the GBBCHMA to find solutions to address these strategic housing shortfalls consists of the following two studies:

- Peter Brett Associates - Strategic Housing Needs Study
- GL Hearn / Wood – Strategic Growth Study 2018 (SGS)

4.7 As well as updating the position regarding the shortfall both up to 2031 and 2036, the Strategic Growth Study identified potential broad areas which each authority could explore and test through their plan-making processes to potentially accommodate the shortfall. Three broad development typologies were identified:

New settlements – 10,000 – 15,000 dwellings  
Employment led – 1,500 – 7,500 dwellings  
Urban Extensions – 1,500 – 7,500 dwellings

4.8 Potential locations were placed in two categories, a short list warranting further consideration and a long list. A full schedule of locations by development typology and potential capacity is shown in Appendix 2.

---

<sup>8</sup> <https://www.birmingham.gov.uk/lds>

- 4.9 These strategic options were accompanied by five smaller areas where potential for a proportionate distribution pattern of development (500 – 2,500 dwellings) should be examined further.

#### Monitoring the GBBCHMA Shortfall

- 4.10 A monitoring framework was established based on the Strategic Growth Study and progress towards meeting this shortfall has been reflected in a series of position statements for the period 2011 – 2031. The most recent of these position statements was published in 2021 with a base date of 1 April 2020. This suggests that the shortfall to 2031 is some 10,000 homes fewer than when the Strategic Growth Study was published. This is mainly as a result of the Birmingham Development Plan identifying additional capacity over that anticipated when the plan was examined.
- 4.11 The summary of GBBCHMA housing supply and need below in Table 1 includes capacity identified through the Solihull and North Warwickshire local plan reviews. In the case of Solihull, a contribution of 2,104 homes has been identified as coming forward before 2031 and in North Warwickshire a contribution of 3,790 by 2033. Further contributions may come forward pre 2031 as identified in Table 2, which may close the gap further.
- 4.12 As North Warwickshire and Stratford-on-Avon straddle the GBBCHMA and the Coventry and Warwickshire Housing Market Area, their contribution is shared and this is set out in an agreed Memorandum of Understanding<sup>9</sup>, consequently an adjustment is made in Tables 1 & 2.

*Table 1: GBBCHMA Housing Supply and Need as at 2019/20*

	SGS Baseline (2011 – 31)	2017 update published (2011 - 31)	2017 Update revised (2011 - 31)	2019 (2011 - 31)	2020 (2011 -31)
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099	205,099	205,099	205,099
Contribution to CWHMA	-2880	-2880	-2880	-2880	-2880
Minimum housing requirement	207,979	207,979	207,979	207,979	207,979
Supply baseline	191,654	197,283	199,238	205,382	201,677
<b>Total shortfall</b>	<b>16,325</b>	<b>10,696</b>	<b>8,741</b>	<b>2,597</b>	<b>6,302</b>

Source: GBBCHMA Position Statement update

- 4.13 The Position Statement and Table 1, however, do not include capacity coming forward in South Staffordshire, Lichfield, Shropshire and Cannock Chase through sources of supply not formally identified in April 2020, which have important implications for the overall position and may provide capacity pre-2031.

<sup>9</sup> Available here:

<http://democracy.stratford.gov.uk/documents/s35727/Appendix%201%20MoU%20CW%20HMA.pdf&TxtOnly=1>

- 4.14 They also do not fully reflect the latest Black Country Plan position as set out in the Regulation 18 Plan, published for consultation in August 2021, which will further adjust supply based on more up to date urban capacity evidence, capacity from potential Green Belt releases and through seeking to address housing needs beyond the 2031 monitoring date. The implications of the total changes in supply arising are set out in Table 2.

*Table 2: Local Plan Reviews – Shortfalls and Contributions*

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Comments
South Staffordshire	Reg 18 October 2021	+4,000	2018-2038 plan period
Cannock	Reg 18 March 2021	+500	2018-2039 plan period
Shropshire	Examination July 2022	+1,500 Contribution specifically for Black Country unmet needs	2016 -2038 plan period
Black Country	Reg 18 Draft Plan August 2021	-28,000	2020 – 2039 plan period
Lichfield	Reg 19 July 2021	+2,655 2,000 contribution specifically for Black Country unmet needs	2018-2040 plan period  Agreement in 2018 to contribute 912 towards the Tamworth shortfall.

### **Housing Need and capacity post-2031**

- 4.15 The Black Country is the only plan area in the GBBCHMA that does not have a post NPPF local plan which has been adopted or reached examination. However, the Black Country Plan has reached Regulation 18 stage, and this is significant because it identifies a shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 over the period 2031-2039). These shortfall figures are based on up-to-date local housing need (including the 35% uplift for Wolverhampton). These figures, however, are subject to further consultation and examination. The Birmingham Development Plan review is at its formative stages and the extent of any post 2031 shortfall has yet to be established.
- 4.16 The 2018 Strategic Growth Study did consider unmet housing needs across the whole GBBCHMA up to 2036, concluding that there was an approximate 60,000 dwelling shortfall. In general, however, at the time of publication, plans looking beyond 2031 were not far enough advanced so capacity beyond this date would be limited by implication.

## 5. Timetable for review and ongoing cooperation

- 5.1 Table 3 sets out progress on local plan reviews across the Statement of Common Ground geography. Where plans have not yet reached Preferred Options Regulation 18 stage, the adopted plan is included. There is clear evidence to show that the shortfall has reduced significantly up to 2031. There is, however, evidence of an as yet untested gap emerging post 2031.

*Table 3: Local plan review progress*

Area	Plan Period	LHN as of 2022 (homes per annum)	Plan Requirement (homes per annum)	Shortfall / Surplus over Plan Period (total homes)	Plan Status
Birmingham	2011-2031	6,750	2,555	-37,900	Adopted (2017)
Black Country	2020 -2039	4004	2278	-28,239	Regulation 18 (2021)
Bromsgrove	2011-2030	383	368	+ 3,400 <sup>10</sup>	Adopted (2017)
Cannock Chase	2018-2038	276	301	+ 500	Regulation 18 (2021)
Lichfield	2018 - 2040	303	422	+2655 <sup>11</sup>	Examination (2022)
North Warwickshire	2014-2033	169	454	+ 3790 <sup>12</sup>	Adopted (2021)
Redditch	2011-2030	165	337	-3,400 <sup>13</sup>	Adopted (2017)
Solihull	2016-2036	807	939	+2,105	Examination (2022)
South Staffordshire	2018-2038	243	444	+4,000	Regulation 18 (2021)
Stratford-on-Avon	2011-2031	567	730		Adopted (2016)
Tamworth	2006-2031	145	177	-1825 <sup>14</sup>	Adopted (2016)
<b>Non-HMA</b>					
Shropshire	2016-38	1,147	1,430	+1,500 <sup>15</sup>	Examination (2022)
Telford and Wrekin	2011-31	491	864		Adopted (2018)
Wyre Forest	2016-36	276	276		Adopted (2022)

- 5.2 Whilst the full extent of the post 2031 shortfall is not yet established and not all plans within the GBBCHMA have agreed to make a contribution towards a GBBCHMA shortfall, there appears to be evidence that it will be difficult to meet the entire GBBCHMA shortfall within its collective boundaries. Shropshire has acknowledged this

<sup>10</sup> 3,400 contribution specifically towards the 2011-30 Redditch shortfall

<sup>11</sup> 2,000 contribution specifically towards the 2020-38 Black Country shortfall

<sup>12</sup> 913 contribution specifically towards the 2006-31 Tamworth shortfall

<sup>13</sup> 3,400 met by Bromsgrove Local Plan (2017)

<sup>14</sup> 500 met by Lichfield Local Plan (adopted 2015) and 913 homes met by North Warwickshire Local Plan (adopted 2021)

<sup>15</sup> Shropshire contribution towards Black Country shortfall specifically post 2031

and proposed a contribution of 1,500 dwellings towards the Black Country shortfall accordingly.

### **Approach taken in local plans to date**

- 5.3 The purpose of this section is to set out how local plan reviews intend addressing the GBBCHMA shortfall and how they have used the shared evidence base, namely the GL Hearn / Wood Strategic Growth Study 2018. The wording provided for each authority represents the views of the authority concerned.

#### Birmingham

- 5.4 Birmingham City Council has commenced an update of the Birmingham Development Plan. It is likely that there will be a shortfall arising from this Plan update, however this has not yet been quantified. The Issues and Options consultation programmed for Autumn 2022 will provide an initial indication of the scale of the shortfall, however the City's capacity will evolve as the Plan update progresses. Housing need has increased since last plan so it is likely that the shortfall will be at least as severe as last time round.

#### Black Country

- 5.5 The Strategic Growth Study made several recommendations of relevance to the Black Country, including examining potential additional urban supply, and identifying and allocating additional land elsewhere for developments of 1500+ homes. The Black Country Urban Capacity Review Update 2021 examines the potential to increase densities in the urban area, and Policy HOU2 of the Draft Black Country Plan proposes increased housing densities compared with those required by current policy.
- 5.6 The Strategic Growth Study also identified areas of search for sites beyond and within the Green Belt. These included land for an urban extension North of Walsall around Brownhills (Walsall, Lichfield, Cannock) and South of Dudley (within Dudley). The Draft Black Country Plan proposes allocations in both of these locations, although the detailed assessment carried out for the Plan has shown that the total capacity of individual sites at each location is less than 1500 homes.

#### Bromsgrove

- 5.7 The Bromsgrove District Plan review is considering over 400 possible sites for inclusion in the plan. In some instances, these sites correspond with those areas suggested for consideration by the Strategic Growth Study. The assessment process the Council is undertaking is significantly more detailed than the Strategic Growth Study. Therefore, all realistic options including those in the Strategic Growth Study have been considered. A July 2022 Memorandum of Understanding between Redditch and Bromsgrove Councils confirms that the surplus of housing currently allocated for the needs for Redditch Borough (currently approximately 2241 dwellings) is handed back to BDC for BDC to consider in its plan making.

### Cannock Chase

- 5.8 The Strategic Growth Study is being used to inform local plan review process. The Preferred Options report set out a strategy to meet own needs and provide a contribution to GBBCHMA shortfall of 500 dwellings, recognising the proportionate dispersal option in the Strategic Growth Study. This will require Green Belt release and there are infrastructure constraints. The Strategic Growth Study is the only independent document providing GBBCHMA shortfall evidence, so the local plan is seeking to test its recommendations. Cannock Chase is not aware of alternative evidence and is keen to make use of existing evidence and work with partners on that.

### North Warwickshire

- 5.9 The Strategic Growth Study was used as a piece of evidence to inform recently adopted plan. CWHMA used commuting patterns as a consistent methodology for distributing needs and used a version of this as a basis for taking 10% of Birmingham's shortfalls. Tamworth and CWHMA unmet needs were also provided for. The Strategic Growth Study was relied upon for market capacity evidence to support the stance in local plan.

### Lichfield

- 5.10 The Strategic Growth Study is used as a piece of evidence to inform the Local Plan review process. All potential options identified within Lichfield District within the Strategic Growth Study have been considered through the plan-making process. The Strategic Growth Study directly informed the identification of one of the key areas for growth within the draft Local Plan. Other options identified within the SGS have been discounted through the plan-making process, having had consideration of wider evidence base. The draft Local Plan proposes to provide 2,000 homes to the Black Country and 665 homes to the wider GBBCHMA. The existing adopted Local Plan provides 500 towards the previous Cannock Chase Local Plan shortfall (which does not now exist) and 500 homes towards the Tamworth Local Plan shortfall. Lichfield District Council signed a Statement of Common Ground with Tamworth Borough Council in 2018 agreeing to meet 912 homes of the Tamworth Local Plan shortfall.

### Redditch

- 5.11 Redditch Borough Council is at the start of the plan review process. The Strategic Growth Study will be one of many pieces of evidence that will be considered proportionately as plan making progresses. A July 2022 Memorandum of Understanding between Redditch and Bromsgrove Councils confirms that the surplus of housing currently allocated for the needs for Redditch Borough (currently approximately 2241 dwellings) is handed back to BDC for BDC to consider in its plan making

## Solihull

- 5.12 The local plan was submitted for examination in May 2021. Hearings took place from September 2021 to February 2022. Solihull Metropolitan Borough Council's (SMBC) approach was to make a contribution to the GBBCHMA based on the shortfall created by the 2017 Birmingham Development Plan as this represented a tested and established position, which is not yet the position for the Black Country Plan. Other LPAs made the case that SMBC should be doing more now. The Inspector's [interim] report is not yet published, but they have confirmed their conclusion *"that the Council has complied with the duty to Cooperate in the preparation of the Local Plan."*
- 5.13 As a piece of evidence, the Strategic Growth Study options were considered during the preparation of the plan and helped inform further evidence (e.g. testing a new settlement proposal through the Sustainability Appraisal for the plan). Whilst the SA did not support a new settlement in the Balsall Common area, the Local Plan has been able to treat the settlement as an appropriate location for what is effectively an urban extension. The plan includes growth at other options identified in the Strategic Growth Study e.g. land south of the airport/NEC and land south of Birmingham around Hollywood, Whitlock's End and Cheswick Green. This represents a balanced approach and reflects the tensions in the Strategic Growth Study which identified the Green Belt in these locations as making a 'principal contribution'.

## South Staffordshire

- 5.14 South Staffordshire first established its 4,000 dwelling contribution towards GBHMA unmet needs in its Local Plan Review 2018 Issues and Options consultation. This contribution was in addition to the district's own housing needs and represented the sum of the minimum indicative capacities of the following four strategic growth locations recommended in the GBHMA Strategic Growth Study 2018:
- Urban extension (1,500 dwellings minimum) north of Penkridge
  - Employment-led strategic development (1,500 dwellings minimum) in vicinity of i54/J2 of M54
  - Proportionate dispersal (500 dwellings minimum) north of Codsall/Bilbrook
  - Proportionate dispersal (500 dwellings minimum) on the western edge of the conurbation
- 5.15 The Council's position was that if all authorities in the GBBCHMA delivered the locations proposed by the Strategic Growth Study, the shortfall (including up to 2036) would be met, in line with paragraph 1.102 of the Study.
- 5.16 There was also a need to consider other locations in the district alongside the locations listed above, due to the district's own increasing housing needs. The Council then proposed a Spatial Strategy in 2019 which delivered both the 4,000 dwelling contribution and growth in the broad locations identified in the Strategic Growth Study. These were then translated into proposed site allocations in the 2021 Local



Plan Review Preferred Options consultation, whilst being refined to take account of local constraints.

- 5.17 South Staffordshire took this approach to ensure that its contribution towards the GBBCHMAs unmet housing needs was based upon the recommendations of the Strategic Growth Study, which it considers to be the only consistent assessment of Green Belt purposes, market capacity, deliverability and sustainability prepared by the GBBCHMA authorities to date. To date it has not received direct objections to the 4,000 dwelling contribution figure from GBBCHMA authorities, although some planning authorities have indicated they would not consider it appropriate to follow a similar methodology to determine their contribution to unmet needs.

#### Stratford-on-Avon

- 5.18 Stratford-on-Avon is continuing to progress its Site Allocations Plan which will identify reserve sites to contribute to the GBBCHMA shortfall to 2031. In addition, SDC is working with Warwick District on the South Warwickshire Local Plan (SWLP) running to 2050. The SWLP is being prepared with work on the strategic Part 1 already underway. Issues and Options consultation is due late summer 2022 with adoption of Part 1 expected by the end of 2025. The SWLP will have to address both Birmingham and Coventry City shortfalls. The Strategic Growth Study will form part of the evidence base to inform plan preparation, but no decisions have yet been made. Stratford-on-Avon are keen to agree a GBBCHMA-wide approach, such as commuting flows, to act as a benchmark for contributions.

#### Tamworth

- 5.19 The adopted Local Plan makes up 1,825 of GBBCHMA unmet need. 913 of this shortfall is met through the recently adopted North Warwickshire Local Plan. The adopted Lichfield Local Plan meets 500 of the shortfall and Lichfield District Council signed a Statement of Common Ground in 2018 agreeing to meet 912 homes of the shortfall. The Lichfield Local Plan review does not propose to make a specific contribution towards Tamworth. The Tamworth Local Plan review statement issued in 2020 stated that: *“given the existing development constraints within Tamworth’s border, it is unlikely that a significant contribution to the HMA shortfall could be made.”* The Tamworth Local Plan review is programmed to commence in 2022.

#### Shropshire

- 5.20 Shropshire submitted a local plan in September 2021 which makes a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. The examination is underway and questions have been asked regarding the rationale for Shropshire’s contribution to unmet needs. Shropshire’s approach is largely based on migratory trends. Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire has engaged with the Association of Black

Country Authorities constructively and have agreed a separate Statement of Common Ground to support its approach towards unmet needs.

#### Telford & Wrekin

- 5.21 The Council has considered the representations made to the local plan received from local authorities. It is acknowledged by all parties that Telford & Wrekin functions as a separate housing market area, based on an analysis of the relevant indicators presented in supporting evidence to the Local Plan. This is consistent with the decision of the Greater Birmingham and Solihull Local Enterprise Partnership (GB&S LEP) to exclude Telford & Wrekin from their assessment of housing needs within the GB&S LEP area. Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the GBBCHMA has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBCHMA. Discussions will therefore continue to progress on this basis.

#### Wyre Forest

- 5.22 The Wyre Forest District Local Plan 2016-2036 was adopted in April 2022. Policy SP1 Spatial Development Strategy 2016-2036 clearly states that due consideration will be given, through a future early review of the Wyre Forest District Council Local Plan where necessary and in accordance with the NPPF, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area.

## **6. Summary of Current Position**

### **Summary of key issues**

- There remains a shortfall of 6,302 homes between 2011 and 2031 based on April 2020 information. Contributions towards addressing the shortfall have thus far been by local authorities within the GBBCHMA. The shortfall may reduce further as a result of plans progressing through the review process.
- There is evidence of a shortfall post-2031 based on published evidence, specifically the Black Country Regulation 18 Plan, although authorities have different positions on whether this currently warrants contributions from other authorities. The shortfall identified is also subject to further testing and consultation.
- This post-2031 shortfall is likely to increase in the future, principally from Birmingham in the light of progress with the Birmingham Plan.
- It is the role of emerging plans to seek to best meet any defined unmet needs in a sustainable manner.

- The Strategic Growth Study recommended testing several strategic opportunities through Local Plan reviews, which it indicated could meet the shortfall if delivered. Some of these opportunities have been reviewed through Local Plan work to date; but these opportunities, plus those which are yet to be tested are unlikely to be sufficient to address the post-2031 shortfall, although work to formally examine this in light of new housing needs has not been commenced.
- Duty to Cooperate engagement and evidence commissioned since the Strategic Growth Study has identified other closely related Local Planning Authorities, that can accommodate unmet need in a sustainable manner where a functional relationship between areas is defined and agreed through Duty to Cooperate engagement.
- Engagement to date has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA officer group. Proposed governance arrangements are intended to supplement and support the Duty to Cooperate process across the GBBCHMA and beyond

### **Summary of key areas of agreement**

- Cross boundary unmet housing needs are acknowledged as a strategic matter.
- The GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs.
- The proposed Officer Working Group and Member Board offers a complementary process to other Duty to Cooperate engagement and is agreed as the preferred means to cooperating across the strategic geography as a whole in order to ensure housing delivery, and terms of reference will be established to support this.
- Joint working will be employed where circumstances warrant (e.g., BC LP etc).
- Agreement in principle to the plan making value of the existing evidence base, including the 2018 Strategic Growth Study, whilst acknowledging that this is not a policy document it is part of an evidence base to take matters forward through the local plan review process<sup>16</sup>.
- Parties to this Statement of Common Ground will commission funding of shared evidence bases, where practicable to do so, to inform cooperation on housing delivery, including any necessary updates to the 2018 Strategic Growth Study.

### **Summary of key areas where agreement is still being sought**

- There is, as yet, no agreed approach to accommodating the shortfall across the GBBCHMA or other closely related Local Planning Authorities with an agreed functional relationship, that can accommodate unmet need in a sustainable manner.
- Despite the findings of the Strategic Growth Study, there is no current agreed position on the scale of the shortfall to be planned for post-2031, with individual

---

<sup>16</sup> [https://www.birmingham.gov.uk/downloads/file/9405/february\\_2018\\_glhwood\\_position\\_statement](https://www.birmingham.gov.uk/downloads/file/9405/february_2018_glhwood_position_statement)

local authorities taking different positions on the Black Country's emerging post - 2031 housing shortfall for example.

- The relative weight given to the Strategic Growth Study varies, all local authorities utilising the Strategic Growth Study have tested and supplemented it with more local evidence, but the manner in which this has been done varies.

## **7. Future objectives and work streams to address key issues and areas where an agreement is still being sought**

### Objectives of the Development Needs Group

7.1 There is considerable variety in the progress and status of local plans across the GBBCHMA. Notwithstanding this complexity, the signatories to this statement will seek to deliver the following objectives:

- coordinate housing delivery to meet identified needs.
- maximise agreement on the approach towards strategic housing distribution.
- identify a transparent minimum level of housing need across the GBBCHMA that is consistent with national policy; and
- develop shared evidence bases where feasible and proportionate to inform the approach to meeting housing needs.

### Review the position to date and the deliverability of the 2018 Strategic Growth Study

7.2 The existing evidence base is in urgent need of review in light of the lack of a clear and up-to-date picture on unmet housing needs beyond 2031 and the differing positions of authorities on the recommendations made in the original 2018 Strategic Growth Study. Further work is required to develop and agree the scope and sequencing of this review, but key next steps should include:

- Confirming how current contributions to meet GBBCHMA wide needs will be apportioned between the current and emerging unmet needs of the Black Country and Birmingham. This work is essential in order to show how the anticipated, but not yet tested, Black Country housing shortfall in particular is being addressed to support the next stages of the Plan.
- To confirm the scale of the housing shortfall across the whole of the GBBCHMA over a period of at least 15 years, using the standard method as the starting point for addressing housing needs, to inform the approach taken by current emerging Local Plan reviews<sup>17</sup>. This should attempt to take a consistent approach to identifying capacity within the study area, particularly in areas generating housing shortfalls.
- A review of whether the growth locations identified in the 2018 Strategic Growth Study remain appropriate and whether further work is needed to identify new growth areas for testing through Local Plan preparation.

---

<sup>17</sup> Where plans have reached an advanced stage then this will be addressed via the review cycle.

- A market analysis which can advise at a strategic level on market absorption rates (including reference to previous build out rates), in particular for areas that may be identified as potential locations for strategic growth.
- Consider the extent to which the shortfall will be addressed within the GBBCHMA before seeking options beyond it.
- Consider the extent to which major job creating and infrastructure projects e.g. West Midland Interchange and UK Central / HS2 can be supported by labour supply from within the GBBCHMA
- A review of existing SHELAA evidence, including Green Belt assessments and viability/deliverability expectations across the GBBCHMA

7.3 This is not necessarily an exhaustive list and may need to be updated to consider findings from local plan examinations within and adjoining the GBBCHMA.

Prepare an updated set of strategic growth recommendations to address any residual housing shortfalls

7.4 Subject to the outcome of the work set out above there may be a need for additional work to identify additional strategic growth locations to meet any residual unmet needs. The exact scope of this work will depend on the findings of the review and the extent of any remaining shortfall, but could examine matters including:

- Potential options for strategic growth locations beyond and within the Green Belt.
- The comparative suitability and deliverability of strategic growth locations using a consistent methodology.
- Opportunities to align future growth locations with existing planned and potential future transport infrastructure improvements.
- Clear conclusions on the level of strategic growth locations required to meet residual housing shortfalls, leading into a range of different growth distributions (e.g., combinations of different strategic growth locations) across the study area which could address these needs.
- Potential transport carbon emission implications and sustainability impacts of different growth distributions to meet the area's unmet needs.
- The degree to which different growth distributions align with functional relationships between shortfall authorities and the surrounding area.

7.5 The detailed scope of this work will be prepared by the GBBCHMA officer group. It is intended that this work, once completed, would provide a range of potential future growth distributions to be considered by the GBBCHMA and any other functionally linked authorities under the proposed governance structures set out in this Statement of Common Ground.

Delivering ongoing engagement going forward

7.6 The GBBCHMA authorities will establish an advisory Member Board of local elected members to address housing solutions across the GBBCHMA and beyond. The

structure of the Board will be agreed through future iterations of this Statement of Common Ground.

- 7.7 Future Duty to Cooperate engagement through the Member Board on the scale and apportionment of housing shortfalls will be informed by the programme of work set out in 7.2-7.4 to review and (if necessary) update the Strategic Growth Study, although the final decision on how such matters will be addressed is a matter for individual local authorities' local plans. The principles which will inform the identification and distribution of housing shortfalls within the GBBCHMA will be further developed in future iterations of this Statement of Common Ground.
- 7.8 The final scope of the revised Strategic Growth Study work and future iterations of this Statement of Common Ground will be informed by best practice from similar statements of common ground covering other large housing market areas, whilst having regard to the differing political structures, combined authority roles and functional geographies across such areas.

## **8. Future governance arrangements for the GBBCHMA Development Needs Group**

- 8.1 At present cross boundary matters are dealt with through an officer group, the details and Terms of Reference are set out below:

### GBBCHMA Development Needs Group – Officer Working Group

#### *Terms of Reference*

- 8.2 The GBBCHMA Development Needs Group provides a framework for coordination between local authorities to ensure that unmet needs within the GBBCHMA can be satisfactorily addressed (where possible). These Terms of Reference set out how the Development Needs Group - Officer Working Group will work together and report to the Member Board of the GBBCHMA.
- 8.3 The objective of the GBBCHMA Development Needs Group – Officer Working Group (OWG) is to prepare evidence and monitoring information to inform recommendations made by the GBBCHMA Development Needs Group – Member Board.

#### *Status*

- 8.4 Each local planning authority is individually responsible for meeting its legal duties under the Duty to Cooperate, working together constructively, actively and on an ongoing basis to address strategic matters, such as cross-boundary housing shortfalls and strategic employment sites. Given the existing and emerging housing pressures facing the GBBCHMA, the local planning authorities listed in this Statement of Common Ground have formed an advisory partnership, overseen by the Member Board with the OWG co-ordinating evidence preparation to support this role. The Member Board and OWG have no additional powers but serve to provide a

mechanism for all local authorities involved in the GBBCHMA Development Needs Group, to work constructively together in a co-ordinated manner to address housing shortfalls and strategic employment sites, resolving (as far as possible) differences in position on this matter and make advisory recommendations.

#### *Composition*

8.5 The membership of the OWG will comprise representatives of all the local planning authorities involved in the GBBCHMA Development Needs Group, as defined through signatories to this statement of common ground (set out in Section 2 of this document).

- The OWG will comprise suitable officers of the GBBCHMA Development Needs Group local authorities.
- Officers or technical / professional representatives of stakeholder organisations, by invitation.

#### *Structure and Procedures*

8.6 The following structures and procedures will be observed:

- The OWG will meet, as a minimum, on a quarterly basis.
- Meetings of the OWG will be chaired by each member local authority in turn.
- Officer support and secretariat services will be provided by a nominated participant in the OWG.
- Agendas, reports, and minutes of meetings will be circulated to relevant facilitators in advance of any meetings.
- Officer support will be provided for each local authority as necessary.
- With the agreement of members of the OWG members, advisory members (such as the West Midlands Combined Authority or relevant County Councils) may be co-opted to represent a specific area of interest or issue of consideration, especially where this will assist with the delivery of sites and support the group in evidence gathering to address housing shortfalls.

#### *Remit*

8.7 The OWG will be responsible, with external support, where agreed with the Member Board, for undertaking the following:

- Advise the Member Board as necessary on issues relating to unmet housing needs and strategic employment sites from the GBBCHMA.
- Provide technical support to the Member Board, prepare reports for the Member Board's consideration, and carry out such actions as may be instructed by the Member Board.
- Co-ordinate quarterly updates on local plan progress and evidence base gathering relevant to the GBBCHMA housing shortfall and strategic employment sites for the Member Board.

- The OWG may agree to establish small project or working groups, resourced as necessary, to progress specific work areas where appropriate.

GBBCHMA Development Needs Group - Member Board

8.8 To steer and respond to the activities of the Development Needs Group (DNG) an appropriate Member Board is required. A suitable structure will be drawn up based on the following principles:

- The Member Board will be supported by the OWG and convene at regular intervals to consider relevant matters.
- The chair of the group will rotate annually with support and secretarial services provided from within the OWG.
- All local authorities that are signatories to the Statement of Common Ground will be represented.
- The Member Board will be advisory in nature and will not override local authority decision making or local plan preparation.

8.9 In terms of its remit the Member Board will:

- Work positively and constructively to address cross boundary strategic matters especially those relating to housing and employment to meet the legal Duty to Cooperate and National Planning Policy Framework requirements.
- Will oversee the development, implementation, and monitoring of joint work to quantify and address existing and emerging housing shortfalls arising from the GBBCHMA.
- Oversee and steer the commission of key studies to inform the evidence base for policy development.
- Will advise/steer the DNG on changing priorities based on changes to the legal and policy framework and commit to new actions where required.
- Will rely on input from the OWG to help inform their advisory decisions and will direct the DNG where additional/different actions are required.
- Receive and review quarterly reports from the OWG, summarising evidence base gathering and local plan progress relevant to the GBBCHMA housing shortfalls and strategic employment sites.
- Receive and consider regular reports from the DNG including the Statement of Common Ground and its regular updates.



## Appendix 1: Local Plan Commitments to review

This appendix sets out commitments in post NPPF local plans (or Site Allocations Documents) to review policies to consider the wider HMA shortfalls.

### Bromsgrove Local Plan 2011 – 2030, Adopted January 2017

#### Policy BDP4: Green Belt

BDP4.1 The Green Belt as indicated on the Policies Map will only be maintained as per BDP 4.2. BDP4.2 A Local Plan Review including a full Review of the Green Belt will be undertaken in accordance with BDP 3 in advance of 2023 to identify:

- a) Sufficient land in sustainable locations to deliver approximately 2,300 homes in the period up to 2030 to deliver the objectively assessed housing requirement for Bromsgrove District.
- b) Safeguarded land for the period 2030-40 to meet the development needs of Bromsgrove District and adjacent authorities based on the latest evidence; and
- c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period i.e. up to 2030.

The timing of the Green Belt Review will be determined by updated evidence such as the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory. The outcomes of the Green Belt Review will then be incorporated into the Local Plan Review. BDP4.3 The Green Belt boundary review will follow sustainable development principles and take into account up to date evidence and any proposals in Neighbourhood Plans. Where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development

### Lichfield Local Plan Strategy 2008 - 29, Adopted February 2015 and Local Plan Allocations 2008-2029, Adopted July 2019

#### Local Plan Strategy

4.6 Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirements for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. A similar situation applies, albeit on a lesser scale, in relation to Tamworth. Lichfield District Council will work collaboratively with Birmingham, Tamworth and other authorities and with the GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review or partial review of the Lichfield District Local Plan will be brought forward to address this

matter. Should the matter result in a small scale and more localised issue directly in relation to Tamworth then this will be dealt with through the Local Plan Allocations document.

### Local Plan Allocations

2.1 The Council is aware and is committed to reviewing its Plan in full to assist in addressing strategic issues which cross local authority boundaries. The Council continues to work proactively with partners to identify the appropriate amount of growth to be accommodated within the boundaries of Lichfield District. In addition, as part of this review the Council will continue work with other Neighbouring Authorities through the Duty to Cooperate (DTC), as well as undertaking a comprehensive review of its evidence base.

2.2 The Local Plan Review has already commenced with the publication of and consultation on a Scope, Issues and Options document in April 2018. Through a Local Plan Review, changes to the spatial strategy, policies and proposals within the current local plan may be required in response to emerging evidence or to reflect strategic issues being dealt with through the DTC. It is through this review process that consideration of such strategic matters, including the spatial strategy, are most appropriately considered.

2.3 Policy LPR Local Plan Review sets a review mechanism for the Lichfield District Local Plan.

### **Policy LPR: Local Plan Review**

Lichfield District Council shall carry out an early review of the Local Plan for Lichfield that will be submitted to the Secretary of State for Examination in accordance with the latest Local Development Scheme or no later than the end of December 2021. This review shall replace the adopted Local Plan Strategy (LPS) 2008-2029 in all aspects and therefore be a comprehensive review. This Plan will extend the existing plan period to at least 5 years beyond the end of the current LPS and it shall review as a minimum the following matters:

- The housing requirement for Lichfield and the potential for housing land supply to meet this need.
- Any unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), inclusive of any unmet housing need arising from Tamworth Borough and the appropriate level of contribution within the District of Lichfield in line with ongoing technical work and the requirements of policy TP48 of the adopted Birmingham Development Plan (BDP).
- Employment land requirements for Lichfield as identified through a comprehensive evidence basis.
- Lichfield's potential role in meeting any wider unmet employment needs through the Duty to Cooperate (DtC).
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing, employment and other service/infrastructure needs.
- Gypsy, Traveller and Travelling Showpeople (GTTS) provision.
- A comprehensive Green Belt Review either in partnership with relevant neighbouring authorities or in close consultation with these authorities through the

- DtC, to inform any further Green Belt release to accommodate new development within the District.
- An evidence-based assessment of highways infrastructure needs, in partnership with the highways authorities.

### **Explanation**

2.4 The Local Plan Strategy identified that following on from discussions falling under the DTC it had been identified through evidence emerging at that time that indicated Birmingham would not be able to accommodate its housing requirement within its administrative boundary and that a similar situation applied to Tamworth, although on a much reduced scale. The Local Plan Strategy recognised that, in the event of further housing provision would be needed within Lichfield District, such issues could be addressed through a review of the Lichfield District Local Plan.

2.5 It has been established through the examination and adoption of the Birmingham Development Plan that there is a significant unmet housing need arising from Birmingham and the wider Housing Market Area (HMA) within which it sits. Policy PG1 of the Birmingham Development Plan identifies an unmet need of approximately 37,900 dwellings in the period to 2021. It should be noted that further consideration of this need has been undertaken and it is considered to be a lower need than established within the Birmingham Development Plan. Lichfield District is part of the Greater Birmingham and Black Country HMA along with Birmingham, the Black Country authorities, South Staffordshire, Cannock Chase, Tamworth, North Warwickshire, Stratford-upon-Avon, Solihull, Bromsgrove and Redditch.

2.6 Additionally, Tamworth Borough Council's adopted Local Plan notes that it cannot meet its housing requirement within its own administrative area and requires a further 1,825 dwellings to be accommodated outside of the Borough. Tamworth is located within the Greater Birmingham and Black Country HMA and this additional shortfall of 1,825 dwellings is part of the overall shortfall within the HMA. It is considered most appropriate to consider how to address such shortfall as part of the wider HMA shortfall through the review of the Local Plan. Furthermore, since the above shortfall was identified, the early stages of the review of the Black Country Core Strategy indicate a further shortfall of approximately 22,000 dwellings.

2.7 To assist with discussion between the authorities within the HMA a significant evidence base has been produced by the authorities. This includes the Strategic Housing Needs Study (stage 2 and stage 3) and the Strategic Growth Study (2018). These studies provide a number of strategic recommendations and examine a number of strategic locations for housing growth which could assist in meeting unmet needs. Ultimately the study sets out a range of options which it concludes could be considered through the review of authorities' respective local plans. At this time no decisions upon the apportionment of such unmet need have been made. A recommendation of the Strategic Housing Needs Studies was that there needed to be a consistent evidence base across the HMA authorities in relation to the Green Belt. The Strategic Growth Study includes a high level strategic green belt review all of which assists in providing a consistent evidence base for the authorities to consider and

upon which future memorandums of understanding (MOU) and/or statements of common ground (SCG) apportioning unmet growth can be based.

2.8 Alongside the strategic Green Belt Review within the Strategic Growth Study, Lichfield District will prepare a comprehensive Green Belt Review to assess, in further detail, the capacity of the Green Belt across the authority as part of the evidence base supporting the review of the Local Plan.

2.9 Although unmet housing need remains the largest cross-boundary issue, there are other associated issues which may need consideration, including provision for Gypsy and Travellers and employment land provision.

2.10 The Council will continue work with other Neighbouring Authorities through the DTC, as well as undertaking a comprehensive review of its evidence base. The District Council is committed to working positively with its partners to address these strategic issues and where appropriate prepare MOU or SCG with respect of the issues above.

#### **Redditch Local Plan, 2011 – 30, Adopted January 2017**

1.11 In addition, Redditch has worked with other Local Authorities, which although are not directly adjacent to Redditch may have strategic matters that have implications for the preparation of BORLP4. In particular, Redditch Borough Council and Birmingham City Council have jointly acknowledged there is a strategic planning matter with regard to Birmingham being unable to accommodate all of its own housing needs. As required by the Duty to Cooperate, due consideration will be given, including through a review of the BORLP4, to the housing needs of another local planning authority in circumstances when it has been clearly established through collaborative working that those needs must be met through provision in Redditch. With regard to Birmingham City Council, the mechanism for resolving this potential strategic matter of Birmingham's unmet housing needs will be through the Greater Birmingham and Solihull Local Enterprise Partnership (LEP) and Redditch's subsequent review of the BORLP4.

#### **Tamworth Local Plan 2006 -31, adopted February 2016**

Agreements have been reached with Lichfield and North Warwickshire for the delivery of housing. In addition to this Tamworth Borough Council is actively involved with the Greater Birmingham and Solihull Local Economic Partnership. The GBSLEP Spatial Framework looks to present options for delivering strategic planning across the LEP, one of which is the delivery of housing. Tamworth recognises that there is a current under provision of housing to meet objectively assessed needs across the LEP and that part of this arises from within Tamworth, but to a much greater extent from Birmingham. It has been established that Tamworth cannot fully meet its own housing or employment needs, any future development which goes beyond the levels of development set out in this Local Plan will be to meet needs arising from Tamworth. Through the preparation of Birmingham City Council's Local Plan and Tamworth's it has been agreed between the two authorities that Tamworth is unable to assist in meeting Birmingham's unmet needs.

## South Staffordshire Site Allocations Document, adopted September 2018

### Local Plan Review

6.7 The Localism Act 2011, and specifically Section 110, introduced a legal requirement known as Duty to Cooperate (DtC). The DtC is important when issues arise that cross the boundaries of local authority areas. Dialogue between neighbouring local authorities should be constructive, active and on-going to ensure that it can be demonstrated that plans have been positively prepared, having regard to cross boundary issues of strategic importance. Further information on the Duty to Cooperate can be found in paragraphs 4.4-4.8.

6.8 Through a Local Plan review, changes to the spatial strategy in the adopted Core Strategy may be necessary in response to emerging evidence, or to reflect cross boundary issues of strategic importance under the DtC. Whilst the SAD is not considered to be the appropriate place at which to revise the strategic approach established in the adopted Core Strategy, it is considered necessary now, to provide a narrative on significant cross boundary issues that have arisen since the Core Strategy was adopted in December 2012. Greater Birmingham Housing Market Area (GBHMA).

6.9 There is a primary Housing Market Area (HMA) comprising Birmingham, the Black Country and nine neighbouring local authorities defined in a Strategic Housing Needs Study (SHNS); commissioned by the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Authorities. South Staffordshire is one of the nine local authorities within the HMA, together with Cannock Chase, Lichfield, Tamworth, North Warwickshire, Stratford-on-Avon, Solihull, Bromsgrove and Redditch.

6.10 The adopted Birmingham Development Plan (Policy PG1) identifies an unmet housing need of 37,900 dwellings up to 2031, for which provision is to be made elsewhere within the GBHMA. Furthermore, since this shortfall was identified, a further additional 22,000 dwelling unmet need has been identified through early stages of the review of the Black Country Core Strategy. For this reason, the distribution of the unmet housing need across the HMA is yet to be agreed. South Staffordshire Council is working positively towards a Memorandum of Understanding (MoU) or Statement of Common Ground (SoCG) with all local planning authorities within the GBHMA.

6.11 To assist discussions between the HMA authorities with regard to the apportionment of housing needs, a Strategic Growth Study is being prepared across all fourteen GBHMA authorities. This examines strategic locations for housing growth which could assist in meeting the identified HMA unmet needs across the GBHMA, having regard to high-level Green Belt Review, assessment of infrastructure capacity, sustainability criteria and deliverability assessments. The study re-examines the potential urban capacity of GBHMA authorities and options for strategic development past the Green Belt, and ultimately sets out options for strategic growth locations to be tested through the Local Plan Review. This provides a Site Allocations Document (SAD) September 2018 20 consistent evidence base upon which a future MoU/SoCG apportioning housing growth can be based.

6.12 In addition to this, South Staffordshire Council and the Black Country authorities have agreed to prepare a joint Green Belt Review to assess, in further detail, the capacity of the Green Belt across the five authorities. This may provide a basis for identifying future housing and employment sites, where exceptional circumstances demonstrate these are required. Given the changing nature of cross-boundary housing growth pressures, additional evidence may be required to review the District's housing capacity. For example, an update of the evidence base in respect of the Cannock Chase Special Area of Conservation (SAC), including mitigation measures and assessment of existing rural settlements' infrastructure capacity, and services and facilities. This evidence will inform the framework for a new spatial strategy which seeks to meet the District's own objectively assessed housing needs and, subject to discussion with other local authorities, could potentially meet a proportionate contribution towards unmet housing needs from the wider housing market area.

### **Stratford-on-Avon Core Strategy, adopted July 2016**

#### **Explanation**

##### **Policy CS.17 Accommodating Housing Need Arising from outside Stratford-on-Avon District**

The existence of unmet housing need arising outside Stratford-on-Avon District will not render this Plan out of date. However, the Plan will be reviewed if evidence demonstrates that significant housing needs arising outside the District should be met within the District and cannot be adequately addressed without a review. To establish this, the Council will work with other local authorities in the Coventry and Warwickshire Housing Market Area to:

1. prepare and maintain a joint evidence base including housing need and housing land availability;
2. take part in a process to agree the strategic approach to address any shortfall of land availability to deliver in full the Housing Market Area's Objectively Assessed Housing Need or other evidenced housing need arising outside the District; and
3. where the evidence and the duty to Cooperate process clearly indicates that there is a housing need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within Stratford-on-Avon District, the Council will seek to identify the most appropriate sites to meet this need and will review the Local Plan to do this, should it be required.

#### **Explanation**

5.3.1 The six local planning authorities within the Coventry and Warwickshire Housing Market Area (HMA) have agreed to cooperate together to ensure the HMA's housing need of at least 4,277 dwellings per annum is met in full. It is recognised that this is important in supporting the growth ambitions of Coventry and Warwickshire as well as ensuring local plans and core strategies within the sub-region comply with national policy and guidance.

5.3.2 However, it is recognised that there may be physical or policy constraints which make it difficult for one or more of the local planning authorities within the sub-region to meet their local objectively assessed housing need in full. In these circumstances it will be



necessary for the six authorities to work closely together to address this potential shortfall and to ensure the HMA's overall housing need is met in full.

5.3.3 The process for doing this has been set out and agreed by the Coventry and Warwickshire Shadow Joint Committee. The starting point of this process is a shared evidence base relating to strategic issues. It is recognised that the following assessments/studies are likely to be the key elements of this shared evidence base:

- a Joint Strategic Housing Market Assessment: it is important to ensure that the objectively assessed housing need of the HMA and each of the Councils within the HMA is understood and that the evidence to support this is kept up to date.
- a Joint Approach to Strategic Housing Land Availability Assessments: it is important that housing land availability is assessed consistently across the HMA so that the overall and local supply of potential housing sites is understood. Stratford-on-Avon District Council - July 2016 100 Stratford-on-Avon Core Strategy 2011-31 Section 5 Development Strategy – 5.3 Accommodating Housing Need from outside the District
- Joint Employment Land Assessment: it is important to ensure that employment land requirements and supply are understood, and planned for, alongside housing. A shared evidence base will help to understand the sub-regional and local employment land requirements as well as the availability of sub-regional and local sites to meet these requirements.
- a Green Belt Study: the West Midlands Green Belt covers significant parts of the Coventry and Warwickshire HMA. The Green Belt study needs to be up to date to inform a sub-regional approach.

5.3.4 In the event that there is a shortfall arising from one or more District within the HMA, and in the context of a shared evidence base, the six local planning authorities have agreed to work together to develop and maintain a strategy to meet the HMA's housing requirement. This process will seek to identify the most suitable available sites to meet any shortfall. Stratford-on-Avon District Council will participate actively in the process on an on-going basis.

5.3.5 Should this strategy identify that sites within Stratford-on-Avon District are required to meet some or all of a housing need arising from outside the District, the Council will undertake work to establish the most appropriate sites to do this and if this indicates that significant modifications are required to the Local Plan, the Council is committed to undertaking an early review of the Plan to address this.

5.3.6 A further issue that may need to be addressed through this process is the potential for a shortfall in housing land arising from outside the Coventry and Warwickshire HMA, in particular from the Greater Birmingham area. In the event that such a shortfall may need to be partially addressed within the Coventry and Warwickshire HMA, the six local planning authorities have agreed to work together using the process described above.

## **North Warwickshire Reviewed Plan 2011 -33, adopted September 2021 (rolled forward from 2029)**

The Localism Act 2011 introduced a requirement for the Borough Council to co-operate with other local authorities as well as organisations and agencies to ensure the effective discussion of issues of common concern to develop sound plans. This Duty is an ongoing process and does not stop with the production of a plan. The Borough Council has a proven track record in cooperating with neighbouring authorities in strategic planning matters and has been working with neighbouring authorities to consider their future development needs and if they can accommodate them. The Borough Council has reached an agreement on the amount of development that can be accommodated can be delivered with local authorities from the Coventry and Warwickshire area as well as the Greater Birmingham and Black Country area (including Tamworth). It is considered there is sufficient information to progress this Plan taking into account these needs and providing for them where possible within this Plan. In addition, the Borough Council continues to commit to working collaboratively with relevant authorities and bodies to refine the scale and distribution of housing and employment needs within the housing market areas and functional economic market areas in which the Borough falls, the levels that it is appropriate for the Borough to seek to accommodate, and to working collaboratively with infrastructure providers to ensure that any impacts of growth are suitably mitigated. In the event that evidence, monitoring indicators (set out below) or events identify that a significant change in provision is needed compared to that set out in the Local Plan (or the evidence upon which it is based) an early partial/ full review, depending on the issue, will be brought forward to address this. In any event the Council is required by statute to complete a review of the plan every five years, starting from the date of adoption

## **Solihull Local Plan – Adopted December 2013**

8.4.5 Following discussions falling under the Duty to Cooperate Solihull Council recognise that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. Solihull Council will work collaboratively with Birmingham and other relevant neighbouring local authorities and with the GBS LEP to establish objectively the level of long term growth through jointly commissioning a Strategic Housing Needs Study and work to establish the scale and distribution of any emerging housing shortfall. This may require a review of the Green Belt in relevant locations.

8.4.6 It is anticipated that a Strategic Housing Needs Study will be commissioned and prepared during 2013 as evidence to inform the development of a GBS LEP strategy (Strategic Spatial Framework). This would provide a high-level context for reviewing the Solihull Strategic Housing Market Assessment (SHMA) during 2014. In the event that the work identifies that further provision is needed in Solihull, a review of the Solihull Local Plan will be brought forward to address this.



### **Telford and Wrekin Local Plan, adopted January 2018**

1.3.2.2 Telford & Wrekin Council has arrived at this version of the Local Plan following extensive discussion on cross-boundary planning issues including with other councils across the West Midlands. A full account of the Council's approach to the Duty to Cooperate is set out in a 'Duty to Cooperate' Statement. Matters were raised at Regulation 18 stage by a number of local authorities in an adjacent, but separate, housing market area (Greater Birmingham and the Black Country authorities, and South Staffordshire). This specifically relates to issues of housing delivery within the West Midlands conurbation, as well as matters relating to waste management.

1.3.2.3 The Council has considered the representations made to the local plan received from these local authorities. It is acknowledged by all parties that Telford & Wrekin functions as a separate housing market area, based on an analysis of the relevant indicators presented in supporting evidence to the Local Plan. This is consistent with the decision of the Greater Birmingham and Solihull Local Enterprise Partnership (GB&S LEP) to exclude Telford & Wrekin from their assessment of housing needs within the GB&S LEP area. Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBC HMA. Discussions will therefore continue to progress on this basis.

## Appendix 2: Strategic Growth Study 2018 Areas of Search

### Recommended strategic development areas

<b>Development type / General Location /</b>	<b>Local Authority</b>	<b>Potential capacity</b>
<b>New Settlements</b>		
South of Birmingham	Stratford-on-Avon	10,000 – 15,000
between Birmingham and Bromsgrove / Redditch	Bromsgrove	10,000 – 15,000
Around Shenstone	Lichfield	10,000 – 15,000
Around Balsall Common	Solihull	10,000 – 15,000
<b>Urban Extensions</b>		
South of Dudley	Dudley	1,500 – 7,500
North of Tamworth	Lichfield	1,500 – 7,500
East of Lichfield	Lichfield	1,500 – 7,500
North of Penkridge	South Staffordshire	1,500 – 7,500
<b>Employment Led</b>		
North of Wolverhampton (I54)	South Staffordshire	1,500 – 7,500
East of Birmingham	North Warwickshire	1,500 – 7,500
South of Birmingham Airport/ NEC	Solihull	1,500 – 7,500

### Long list of alternative strategic development areas

<b>Development type / General Location /</b>	<b>Local Authority</b>	<b>Potential capacity</b>
<b>New Settlements</b>		
Between Wolverhampton and Penkridge	South Staffordshire	10,000 – 15,000
Around Dunston	South Staffordshire	10,000 – 15,000
Around New Arley	North Warwickshire	10,000 – 15,000
Around Fradley and Alrewas	Lichfield	10,000 – 15,000
South West of Stratford-on-Avon District	Stratford-on-Avon	10,000 – 15,000
Around Wellsbourne	Stratford-on-Avon	10,000 – 15,000
<b>Urban Extensions</b>		
South of Penkridge	South Staffordshire	1,500 – 7,500
North west of Tamworth	Lichfield	1,500 – 7,500
East of Polesworth	North Warwickshire	1,500 – 7,500
South of Stratford-on-Avon town	Stratford-on-Avon	1,500 – 7,500
South East of Redditch	Stratford-on-Avon	1,500 – 7,500
North of Walsall around Brownhills	Walsall, Lichfield, Cannock	1,500 – 7,500

Recommended areas of proportionate dispersal

<b>Proportionate Distribution area</b>	<b>Local Authority</b>	<b>Potential capacity</b>
Western edge of the conurbation between Stourbridge and Wolverhampton	Dudley/ South Staffordshire / Wolverhampton	500 – 2,500
To the north of Codsall/Bilbrook	South Staffordshire	500 – 2,500
The vicinity of Cannock, Great Wyrley, Burntwood, Brownhills and Aldridge	Walsall / Cannock / South Staffordshire	500 – 2,500
To the west / southwest of Tamworth	Lichfield/Tamworth	500 – 2,500
To the south of Birmingham around Hollywood, Whitlock's End and Cheswick Green	Solihull / Bromsgrove	500 – 2,500
To the south and southeast of Redditch	Redditch?	500 – 2,500

**Signatories (Senior Officer and Councillor)**

**Birmingham City Council**

Name:

Position:

Name:

Position:

**Bromsgrove District Council**

Name:

Position:

Name:

Position:

**Cannock Chase District Council**

Name:

Position:

Name:

Position:

**Dudley Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**Lichfield District Council**

Name:

Position:

Name:

Position:

**North Warwickshire Borough Council**

Name:

Position:

Name:

Position:

**Redditch Borough Council**

Name:

Position:

Name:

Position:

**Sandwell Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**Solihull Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**South Staffordshire District Council**

Name:

Position:

Name:

Position:

**Stratford-on-Avon District Council**

Name:

Position:

Name:

Position:

**Tamworth Borough Council**

Name:

Position:

Name:

Position:

**Walsall Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**City of Wolverhampton Council**

Name:

Position:

Name:

Position:

**Shropshire Council**

Name:

Position:

Name:

Position:

**Telford and Wrekin Council**

Name:

Position:

Name:

Position:

**Wyre Forest District Council**

Name:

Position:

Name:

Position:



## **Appendix C - South Staffordshire FEMA Draft Statement of Common Ground**

The draft Statement of Common Ground contained in this appendix has been prepared with officers of the South Staffordshire FEMA authorities and Sandwell Metropolitan Borough Council through Duty to Cooperate meetings and correspondence. South Staffordshire has led on this Statement of Common Ground following the suspension of work on the Black Country Plan in late 2022, meaning the Black Country authorities were no longer likely to progress a single Statement of Common Ground across their FEMA. At this stage the statement is in draft and is being put through the formal agreement procedures of individual local authorities.

# **South Staffordshire Functional Economic Market Area**

## **Statement of Common Ground**

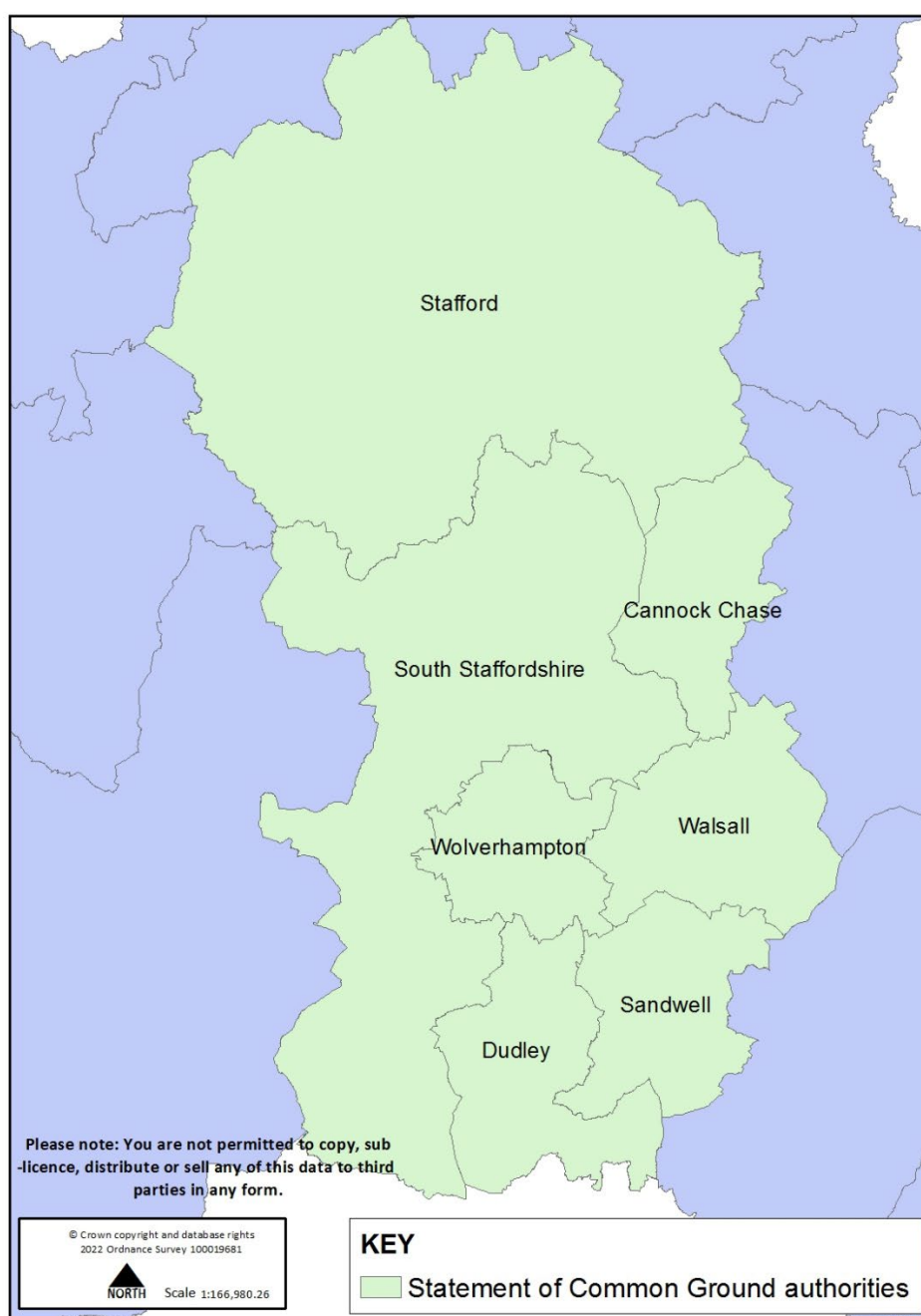
**November 2022**

DRAFT

## 1. Purpose and list of Parties involved in this Statement of Common Ground

- 1.1 This statement of common ground has been prepared to facilitate and record cross-boundary engagement between local authorities in addressing the employment needs arising within the South Staffordshire Functional Economic Market Area (FEMA). It records co-operation and progress to date in addressing this strategic issue, demonstrating that the participating authorities have engaged constructively, actively and on an ongoing basis under the Duty to Cooperate.
- 1.2 The parties to this statement of common ground comprise of the local planning authorities set out below, as shown on the following map.

**Figure 1: Employment Statement of Common Ground authorities**



#### Local planning authorities within the South Staffordshire FEMA

- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- South Staffordshire District Council
- Stafford Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council

#### Other related local planning authorities outside of the South Staffordshire FEMA

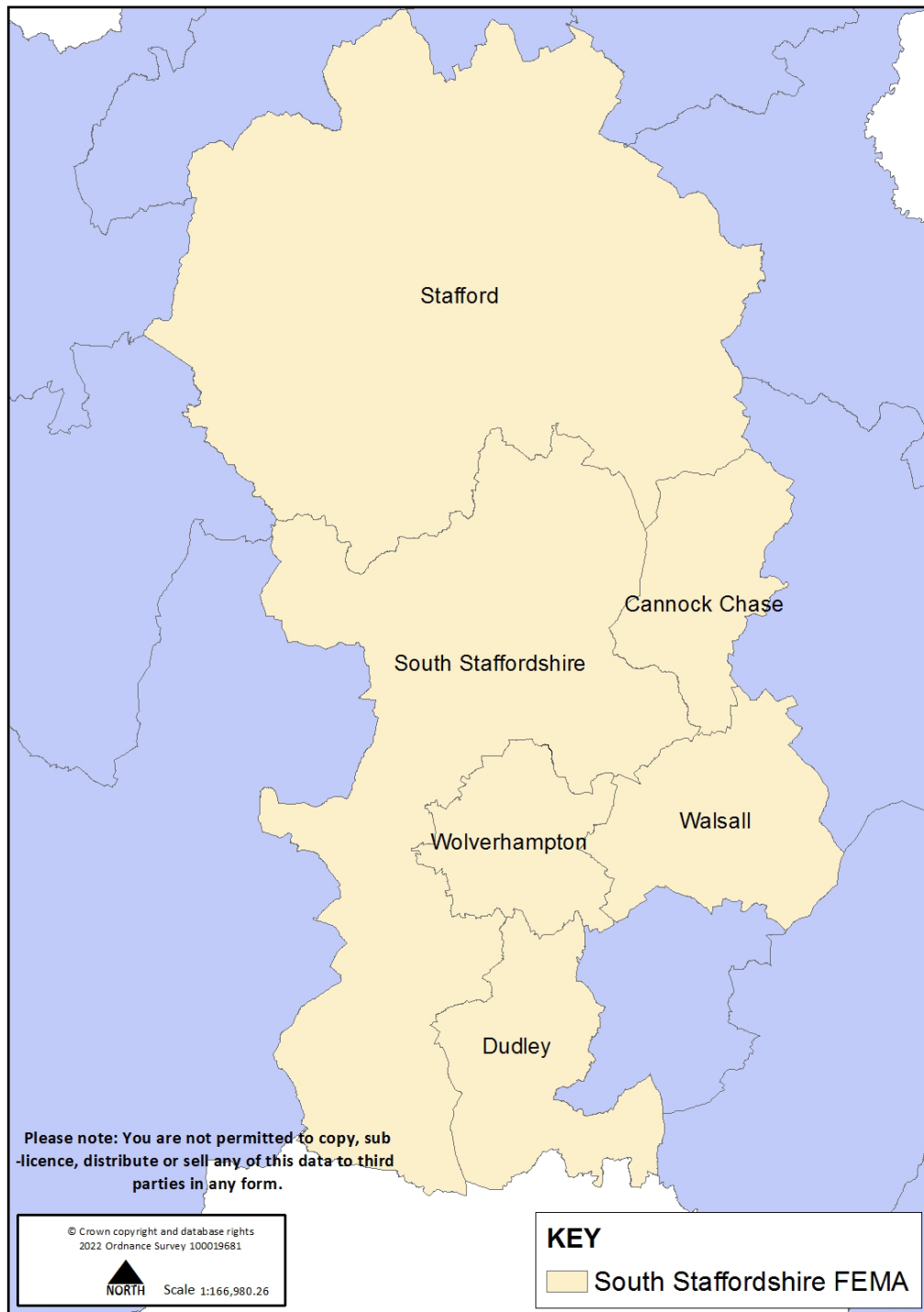
- Sandwell Metropolitan Borough Council

DRAFT

## 2. Strategic Geography

- 2.1 South Staffordshire's most up to date FEMA is set out in its Economic Development Needs Assessment (EDNA) 2020 – 2040 and comprises 6 local authorities: Cannock Chase District Council, Dudley Metropolitan Borough Council, South Staffordshire District Council, Stafford Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council. The South Staffordshire FEMA geography is shown below.

**Figure 1: South Staffordshire FEMA authorities**



- 2.2 In addition to these local authorities, Sandwell Metropolitan Borough Council has also been included within this statement of common ground, despite being outside of the functional geography set out in the South Staffordshire EDNA 2020 – 2040. Sandwell has been included within this statement to recognise the emerging shortfall identified across the four Black Country authorities through work on the Black Country Plan<sup>1</sup>. While work on the Black Country Plan ceased in October 2022, the published evidence to support the Black Country Plan will inform the approach and assessments taken by the four Councils in producing their own individual Local Plans.
- 2.3 The Black Country Plan Regulation 18 draft, published in 2021 indicates that the Black Country as a whole (including Sandwell) was required to export 210ha of employment land through the Duty to Cooperate in order to address its employment needs. This shortfall is based on the balance of employment land need and supply across the individual Black Country local authorities.
- 2.4 Both the Black Country Economic Development Needs Assessment 2017 and Economic Development Needs Assessment Update August 2021 concluded that the four Black Country authorities (Wolverhampton, Walsall, Dudley and Sandwell) form a single functional economic market area (FEMA), albeit with complex and varying functional interactions between the four Council areas within it. The work also confirms that the FEMA authorities have functional links to South Staffordshire, Birmingham, Wyre Forest, Bromsgrove, Solihull, Tamworth, Lichfield and Cannock Chase. Given this extensive geography, the relationship between the individual Black Country FEMA authorities and the authorities within this wider area also varies.
- 2.5 The 2021 update also identified functional links to Shropshire from the Black Country FEMA authorities. Therefore, aside from Stafford, there is strong overlap between the South Staffordshire FEMA and the authorities functionally related to the Black Country FEMA, with South Staffordshire and Cannock sitting in both groups.
- 2.6 Given the above context, Sandwell has been included in this statement of common ground, to ensure that the Black Country's employment land shortfall is addressed in a coherent manner and to recognise the functional links that Cannock and South Staffordshire have to the Black Country FEMA.
- 2.7 As indicated above in relation to the Black Country, parties to this SoCG also have evidence of FEMAs that differ from South Staffordshire's FEMA. The Cannock Chase Economic Development Needs Assessment 2019 identifies the FEMA for Cannock Chase as Cannock Chase District, Stafford, Lichfield Walsall and South Staffordshire District. The Stafford Borough Economic Development Needs Assessment 2020 identifies the FEMA predominantly aligns with the Borough's administrative boundary.

---

<sup>1</sup> <https://blackcountryplan.dudley.gov.uk/t2/p5/>

### 3. Strategic Matter - Meeting Employment Needs

- 3.1 All adopted or emerging development plans for authorities involved in this statement of common ground are set below, including whether a shortfall is currently being declared from any of these areas.

Local authority	Plan progress	Most recent published evidence on surplus/shortfall
South Staffordshire District Council	<a href="#">Regulation 18 Preferred Options</a> consultation completed (2021)	The EDNA 2020 – 2040 indicates that South Staffordshire can meet its own locally generated needs, whilst providing a surplus of 36.6ha to the unmet needs of other local authorities. It also indicates that only 18.8ha of the very large strategic employment site at West Midlands Interchange is attributable to South Staffordshire's needs, supporting the idea that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.
Cannock Chase District Council	Regulation 19 Pre-submission consultation proposed November 2022  <a href="#">Regulation 18 Preferred Options</a> consultation completed (2021)	The Pre-submission consultation is proposed for November 2022. The consultation proposes 66 hectares of land for employment uses during the plan period, to be provided within the District and its apportionment of 10 hectares provided at the West Midlands Interchange. The Plan includes policies and allocations which require the removal of land from the Green Belt. No surplus employment land is identified by the Plan that is to be exported through the Duty to Cooperate arising from Cannock Chase District.  Policy SO4.2 of the Preferred Options consultation indicates no employment shortfall or surplus arising from Cannock, stating that the district will provide for up to 50 ha of land for employment uses during the plan period.
Stafford Borough Council	Regulation 18 Preferred Options consultation – in progress (October to December 2022)	The preferred options consultation is currently seeking views on the development strategy, draft policies and proposed sites, including at least 80 hectares of new employment land and two new proposed allocations north of Stafford and at Ladfordfields Recognised Industrial Estate. No surplus or shortfall to be

	<a href="#">Regulation 18 Issues and Options</a> consultation complete (2020)	<p>exported through the Duty to Cooperate is identified by this consultation.</p> <p>Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the borough through the 2021 Stantec Report<sup>2</sup></p> <p>The issues and options consultation sought views on a range of levels of employment growth and land supply options to meet this growth, identifying a need to allocate employment land to accommodate this need. No surplus or shortfall to be exported through the Duty to Cooperate was identified through this consultation.</p>
Black Country authorities (Wolverhampton, Dudley, Sandwell, Walsall)	<a href="#">Regulation 18 Preferred Options</a> consultation complete (2021). October 2022 confirmation that work on the Black Country Plan has ceased and the Council's will be preparing individual Local Plans. The timescale to be confirmed late 2022 / early 2023.	<p>Identifies a shortfall of 210ha of employment land over the plan period.</p> <p>Supporting work commissioned to examine the apportionment of West Midlands Interchange (WMI) suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. This is broken up on the following basis:</p> <ul style="list-style-type: none"> <li>• Dudley – 14ha</li> <li>• Sandwell – 18ha</li> <li>• Walsall – 19ha</li> <li>• Wolverhampton – 16ha</li> </ul>

#### Work to date on the Black Country employment land shortfall

- 3.2 The Black Country Plan began its preparation process in summer 2017, when an Issues and Options was published to commence the plan review. This initial document, based upon the 2017 Black Country EDNA, identified a Black Country-wide gap between employment land needs and supply of up to 300ha. Since then the employment land shortfall being stated by the Black Country has altered in its exact amount, but has remained significant throughout the preparation of the Black Country Plan. The Association of Black Country Authorities sent further correspondence to neighbouring and housing market area local authorities in August 2020 (Appendix 1), outlining a

<sup>2</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)



shortfall of at least 292ha of employment land from the Black Country, which might be altered slightly by the findings of the emerging Black Country Employment Area Review which was then under preparation.

- 3.3 Following completion of this evidence, the most recent published evidence from the 2021 Draft Black Country Plan consultation indicated that the shortfall had fallen since 2017 but remained significant, amounting to 210ha of land which needs to be exported through the Duty to Cooperate process. The Draft Plan suggested this would be informed by an update to the Black Country's EDNA and would be distributed to authorities that have a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway.
- 3.4 Following this in April 2022 the Association of Black Country Authorities wrote to neighbouring and housing market area authorities (Appendix 2). This letter requested clarification that all opportunities to accommodate unmet employment needs had been explored in local plan work and queried whether authorities would be willing to participate in an update to the 2021 West Midlands Strategic Employment Sites work. It also indicated that the Black Country's employment shortfall had fallen to around 108ha, taking account of West Midlands Interchange's contribution to the Black Country and the proposed contribution from Shropshire Regulation 19 Local Plan. The correspondence requested that local planning authorities enter into a Statement of Common Ground with Black Country to regularise their positions on its employment shortfall. However, this is yet to be progressed.
- 3.5 In October 2022, the Black Country Councils confirmed that work on the Black Country Plan had ceased, and that the four Council's would be preparing individual Local Plans. The Local Development Schemes confirming the programmes for these Local Plans are likely to come effect in late 2022 / early 2023. The Plans will be informed by an update of the 2021 EDNA which was commissioned on the basis of it supporting the Regulation 19 Black Country Plan. This update will confirm the employment land demand scenario and associated shortfall arising in each of the local authority areas and the associated sum across the FEMA as a whole.

#### Contributions to date from the South Staffordshire FEMA to the Black Country's shortfall

- 3.6 Following the Black Country shortfall being identified, the Black Country authorities corresponded with other neighbouring local authorities under the Duty to Cooperate to establish opportunities to address this gap between need and supply. This included work to understand the role of the West Midlands Interchange (WMI) strategic employment site in contributing to employment supply in the Black Country and the site's wider travel to work area. This work supported the conclusions of the examining authority which granted the development consent order for the scheme, indicating that WMI will have no significant labour impact in the wider market area<sup>3</sup>. It also

---

<sup>3</sup> Employment Issues Response Paper – Labour Supply' (prepared on behalf of South Staffordshire Council and the Black Country Authorities) (Stantec, May 2020)

provided evidence of the contribution WMI would make to the employment land supply of authorities throughout the wider market area<sup>4</sup>, suggesting that WMI would contribute 67ha to the four Black Country authorities' employment land shortfall<sup>5</sup>. More recent Duty to Cooperate correspondence from South Staffordshire to the Black Country authorities confirms that this contribution from WMI towards the shortfall remains robust (Appendix 3).

- 3.7 South Staffordshire has also historically had an oversupply of employment land which has contributed towards the unmet needs of the wider region. This has been reflected in historic local plans, such as the district's Site Allocations Document 2018, which allocated modest extensions to the district's strategic employment sites to address regional unmet needs from beyond the district. South Staffordshire's current emerging Local Plan Review has similarly identified a surplus of employment land supply against South Staffordshire's own needs. The district has formally indicated to the Black Country through Duty to Cooperate correspondence that this 36.6ha oversupply could contribute to the unmet employment land needs identified in the Regulation 18 Draft Black Country Plan.
- 3.8 To date neither Cannock Chase District Council nor Stafford Borough Council have proposed surplus employment land contributions towards the Black Country's employment land shortfalls. The reasoning and context for these positions is set out in Section 4 below.

#### Contributions to date from areas outside of the South Staffordshire FEMA

- 3.9 The Black Country EDNA 2017 and 2021 concluded that the four Black Country local authorities are their own FEMA. It also indicates that there are eight local authority areas outside of the Black Country's FEMA which also have strong or moderate functional economic links with the Black Country. These authorities include six local authorities that are not currently within the South Staffordshire FEMA<sup>6</sup>. The Black Country EDNA 2021 also identifies Shropshire Council as having strong labour market linkages with the Black Country. Despite this context, to date only Shropshire Council has proposed a contribution to the Black Country's employment land shortfall, proposing a 30ha contribution in their emerging Local Plan. Currently there are no other contributions proposed from other local authorities related to the Black Country but outside the South Staffordshire FEMA, although this is a matter of ongoing Duty to Cooperate discussions between the Black Country authorities and those areas.

#### **4. Position of signatory authorities on the emerging Black Country shortfall as it relates to the South Staffordshire FEMA**

- 4.1 The purpose of this section is to set out the position of individual local authorities as to how they intend to address the emerging shortfalls within the South Staffordshire

---

<sup>4</sup> Including the Black Country, Birmingham and wider Staffordshire market areas

<sup>5</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

<sup>6</sup> Bromsgrove DC, Lichfield DC, Solihull MBC, Tamworth BC and Wyre Forest DC

FEMA through their local plan reviews, including the work undertaken by each local authority to date. The wording provided for each authority represents the views of the authority concerned.

#### South Staffordshire District Council's position

- 4.2 South Staffordshire has been clear in Duty to Cooperate correspondence since 2018 that it will contribute surplus employment supply above its own needs to reduce the unmet needs of the Black Country authorities. The South Staffordshire ENDA 2018 identified a 19-38ha employment land oversupply against past completions and GVA growth predicted over the plan period. It indicated that this could contribute to part of the Black Country's employment shortfall (whilst acknowledging that Sandwell was not in South Staffordshire's FEMA) and that any oversupply to the Black Country should be secured through a Statement of Common Ground. Since this work was completed at the start of the district's plan review, South Staffordshire has revisited its EDNA in 2022, which identified a 36.6ha surplus of strategic employment land to meet cross boundary unmet needs.
- 4.3 In addition to this, South Staffordshire have also made clear that the West Midlands Interchange (WMI) Development Consent Order could contribute further to reduce the Black Country's shortfall. This was granted by the Planning Inspectorate in 2020, which creates around 200ha of B8 employment land within South Staffordshire's Green Belt. South Staffordshire has worked with the Black Country to identify the proportion of this land take that could be attributed to the Black Country's shortfall, firstly through the 2021 Stantec Report<sup>7</sup> and then through the district's 2020-2040 EDNA<sup>8</sup>. This work identified a **minimum** 67ha B8 contribution to the Black Country's unmet needs solely from WMI, which the Stantec Report indicates could increase if other local authorities within the WMI travel to work area do not require their 'share' of the site's considerable land supply. South Staffordshire understands that the Black Country is working with other local authorities within the WMI travel to work area to understand if more land from WMI could be counted towards the Black Country's shortfalls, hence why this figure is an absolute minimum at this stage.
- 4.4 As communicated in the district's June 2022 Duty to Co-operate letter to the Black Country Authorities, the Council considers that there is a minimum of 103.6ha of surplus employment land within South Staffordshire which could contribute to addressing the Black Country's 210ha employment land shortfall. As set out in previous Duty to Cooperate correspondence the District Council does not consider there is further suitable employment land to reduce this shortfall further within its administrative area, which reflects the findings of our Employment Site Assessment Topic Paper 2021.
- 4.5 The District Council is also already releasing 232ha of Green Belt land to deliver the West Midlands Interchange site and therefore contribute 67ha to the Black Country's

---

<sup>7</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

<sup>8</sup> South Staffordshire Economic Development Needs Assessment 2020-2040

unmet needs, despite the district being identified only as an area of strong economic links with the Black Country, outside of the Black Country's FEMA<sup>9</sup>. Given this context South Staffordshire now expects that the Black Country authorities, either collectively or individually, must continue to approach the other seven local authority areas identified as having strong or moderate economic links with the Black Country in the 2017 and 2021 Black Country EDNAs. It must do this to identify how these authorities can now increase their land supply contribution (including consideration of Green Belt options if necessary) to address the Black Country's employment shortfall. South Staffordshire District Council would be happy to participate in any Statement of Common Ground prepared by the Black Country authorities over this wider geography to address its shortfall more comprehensively.

#### Cannock Chase District Council's position

- 4.6 Evidence to support the Cannock Chase Local Plan review identifies that the Cannock Chase FEMA includes areas of South Staffordshire, Walsall, Lichfield and Stafford.
- 4.7 Cannock Chase District Council wrote to the local authorities identified as being in its FEMA in December 2021 advising that it could not meet its employment land needs without removing sites from the Green Belt. The correspondence asked if the authority was able to assist in meeting some of Cannock Chase's employment land needs using land which is not in the Green Belt? The correspondence also asked in principle if the authority had any concerns regarding Cannock Chase District removing land from the Green Belt within its own administrative area to meet its local need for employment land.
- 4.8 South Staffordshire response in December 2021 advised potentially there may be capacity / sites in an emerging development plan which were not in the Green Belt and sought further discussions. South Staffordshire also sought further discussions regarding Cannock Chase removing land from the Green Belt within its own administrative area to meet the local need for employment land. They advised that they were updating their evidence and subject to its findings, there may be scope for some surplus employment land arising due to the West Midlands Interchange contributing towards the Cannock's supply.
- 4.9 The West Midlands Interchange lies within South Staffordshire district and the approach taken by South Staffordshire to the apportionment of land from this and their surplus employment land is set out within this statement.
- 4.10 The Black Country Authorities provided a joint response to the letter in December 2021 and advised they also had a shortfall in land supply to meet their own needs.
- 4.11 The Association of Black Country Authorities advised in December 2021 that the 2021 West Midlands SRFI Employment Issues Response Paper commissioned by the Black Country Authorities (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>) suggests

---

<sup>9</sup> Page 49 of the Black Country Economic Development Needs Assessment May 2017 Stage 1 Report

that some 10ha of B8 land provided at the consented West Midlands Interchange could be apportioned to Cannock Chase. This would suggest that if the Local Plan is meeting its B8 needs in full, and the potential supply at WMI has not been accounted for in the land supply calculation, then there may be a surplus of land which could be available to contribute towards meeting needs arising in the Black Country in the context of the acknowledged shortfall. And advised they had no concerns regarding the approach to remove land from the Green Belt within Cannock Chase's administrative area and no further discussions on this matter were considered necessary at this time.

- 4.12 Stafford Borough responded and advised that they had no land within their administrative boundary to assist in meeting some of the employment land need which was not in the Green Belt and that they had no concerns in principle regarding the removal of land from the Green Belt within Cannock Chase's administrative area and considered no further discussions were necessary at the time subject to the sites being identified.
- 4.13 Cannock Chase District Council has stated in its 2022 Regulation 19 Pre-submission consultation that it will provide for up to 66ha of land for employment uses during the plan period. This is based on a robust assessment of the suitability, availability and achievability of employment site options within the district. The provision of 66ha figure is an upper limit on the supply of employment land and incorporates the 10ha of employment land apportioned at the West Midlands Interchange which could form part of Cannock Chase's employment land supply and further release of land within the Green belt within the District. Cannock Chase District Council does not currently consider that it has surplus in employment land provision available at this time to assist with the Black Country FEMA's employment land shortfalls which can be exported through the Duty to Cooperate. The Regulation 19 Pre-submission consultation had not commenced at the time of this Statement of Common Ground.
- 4.14 Cannock Chase District Council has committed to the funding of the update to the West Midlands Strategic Employment Sites Study and respond to findings of this study in future local plan reviews.

#### Stafford Borough Council's position

- 4.15 Stafford Borough Council's latest 2022 Regulation 18 Preferred Option consultation sets out the borough's current position on employment land provision. This indicates there is no surplus in employment land provision to be exported through the Duty to Cooperate to the Black Country. Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the borough in the work to apportion land from that site<sup>10</sup>.

---

<sup>10</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

The Black Country authorities' (Wolverhampton, Walsall, Dudley and Sandwell) position

- 4.16 The four Black Country authorities have established through successive studies and local plan consultations that there is a significant employment land shortfall arising from its administrative area. The demand requirement is based on a combination of past-trends and forecast growth in GVA with further adjustments to take account of forecasts 'losses'. The more recent 2021 Draft Black Country Plan consultation also indicated that, even when potentially suitable Green Belt sites in the four authorities were released, there would still be a 210ha shortfall of employment land arising from the Black Country FEMA. The position of the individual areas is set out in the table below:

DRAFT

#### Black Country – employment land need and supply

BCLA	Past comp. emp land need (ha)	GVA based emp land need (ha)	Emp land supply	Balance against past completions scenario	Balance against GVA based scenario
Dudley	61	137	22	-39	-115
Sandwell	215	84	29	-186	-55
Walsall	138	193	164	26	-29
Wolverhampton	153	108	70	-83	-38
<b>Total</b>	<b>567</b>	<b>522</b>	<b>283</b>	<b>-284</b>	<b>-239</b>

- 4.17 Work is ongoing to update the exact extent of the shortfall across the FEMA as a whole and those of the constituent local authority areas through and update to the Black Country EDNA. But it is still imperative that local authorities with functional ties to the Black Country authorities examine whether they can reduce the Black Country FEMA shortfall through Local Plan Reviews.
- 4.18 The Black Country Councils are currently engaging with authorities they consider to have functional economic relationships with in order to identify potential contributions to address the relatively significant employment land shortfall across the individual authority areas and the FEMA as a whole. To date this has led to a minimum contribution of 103.6ha of employment land from South Staffordshire which could contribute to the needs of the Black Country FEMA. Duty to Cooperate work between the Black Country authorities and other authorities in the WMI travel to work area may increase this amount further, through identifying a greater share of West Midlands Interchange which is attributable to the Black Country FEMA. Given the sizeable nature of this contribution and the number of other local authorities with functional economic relationships with the Black Country, this is considered an appropriate contribution to the Black Country's employment land needs, although the Black Country authorities would expect South Staffordshire to participate in future updates to the West Midlands Strategic Employment Sites Study and respond to the findings of this study in future local plan reviews. The Black Country FEMA authorities have also agreed the appropriateness of Shropshire's proposed 30ha contribution towards its unmet needs subject to the inclusion of an early review mechanism should a shortfall remain in the light of the current round of Local Plans reviews and this position has been recorded in a separate Statement of Common Ground with Shropshire.
- 4.19 The Black Country authorities have made representations to the Cannock Chase and Stafford Borough emerging Local Plans to request that those Plans consider making a contribution towards addressing the Black Country employment land shortfall. The Black Country authorities will consider the evidence prepared to inform those Local Plans to inform a review of this position.

## 5. Summary of Current Position

5.1 Based on the above, the current extent of employment land shortfalls within South Staffordshire's FEMA, and the extent to which they can be addressed, can be summarised as per the table below:

Local authority	Oversupply or undersupply vs local needs	Evidentiary basis for contribution
<i>South Staffordshire</i>	+103.6ha	Employment land supply identified as suitable, available and achievable in the 2021 Employment Site Assessment topic paper, alongside evidence of need vs supply in the district's 2022 EDNA update and technical papers examining how to distribute the circa 200ha of employment land at WMI across the wider travel to work area.
<i>Cannock</i>	0ha	Employment land supply identified as suitable, available and achievable in the 2022 ELAA , Cannock Chase District EDNA Update 2020 and technical paper examining how to distribute the circa 200ha of employment land at WMI across the wider travel to work area.
<i>Stafford</i>	0ha	Based on evidence available as at the 2020 Issues and Options consultation, including the Economic and Housing Development Needs Assessment 2019. It is also important to note that Stafford Borough is not identified as having strong or moderate functional economic relationship with the Black Country in the Black Country EDNA 2017 and 2021. It should be noted that the Stafford Borough FEMA predominantly aligns with the Borough's administrative boundary
<i>Black Country authorities*</i>	-210ha**	Based on available evidence as at the 2021 Draft Black Country Plan consultation, including the Black Country Urban Capacity Review Update 2021, the Black Country Employment Area Review 2021, the EDNA update 2021, the Employment Land Supply Technical Paper 2021 and the Black Country Plan Site Assessment Report 2021.

*\*Including Sandwell, who are not within the South Staffordshire FEMA*

*\*\*Arising from the Black Country FEMA as a whole, including Sandwell which is not part of the South Staffordshire FEMA*



### **Summary of key issues relating to the South Staffordshire FEMA**

- There remains a shortfall of around 210ha of employment land arising cumulatively from the Black Country FEMA (Wolverhampton, Walsall, Dudley and Sandwell). This shortfall is being reviewed through the update to the published EDNA.
- The South Staffordshire FEMA and Black Country FEMA are different geographies, but include significant overlap, recognising the significant functional relationships between South Staffordshire and Cannock and most (but not all) of the Black Country FEMA authorities.
- Both South Staffordshire and Cannock are identified in the 2018 and 2021 update of the Black Country EDNA as areas outside of the Black Country FEMA which nonetheless have strong or moderate economic links with this geography.
- Stafford Borough is not identified as an area with strong or moderate economic links with the Black Country FEMA in the published Black Country EDNA, but this relationship will be reviewed through the EDNA update and subsequent Local Plan work.
- Birmingham, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest have either strong or moderate economic links with the Black Country FEMA, but are also outside of the South Staffordshire FEMA.
- The relationship between the individual Black Country FEMA authorities, and with authorities within the wider geography varies.
- Whilst over a much wider geography, there is also a need for South Staffordshire FEMA authorities to participate in a follow-up study to the West Midlands Strategic Employment Sites Study 2021.

### **Summary of key areas of agreement**

- The Black Country FEMA's shortfall, whilst not yet finalised through local plans, is nonetheless likely to be significant and requires cross-boundary working with local authorities within and outside of the Black Country FEMA in order to be addressed.
- Duty to Cooperate discussions with all other local authorities identified as having a strong or moderate economic relationship with the Black Country FEMA and other areas with which there is an evidenced functional relationship should continue to be progressed to identify further options to address the area's shortfall.
- Future updates to the West Midlands Strategic Employment Sites Study may inform future Duty to Cooperate discussions over the need for, scale of, location and phasing of additional strategic employment sites to meet wider needs potentially including those arising in the Black Country.

### **Key areas where agreement is yet to be reached**

- There are currently differing views within the South Staffordshire FEMA as to whether Cannock and Stafford Borough are able to contribute to the Black Country's employment shortfall.

- The Black Country FEMA authorities will review the Regulation 19 Plan and advise on whether they consider that the South Staffordshire District Council's proposed contribution to unmet employment needs (103.6ha minimum) to be proportionate given its land constraints and the economic links the area has with the Black Country and the potential contributions from other neighbouring authorities with which the Black Country has a functional relationship. This response would be subject to the publication of the Black Country EDNA programmed for February 2023.
- The level of contribution that can reasonably be expected from authorities functionally linked to the Black Country but which are outside of the South Staffordshire FEMA is yet to be determined.

Future work streams to address key issues and areas where an agreement is still being sought

- 5.2 There is considerable variety in the progress and status of local plans across the South Staffordshire FEMA and it is likely that the position on the unmet employment needs of the Black Country will change over time as plan-making within that area progresses. Notwithstanding this complexity, the signatories to this statement will seek to engage proactively and positively on employment land shortfalls, seeking to maximise agreement on the approach to distributing any shortfalls and using shared evidence bases wherever possible.
- 5.3 It is anticipated that the following key steps will be required to address the outstanding issues identified in this section:
- The Black Country authorities will approach other authorities beyond South Staffordshire and Shropshire to request evidence of ability to assist with unmet employment needs (including areas functionally related to Black Country outside of South Staffordshire FEMA)
  - The West Midlands Strategic Employment Sites Study update work will be progressed alongside other local authorities within the study area identified in that work
  - Duty to Cooperate discussions between Black Country authorities and Stafford/Cannock will continue to understand whether an agreed position can be reached on their contributions to Black Country employment shortfalls

**Signatories (Senior Officer and Councillor)**

**Cannock Chase District Council**

Name:

Position:

Name:

Position:

**Dudley Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**Sandwell Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**South Staffordshire District Council**

Name:

Position:

Name:

Position:

**Stafford Borough Council**

Name:

Position:

Name:

Position:

**Walsall Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**City of Wolverhampton Council**

Name:

Position:

Name:

Position:



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

Our Ref: HP/CW  
Date: 4 August 2020  
Please ask for: Christine Williams  
Direct Line: 01922 652089

Dear Colleagues

**Black Country Plan Review**

**Duty to Co-operate: Strategic Housing and Employment land Issues**

As you will be aware, the Black Country Authorities are currently in the process of reviewing the Black Country Core Strategy, which is now called the Black Country Plan. As a key part of this review we completed our Issues and Options consultation in September 2017, which included a call for sites. In light of the impacts of Covid-19 we have now published a revised timetable for the Black Country Plan review (<https://blackcountryplan.dudley.gov.uk/t2/p1/>).

In line with the new timetable, we are now finalising evidence and preparing a Draft Plan for consultation in summer 2021. We aim to produce a Publication Plan in summer 2022 and adopt the Plan in early 2024. In order to ensure the adopted Plan covers a period of at least 15 years we will be extending the Plan period to 2039.

We are keen to continue to work with neighbouring authorities, including yours, on strategic matters. You may recall that we contacted you in July 2018 asking your authority to consider whether it would be able and willing to accommodate any identified housing or employment land needs arising from the Black Country. We were pleased to receive a number of positive responses to this request and note that a number of authorities have since progressed their Local Plan reviews in a consistently positive manner. We also held a Duty to Co-operate meeting in January 2020 when we took the opportunity to update neighbouring authorities on key strategic planning matters.

The purpose of this letter is to provide a further update on the strategic issues of housing and employment land needs arising in the Black Country over our Plan period, and how these can be met, and to ask your authority to respond to specific questions on these issues. These are the most pressing strategic issues which we need to address to enable us to fully develop our Draft Plan, in line with the new timetable.

## **Strategic Housing Issues**

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able to accommodate all of our identified housing needs within the urban area of the Black Country.

This view is supported by our urban housing supply estimates, which are detailed in the 2019 UCR. The UCR continues to focus on a brownfield first approach, building on the success of the current strategy, and making every endeavour to accommodate as much of our development needs as possible in our urban areas before considering other locations in the Black Country or beyond. However, even by increasing densities and looking to other sources of urban land supply, it is clear that we cannot accommodate all our housing needs within the urban area. Current estimates are that we have a shortfall in the region of 27,000 homes up to 2038. We are in the process of updating the UCR to reflect the most up-to-date information and hope to publish this update by the end of the year. However, it is very unlikely that this update will result in a significant increase in urban housing supply over the Plan period.

## **Strategic Employment Land Issues**

Turning to employment land, the Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 300 ha of land, leaving a shortfall of between 292 ha and 570 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area including a review of opportunities within our existing employment areas through the Black Country Employment Area Review (BEAR). While this work will yield some additional capacity, it will not make a significant impact upon addressing our unmet need.

## **Potential contributions from Non-Green Belt Areas**

The Black Country clearly has development needs which cannot be met within the non-green belt areas of the Black Country. In this event, national policy (reference NPPF para 137) requires that, if there are non-green belt areas in neighbouring authorities which can be brought forward to meet Black Country development needs, these should be clearly identified first, before considering release of land from the green belt. To date, no existing adopted Local Plans are making such a contribution.

**Therefore, we would request that your authority confirms if your existing or emerging Local Plan is seeking to deliver levels of housing and / or employment land in excess of local needs on non-green belt land and, if so, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.**

### **Green Belt Areas**

The Black Country authorities have undertaken a Green Belt and Landscape Sensitivity Assessment, which has shown that the Black Country Green Belt makes a principal contribution towards Green Belt purposes and its capacity to undertake large-scale development is limited.

Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where 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 majority of 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 potential delivery of housing in the Green Belt, 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 reasonably conclude that the housing market areas in Dudley and Walsall could only be expected to deliver up to a maximum of 5,000 homes in each of the two boroughs (providing a maximum total of 10,000 homes) over the 15-year Plan period. We hope to publish further delivery evidence to refine this figure by the end of the year. On the basis of this approach, the Black Country is facing a 'gap' of some 17,000 homes that cannot be accommodated within the Black Country.

Turning to employment, the call for sites stage identified few additional sites for consideration on land within the Black Country Green Belt. We are considering

---

<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)

these proposals but it is not anticipated that this will provide significant additional capacity.

Taking into account the likely housing and employment land capacity of the Black Country Green Belt, even if the maximum contributions from neighbouring authorities set out in the Duty to Cooperate table above are brought forward, there remains a significant level of unmet need in the order of at least 4,500 - 6,500 homes and up to 292 ha-570ha of employment land.

**Therefore, we would request that your authority confirms if your existing or emerging Local Plan is seeking to deliver levels of housing or employment land in excess of local development needs on land currently designated as green belt and, if so, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.**

### **Duty to Cooperate progress**

As set out above, we were pleased to receive a number of positive responses to our Duty to Cooperate letter of July 2018 and a number of authorities have since progressed their Local Plan reviews in a consistently positive manner. Potential contributions to housing and employment land from neighbouring authorities indicated through our engagement under the Duty to Cooperate to date are summarised in the table below:

<b>Local Plan and timescale</b>	<b>Plan stage</b>	<b>Potential housing contribution</b>	<b>Potential employment land contribution (ha)</b>
South Staffordshire	Issues and Options (November 2018) & Spatial Housing Strategy and Infrastructure Delivery consultation (October 2019)	Up to 4,000* (majority Green Belt release)	Contributions to be sought from District's employment land surplus, including West Midlands Interchange (majority Green Belt release)**
Lichfield	Preferred Options (November 2019)	Up to 4,500* (part may be outside the Green Belt)	0
Cannock	Issues and Options (May 2019)	Up to 500-2,500* (all Green Belt release)	0
Shropshire	Publication (Summer 2020)	1,500 (may be outside the Green Belt)	0
<b>Total</b>		<b>Up to 10,500-12,500</b>	<b>TBD**</b>



\* - potential contribution to needs arising across the Birmingham and Black Country Housing Market Area and not at this stage wholly apportioned to the Black Country.  
\*\* dependent on the outcome of ongoing work to determine the extent of surplus South Staffordshire Green Belt employment land release that can reasonably be attributed to the Black Country's employment land needs

This suggests that the combined housing and employment land capacity of non-green belt areas and green belt in neighbouring authorities is unlikely to be sufficient to address Black Country housing and employment land shortfalls up to 2039.

### **Statement of Common Ground**

**Looking ahead to the Duty to Cooperate work needed to support the emerging Black Country Plan, we would like to invite your authority to take part in developing a single Statement of Common Ground (SoCG) covering strategic issues for the Black Country Plan up to 2039, with the initial focus on housing and employment land issues.**

We are keen to involve as many relevant authorities as possible in developing the strategic housing and employment land related parts of the SoCG, including Greater Birmingham and Black Country Housing Market Area authorities and other neighbouring authorities with an existing or potential housing market or functional economic relationship to the Black Country. The SoCG will evolve as the BCP review progresses, and it is intended to agree and publish an up-to-date SoCG for each key stage of the review process.

We hope that the SoCG will ultimately be supported by a separate agreement on strategic housing issues between relevant authorities, setting out how and where the combined Black Country and Birmingham housing shortfalls will be met over the Black Country Plan and Birmingham Plan review periods, which can be relied upon at our Examinations in Public and form the basis for partnership working in the years following the adoption of our Plans.

### **Timetable for Responses**

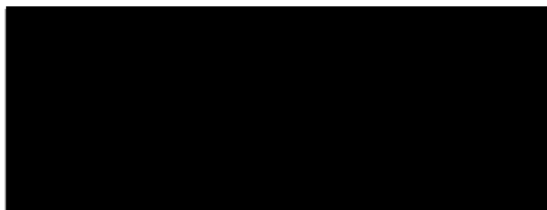
**We ask that you consider the requests set out in this letter and respond in writing to: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk) within two months of the date of this letter. If you wish to discuss the contents of this letter before responding, by phone or at a meeting, please get in touch.** We appreciate that this letter may raise difficult issues that need thorough consideration from both officers and Councillors. However, given the time that has already passed since the Black Country initially identified a significant housing shortfall in 2018 and the wider work already undertaken across the Greater Birmingham Housing Market Area, we would be grateful if you could adhere to these timescales. **If you anticipate a delay in being able to provide a response, it would be helpful if you could let us know as soon as possible.**

We will be inviting your authority to attend a meeting in October 2020 to discuss the responses we have received to this letter and to agree a way forward, with the view to developing a Statement of Common Ground to accompany the Draft Black Country Plan by spring 2021.

Given the need to adhere to the current Black Country Plan timetable, if we do not receive a response from your authority on these issues by September 2020 we will assume that your authority is not considering making a contribution towards Black Country housing or employment land needs and does not wish to take part in developing our Statement of Common Ground, and this will be noted in our Duty to Cooperate records.

We look forward to working with you on strategic matters during the course of our review work.

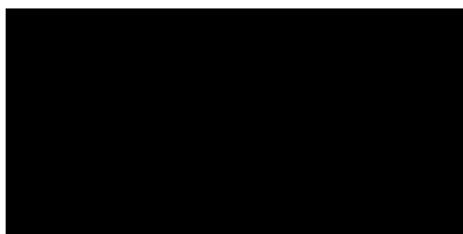
Yours sincerely



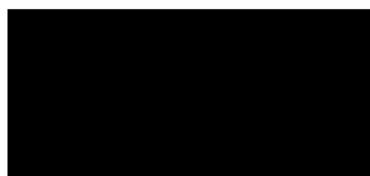
Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council



Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council



Councillor Maria Crompton  
Deputy Leader  
Sandwell Metropolitan Borough  
Council



Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council



Our Ref: HP/CW  
Date: 26 April 2022

Dear Colleagues,

**Black Country Plan Review**  
**Duty to Cooperate: Strategic Housing and Employment land issues**

The Black Country Authorities (BCAs) are progressing the Black Country Plan (BCP) which will replace the Black Country Core Strategy as the overarching strategic planning and regeneration strategy for the area.

You may recall that we contacted neighbouring authorities including yours, in July 2018 and again in August 2020, to request assistance in accommodating identified housing and / or employment land needs arising from the Black Country. We received a number of positive responses to this request and note that a number of authorities have since progressed their Local Plan reviews in a consistently positive manner. We have also held Duty to Cooperate meetings in January 2020, June 2021 and August 2021 – the latter alongside the commencement of the BCP Regulation 18 consultation.

We were also fully supportive of South Staffordshire Council's convening of a meeting of all local authorities in the Greater Birmingham, Solihull and Black Country Housing Market Area (the HMA) and other neighbouring authorities with a functional relationship with the HMA in December 2021. The BCA suggested a series of actions in advance of that meeting, building on our Duty to Cooperate engagement to date, and which are directly relevant to our strategy of working with you to ensure that the Black Country evidenced growth needs can be met in full.

The purpose of this letter is to update you on progress with the BCP and to outline next steps. We also set out our strategy for ongoing engagement through the Duty to Cooperate with a focus on strategic housing and employment land issues. This includes a set of proposals which we are seeking your response to by way of a series of specific requests.

## Recent progress

1. The Regulation 18 BCP consultation took place between August and October 2021. We received around 20,800 responses and all of the representations can be viewed online via the link - <https://blackcountryplan.dudley.gov.uk/bcp/> . The bulk of feedback centred around the potential use of green belt land for development and we are currently reviewing all of the responses to inform the preparation of the Regulation 19 BCP programmed for consultation in the Autumn of this year.
2. We received responses from a number of neighbouring authorities – Bromsgrove, Cannock Chase, Lichfield, Redditch, Solihull, South Staffordshire, Stafford, Staffordshire and Worcestershire. These representations raised a variety of issues at a strategic level, recognising the broad scale of the shortfall and the need for ongoing and better aligned engagement going forward, in order to ensure a consistent and fair approach be taken to address longer term needs once the final shortfalls are confirmed.
3. The next sections of this letter summarise the current scale of the housing and employment land shortfalls and how we intend to address them.

## Strategic Housing Issues

4. The Regulation 18 BCP identifies a housing shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 2031-39). This shortfall is based on the most up to date local housing need (including the 35% uplift for Wolverhampton), the most recent housing monitoring information and land supply on sites allocated in the draft BCP including land currently designated as green belt. The Regulation 18 BCP proposes that this shortfall is addressed via the Duty to Cooperate through 'exporting' to sustainable locations in neighbouring areas.
5. As part of the preparation of the Regulation 19 BCP, we are undertaking further evidence gathering in relation to urban land supply. This will involve an update of the existing Urban Capacity Study including a detailed assessment of the implications of the ongoing restructuring of some retail and commercial sectors which may 'free up' space in town and city centres. However, the scale of any additional capacity is likely to be limited and is not anticipated to make significant headway into the shortfall outlined above.
6. As set out above, through the Duty to Cooperate, we are pleased that some Local Plans have responded positively to our request initially raised in 2018 for assistance in addressing our future growth needs. Potential contributions through our Duty to Cooperate engagement to date are outlined in the table below.

**Table 1 – Duty to Cooperate contributions (in order of Local Plan progress)**

<b>Local Plan</b>	<b>Status</b>	<b>Potential contribution to meeting Black Country housing needs</b>	<b>Comments</b>
Solihull	Submission (May 2021)  Examination underway	2,000 (minority)	Contribution is to meet needs arising across the whole of the HMA and not limited to the Black Country, 2,000 HMA contribution noted by Local Plan Inspector February 2022. However, Solihull has a stronger functional relationship with Birmingham than with the Black Country.
Shropshire	Submission (September 2021)  Examination underway	1,500 (all)	Contribution towards the Black Country only, confirmed in Statement of Common Ground (August 2021)
Lichfield	Publication (July 2021)  Submission due April 2022	2,000 (all)	Contribution forms majority of 2,665 contribution to meet the needs of the HMA as a whole.
Cannock Chase	Preferred Options (March 2021)	Up to 500 (majority)	Contribution is to meet needs arising across the whole of the HMA and not limited to the Black Country. However, Cannock Chase has a stronger functional relationship with the Black Country than with Birmingham.
South Staffordshire	Preferred Options (November 2021)	Up to 4,000 (majority)	Contribution is to meet needs arising across the whole of the HMA and not limited to the Black Country. However, South Staffordshire has a stronger functional relationship with the Black Country than with Birmingham.
<b>Total</b>		<b>3,500-10,000</b>	

7. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.
8. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.
9. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.
10. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.
11. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

12. Going forward, it is critical that those contributions currently expressed as meeting needs arising across the HMA as a whole are apportioned to individual Local Plans areas through Statements of Common Ground to provide the BCAs with certainty over the scale of contributions that is available to meet our shortfall. **However, even in the event of a contribution being secured at the higher end of the range of scenarios outlined above, a significant ‘gap’ of some 11,500 homes would remain for the Black Country up to 2039 (with a proportion of this gap arising before 2031). It is therefore critical that additional sources of land must be identified through the Duty to Cooperate if the Black Country is able to show how its identified growth needs can be accommodated.**

Request 1 - We request that any contributions that your authority is making to meet the needs of the HMA as a whole includes an apportionment to solely address needs arising in the Black Country.

Request 2 – We request that you provide confirmation that you have either explored all opportunities to accommodate unmet housing needs arising in the Black Country within your Local Plan work, or that you will actively test opportunities going forward.

### **Strategic Employment Land Issues**

13. As is the case with housing needs, the Black Country is unable to meet its identified employment land requirements in full. The Black Country Plan employment land shortfall to 2039 is 210ha as set out in the Regulation 18 Black Country Plan – this figure the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the split of employment land provided for by the Plan comprise around 30% of B8 activity and 70% for E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. We are reviewing these requirements in the light of updated economic projections which include a more up to date understanding of the CV-19 recession recovery trajectory. This work may result in a refinement of the requirements but it is highly likely that our shortfall will remain.
14. In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

15. At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>). This suggests that a minimum of some 67ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be largely satisfied by this site should the programmed South Staffordshire EDNA update confirm a surplus of employment land against local needs. **This could reduce the Black Country employment land shortfall to 138ha. Any additional surplus of employment land arising from the South Staffordshire EDNA update would reduce the shortfall further.**
16. In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, **reducing the shortfall to some 108ha**. We are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford, but no contributions have been put forward by those authorities and the BCAs will continue to press this matter through Local Plan examinations, particularly those authorities within the areas of strong economic transactions with the Black Country as listed above. We will also be seeking the participation of authorities listed in paragraph 14, and any others able to contribute to BCA employment shortfalls, in a Statement of Common Ground (SoCG) addressing this issue to inform the Black Country's Regulation 19 plan and will use the responses to this letter to inform the draft SoCG. **As is the case with housing, additional sources of land supply must be identified if the Black Country is able to meet its growth needs in full.**

Request 3 - We request that you provide confirmation that you have either explored all opportunities to accommodate unmet employment land needs arising in the Black Country within your Local Plan work, or that you will actively test opportunities going forward, and that you will be willing to enter into a Statement of Common Ground with the Black Country under the scope set out in paragraph 16 of this letter.

17. We draw your attention to the West Midlands Strategic Employment Sites Study (WMSESS) (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>) published in 2021. The Report was produced by Avison Young and Arcadis consultants and commissioned by three of the West Midlands Local Enterprise Partnerships (the Black Country, Greater Birmingham and Solihull and Coventry Warwickshire) and Staffordshire County Council. The Study updates the 2015 West Midlands Strategic Employment Sites Study which identified a demand for strategic employment sites in the West Midlands, but a lack of suitable sites.



18. The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.
19. The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.
20. There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. Through the HMA Group and liaison with those bodies who were party to the 2021 Study, a draft brief has been prepared to address the recommendations for the 2021 Study and strongly recommend that this work is progressed in partnership with the local planning authorities across the 2021 Study geography, and other areas which share a functional relationship with the Black Country, for example Shropshire.

Request 4 - We request that you indicate whether your authority is willing to participate in the further work to address the recommendations of the WMSESS.

### **Next steps**

21. As set out above, there is a significant level of unmet need for housing and employment land to address evidenced Black Country growth requirements which cannot be met within the Black Country administrative area. There are three elements to our strategy to address the shortfall through the Duty to Cooperate and these are summarised below.

22. In the short term we will be continuing to engage with individual Local Plans to ensure 2018 Growth Study recommendations are maximised and to confirm current contributions to help address the Black Country shortfall, particularly in relation to those housing contributions which have been expressed at HMA level and not yet distinguishing a specific Black Country apportionment. For those Local Plans which are less progressed, we will engage in a positive and robust manner to ensure that the unmet needs of the Black Country are fully recognised and all opportunities to assist in meeting our needs are comprehensively explored. This will include opportunities identified in the 2018 Growth Study.
23. **But these current workstreams may not address our needs in full, and we strongly recommend to you that there is a compelling need to address this matter in a comprehensive and inclusive manner across a wide but functional geography.** We are also mindful of the forthcoming Birmingham Local Plan review and the potential for this to further increase the shortfall arising from the West Midlands conurbation. We outlined our suggestions on a potential programme of work as part of the 15<sup>th</sup> December South Staffordshire Duty to Cooperate meeting. This was shared with you in advance and we attach it to this letter. The key elements of this work programme are:
- To review the extent of the HMA in order to understand if this is the most appropriate geography by which housing needs and mechanisms to accommodate any shortfalls can be considered;
  - To confirm the scale of the housing shortfall across the whole of the HMA over a period of at least 15 years to inform the approach taken by current and emerging Local Plan reviews.
  - A review of whether the growth locations identified in the 2018 Growth Study work remain appropriate and whether new growth areas should be identified for testing through Local Plan preparation. This work may well result in the need for a new Growth Study but we would not want to pre-judge the work before confirming that is the case.
24. This work programme is currently subject to ongoing discussions largely through the HMA officer group, and we recognise that the existing governance arrangements are in need of review to ensure that we have in place mechanisms to manage and oversee the implementation of this work. The nature of these governance arrangements and the parties involved should be informed by the evidence but at this stage, a Statement of Common Ground across the HMA geography and including other authorities which have a functional relationship with it which sets out the nature of how we work together going forward is essential. We strongly encourage your authority to fully engage in this work.

Request 5 - We request that you indicate whether your authority is willing to participate in the further work outlined in the bullet points above, and that your authority would be willing to confirm this commitment through a Statement of Common Ground and review of governance arrangements to deliver these actions.

25. Turning to employment land, as with housing we will pursue a Statement of Common Ground with functionally related authorities to both secure current contributions and engage with less progressed Local Plans through the Duty to Cooperate to establish potential for further contributions. We have set out the compelling need for a follow-up study to address the recommendations of the 2021 West Midlands Strategic Employment Sites Study and have asked if your authority would be willing to participate in this work and assist with its resourcing.
26. Common to both the housing and employment land shortfalls is the final element of our strategy – for Local Plans to include an early review mechanism. This is important given the potential for there could continue to be a shortfall following the current round of Local Plan preparation. This shortfall should trigger the detailed evaluation of opportunities identified from the recommendations of the proposed work outlined above in relation to both housing and employment land through updated Local Plans. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. We consider that a failure to include an early review mechanism is a serious omission and must be addressed in order for the Plan to be sound.

Request 6 - We request that you indicate whether your authority is willing to consider the inclusion of a commitment to an early review mechanism in your emerging Local Plan to enable the consideration of additional growth opportunities outlined in the work listed above in a timely manner should this be necessary.

### **Timetable for responses**

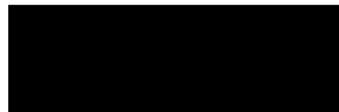
27. Moving forward, the BCAs are progressing the preparation of the Regulation 19 Plan having regard to the issues raised in the Regulation 18 consultation responses and evidence currently under preparation. This includes the Transport Study, updated urban capacity study and employment land update. The Transport Study in particular will provide us with a better understanding of the constraints and opportunities associated with the levels of and location of growth set out in the Regulation 18 Plan with potential implications for the development capacity of some sites.

28. To enable us to meet this timetable, and clear understanding of opportunities through the Duty to Cooperate is critical. **We therefore ask that you consider the requests set out in this letter and respond in writing to: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk) within six weeks of the date of this letter.** If you wish to discuss the contents of this letter before responding, please get in touch. We appreciate that this letter may raise difficult issues that need thorough consideration from both officers and Councillors. However, given the time that has already passed since the Black Country initially identified a shortfall in 2018 and the wider work already being undertaken across the HMA, we would be grateful if you could adhere to these timescales. If you anticipate a delay is being able to provide a response, it would be helpful if you could let us know as soon as possible.

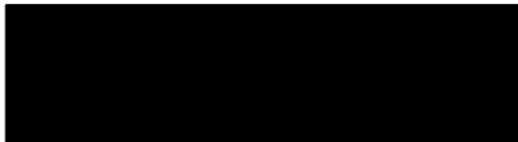
Yours sincerely



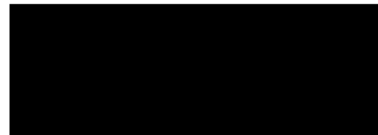
Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council



Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council



Councillor Kerrie Carmichael  
Leader  
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council



## South Staffordshire Council

Association of Black Country Authorities  
Walsall MBC  
The Civic Centre  
Darwall Street  
Walsall  
WS1 1TP

Please ask for: [REDACTED]

Direct Dial: (01902) 696418

Email [REDACTED]

6 June 2022

**FAO:**

Councillor Patrick Harley, Leader, Dudley Metropolitan Borough Council  
Councillor Mike Bird, Leader, Walsall Metropolitan Borough Council  
Councillor Kerrie Carmichael, Leader, Sandwell Metropolitan Borough Council  
Councillor Ian Brookfield, Leader, City of Wolverhampton Council

Dear Councillor,

**RE: Black Country Plan Review**

**Duty to Co-operate: Strategic Housing and Employment Land Issues**

Thank you for your letter dated 26 April 2022. Please see below answers to your requests.

**Request 1 – We request that any contributions that your authority is making to meet the needs of the HMA as a whole includes an apportionment to solely address needs arising in the Black Country.**

South Staffordshire District Council's (SSDC) proposed 4,000 contribution to unmet needs was based on findings of the GBHMA Strategic Growth Study 2018. This concluded there was a 60,000 dwelling shortfall up to 2036 across the GBHMA, generated primarily by both Black Country and Birmingham. South Staffordshire's contribution is directed at this cumulative shortfall and we have not sought to divide it between the Black Country and Birmingham to date as that original study did not divide either the shortfall across HMA or the recommended strategic growth locations between either shortfall.

If it is necessary to separate out HMA housing contributions in this manner then we are concerned that requests for HMA authorities to individually determine how to separate their contributions between Birmingham and the Black Country in this manner without any consistent evidence base is fundamentally unrobust and risks inconsistent approaches to this key issue across the HMA. Furthermore we are firmly of the view that this issue should be addressed through Duty to Co-operate discussions with the wider HMA group, rather than through individual letters from the Black Country to individual local planning authorities. Any proposals to split contributions would affect Birmingham City Council's position so it is vital that, as a minimum, any agreed approach to splitting contributions is agreed in collaboration with Birmingham City Council as well as the Black Country.

Given the above, we do not consider that this letter is an appropriate forum for local authorities to propose the splitting of their HMA housing contributions. We consider that the opportunity to undertake this exercise, if it is necessary, is through the further work to review the 2018 Strategic Growth Study referred to in Request 5 of your

letter. This would offer a chance for a consistent methodology to be agreed across all HMA authorities in a consistent and transparent way.

**Request 2 – We request that you provide confirmation that you have explored all opportunities to accommodate unmet housing needs arising in the Black Country within your Local Plan work, or that you will actively test opportunities going forward.**

South Staffordshire has engaged with the findings of the 2018 Strategic Growth Study from the earliest stages of its Local Plan Review to ensure that it makes an appropriate contribution to the unmet needs of the GBHMA, including the Black Country.

Different levels of housing growth were initially tested in our Issues and Options consultation, involving unmet need contributions of between 0 and 20,000 dwellings to the GBHMA. These options reflected the indicative capacities of the strategic growth locations recommended for the District in the 2018 Strategic Growth Study. Of all the options tested, the 4,000 dwelling contribution to the GBHMA was the option that best balanced the need for additional housing and past delivery rates with the need to avoid a range of more negative sustainability impacts, as shown in the 2018 Sustainability Appraisal. Given these findings and the Council's majority Green Belt coverage, the Council proposed to test a 4,000 dwelling contribution towards the GBHMA unmet needs as the recommended housing target. Following this consultation the Council's proposed housing target received broad support from GBHMA authorities, including the Black Country authorities.

The Council then proceeded to test seven different spatial strategies for delivering the preferred level of housing growth (i.e. the District's needs plus 4,000 dwellings to HMA unmet needs) in the 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation. These included testing of a scenario (Spatial Option D) which sought to solely maximise new allocations in the locations recommended for growth in the GBHMA Strategic Growth Study. The SHSID consultation ultimately chose an infrastructure-led strategy (Spatial Option G) which sought to deliver significant levels of growth in three of the four areas recommended for growth in the Strategic Growth Study, but a lesser level of growth on the western edge of the Black Country. Instead Option G sought to deliver an additional strategic site on the northern edge of the Black Country in addition to the locations recommended by the Strategic Growth Study, recognising this broad location's proximity to local authorities with unmet needs (Wolverhampton/Walsall) and better access to employment via sustainable transport than the western edge of the conurbation.

Once again, the consultation responses from other GBHMA authorities (including the Black Country) were broadly supportive of this approach and the contribution to unmet housing needs being made. A request was made from the Black Country authorities for the whole of the unmet needs contribution to be attributed to the Black Country rather than the wider GBHMA, but no evidence or HMA-wide agreement to apportionment was forthcoming to support this request.

Building upon the 2019 SHSID consultation and responses made to this, the District published its 2021 Preferred Options consultation, containing housing site proposals to deliver the preferred spatial housing strategy for the District and the 4,000 dwelling contribution to the GBHMA. As with the 2019 SHSID consultation, this sought to deliver growth in the locations set out in the GBHMA Strategic Growth Study for South Staffordshire. This is summarised below.

GBHMA Strategic Growth Study recommendation	Dwelling capacity indicated in GBHMA study	Capacity in Preferred Options 2021 and rationale for level of growth
Urban extension: North of Penkridge	1,500 – 7,500	1,721 dwellings across Penkridge, primarily in the north of the village. This aligns to the maximum amount of available land delivery north of the village (alongside additional existing commitments and safeguarded land) and the maximum amount of growth likely to be delivered on a urban extension during the plan period (1,200 dwellings).
Urban extension (employment-led): North of Wolverhampton in the vicinity of i54	1,500 – 7,500	1,200 dwellings in a single urban extension at Cross Green (Site 646). There are no other allocations in this area and the indicated capacity solely aligns to the maximum amount of growth likely to be delivered on a urban extension during the plan period (1,200 dwellings) and the available land in this broad location.
Proportionate dispersal: North of Codsall/Bilbrook	500 – 2,500	1,673 dwellings in Codsall/Bilbrook. This requires significant Green Belt release and aligns growth to levels discussed with the Education Authority to ensure delivery of a First School needed in the area.
Western edge of the conurbation between Stourbridge and Wolverhampton	500 – 2,500	390 dwellings on a site in South Staffordshire. This level of growth recognises that much of this broad location is adjacent to a local authority not generating unmet needs once its Green Belt has been explored (Dudley MBC) and the relatively lesser sustainability of this location compared to the Black Country's northern edge. The Council are mindful that this broad location also includes land within the Black Country and that the Black Country Draft Plan 863 dwellings on two strategic sites along the western edge of the conurbation (DUH208 and DUH211) and that cumulatively this would mean that 1,253 dwellings would be delivered in this broad location across both areas.

In addition to the above the Preferred Options consultation also continued to propose an additional strategic allocation on the Black Country's northern edge of 1,200 dwellings (Site 486c – Land at Linthouse Lane) alongside proportionate growth across the District's remaining rural settlements. Cumulatively, this ensures that the District's own needs and a 4,000 dwelling contribution to the GBHMA unmet needs can be accommodated within the Preferred Options document. As shown above, the Preferred Options document does this in a manner which delivers growth in each of the four recommended growth locations in the Strategic Growth Study, often exceeding the minimum growth levels required unless market build rates indicate this cannot be achieved.

Consultation responses to the Preferred Options consultation from other HMA authorities were generally supportive of the 4,000 dwelling contribution. The Association of Black Country authorities were also supportive

and re-stated their request for all of the 4,000 dwelling contribution to be attributed to the Black Country referencing commuting and migration links and the proximity of some allocations to the Black Country, but again no HMA-wide evidence was submitted to support this stance and no consistent methodology or agreement to roll such an approach out across the GBHMA was provided.

Cumulatively, the above shows that the Council has sought to accommodate the recommendations of the GBHMA Strategic Growth Study as far as possible within the Local Plan Review and has sought to allocate additional growth where these cannot be fully delivered to ensure the District's commitment to deliver 4,000 dwellings to unmet needs can be met. Given this, the Council considers it has explored all reasonable evidence-based opportunities to accommodate unmet needs from the GBHMA, including the Black Country. If there are now concerns that existing commitments will not be sufficient to meet emerging unmet needs, then we would request that an updated HMA-wide evidence is commissioned to re-examine the extent of the unmet needs across the GBHMA and potential for strategic growth locations to address these in a comprehensive manner. We will continue to be an active participant in the work being progressed towards a Statement of Common Ground and updated evidence base at the HMA level to ensure that this can be addressed.

**Request 3 - We request that you provide confirmation that you have either explored all opportunities to accommodate unmet employment land needs arising in the Black Country within your Local Plan work, or that you will actively test opportunities going forward, and that you will be willing to enter into a Statement of Common Ground with the Black Country under the scope set out in paragraph 16 of this letter.**

SSDC recognise the clear functional relationship between South Staffordshire and the Black Country (principally Dudley, Walsall and Wolverhampton) in relation to employment land which is reflected by South Staffordshire's role in recent years of delivering strategic employment sites that have a sub-regional function. SSDC have indicated to the Black Country Authorities previously in response to your letter of 4 August 2020 that in principle we would be willing to explore if any surplus employment supply in South Staffordshire could be attributed to the Black Country. This was subject to the findings of our updated employment evidence base - our Economic Development Needs Assessment (EDNA) 2022 - which is now finalised.

With regard to West Midlands Interchange (WMI), the EDNA acknowledges and builds upon the approach to apportioning WMI that was set out in the February 2021 Stantec Report. That report apportions WMI based on an approach of using projected population change for each authority within the sites market area as a proxy for apportioning the site to those authorities. The EDNA re-examines this matter exclusively for South Staffordshire, and utilises economic forecasting and projected labour demand to conclude that a **18.8ha** share of WMI for South Staffordshire is appropriate.

The 2021 Stantec Report apportions a total of 5ha of the 193ha total to South Staffordshire, leaving residual of 188ha for other authorities. The findings from South Staffordshire's EDNA based on a total share of 18.8ha would continue to leave an alternative total of 174.2ha for other authorities. For the avoidance of doubt assuming an unchanged Black Country claim of 67ha based on the 2021 Stantec Report this would comprise around 35% of the remaining 188ha total (excluding South Staffordshire) identified from that evidence. The equivalent percentage would comprise around 38% of the remaining 174.2ha based on the findings of our EDNA. We do not consider that this materially impacts the Black County Authorities continuing to base their request under the Duty to Cooperate on the basis of the 2021 Stantec Report.



Whilst we have taken a more in depth approach to calculating our share of WMI through our local evidence, we still consider that the Stantec Study is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec work whilst identifying a **67ha** share towards the Black Country, also identifies that this should be viewed as a minimum. Given this, together with the strong functional links between South Staffordshire and the Black Country and noting that no other authority has indicated to us that they require a share of WMI to meet their local needs, relevant evidence continues to indicate that a higher proportion of the site towards Black Country needs may be justified should it be required.

Our EDNA also considered our employment requirements exclusive of WMI, and isolated strategic supply/demand from local supply/demand. This identified the proportion of our pipeline of strategic sites that could potentially meet cross boundary needs and following the supply/demand balancing exercise concluded that **36.6ha** was surplus and could meet cross boundary needs. This total includes 28.4ha within Use Class B2/B8 based on the supply/demand balance undertaken within the 2022 EDNA. The remainder of the total is influenced by previous trends in the delivery of ancillary office floorspace upon strategic sites within South Staffordshire district. As the total 36.6ha comprises a surplus for the purposes of South Staffordshire's identified needs it is suggested that the entire total is capable of being considered flexibly in terms of its future land use and contribution towards Black Country unmet needs.

Other new site options that would potentially increase our pipeline of employment land over the plan period were assessed as part of our [Employment Site Assessment Topic Paper \(2021\)](#) that accompanied our [Preferred Options](#) consultation. This assessment did not identify any further sites for allocation to increase the supply of employment land further.

We reiterate our request in our letter of 18 November 2021 that the Black Country should lead on the preparation of a Statement of Common Ground (SoCG) across the wider geography identified as having strong and moderate economic transactions with the Black Country as a matter of urgency. As set out in your letter, there also appears to be evidence to include Shropshire within this functional geography. Based upon our latest evidence we can confirm that a minimum of **103.6ha** (subject to your WMI claim) of surplus employment land in South Staffordshire is in principle available towards Black Country unmet employment needs which we are willing to confirm through the SoCG. This is a significant contribution to your unmet needs, accounting for around half of your declared shortfall. As such, we expect that the Black Country should now strongly engage with other functionally related authorities (including Shropshire) to address the remainder of the shortfall and should formalise its current position through a SoCG as a matter of urgency.

**Request 4 - We request that you indicate whether your authority is willing to participate in the further work to address the recommendations of the WMSESS.**

SSDC can confirm we are willing to participate in an updated West Midlands Strategic Employment Sites Study (WMSESS). However, this is subject to the study recognising (and addressing) that the need for employment land has already been factored into assessments of employment need through local EDNAs. This issue will need to be carefully considered through this work to ensure that a forecast based ('labour demand') approach to identifying need does not double count need already identified through local EDNAs, and recognise that it may be that strategic employment sites meet both a local and regionally derived need simultaneously. This is very relevant to

South Staffordshire where our latest 2022 EDNA confirms that the need for strategic employment sites is already 'baked into' our local labour demand forecasts as a result of large-scale strategic sites being delivered in recent years. This raises a critical point, noting the Council's response to your 'Request 3' and findings of the 2022 EDNA, the remaining pipeline of strategic sites in South Staffordshire remains critical to meeting the Council's identified need for land and floorspace and forms part of the basis upon which a contribution towards the Black Country's identified shortfall (in addition to WMI) has been identified.

Given the scale of these large employment sites and the markets they serve, we consider it appropriate that this is considered a regional scale issue, and request that demand for these is considered over the entire study area, rather than being broken down into sub areas, which are not appropriate geographies to assess regional needs over. Likewise, it is important that any assessment of past take-up (upon which the existing Report essentially relies), for the purposes of an updated WMSESS, reflects that the delivery of 'one-off' schemes in particular authorities has been provided (in part) to meet wider needs and would not necessarily be expected to be sustained at these rates locally. This would be consistent with the findings of South Staffordshire's EDNA 2022 (and previous evidence prepared for the Council in addressing past take-up trends).

Equally, options to meet the identified demand should be looked at afresh over the entire study and not automatically confined to the sub areas identified within the 2021 WMSESS. These sub areas seem to be focused very much around key motorway junctions and trunk roads which are key locational requirements for logistics and warehousing, but it is important that the study also examines the optimal locational requirements for advanced manufacturing and research and development which are likely to be distinct from logistics and warehousing.

**Request 5 – We request that you indicate whether your authority is willing to participate in the further work outlined in the bullet points above, and that your authority would be willing to confirm this commitment through a Statement of Common Ground and review of governance arrangements to deliver these actions.**

As you will recall from our December 2021 Duty to Co-operate meeting, South Staffordshire District Council is of the clear view that a Statement of Common Ground, reviewed governance arrangements and updated work programme to review and update the 2018 Strategic Growth Study recommendations is vital to the progress of plans throughout the GBHMA area. We also understand there to have been broad acceptance for this position at the meeting, albeit the details of the future governance arrangements and future work programme were not available at that time. Officers from the District Council have since been heavily involved in the drafting of the draft Statement of Common Ground and governance arrangements to deliver this schedule of work across the GBHMA. This proposed work schedule includes, but is not limited to, the work outlined to review the 2018 Strategic Growth Study in this letter. We will continue to participate in this work to ensure that the unmet housing needs of the GBHMA can be addressed.

**Request 6 – We request that you indicate whether your authority is willing to consider the inclusion of a commitment to an early review mechanism in your emerging Local Plan to enable to consideration of additional growth opportunities outlined in the work listed above in a timely manner should this be necessary.**

South Staffordshire's current Local Plan Review is already making a significant housing contribution towards the GBHMA's unmet needs, delivering growth within all of the strategic areas recommended in the current regional evidence base. It has also played a significant role in contributing to the Black Country's unmet employment needs

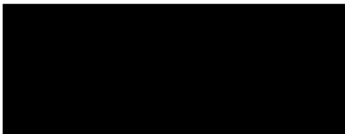
and has already delivered substantial amounts of regionally and nationally important employment sites. All of this growth has required substantial existing or proposed Green Belt release within the District, a trend which is highly likely to continue in future if further reviews are necessary given the District's rural nature and significant Green Belt coverage.

Given the significant land supply constraints affecting the District the need for an early review would have to depend on the outcomes of future evidence base documents (e.g. updates to the Strategic Growth Study and the regional strategic employment evidence base). It would also depend on the outcome of Duty to Co-operate discussions that the Black Country will need to have with other HMA/FEMA local authorities to understand their capacity to meet unmet needs, informed by regional evidence bases. The outcomes of these processes cannot be prejudged and so it cannot be automatically assumed that South Staffordshire's Local Plan Review will require an early review at this point.

Notwithstanding this, the Planning Practice Guidance requires plans to be reviewed to assess whether they need updating at least once every 5 years that any review should be proportionate to the issues in hand. The District Council is willing to reflect the need to assess whether an early review is required at least once every 5 years within the Local Plan Review to provide clarity to Duty to Co-operate partners. In doing so it will confirm that an early review will commence should it be considered appropriate at that point in time informed by the latest sub-regional evidence base and Duty to Co-operate agreements

I trust that this letter is helpful in understanding our position on the points that you raise and we look forward to continuing to proactively engage with you as we progress our respective plans.

Yours sincerely



**Councillor Terry Mason**  
Cabinet Member for Planning & Business Enterprise



## **Appendix D - Statements of Common Ground with individual adjoining and HMA local authorities**

This appendix contains individual draft statements of common ground with each GBHMA authority and adjoining local authority to South Staffordshire. These are intended to address cross boundary matters not directly addressed by the draft housing and employment statements of common ground set out in Appendices B and C of this document. These are yet to be formally agreed but are the product of joint working between the authorities to date. These will now be circulated through the formal agreement process for each local authority. South Staffordshire has been able to agree initial officer drafts that are to be put through the formal member sign off process with all adjoining and GBHMA authorities except two. This first is Lichfield, who are unable to comment on draft statement of common ground due to staff shortages. The second is Wolverhampton, who have confirmed they will engage on draft statement of common ground during South Staffordshire's Regulation 19 consultation.



Statement of Common Ground  
between Birmingham City Council  
and South Staffordshire District  
Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Birmingham City Council (BCC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Birmingham City Council (BCC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Birmingham City Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council



Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and BCC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs.
8. The Birmingham Development Plan 2017 also established a shortfall of 37,900 dwellings over the period 2011-2031. More recent land supply estimates<sup>2</sup> suggest this shortfall had fallen to around 6,300 dwellings across the GBBCHMA (2011-2031), however the emerging Birmingham Local Plan Issues and Options consultation indicates that this shortfall is now likely to increase to around 78,000 dwellings over the 2020-2042 period, although this plan is still at an early stage in its production. The Black Country authorities<sup>3</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
9. SSDC and BCC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities<sup>4</sup>. This has led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. Notwithstanding the fact that BCC would prefer all contributions to be made to the overall HMA shortfall, rather than apportioned, SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls.
10. SSDC and BCC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

---

2

[https://www.birmingham.gov.uk/downloads/download/2434/gbbchma\\_housing\\_supply\\_and\\_need\\_position\\_statement\\_september\\_2020\\_updated\\_december\\_2021](https://www.birmingham.gov.uk/downloads/download/2434/gbbchma_housing_supply_and_need_position_statement_september_2020_updated_december_2021)

<sup>3</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

11. SSDC and BCC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.
12. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
13. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities and 53ha from Birmingham (taken from the Stantec report). The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site. Birmingham City Council has however recently evidenced a shortfall of 73.64ha of employment land against its identified need to 2042 through its Issues and Options Consultation Document published 24th October 2022

#### Cross boundary transport impacts

14. SSDC and BCC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to Birmingham City Council's administrative area. No other cross-boundary transport issues have been identified.

#### Infrastructure

15. SSDC and BCC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
16. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

#### Gypsy & Traveller Provision

17. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>5</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
18. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
19. In response to these requests BCC indicated that, at this time, it is likely that the new Birmingham Plan will need to identify new sites to meet its own pitch needs, meaning it is unlikely that additional pitches could be offered to SSDC. However, it confirmed that it had not yet explored options for a new publicly owned site, nor had it engaged site promoters of proposed general housing allocation sites to see if their sites could contribute to increasing overall pitch delivery. These points were not anticipated to be addressed before the Preferred Options document in 2023.

## Natural Environment

20. SSDC and BCC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
21. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Birmingham City Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

---

<sup>5</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

**South Staffordshire District Council**

**Name:**

**Position:**

**Signature:**

**Date:**

**Birmingham City Council**

**Name:**

**Position:**

**Signature:**

**Date:**

DRAFT

Statement of Common Ground  
between Bromsgrove District  
Council and South Staffordshire  
District Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT



## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Bromsgrove District Council (BDC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Bromsgrove District Council (BDC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Bromsgrove District Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing housing and employment needs and Gypsy and Traveller accommodation. These discussions have informed the development of adopted plans and other related documents. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites.
6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and BDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities<sup>2</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
8. BDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

9. SSDC's Economic Development Needs Assessment (June 2022) concludes that SSDC lies within a Functional Economic Market Area (FEMA) which includes South Staffordshire, Wolverhampton, Dudley, Walsall, Cannock Chase and Stafford. BDC's Housing and Economic Development Needs Assessment (HEDNA) (January 2022) identifies two possible options for defining Bromsgrove's FEMA, one of which would be to use the GBBC HMA geography, as this reflects an economic area centred on Birmingham and aligns with Travel to Work Areas. Despite differences in FEMA definitions, there is nothing within guidance to suggest that a FEMA defines an exclusive relationship and therefore SSDC and BDC will continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.
10. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
11. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA

---

<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site.

### Cross boundary transport impacts

12. SSDC and BDC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Bromsgrove administrative area. No other cross-boundary transport issues have been identified.

### Infrastructure

13. SSDC and BDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
14. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

### Gypsy & Traveller Provision

15. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>3</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
16. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which

---

<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021



would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

17. BDC's latest response to the August 2022 correspondence suggests that there is no free pitch provision on existing public sites in Bromsgrove and that meeting BDC's own need is likely to require pitches within the Green Belt. BDC indicated that they may approach site promoters to consider options for publicly run sites in the future and that all publicly owned land that BDC was aware of has been considered at this stage. Therefore, in SSDC's view it is currently unclear at this stage as to what extent BDC may or may not be able to assist in meeting unmet pitch need arising from SSDC as currently site promoters have not been approached and it is unclear from the information provided whether options for a new publicly run site have currently been examined.

## Natural Environment

18. SSDC and BDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
19. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Bromsgrove District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### Bromsgrove District Council

Name:

Position:

**Signature:**

**Date:**

DRAFT

Statement of Common Ground  
between Cannock Chase District  
Council and South Staffordshire  
District Council

South Staffordshire Local Plan 2018-  
2039

[November 2022]

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Cannock Chase District Council (CCDC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment (Special Areas of Conservation).

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District Council and Cannock Chase District Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup> and are either within, or are closely functionally related to, the South Staffordshire FEMA<sup>2</sup>, Cannock Chase FEMA<sup>3</sup> and Black Country FEMA<sup>4</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

<sup>2</sup> South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

<sup>3</sup> Cannock Chase EDNA 2019 and 2020 update

<sup>4</sup> Black Country EDNA 2017 and 2021 update

traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.

6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and CCDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities<sup>5</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
8. CCDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

9. SSDC and CCDC both sit within the South Staffordshire functional economic market area (FEMA) and the Cannock Chase functional economic market area (FEMA).
10. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
11. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work

---

<sup>5</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

area. Supporting work commissioned to examine the apportionment of WMI<sup>6</sup> suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. CCDC has formally stated their employment land provision in their forthcoming Regulation 19 Pre-Submission Local Plan will include 10 ha of employment land at the West Midlands Interchange as identified in the SFRI 2021 Study. The remaining land supply from WMI aside from the South Staffordshire, Cannock Chase and Black Country apportionment has not to date been formally stated as necessary to meet needs by the other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site.

12. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

### Cross boundary transport impacts

13. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Cannock administrative area. No other cross-boundary transport issues have been identified.

### Infrastructure

14. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
15. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

### Gypsy & Traveller Provision

---

<sup>6</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

16. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>7</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
17. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
18. CCDC's latest response to the August 2022 correspondence states that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This is not something that we intend to explore further. No engagement has taken place with site owners in respect of potential to allocate part of their site for a publicly run site. Again, there are no plans to investigate this further.
19. Publicly owned sites have been considered for potential new sites but these options were very limited when considered against CCDC assessment criteria. The CCDC Regulation 19 pre-submission consultation Local Plan was considered at the council's Cabinet on 25<sup>th</sup> August 2022. The CCDC Pre-submission consultation includes provision for a site for gypsy accommodation (Policy SO 3.3) which will help address the need identified in evidence for accommodation for gypsy and travellers. Whilst this provides a 5 year supply there remains a longer term need which is proposed to be addressed in a review of the Local Plan following an update of the evidence base.
20. To support the provision of gypsy and traveller sites within Cannock District the use of publicly owned land was investigated, along with privately operated sites through its continual Call for Sites and proactive search for suitable sites including sites within the Green Belt. Two permissions for new sites within the Green Belt have been given in recent years

---

<sup>7</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

and the proposed allocation within the Regulation 19 Pre-submission consultation version of the Local Plan is an extension to an existing site within the Green Belt.

21. The evidence<sup>8</sup> to support the Local Plan did not identify a need for transit sites and there was no evidence of any households wishing to move to Cannock Chase or of any residents on existing sites stating that they were planning to move away from the area. CCDC have considered potential new sites against site selection criteria but options were very limited and CCDC is not able to identify any surplus capacity on sites not within the Green Belt or sites within the Green Belt for gypsy and travellers at this time that can be exported through the Duty to Cooperate at this time and stage in the preparation of the Local Plan.
22. To support the ongoing cooperation between the authorities an update of the evidence on the assessment of the accommodation needs for gypsy and travellers which considers any longer-term unmet need arising within Cannock District over a wider geography than just Cannock Chase District and South Staffordshire District given the strategic nature of the A5 corridor which could then inform future allocations is supported by CCDC. At this current time CCDC are not in a position to examine the potential for new publicly run sites. SSDC's request was submitted at the time CCDC were preparing to seek authority to embark on their Regulation 19 consultation and too late to be considered as part of the plan making process. A response to the SSDC request cannot be provided at this time and will be considered as part of future work streams.
23. In SSDC's view it is therefore currently unclear as to what extent CCDC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as CCDC appears to be indicating that it has no intention of examining the potential for new publicly run sites in the Green Belt or new publicly run sites delivered alongside wider allocations for other uses.
24. How SSDC can address their identified unmet need for gypsy and traveller accommodation provision is currently not an area upon which agreement is yet reached.

## Natural Environment

25. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.
26. Both CCDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and CCDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs.
27. SSDC and CCDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

---

<sup>8</sup> Cannock Chase Gypsy and Traveller Accommodation Assessment 2019



## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Cannock Chase District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### **South Staffordshire District Council**

**Name:**

**Position:**


**Signature:**

**Date:**

### **Cannock Chase District Council**

**Name:** 

**Position:** Head of Economic Prosperity

**Signature:** 

**Date:** 8<sup>th</sup> November 2022

Statement of Common Ground  
between Dudley Metropolitan  
Borough Council and South  
Staffordshire District Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Dudley Metropolitan Borough Council (DMBC).

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Dudley Metropolitan Borough Council (DMBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Dudley Metropolitan Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup> and are either within, or are closely functionally related to, the South Staffordshire FEMA<sup>2</sup> and Black Country FEMA<sup>3</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

<sup>2</sup> South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

<sup>3</sup> Black Country EDNA 2017 and 2021 update

traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.

6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and DMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities<sup>4</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Whilst SSDC has raised points through the Draft Black Country Plan consultation which it considers may reduce this shortfall, it is common ground that there is likely to be a very significant shortfall arising from the Black Country and that this requires discussion under the Duty to Cooperate.
8. DMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities<sup>5</sup>. This has led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. DMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.
9. SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.
10. DMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the

---

<sup>4</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council



HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

11. SSDC and DMBC both sit within the South Staffordshire Functional Economic Market Area (FEMA). DMBC is also within the Black Country FEMA and SSDC is identified as being outside of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between DMBC and SSDC on employment matters.
12. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
13. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI<sup>6</sup> suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs.
14. DMBC has been part of the preparation of the Black Country Plan. Published evidence from that plan, at the Reg 18 Stage, as informed by the EDNA 2021, indicated that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities through the duty to cooperate process. DMBC, as part of the Black Country authorities, has therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall. However, in October 2022, the Black Country Councils confirmed that work on the Black Country Plan had ceased, and that the four councils would be preparing individual local plans. These plans will be informed by an update of the Black Country EDNA 2021, and that update will confirm the employment land scenario and associated shortfall arising in each of the local authority areas and the associated sum across the FEMA as a whole.
15. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including DMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and DMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst

---

<sup>6</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

acknowledging that the Black Country FEMA authorities (including DMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and DMBC's stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

## Cross boundary transport impacts

16. SSDC and DMBC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Dudley administrative area. No other cross-boundary transport issues have been identified at this stage. However, SSDC and DMBC will continue to work together to ensure that any cross-boundary transport matters arising are addressed.

## Infrastructure

17. SSDC and DMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas
18. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified at this stage. SSDC, Staffordshire CC and DMBC will continue to work together to ensure that any cross-boundary matters arising are addressed.
- 19.

## Gypsy & Traveller Provision

20. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>7</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
21. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring

---

<sup>7</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

22. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. However, no details were given about efforts made to examine the potential for expanded or new public site provision, nor was a follow-up response received to SSDC's subsequent August 2022 letter.
23. Subsequently, correspondence has confirmed that DMBC's one existing public/Council owned Traveller site is fully occupied with a waiting list. DMBC indicated that no site submissions had been received for Gypsy and Traveller sites and that a review of a number of sites (including public land and Green Belt) had only identified one site that would suitably accommodate a permanent transit site, which is now the subject of a planning application. DMBC also indicated that it will consider engaging with site promoters/proposed allocations to identify if part of a wider site can be made available for a publicly run site as part of its Local Plan work being progressed in 2023. SSDC has not currently reviewed the site assessment work undertaken by DMBC but will continue to engage with DMBC as its plan preparation progresses to identify if there is scope for a contribution to SSDC's unmet needs.

## Natural Environment

24. SSDC and DMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
25. No cross-boundary issues have been identified at this stage.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Dudley Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

**Signature:**

**Date:**

**Dudley Metropolitan Borough Council**

**Name:**

**Position:**

**Signature:**

**Date:**

DRAFT



Statement of Common Ground  
between North Warwickshire  
Borough Council and South  
Staffordshire District Council  
South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & North Warwickshire Borough Council

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and North Warwickshire Borough Council (NWBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and North Warwickshire Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and NWBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities have participated in both the Strategic Housing Market Assessments including the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2036. Each authority have considered how through their own plan-making process to assist in addressing unmet needs. The Black Country authorities<sup>2</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. In SSDC's view, the GBBCHMA remains the appropriate geography over which to plan for housing shortfalls. In NWBC's view, as there is no functional relationship between North Warwickshire and the Black Country it is not considered that North Warwickshire will deliver towards the housing shortfall identified in the Black Country.
8. NWBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are working to progress the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, a joint HMA Statement of Common Ground is considered to be an appropriate vehicle by which to address the issue holistically.

## Employment

9. SSDC and NWBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.

## Cross boundary transport impacts

10. SSDC and NWBC are committed to continue working together in partnership, alongside their respective highway authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the North Warwickshire administrative area. No other cross-boundary transport issues have been identified.

---

<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

## Infrastructure

11. SSDC and NWBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
12. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

13. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>3</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
14. SSDC has written to all adjacent and housing market area authorities in January 2022 and then in August 2022 during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
15. SSDC wrote to NWBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. NWBC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent NWBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation regarding what options to explore additional public pitches have/have not been considered by NWBC. NWBC has indicated they are unable to assist in

---

<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021



the provision of publicly owned pitches to cater for the needs of Gypsy and Travellers in South Staffordshire. In the Local Development Scheme NWBC has committed to bring forward a Gypsy and Traveller DPD and this may be an issue that could be considered at that time.

## Natural Environment

16. SSDC and NWBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
17. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and North Warwickshire Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### North Warwickshire Borough Council

Name:

Position:

Signature:

Date:

Statement of Common Ground  
between Redditch Borough Council  
and South Staffordshire District  
Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Redditch Borough Council (RBC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Redditch Borough Council (RBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Redditch Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing housing needs and Gypsy and Traveller provision. These discussions have informed the development of adopted plans and other related documents. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites.
6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and RBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities<sup>2</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
8. RBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

9. SSDC and RBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.
10. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
11. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the

---

<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council



apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site.

### Cross boundary transport impacts

12. SSDC and RBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Redditch administrative area. No other cross-boundary transport issues have been identified.

### Infrastructure

13. SSDC and RBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
14. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

### Gypsy & Traveller Provision

15. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>3</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
16. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through

---

<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

new or expanded publicly run sites.

17. RBC's most recent response was to the January 2022 correspondence where they considered that there is insufficient evidence to conclude that there was a strong connection between movement patterns of travellers between the authority areas. Therefore, additional provision within the Redditch area would not provide a sustainable solution to meeting the specific needs of the Gypsy and Traveller population within the South Staffordshire area. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SSDC acknowledges that it has less of a functional relationship with RBC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in RBC's administrative area if this secured them a permanent pitch. In SSDC's view it is therefore currently unclear as to what extent RBC may or may not be able to assist in meeting unmet pitch need arising from SSDC. RBC maintain that the evidence does not provide clear evidence of a functional link with regard to Gypsy and Traveller Accommodation Needs, which can be closely related to extended family and their existing locations. The GBBCHMA strategic study does not consider the needs of Gypsy and Travellers and it is not clear whether any work has been previously done to evidence this functional link in relation to these specific gypsy and traveller needs. Therefore, RBC feel that the emphasis remains as stated here - that it is very much unclear as to what extent RBC may/may not be able to assist in meeting SSDC's pitch needs.

## Natural Environment

18. SSDC and RBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
19. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Redditch Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

**Redditch Borough Council**

**Name:**

**Position:**

**Signature:**

**Date:**

DRAFT

Statement of Common Ground  
between Sandwell Metropolitan  
Borough Council and South  
Staffordshire District Council  
South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Sandwell Metropolitan Borough Council (SMBC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Sandwell Metropolitan Borough Council (SMBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Sandwell Metropolitan Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup> and are either within, or are closely functionally related to, the South Staffordshire FEMA<sup>2</sup> and Black Country FEMA<sup>3</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

<sup>2</sup> South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

<sup>3</sup> Black Country EDNA 2017 and 2021 update



including designated sites. These discussions have informed the development of adopted plans and other related documents.

6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and SMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities<sup>4</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Whilst SSDC has raised points through the Draft Black Country Plan consultation which it considers may reduce this shortfall, it is common ground that there is likely to be a very significant shortfalls arising from the Black Country and that this requires discussion under the Duty to Cooperate.
8. SMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities<sup>5</sup>. This has led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. SMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.
9. SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.
10. SMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

---

<sup>4</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

## Employment

11. SSDC and SMBC both sit within the South Staffordshire functional economic market area (FEMA). SMBC is also within the Black Country FEMA and SSDC is identified as being outside of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between SMBC and SSDC on employment matters.
12. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
13. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI<sup>6</sup> suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs.
14. SMBC has been part of the preparation of the Black Country Plan. Evidence from this suggested that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities through the duty to cooperate. SMBC, as part of the Black Country authorities, has therefore been in duty to cooperate discussions SMBC with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.
15. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including SMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and SMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including SMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and SMBC's stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

---

<sup>6</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

## Cross boundary transport impacts

16. SSDC and SMBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Sandwell administrative area. No other cross-boundary transport issues have been identified.

## Infrastructure

17. SSDC and SMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
18. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

19. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>7</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
20. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
21. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black

---

<sup>7</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021



Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. At the time, no details were given about efforts made to examine the potential for expanded or new public site provision. SMBC has since indicated that it has no plots available on existing public sites for SSDC needs. However, it also indicates it will engage with site promoters through a 'Call for Sites' to explore if they are willing to make part of their site available for a publicly run site during 2023 and that options for a new publicly run site in the Green Belt will be examined through its Issues and Options consultation for the Sandwell Development Plan. It has also stated that further work to consider whether there is publicly owned land for permanent sites will likely be undertaken during 2023. SSDC and SMBC will continue to work together to identify whether SMBC can contribute to SSDC's unmet needs as the SMBC and SSDC plans progress.

## Natural Environment

22. SSDC and SMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
23. No other cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Sandwell Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### Sandwell Metropolitan Borough Council

Name:

Position:

Signature:

Date:

Statement of Common Ground  
between Shropshire Council and  
South Staffordshire District Council  
South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Shropshire Council (SC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Shropshire Council (SC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural and historic environment including designated sites.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Shropshire Council.

### Key Strategic Matters

4. The local authorities have had positive, constructive and on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The parties have already entered into a Statement of Common Ground to inform the submission of the draft Shropshire Local Plan (2016-2038) which is currently at Examination. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

6. SC and SSDC are within separate housing market areas (HMAs). Although SC are not within the GBBCHMA<sup>1</sup> they are members of the Technical Officers Group as a related planning authority. Both authorities are actively engaged in the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address emerging housing shortfalls forecast to arise within the GBBCHMA. Whilst both parties have already engaged constructively with regional partners on this issue, which has included offers of assistance towards accommodating emerging unmet need forecast to arise in the Black Country which forms part of the GBBCHMA, given the scale and complexity of the housing shortfalls forecast to arise in the GBBCHMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically moving forward.
7. No other housing related cross-boundary issues have been identified.

## Employment

8. SSDC and SC are within separate functional economic market areas (FEMAs) but continue to work together collaboratively as part of GBBCHMA Technical Officers Group.

## Cross boundary transport impacts

9. SSDC and SC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC is proposing four strategic housing site allocations, however none are within close proximity to the Shropshire administrative area. No other cross-boundary transport issues have been identified.

## Infrastructure

10. SSDC and SC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
11. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council



## Gypsy & Traveller Provision

12. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the proposed local plan period, including 72 pitches within the first 5 year period<sup>2</sup>.
13. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC consider they can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same HMA.
14. SC has not assessed SSDC's evidence on Gypsy and Traveller Needs. This need was formally identified in evidence published after the submission of the Shropshire Local Plan for Examination in September 2021. SC and SSDC have an established agreed position as of August 2021 on this issue as part of the SoCG that has informed the draft Shropshire Local Plan. This acknowledged that whilst no strategic cross-boundary matter had been identified in relation to gypsy and traveller needs arising in the South Staffordshire District Council area, that updated evidence on this issue would be prepared by SSDC to inform their ongoing Local Plan review. This also agreed that in the event that this emerging evidence identified a need which SSDC considered could not be accommodated within the SSDC administrative area, , that due to the advanced stage of the Shropshire Local Plan preparation this would form part of duty to cooperate discussions with respect to a future Local Plan review process in Shropshire.
15. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the potential pitch shortfall that they consider is likely to exist, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested these authorities to examine their ability to contribute to its unmet pitch needs, specifically in the form of the potential for extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC.
16. SSDC then wrote again to these same authorities in August 2022, providing an update on extra efforts that they had made to identify new public sites within the District upon Staffordshire County Council land. This letter communicated that SSDC consider that a significant shortfall still remained and that SSDC consider they require assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
17. SC's most recent response to the August 2022 correspondence confirmed their previous January 2022 position that Shropshire would not be able to accommodate any identified unmet Gypsy and Traveller needs from South Staffordshire, due to a notable mismatch in both timing of our Local Plan preparation cycles, as agreed in the SoCG agreed between the parties to inform the Shropshire Local Plan (referred to in Para 14 above), and having regard

---

<sup>2</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

to the geography of Shropshire's gypsy and traveller provision and main areas of demand. SC confirmed it is seeking to address the needs identified within its own GTAA, but based upon this evidence are not proposing to allocate specific sites for this purpose in the emerging Shropshire Local Plan. SC has confirmed that given the advanced stage of its own Plan making, that it has not investigated the potential for any new additional public sites to be created as part of wider allocations beyond that already identified within its Plan as part of its current Plan review cycle. Both parties agree that this is an issue which can be reviewed further as part of future Plan review cycles if required.

## Natural Environment

18. SSDC and SC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
19. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Shropshire Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### Shropshire Council

Name:

Position:

Signature:

Date:

Statement of Common Ground  
between Solihull Metropolitan  
Borough Council and South  
Staffordshire District Council  
South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Solihull Metropolitan Borough Council (SMBC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Solihull Metropolitan Borough Council (SMBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Solihull Metropolitan Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council



6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and SMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (SGS) (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The parties acknowledge that the SGS forms part of the evidence base (not policy) for relevant plans and that through more detailed work of their own plans the proposed locations for strategic growth in the SGS may not be suitable, achievable or deliverable and/or other strategic options may be available
8. The Black Country authorities<sup>2</sup> declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan<sup>3</sup> consultation in 2021 that this shortfall stood at around 28,000 dwellings (up to 2036), despite Green Belt release being explored. At the time of writing this shortfall, and whether their approach to dealing with it within their plan area, has not been subject to examination and is not in an adopted plan.
9. The parties recognise that Birmingham City Council have published an Issues and Options consultation in October 2022 which indicates a shortfall of over 78,000 (to 2042) dwellings based on existing known supply. This is the first BCC publication setting out the nature of unmet need beyond 2031. The contribution of 4,000 dwellings<sup>4</sup> towards the HMA shortfall included in SSDC plan was made before this publication.
10. SMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

---

<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

<sup>3</sup> The parties recognise that in October 2022 the 4 Black Country authorities announced that work on a joint plan covering the 4 authorities would no longer be pursued, and instead each authority would pursue its own individual plan. At the time of writing the implications of this change in circumstances have not yet been fully considered.

<sup>4</sup> The parties note that this 4,000 contribution has not been attributed to an individual authority within the HMA, and is a contribution towards unmet need to the HMA as a whole.

11. SSDC and SMBC are within separate functional economic market areas but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.
12. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
13. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site.
14. In the context of the potential apportionment of employment land at the WMI, the parties recognise that proposals for UK Central included in SMBC's emerging plan also include strategic employment land being provided beyond the local needs of the host authority. More clarity on how this could be accounted/attributed for is expected to be included in the Inspectors' report which will be received in due course.

#### Cross boundary transport impacts

15. SSDC and SMBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Solihull administrative area. No other cross-boundary transport issues have been identified.

#### Infrastructure

16. SSDC and SMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
17. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

18. SSDC has an identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>5</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
19. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
20. SSDC wrote to SMBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. SMBC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent SMBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by SMBC. SMBC assert that there is no current surplus of pitches in Solihull and that experience from adopting SMBC's existing Gypsy & Traveller DPD that any future additional pitches needed to accommodate SMBC's own needs would need to be provided in the Green Belt and as such Solihull is in no sequentially preferable position to accommodate any of SSDC's needs.

## Natural Environment

21. SSDC and SMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
22. No specific issues have been identified.

---

<sup>5</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Solihull Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### **South Staffordshire District Council**

**Name:**

**Position:**

**Signature:**

**Date:**

### **Solihull Metropolitan Borough Council**

**Name:**

**Position:**

**Signature:**

**Date:**



Statement of Common Ground  
between Stafford Borough Council and  
South Staffordshire District Council  
South Staffordshire Local Plan

2018-2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Stafford Borough Council (SBC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stafford Borough Council (SBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment (Special Areas of Conservation).

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Stafford Borough Council. SSDC and SBC both sit within the South Staffordshire functional economic market area (FEMA).

### Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

### Housing

6. SSDC and SBC are in separate housing market areas but continue to engage constructively on housing related issues.

## Employment

7. SSDC and SBC both sit within the South Staffordshire functional economic market area (FEMA).
8. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls. Stafford Borough Council's latest 2022 Regulation 18 Preferred Option consultation sets out the borough's current position on employment land provision. This indicates there is no surplus in employment land provision to be exported through the Duty to Cooperate to the Black Country. Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the borough in the work to apportion land from that site.
9. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site.
10. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and SBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and SBC stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

## Cross boundary transport impacts

11. SSDC and SBC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Stafford administrative area. As these sites progress the local authorities

will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

## Infrastructure

12. SSDC and SBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
13. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

14. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>1</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
15. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. It should be noted that SSDC and SBC are in separate housing market areas.
16. SBC's most recent response to the August 2022 correspondence provided additional clarification in order to confirm their previous position in January 2022 that Stafford Borough would not be able to accommodate any identified unmet Gypsy and Traveller accommodation needs from South Staffordshire. SBC is currently seeking to provide sufficient sites to meet its own Gypsy and Traveller accommodation needs, and is progressing with the Local Plan 2020-2040. The call for sites process remains open, and

---

<sup>1</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021



relevant policy context is available through the Preferred Options consultation currently taking place during October to December 2022. In SSDC's view it is therefore currently unclear as to what extent SBC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as the call for sites identification process is still on-going, including covering the Green Belt areas. In addition SSDC's view is that the potential for additional public pitch options in SBC has not been fully explored. SBC consider that public pitch options have been fully explored, with all of the plots on existing public sites currently occupied and therefore unable to support South Staffordshire's unmet need. In addition the Borough Council hold a waiting list for plots for when any become available. This unfortunately is rare as we have recently had to reduce the number of pitches during a refurbishment and most of the residents on the site have lived there for long periods of time and are not considering moving. Based on current market conditions and available resources for effective delivery within Stafford Borough all potential site delivery options for gypsies, both public and private, have been considered through submissions from landowners / developers, including in the Green Belt areas. At this stage the Borough Council are not aware of any publicly owned land which is available to deliver new gypsy sites despite reviewing Stafford Borough Council's land and working with Staffordshire County Council over a number of years in an attempt to identify new gypsy sites. Based on exploring the options set out by SSDC in its letter dated 8 August 2022, at this stage SBC's position is that it is consequently unable to identify potential new gypsy sites to accommodate the needs from South Staffordshire.

## Natural Environment

17. SSDC and SBC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.
18. Both SBC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and SBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs.
19. SSDC and SBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Stafford Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

**South Staffordshire District Council**

**Name:**

**Position:**

**Signature:**

**Date:**

**Stafford Borough Council**

**Name:**

**Position:**

**Signature:**

**Date:**

DRAFT

Statement of Common Ground  
between Stratford-on-Avon District  
Council and South Staffordshire  
District Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Stratford-on-Avon District Council (SoADC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stratford-on-Avon District Council (SoADC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.
3. In respect of plan-making in Stratford-on-Avon District, the Council is working with Warwick District Council to prepare a South Warwickshire Local Plan for the period to 2050. A scoping consultation was undertaken in 2021 and Regulation 18 Issues and Options consultation is expected in January 2023. Adoption of this new Part 1 Local Plan to supersede the current adopted Core Strategy (2016) is expected in 2025. More information is available at [www.southwarwickshire.org.uk/swlp](http://www.southwarwickshire.org.uk/swlp). The Council is also preparing a Site Allocations Plan to sit alongside the adopted Core Strategy and more information is available at [www.stratford.gov.uk/siteallocations](http://www.stratford.gov.uk/siteallocations). Both plans are seeking to address strategic cross boundary issues.

### Geography covered by Statement of Common Ground

4. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Stratford-on-Avon District Council.
5. Although not neighbouring authorities, both Councils are within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

6. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
7. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

8. SSDC and SoADC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities<sup>2</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
9. SoADC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

10. SSDC and SoADC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group.

## Cross boundary transport impacts

11. SSDC and SoADC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Stratford-on-Avon administrative area. No other cross-boundary transport issues have been identified.

---

<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council



## Infrastructure

12. SSDC and SoADC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
13. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

14. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>3</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
15. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
16. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SoADC's most recent response to the August 2022 correspondence stated that in view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SoADC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding this, SoADC is keen to work with authorities across the

---

<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Greater Birmingham and Black Country Housing Market Area (GBBCHMA) in respect of evidence gathering to better understand these functional relationships. SSDC acknowledges that it has less of a functional relationship with SoADC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in SoADC's administrative area if this secured them a permanent pitch. SoADC are Planning for Gypsies and Travellers through the preparation of the South Warwickshire Local Plan and have commissioned a GTAA to help inform that process. No decisions have yet been made about how needs will be met. In SSDC's view it is therefore currently unclear as to what extent SoADC may or may not be able to assist in meeting unmet pitch need arising from SSDC until work on SoADC's has been progressed.

## Natural Environment

17. SSDC and SoADC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
18. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Stratford-on-Avon District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### Stratford-on-Avon District Council

Name:

Position:

Signature:

Date:



Statement of Common Ground  
between Tamworth Borough  
Council and South Staffordshire  
District Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Tamworth Borough Council (TBC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Tamworth Borough Council (TBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Tamworth Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and TBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities<sup>2</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
8. TBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

9. SSDC and TBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.

## Cross boundary transport impacts

10. SSDC and TBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Tamworth administrative area. No other cross-boundary transport issues have been identified.

## Infrastructure

11. SSDC and TBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

---

<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

12. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

### Gypsy & Traveller Provision

13. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>3</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
14. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
15. TBC's most recent response to the August 2022 correspondence stated that its joint GTAA in 2019 concluded that there was no identified need for pitches within Tamworth Borough. As a result of this, the TBC has not currently identified any potential sites within the Borough that would be suitable for accommodating pitches. The parties agree it is therefore currently unclear as to what extent TBC may or may not be able to assist in meeting unmet pitch need until work has been undertaken to identify additional potentially suitable public site options.

### Natural Environment

16. SSDC and TBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
17. No cross-boundary issues have been identified.

---

<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Tamworth Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### Tamworth Borough Council

Name:

Position:

Signature:

Date:



Statement of Common Ground  
between Telford and Wrekin  
Council and South Staffordshire  
District Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Telford and Wrekin Council (T&WC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Telford and Wrekin Council (T&WC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Telford and Wrekin Council.

### Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.



## Housing

6. SSDC and T&WC are within separate housing market areas (HMAs). Although T&WC are not within the GBBCHMA<sup>1</sup> they attend the Technical Officers Group in an observation capacity as a neighbouring planning authority. The GBBCHMA Development Needs Group have been developing a Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA, T&WC has not yet confirmed if it will be a signatory to this.
7. No other housing related cross-boundary issues have been identified.

## Employment

8. SSDC and T&WC are within separate functional economic market area but continue to work together collaboratively to monitor any cross boundary employment issues.

## Cross boundary transport impacts

9. SSDC and T&WC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. This includes the shared ambition for the electrification of the Shrewsbury – Telford – Wolverhampton Rail Line. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Telford and Wrekin administrative area. No other cross-boundary transport issues have been identified.

## Infrastructure

10. SSDC and T&WC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
11. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council  
South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

12. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>2</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
13. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
14. SSDC wrote to T&WC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. T&WC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent T&WC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by T&WC. T&WC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. Until the Council understand how they will be able to plan for their own needs they are not in a position to respond to this request at this time.

## Natural Environment

15. SSDC and T&WC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
16. No cross-boundary issues have been identified.

## Signatures

---

<sup>2</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Telford and Wrekin Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

**South Staffordshire District Council**

**Name:**

**Position:**

**Signature:**

**Date:**

**Telford and Wrekin Council**

**Name:**

**Position:**

**Signature:**

**Date:**

DRAFT

Statement of Common Ground  
between Walsall Metropolitan  
Borough Council and South  
Staffordshire District Council  
South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Walsall Metropolitan Borough Council (WMBC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Walsall Metropolitan Borough Council (WMBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment (Special Areas of Conservation).

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Walsall Metropolitan Borough Council (WMBC)
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup> and are either within, or are closely functionally related to, the South Staffordshire FEMA<sup>2</sup> and Black Country FEMA<sup>3</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

### Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

<sup>2</sup> South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

<sup>3</sup> Black Country EDNA 2017 and 2021 update



traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.

6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. SSDC and WMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities<sup>4</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Whilst SSDC has raised points through the Draft Black Country Plan consultation which it considers may reduce this shortfall, it is common ground that there is likely to be a very significant shortfalls arising from the Black Country and that this requires discussion under the Duty to Cooperate.
8. WMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities<sup>5</sup>. This has led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. WMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.
9. To date, there is no agreed approach between SSDC, Black Country authorities and Birmingham as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.
10. WMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the

---

<sup>4</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically.

## Employment

11. SSDC and WMBC both sit within the South Staffordshire functional economic market area (FEMA). WMBC is also within the Black Country FEMA and SSDC is identified as being outside of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between WMBC and SSDC on employment matters.
12. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
13. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI<sup>6</sup> suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs.
14. WMBC has been part of the preparation of the Black Country Plan. Evidence from this suggested that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities through the duty to cooperate. WMBC, as part of the Black Country authorities, has therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.
15. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including WMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and WMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including WMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and WMBC's stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

---

<sup>6</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)



## Cross boundary transport impacts

16. SSDC and WMBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Walsall administrative area. No other cross-boundary transport issues have been identified.

## Infrastructure

17. SSDC and WMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
18. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Both authorities will continue to engage with health providers (e.g. Integrated Care Boards) to identify the most appropriate strategies for mitigating health impacts from each local authority area. No other cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

19. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>7</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
20. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that

---

<sup>7</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

21. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. However no details were given about efforts made to examine the potential for expanded or new public site provision, nor was a follow-up response received to SSDC's subsequent August 2022 letter.
22. Subsequently, correspondence has confirmed that WMBC's permanent traveller site is full and that there is a temporary transit site but that only has a 3 year permission. Whilst the Walsall Site Allocation Document allocates a new permanent (non-Green Belt) site, no funding has been identified to enable its delivery and no options have been considered for publicly run sites in the Green Belt. Green Belt sites proposed in the Black Country Plan had not yet been contacted to consider the inclusion of a traveller site and WMBC have not yet scoped out issues that might be addressed by any replacement for the Black Country Plan. Finally, Walsall has very little publicly owned land that remains available for development either as a traveller site or for general housing.
23. Given this background SSDC is of the view that it will need to continue to work with WMBC to establish whether there is scope for new publicly run Green Belt sites (including as part of a wider housing allocation) which could address SSDC pitch needs as the new WMBC local plan progresses.

## Natural Environment

24. SSDC and WMBC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.
25. Both WMBC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and WMBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs.
26. SSDC and WMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Walsall Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

**South Staffordshire District Council**

**Name:**

**Position:**

**Signature:**

**Date:**

**Walsall Metropolitan Borough Council**

**Name:**

**Position:**

**Signature:**

**Date:**

DRAFT

Statement of Common Ground  
between Wyre Forest District  
Council and South Staffordshire  
District Council

South Staffordshire Local Plan 2018-  
2039

[Insert Date]

DRAFT

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Wyre Forest District Council (WFDC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and City of Wolverhampton Council (WFDC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District Wyre Forest District Council.

### Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.



## Housing

6. SSDC and WFDC are within separate housing market areas (HMAs). Although WFDC are not within the GBBCHMA<sup>1</sup> they are members of the Technical Officers Group as a related planning authority. Both authorities are party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address the issue holistically
7. No other housing related cross-boundary issues have been identified.

## Employment

8. SSDC and WFDC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.
9. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
10. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site

## Cross boundary transport impacts

11. SSDC and WFDC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both

---

<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Wyre Forest administrative area. No other cross-boundary transport issues have been identified.

## Infrastructure

12. SSDC and WFDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
13. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

14. SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period<sup>2</sup>. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
15. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.
16. WFDC's most recent response to the August 2022 correspondence, which confirmed WFDC's previous response that WFDC did not have any suitable sites which could assist with SSDC's unmet need for pitches. WFDC have confirmed that their planned new allocated sites and the expansions of existing sites will only provide enough new pitches to meet the needs of Wyre Forest. WFDC also confirmed that the allocation of gypsy pitches on the proposed allocations was discussed through the Local Plan Inquiry and was not considered feasible.

---

<sup>2</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021



SSDC's view it is currently unclear as to what extent WFDC may or may not be able to assist in meeting unmet pitch need arising from SSDC due to public land within WFDC's administrative area needing to be assessed to see if there are any additional suitable sites for pitches to help meet SSDC's need.

## Natural Environment

17. SSDC and WFDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
18. No cross-boundary issues have been identified.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Wyre Forest District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### South Staffordshire District Council

Name:

Position:

Signature:

Date:

### Wyre Forest District Council

Name:

Position:

Signature:

Date:

## Appendix E - Summary of key Duty to Cooperate events relating to housing and employment with the Black Country authorities and Birmingham

The below sets out key Duty to Cooperate events involving the matter of strategic housing and employment needs between the four Black Country authorities (Wolverhampton, Walsall, Dudley and Sandwell), Birmingham City Council and South Staffordshire District Council. This summary of key events focuses on these urban authorities as these are the primary authorities declaring housing and (in the case of the Black Country authorities) employment shortfalls which affect the preparation of the South Staffordshire Local Plan 2020-2039. Alongside the engagement summarised below, South Staffordshire District Council has also proactively engaged other authorities in the relevant functional geographies for housing and employment to ensure that it meets its Duty to Cooperate commitments.

Officers from South Staffordshire District Council, Birmingham City Council and the Black Country authorities have regularly discussed Local Plan progress and joint work throughout their respective plan preparation stages. The table below is not intended to be a full catalogue of all engagement between the authorities, focusing instead on a summary of key correspondence, agreements and cross-boundary work that the authorities have participated in. It also excludes the numerous officer level duty to cooperate meetings between the authorities and meetings of the GBHMA Officer Working Group, which discusses the progress of Local Plans across the GBHMA and updates housing monitoring evidence across the GBHMA and wider West Midlands Combined Authority Area.

To ensure the table focuses on current cross boundary housing and employment needs, key events are recorded from 2017 onwards. This is in part reflects the Birmingham Development Plan's adoption in 2017, with the associated monitoring role for Birmingham in distributing unmet needs across the wider housing market area. It also recognises that the Black Country only initially indicated a potential unmet need as part of its plan preparation in 2017 through its Issues and Options consultation. Prior to this, the two areas have previously worked effectively through the Duty to Cooperate on various Area Action Plans and Site Allocation DPDs prepared in both the Black Country and South Staffordshire, which did not seek to revise strategic housing targets for either authority.

<b>Date</b>	<b>Event</b>	<b>Summary of key points relating to cross boundary housing and employment unmet needs</b>
03/07/2017	<i>Black Country Core Strategy Review – Issues and Options consultation</i>	<ul style="list-style-type: none"> <li>- Presented initial potential scale of Black Country housing shortfall, informed by a 2017 Strategic Housing Market Assessment</li> <li>- Presented initial potential scale of Black Country employment land shortfall, informed by a 2017 Part 1 Economic Development Needs Assessment</li> </ul>

		<ul style="list-style-type: none"> <li>- Asked questions including whether the housing and employment shortfalls set out in the Issues and Options report could be exported to the wider GBHMA and what spatial options may be appropriate to accommodate this</li> </ul>
06/09/2017	<i>South Staffordshire consultation response to Black Country Issues and Options consultation</i>	<ul style="list-style-type: none"> <li>- Indicated willingness to work with the Black Country and other GBHMA authorities on the emerging GBHMA Strategic Growth Study to address housing shortfalls comprehensively</li> <li>- Provided views on the potential feasibility of broad spatial typologies to meet unmet housing needs (i.e. new settlements, SUEs, smaller housing sites)</li> <li>- Stressed the importance of non-Green Belt supply being demonstrably maximised first prior to Green Belt release in other authorities</li> <li>- Stressed that opportunities both within and beyond the Black Country should be evidence-led, including having regard to the emerging GBHMA Strategic Growth Study, finer grain Green Belt assessment and Landscape Sensitivity Studies</li> <li>- Acknowledged strong economic links between South Staffordshire and the Black Country and indicated willingness to discuss assisting in meeting any evidenced unmet employment needs from the Black Country in conjunction with the wider functional economic area set out in the Black Country EDNA</li> </ul>
2017 – February 2018	<i>GBHMA Strategic Growth Study 2018</i>	<ul style="list-style-type: none"> <li>- Both South Staffordshire and the Black Country were active participants in the GL Hearn/Wood GBHMA Strategic Growth Study</li> <li>- Study sought to quantify the approximate scale of unmet housing needs up to 2031 and 2036 across the GBHMA as a whole, before recommending strategic spatial locations and options for densification which could be delivered within the GBHMA to address these shortfalls, including locations within and beyond the Green Belt</li> <li>- Alongside the published study, a position statement was prepared by the GBHMA officers group and published by South Staffordshire and other GBHMA authorities alongside the finalised study</li> <li>- The position statement acknowledged the shortfalls up to both 2031 and 2036 presented in the study and the study's recommendations regarding strategic locations for growth, indicating that the study presented "<i>an independently prepared, objective</i></li> </ul>

		<i>study and not a policy statement ... but it is a thorough evidence base to take matters forward through the local plan review process"</i>
12/07/2018	<i>ABCA letter to Duty to Cooperate bodies</i>	<ul style="list-style-type: none"> <li>- Set out key findings of 2017 Black Country Issues and Options consultation, including updated urban capacity evidence to evidence shortfall in housing needs from Black Country urban area</li> <li>- Requested consideration be given to whether emerging Black Country housing or employment needs could be accommodated in Local Plan Reviews</li> </ul>
23/08/2018	<i>South Staffordshire letter in response to July 18 ABCA letter</i>	<ul style="list-style-type: none"> <li>- Updated the Black Country on progress on the South Staffordshire Site Allocations Document, including the housing and employment land brought forward under that document</li> <li>- Indicated commitment to immediately review Local Plan, recognising cross boundary unmet needs</li> <li>- Reiterated commitment to working with Black Country in line with the Duty to Cooperate on unmet needs issues</li> <li>- Highlighted imminent Issues and Options consultation would be published shortly to set out an approach to this issue</li> </ul>
30/10/2018	<i>South Staffordshire Local Plan Review - Issues and Options consultation published</i>	<ul style="list-style-type: none"> <li>- Sought consultation views on a number of matters relevant to cross boundary unmet needs, including from the Black Country</li> <li>- Proposed a preferred level of housing growth alongside alternatives, reflecting factors including the District's existing housing needs, past levels of housing delivery and the levels of housing growth implied by the strategic locations recommended for delivery within the GBHMA Strategic Growth Study 2018</li> <li>- Sought views on whether additional land should be allocated to meet unmet cross boundary employment needs in the wider FEMA</li> </ul>
19/11/2018	<i>Birmingham City Council response to Issues and Options consultation</i>	<ul style="list-style-type: none"> <li>- Indicated that the consultation identified the relevant strategic considerations</li> <li>- Agreed that the GBHMA was the most appropriate functional geography to plan housing needs across, and that there was a need to draw up a Statement of Common Ground between the relevant planning authorities</li> </ul>

		<ul style="list-style-type: none"> <li>- Suggested that the GBHMA Strategic Growth Study should be identified as a key piece of evidence in the Local Plan Review and that its recommendations should be tested in the Local Plan Review process</li> <li>- Indicated that identifying safeguarded land was unlikely to be appropriate given the need to review Local Plans every five years</li> <li>- Supported options which would allow the District to contribute to the wider unmet needs within the FEMA</li> <li>- Recognised the need to test for levels of contributions towards wider unmet housing needs and the need for the requisite Statement of Common Ground to support this</li> </ul>
7/12/2018	<i>ABCA response to Issues and Options consultation</i>	<ul style="list-style-type: none"> <li>- Expressed support for the preferred level of housing growth</li> <li>- Requested that all of the 4,000 dwelling contribution to be directed towards the Black Country's unmet needs specifically, rather than the wider GBHMA</li> <li>- Indicated support for a mix of spatial options to deliver a proportionate amount of housing growth on the edge of the Black Country in line with the GBHMA Strategic Growth Study areas of search, subject to findings of the joint Green Belt Review and other evidence</li> <li>- Supported the option for South Staffordshire to provide additional high quality employment land towards the Black Country needs, including attributing the West Midlands Interchange scheme towards the unmet Black Country need for employment and logistics.</li> <li>- Raised concerns with sterilisation of brick clay mineral resources in South Staffordshire</li> <li>- Welcomed constructive ongoing work between South Staffordshire and Black Country</li> </ul>
August 2018 – July 2019	<i>Joint officer work on cross-boundary Green Belt Study and Landscape Sensitivity Assessment</i>	<ul style="list-style-type: none"> <li>- Policy SAD1 of South Staffordshire's 2018 Site Allocations Document required the Local Plan Review to be informed by a comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the District.</li> <li>- The GBHMA Strategic Growth Study 2018 also recommended that more detailed Green Belt Reviews were undertaken at a local level to inform Local Plans</li> <li>- In response to this, South Staffordshire and Black Country officers jointly commissioned Land Use Consultants to prepare a cross boundary Green Belt Study and Landscape</li> </ul>

		Sensitivity Assessment of potential greenfield development options within both areas using a consistent methodology
27/09/2019	<i>Birmingham Development Plan – Monitoring and Review of Progress Progress of Neighbouring Authorities – South Staffordshire Questionnaire response</i>	<ul style="list-style-type: none"> <li>- Questionnaire circulated to GBHMA authorities to support the Birmingham Development Plan monitoring process</li> <li>- South Staffordshire provided an update on progress of Local Plan Review</li> <li>- Confirmed that the District was testing providing 4,000 dwellings towards the GBHMA unmet housing need, based on the GBHMA Strategic Growth Study 2018, the Birmingham Development Plan and the emerging Black Country Plan housing shortfall.</li> <li>- South Staffordshire expressed concern to Birmingham that more recent GBHMA housing monitoring efforts had not re-examined the extent of the housing shortfall in the period beyond 2031</li> </ul>
17/10/2019	<i>South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation published</i>	<ul style="list-style-type: none"> <li>- Reconfirmed commitment to test delivery of 4,000 dwellings towards the unmet needs of the GBHMA</li> <li>- Set out 7 different spatial strategies for accommodating preferred housing target, including a preferred option (Option G)</li> <li>- Consulted on site selection criteria for future housing site selection</li> </ul>
17/10/2019	<i>Birmingham City Council letter to GBHMA authority officers</i>	<ul style="list-style-type: none"> <li>- Acknowledged ongoing participation in GBHMA/WMCA housing monitoring work</li> <li>- Birmingham indicated emerging monitoring figures suggested that the housing shortfall in the Housing Market Area to 2031 had now been addressed (<i>NB: these figures did not include South Staffordshire's 4,000 dwelling contribution to GBHMA unmet needs</i>)</li> <li>- Sought confirmation that the figures presented in latest monitoring for each receiving authority were correct</li> </ul>
25/10/2019	<i>South Staffordshire response to Birmingham City Council letter dated 17/10/2019</i>	<ul style="list-style-type: none"> <li>- Expressed concerns at the lack of clarity regarding whether Birmingham/the wider GBHMA still required contributions to unmet housing needs from other authorities</li> <li>- Confirmed that South Staffordshire's housing monitoring data was accurate, but that it could not vouch for information produced by other authorities</li> <li>- Expressed concerns at the lack of an audit trail for the housing windfalls realised in the GBHMA since 2018</li> </ul>

		<ul style="list-style-type: none"> <li>- Highlighted that emerging evidence strongly suggested an unmet need within the GBHMA post 2031, but that recent GBHMA housing monitoring did not seek to address this issue</li> <li>- Expressed concerns that this matter was not addressed given NPPF requirements and the number of emerging Local Plans planning for housing needs beyond the 2031 period</li> </ul>
11/12/2019	<i>Birmingham City Council response to South Staffordshire SHSID consultation</i>	<ul style="list-style-type: none"> <li>- Recognised the constructive and positive engagement undertaken between Birmingham and South Staffordshire to date and that the relevant strategic matters were identified in the SHSID document</li> <li>- Noted that the latest GBHMA housing monitoring information was expected to show significant progress in reducing the shortfall to 2031, but that a shortfall was likely to remain due to the Black Country Local Plan Review</li> <li>- Supported preferred Option G and the 4,000 dwelling contribution to the unmet needs of the GBHMA, particularly in light of South Staffordshire's strong functional relationship with the Black Country</li> <li>- Supported proposed area of search for a new settlement beyond the plan period, in recognition of likely future unmet needs from the GBHMA beyond 2037</li> </ul>
18/12/2019	<i>ABCA response to South Staffordshire SHSID consultation</i>	<ul style="list-style-type: none"> <li>- Restated support for 4,000 dwelling contribution to unmet needs, but restated request that this should be attributed solely to the Black Country</li> <li>- Provided updated evidence on Black Country urban capacity and broad indication of potential level of development that may be accommodated in Black Country Green Belt</li> <li>- Supported preferred approach (Option G), subject to ensuring urban extensions are supported by on site infrastructure and that site selection avoids areas of environmental sensitivity, green belt harm and minimise impacts on infrastructure, whilst reflecting importance of brick clay mineral areas</li> <li>- Suggested threshold for discounting sites solely on the basis of joint Green Belt/landscape study</li> <li>- Requested impacts on wider transport network are assessed, support Brinsford Strategic Park and Ride proposal</li> <li>- Welcomed constructive ongoing work between South Staffordshire and Black Country</li> </ul>



04/08/2020	<i>ABCA letter to Duty to Cooperate bodies</i>	<ul style="list-style-type: none"> <li>- Advised that the Black Country Plan timescales had been delayed and that the plan period would be extended to 2039</li> <li>- Provided update on Black Country urban and non-Green Belt capacity</li> <li>- Sought clarification on whether existing or emerging Local Plans were exceeding local housing or employment needs in either non-Green Belt or Green Belt locations and whether such oversupply could be attributed to the Black Country's unmet needs</li> <li>- Referenced 4 existing authorities that had already committed to providing a contribution to unmet needs, including the Black Country, but that further contributions would be needed to meet Black Country needs</li> <li>- Invited parties to participate in a single Statement of Common Ground covering these strategic cross-boundary needs</li> </ul>
18/12/2020	<i>South Staffordshire response to August 2020 ABCA letter</i>	<ul style="list-style-type: none"> <li>- Referred to previous South Staffordshire 2018 and 2019 Local Plan consultations, clarifying that South Staffordshire's preferred strategy, including a 4,000 dwelling contribution to unmet GBHMA needs, would require Green Belt release within South Staffordshire</li> <li>- Recognised that potential oversupply of employment land in South Staffordshire, particularly at the West Midlands Interchange strategic site, may contribute to Black Country needs</li> <li>- Indicated reforms in Planning for the Future, including the proposal to abolish the Duty to Cooperate and the lack of clarity regarding the government's timescales for these reforms meant the Council could not be sure that Green Belt release was warranted</li> <li>- Indicated this may delay agreement of cross boundary needs via a Statement of Common Ground, but that the Council would keep its position under review</li> </ul>
8/12/2020	<i>South Staffordshire letter to adjoining authorities and wider GBHMA authorities (including Black Country)</i>	<ul style="list-style-type: none"> <li>- Set out South Staffordshire's Local Plan Review progress to date, including the scope of the review set out in Policy SAD1 in the Site Allocations Document 2018</li> <li>- Restated Council's commitment to test 4,000 dwelling contribution to GBHMA unmet needs, using the evidence base set out in the 2018 GBHMA Strategic Growth Study</li> <li>- Advised that this level of growth would require Green Belt release</li> </ul>

		<ul style="list-style-type: none"> <li>- Requested indication whether other local authorities could release sufficient non-Green Belt land supply to allow South Staffordshire to reduce or avoid need for Green Belt release</li> <li>- Requested indication of whether the relevant local authorities would participate in a Statement of Common Ground covering strategic housing needs in the GBHMA</li> </ul>
12/02/2021	<i>South Staffordshire follow up letter to December 2020 response to ABCA</i>	<ul style="list-style-type: none"> <li>- Indicated that SSDC had received clarity from January 21 Ministerial Statement on timescales for current Local Plans and the relationship with White Paper reforms</li> <li>- Reconfirmed commitment to test 4,000 homes towards GBHMA, in response to emerging evidence of unmet needs, including from the Black Country</li> <li>- Reclarified that South Staffordshire's contribution to unmet needs reflected the recommendations of the GBHMA Strategic Growth Study from 2018</li> <li>- Indicated South Staffordshire would require further robust evidence of urban capacity and Green Belt release before releasing its own Green Belt</li> <li>- Committed to exploring whether South Staffordshire's oversupply on employment land could be attributed to the Black Country, and future engagement on Gypsy and Travellers and cross-boundary infrastructure</li> <li>- Indicated willingness of South Staffordshire to participate in a Statement of Common Ground to address these matters</li> </ul>
25/02/2021	<i>Birmingham City Council response to South Staffordshire letter dated 8/12/2020</i>	<ul style="list-style-type: none"> <li>- Restated that Birmingham welcomed and was fully supportive of the approach taken to date by South Staffordshire in its Local Plan Review</li> <li>- Indicated that the latest (September 2020) position statement suggested that a limited (2,597 dwelling) shortfall remained across the GBHMA up to 2031</li> <li>- Also indicated a substantial shortfall of up to 29,260 dwellings across the Black Country up to 2038 as set out in 2019 Urban Capacity Review</li> <li>- Indicated that shortfall prior to 2031 may be exacerbated by a 35% uplift applied to Birmingham and Wolverhampton's housing needs through December 2020 amendments to the standard method for housing needs</li> <li>- Welcome and support the development of an agreed Statement of Common Ground (SoCG) either across the HMA or as a separate agreement between Birmingham and</li> </ul>

		South Staffordshire in support of the proposed contribution towards GBHMA unmet needs up to 2038
26/02/2021	<i>Birmingham City Council letter to Duty to Cooperate bodies</i>	<ul style="list-style-type: none"> <li>- Set out circumstances which may require a review of the Birmingham Development Plan</li> <li>- These included changes in national policy, a shortfall in affordable housing delivery, the 35% uplift in Birmingham's housing requirement, the slowness in delivery of some strategic growth areas and the unmet needs arising from other areas (the Black Country)</li> <li>- Sought initial views on any strategic or cross boundary issues considered to be relevant</li> </ul>
06/04/2021	<i>Black Country officer response to South Staffordshire letter of 8/12/2021</i>	<ul style="list-style-type: none"> <li>- Confirmed discussions of housing need and supply had been ongoing between BC and South Staffordshire representatives for some time, both through GBHMA officer meetings and direct discussions between officers from the two areas</li> <li>- Confirmed the latest estimate of unmet urban capacity need was around 26,920 dwellings according to the Black Country's evidence</li> <li>- Confirmed support for South Staffordshire's intention to accommodate its own needs and a proportionate contribution to GBHMA unmet needs (including the Black Country)</li> <li>- Indicated that due to the constrained nature of the authority areas, the Black Country was unlikely to deliver additional housing land to meet South Staffordshire's own need</li> <li>- Indicated willingness to participate in a SoCG "at the appropriate stage", whilst the covering email indicated <i>"We have come to the conclusion that it is not possible/practical to ask other authorities to sign up to a SoCG with us in advance of publishing our Draft Plan and associated evidence. However, as there will hopefully be little change in the Plan contents between Draft Plan and Publication in summer 2022, it should be possible to gain agreement to one or more SoCG which can be published alongside the Publication Plan. With regard to the housing shortfall, we have responded to Birmingham's letter and will be speaking to them soon about their Plan review timetable and how we should work together to prepare for the lapse of the 2011-31 Birmingham Plan early next year, and what is the best way forward to demonstrate effective HMA joint-working."</i></li> </ul>

19/04/2021	<i>South Staffordshire response to Birmingham letter dated 26/02/2021</i>	<ul style="list-style-type: none"> <li>- Set out role of existing 2018 GBHMA Strategic Growth Study in informing South Staffordshire's contribution to unmet needs and acknowledged that Birmingham's housing needs may significantly increase due to 35% uplift</li> <li>- Stressed PPG requirement that 35% uplift must be met by "<i>cities and urban centres themselves, rather than the surrounding areas...</i>" to provide sustainable transport patterns</li> <li>- Stressed need for Birmingham to fully evidence maximisation of brownfield and underutilised land prior to exporting further needs arising since the 2018 GBHMA Strategic Growth Study, including through use of design codes and densification</li> <li>- Highlighted that, if there was a significant step-change in unmet needs, the GBHMA Strategic Growth Study must be updated (alongside West Midlands transport evidence base) to distribute this sustainably</li> <li>- Indicated further export without a supporting HMA evidence base and sustainable transport investment would be unsustainable and inconsistent with Birmingham's carbon neutrality pledge</li> <li>- Requested clarification on Birmingham's intentions/timescales for its Local Plan Review and role in preparing a GBHMA SoCG to distribute unmet housing needs with Black Country, highlighting PPG requirement for a single statement to be prepared for such purposes</li> </ul>
01/06/2021	<i>South Staffordshire DtC letter to all adjoining and GBHMA authorities (including Black Country and Birmingham)</i>	<ul style="list-style-type: none"> <li>- Indicated South Staffordshire's intention to progress to Preferred Options on the basis of the 4,000 dwelling contribution to GBHMA unmet needs, based on the 2018 Strategic Growth Study</li> <li>- Indicated that South Staffordshire was not aware of any authorities intending to update the GBHMA Strategic Growth Study or an alternative evidence base to sustainably distribute growth</li> <li>- Sought agreement to the Council's 4,000 dwelling contribution and confirmation that it aligned with the existing GBHMA evidence base</li> </ul>
29/06/2021	<i>Birmingham City Council response to 01/06/2021 South Staffordshire DtC letter</i>	<ul style="list-style-type: none"> <li>- Acknowledged South Staffordshire's role as a "proactive participant" in HMA discussions and in seeking to provide additional housing to meet shortfalls within Birmingham and the wider HMA</li> </ul>

		<ul style="list-style-type: none"> <li>- Recognised South Staffordshire's assistance in making significant progress to reducing that shortfall, as reflected in the 4,000 dwelling contribution to unmet need, and that Birmingham was fully supportive of the approach taken</li> <li>- Flagged Birmingham's intention to review its Local Plan and that a Local Development Scheme had recently been approved for this</li> <li>- Indicated that the significant shortfalls were likely to remain in the HMA beyond 2031 and that the strategic approach first reflected in the 2018 GBHMA Strategic Growth Study was likely to continue and that further work and co-operation would be required.</li> </ul>
28/07/2021	<i>ABCA response to South Staffordshire DtC letter 01/06/2021</i>	<ul style="list-style-type: none"> <li>- Confirmed co-operation to date of South Staffordshire with Black Country, through GBHMA officer meetings and direct discussions</li> <li>- Highlighted the Draft Black Country Plan's (BCP) anticipated 28,239 dwelling shortfall</li> <li>- Requested discussions 'later this year' to agree the proportion of the 4,000 dwelling GBHMA contribution to be allocated to the emerging BCP shortfall</li> <li>- Encouraged the Preferred Options to be approved for consultation "as soon as possible" to enable an overlap between the consultation periods</li> <li>- Confirmed that, to date, no GBHMA authorities had decided to update the GBHMA Strategic Growth Study or prepare alternative evidence, so the current South Staffordshire approach to unmet housing needs aligns with the existing GBHMA evidence base</li> <li>- Highlighted that after the BCP consultation and Birmingham Local Plan Review commencing in early 2022, "further work will be required to enable agreement between neighbouring authorities both within and beyond the GBHMA" to support statements of common ground being prepared in summer 2022</li> </ul>
01/11/2021	<i>South Staffordshire Local Plan Review – Preferred Options consultation published</i>	<ul style="list-style-type: none"> <li>- Indicated South Staffordshire's intention to progress to Preferred Options on the basis of the 4,000 dwelling contribution to GBHMA unmet needs in light of Duty to Cooperate correspondence received to date (especially from Birmingham and Black Country authorities) and latest regional evidence</li> <li>- Confirmed allocation of West Midlands Interchange strategic employment site and removal of the site from the Green Belt to ensure its delivery, allowing it to contribute towards unmet needs in the wider FEMA (e.g. from the Black Country authorities)</li> </ul>

		<ul style="list-style-type: none"> <li>- Indicated intention to update EDNA to address changing economic circumstances and to reflect the role of West Midlands Interchange in the District's land supply</li> <li>- Accompanied by a Duty to Cooperate Topic Paper which summarised progress to date and future proposed actions on housing and employment shortfalls, including: <ul style="list-style-type: none"> <li>- Engaging council leaders and members in each GBHMA authority in a SoCG</li> <li>- Continue to facilitate delivery of Strategic Growth Study recommendations in other authorities</li> <li>- Participate in an update of the GBHMA Strategic Growth Study</li> <li>- Establish a contribution to unmet employment needs through EDNA update</li> <li>- Request Black Country authorities lead on a SoCG to distribute their employment shortfalls</li> <li>- Agree programme or follow on work for West Midlands Strategic Employment Sites with GBHMA officer group</li> </ul> </li> </ul>
08/11/2021	<i>South Staffordshire letter to all GBHMA and adjoining authorities (including Birmingham and Black Country authorities)</i>	<ul style="list-style-type: none"> <li>- Requested attendance at December 2021 Duty to Cooperate meeting</li> <li>- Stated all parties should be prepared to address their positions on Birmingham and Black Country housing shortfalls, the GBBCHMA Strategic Growth Study 2018, alternative approaches to distributing shortfalls, HMA governance arrangements and the need for additional HMA wide evidence (including a review of the GBBCHMA Strategic Growth Study)</li> </ul>
18/11/2021	<i>South Staffordshire letter to Black Country authorities regarding employment DtC matters</i>	<ul style="list-style-type: none"> <li>- Stressed urgent need for Black Country to prepare a SoCG to distribute its emerging 210ha employment land shortfall, clarify its functional geography for employment, establish areas of agreement/disagreement and governance arrangements for cooperation on this issue</li> <li>- Indicated South Staffordshire's willingness to participate in a SoCG prepared by the Black Country on employment shortfalls</li> <li>- Indicated South Staffordshire EDNA update would be completed in advance of the South Staffordshire and Black Country Regulation 19 consultations to allow preparation of SoCG</li> </ul>

		<ul style="list-style-type: none"> <li>- Asked for confirmation that this reflected the Black Country's intended programme of work</li> </ul>
13/12/2021	<i>ABCA response to South Staffordshire Preferred Options consultation</i>	<ul style="list-style-type: none"> <li>- Confirmed constructive joint working with South Staffordshire on cross boundary development and infrastructure</li> <li>- Stated an estimated shortfall of 28,239 homes up to 2039 from the Black Country</li> <li>- Indicated South Staffordshire and Black Country should aim to reach agreement on cross-boundary issues and reflect this in draft SoCG to support each Regulation 19 plan</li> <li>- Support for preferred housing growth option of South Staffordshire's needs plus 4,000 homes to the HMA up to 2038</li> <li>- Requested that the full 4,000 homes should be allocated to Black Country housing needs</li> <li>- Requested the EDNA is completed and shared with Black Country authorities to determine how far South Staffordshire could contribute to unmet employment needs from Black Country</li> </ul>
13/12/2021	<i>Birmingham City Council response to South Staffordshire Preferred Options consultation</i>	<ul style="list-style-type: none"> <li>- Indicated HMA-wide shortfall was now around 6,300 dwellings up to 2031</li> <li>- Noted Birmingham had commenced work on new local plan which would review housing needs up to 2042</li> <li>- Acknowledged South Staffordshire had been a proactive participant in HMA discussions to meet shortfalls from Birmingham and the wider HMA area</li> <li>- Welcomed the 4,000 dwellings proposed towards the HMA, stating Birmingham was grateful for the cooperation received in making significant progress to reducing the shortfall</li> <li>- Indicated the Strategic Growth Study was likely to require updating to identify further solutions to strategic housing shortfalls</li> <li>- Restated that work prepared by Stantec indicated Birmingham has a 53ha share of the employment land at West Midlands Interchange</li> <li>- Indicated Birmingham is likely to face employment shortfalls and that the impact of West Midlands Interchange should be reflected in a statement of common ground with Birmingham</li> </ul>



15/12/2021	<i>Duty to Cooperate meeting with all GBBCHMA authorities (including Birmingham and Black Country)</i>	<ul style="list-style-type: none"> <li>- Broad support for South Staffordshire's 4,000 dwelling contribution but no universal agreement on how to address HMA shortfalls or the extent of these</li> <li>- Differing approaches to use of the Strategic Growth Study across different authorities, but no alternative HMA-wide evidence base prepared by other local authorities to replace this</li> <li>- General agreement to the need to update the GBHMA Strategic Growth Study</li> <li>- General agreement to need for governance arrangements</li> <li>- Proposed to take these future actions to GBBCHMA officer working group meetings to develop further for statement of common ground</li> </ul>
15/03/2022	<i>GBBCHMA Officer meeting to discuss emerging Housing SoCG and West Midlands Strategic Employment Sites work</i>	<ul style="list-style-type: none"> <li>- Sought confirmation of each LPAs position on signing up to the proposed SoCG as presented at the meeting and further detailed comments on the document following the meeting</li> <li>- Sought confirmation of each authority's likely position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5k per local authority.</li> </ul>
17/03/2022	<i>South Staffordshire response to follow on actions from 15/03/2022 GBBCHMA officer meeting</i>	<ul style="list-style-type: none"> <li>- Confirmed South Staffordshire was fully supportive of the SoCG having consulted with Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 consultation</li> <li>- Indicated support for contributing up to £5k towards the necessary follow on work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities as possible that were identified within the geography set out in the 2021 West Midlands Strategic Employment Sites Study</li> </ul>
26/04/2022	<i>ABCA letter to authorities regarding strategic housing and employment land issues</i>	<ul style="list-style-type: none"> <li>- Summarised DtC progress to date on addressing Black Country housing shortfall and restressed the emerging housing shortfall of circa 28,000 homes arising 2020-2039</li> <li>- Indicated that with housing contributions to date there was still likely to be a significant remaining shortfall of some 11,500 homes up to 2039</li> <li>- Requested any contributions to HMA as a whole included an element attributed to the Black Country and requested confirmation that all opportunities to accommodate unmet housing needs have been explored</li> </ul>

		<ul style="list-style-type: none"> <li>- Indicated that a significant shortfall in employment land was still likely to remain despite contributions to date and requested confirmation that all opportunities have been explored to accommodate unmet employment needs from the Black Country and that authorities would be willing to enter into a SoCG with the Black Country to confirm this</li> <li>- Requested confirmation that authorities are willing to participate in further work to address the recommendations of the 2021 West Midlands Strategic Employment Sites Study</li> <li>- Requested confirmation of whether authorities would be willing to consider a early review mechanism in emerging local plans</li> </ul>
06/06/2022	<i>South Staffordshire response to ABCA 26/04/2022 letter</i>	<ul style="list-style-type: none"> <li>- Indicated South Staffordshire did not consider it appropriate to apportion contributions through individual correspondence with LPAs without a consistent methodology and approach, indicating that (as a minimum) it would be vital for any agreed approach to be agreed with both Birmingham and the Black Country</li> <li>- Provided summary evidence to show that the Council's emerging Local Plan would provide housing growth in all the areas recommended by the Strategic Growth Study 2018, often exceeding minimum growth levels required and in addition allocating an additional strategic site (Land at Linthouse Lane) which was supported by local evidence – this evidenced the Council had explored all reasonable evidence-based opportunities to accommodate unmet needs prior to an updated HMA-wide evidence base being prepared</li> <li>- Confirmed that South Staffordshire could contribute a total of 103.6ha from West Midlands Interchange and the updated 2022 EDNA towards Black Country unmet needs and that the Employment Site Assessment Topic Paper 2021 did not identify further suitable options to increase supply</li> <li>- Requested Black Country strongly engage with other non-FEMA authorities with economic relationships to it (as South Staffordshire is) to address the remainder of the employment land shortfall</li> <li>- Confirmed South Staffordshire's willingness to participate in updates to the West Midlands Strategic Employment Sites Study 2021</li> </ul>

		<ul style="list-style-type: none"> <li>- Stressed that work should recognise that the need for strategic employment sites has already been factored into many local demand forecasts and shouldn't be 'double counted' and that locations for growth should not be confined to sub areas identified within the 2021 study, which only seem to reflect locational requirements for logistics uses rather than advanced manufacturing and research and development</li> <li>- Acknowledged PPG requires review every 5 years but stressed that the need for early reviews should be guided by the outcomes of future updates to the Strategic Growth Study/regional strategic employment site evidence base and Duty to Cooperate discussions between the Black Country and other related authorities</li> </ul>
18/08/2022	<i>Draft housing SoCG circulated by South Staffordshire to all GBBCHMA authorities</i>	<ul style="list-style-type: none"> <li>- Draft SoCG circulated to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement of the SoCG at multiple meetings of the GBBCHMA officer group</li> <li>- Summarised current emerging shortfalls up to 2031 and beyond in the GBBCHMA</li> <li>- Recorded key areas of agreement, including the value of the existing Strategic Growth Study, whilst acknowledging this is not a policy document but is part of an evidence base to take matters forward through local plan reviews</li> <li>- Recorded key areas where agreement is still being sought, including the lack of an agreed approach to accommodating the shortfall across the GBBCHMA, the lack of consensus on the scale of shortfalls post 2031 and the relative weight given to the Strategic Growth Study in local plan evidence bases</li> <li>- Set out agreed future work streams to address outstanding issues, including a framework for future update work to the 2018 Strategic Growth Study and a the scope of an advisory Member Board to guide future decisions across the GBBCHMA</li> </ul>
26/09/2022 – 11/2022	<i>Initial draft employment SoCG circulated and agreed in officer draft between South Staffordshire and all South Staffordshire FEMA authorities (and Sandwell)</i>	<ul style="list-style-type: none"> <li>- Draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments to allow this to be finalised then signed</li> <li>- Summarised current extent of Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA</li> <li>- Proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of further work between other authorities</li> </ul>