

Statement of Common Ground  
between North Warwickshire  
Borough Council and South  
Staffordshire District Council

# 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 2023-2041.
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 2023-2041 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

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<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

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 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

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

Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Subsequent Local Plan consultations from City of Wolverhampton Council, Sandwell MBC and Dudley MBC continue to demonstrate that a significant unmet need remains. 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. SSDC is party to the 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 as a whole. 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 consider the issue holistically.
9. SSDC Previously proposed 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. This was reflected in SSDC's November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

## Matter not Agreed in relation to housing

10. Following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected an amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that “Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated”, and that “Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process”. SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.
11. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based

upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

12. North Warwickshire made objections relating to the above matter.

## Employment

13. 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 2022.
14. No further cross-boundary issues have been identified.

## Cross boundary transport impacts

15. 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.
16. No other cross-boundary transport issues have been identified.

## Infrastructure

17. 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.
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 an identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 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.
20. 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 (GTAA) 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

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<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

21. NWBC has indicated they are unable to assist in 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 review of their Local Plan which will include consideration of Gypsy and Traveller needs and this may be an issue that could be considered at that time.

## Natural Environment

22. 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.
23. No cross-boundary issues have been identified.



## Signatures

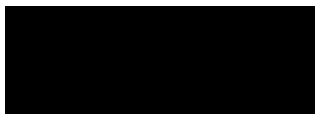
We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and North Warwickshire Borough Council. The authorities will continue to work together to address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

### **South Staffordshire District Council**

**Name:** Kelly Harris

**Position:** Lead Planning Manager

**Signature:**



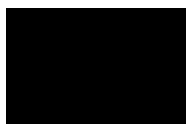
**Date:** 23/05/2025

### **North Warwickshire Borough Council**

**Name:** Steve Maxey

**Position:** Chief Executive

**Signature:**



**Date:** 23 May 2025