

**Supplementary Note to the South Staffordshire Local Plan Examination 2025 – Matter 2 (Action 2.1)**

This note has been produced by South Staffordshire Council to supplement the Examination of the South Staffordshire Local Plan. It directly responds to Action 2.1 to set out Statements of Common Ground (SoCG) in full.

**Action 2.1** - Council to provide a paper which provides a narrative to demonstrate the engagement activity on all strategic matters undertaken under Duty to Co-operate, the outcomes and how these discussions shaped the Plan. The paper should include cross reference to relevant agendas and minutes which should be included as appendices.

**Explanatory Notes**

All documents referenced throughout this paper are available either through the relevant appendix or are evidence base documents and have been linked in [square brackets].

Any relevant representations referred to throughout are referenced in (round brackets) and linked where possible.

Documents in appendices have been listed in chronological order and identified by the date, as per the timelines.

Documents sent / received to the whole Housing Market Area (HMA) are identified in blue text throughout the timelines and can be found in the HMA specific appendix (**Appendix 20**). Meetings of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Group are also identified in blue text throughout the timelines and the agendas and minutes for meetings from 2018 – 2025 can be found in **Appendix 22**. This is to reduce repetition of the documents within the body specific appendices.

A list of appendices has been provided for reference.

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## **1. Housing Duty to Co-operate**

### **Section 1**

1.1 In summary, the key outcomes of duty to co-operate engagement on the matter of housing are as follows:

- Recognition of housing need and supply representing a significant cross-boundary issue for consideration.
- Recognition and consideration of the unmet housing need across the GBBCHMA from the beginning of the plan making process. Every version of the emerging plan consulted on included a proposed contribution to the unmet needs of the GBBCHMA.
- The Submission Plan includes a 640-home contribution to the GBBCHMA which has been agreed and apportioned to those generating the unmet need through a signed SoCG [[SST/ED21](#)].
- The council has engaged constructively, actively and on an ongoing basis with the other authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and other associated authorities. There have been regular meetings with the HMA authorities which has led to the production of the completion of the HMA Strategic Growth Study 2018 [[EB28](#)] and subsequent updated position statements [[EB29-31](#)]. An update the Strategic Growth Study is currently underway. This engagement has also led to SoCG being signed with all neighbouring authorities and authorities within the HMA [[DC7 – 20](#) & [SST/ED3](#), [SST/ED13](#), [SST/ED14](#), [SST/ED23](#)].

1.2 These discussion points and outcomes are set out in further detail below under key milestones as well as how these have shaped each iteration of the Plan, including the final submitted Local Plan. For full details of all Duty to Co-operate activities please see the Table 1 and associated appendices.

#### Housing Market Area and shortfall confirmed through the 2017 Birmingham Development Plan

1.3 South Staffordshire sits in an HMA with thirteen other local authorities, including Birmingham and the Black Country. This HMA has been confirmed by the Secretary of State through the examination of the 2017 Birmingham Development Plan as an appropriate geography within which to ensure that strategic housing needs are planned for, due to the level of functional self-containment of migration and commuting patterns within these fourteen local authority areas. The Birmingham Development Plan confirmed a shortfall of 37,900 dwellings which couldn't be accommodated in Birmingham at that time.

#### The 2018 HMA Strategic Growth Study [[EB28](#)]

1.4 A HMA Strategic Growth Study was prepared by consultants, covering all fourteen local authorities to quantify the housing shortfall across the entire HMA. This considered all evidence on housing need and supply as of 31st March 2017 and identified a cumulative total shortfall of 60,855 dwellings across the HMA up to 2036. The study indicated that this shortfall largely arose from Birmingham and the Black Country authorities and that it couldn't be accommodated on existing sites identified for housing in those authorities.

1.5 To identify possible options to meet this significant shortfall, the HMA Strategic Growth Study identified a range of potential development options in the Green Belt across the HMA. These included new settlements, urban extensions and dispersed housing developments which could be tested by each of the fourteen local authorities through reviews of their local plans. However, national planning policy also requires full examination of all other reasonable options for non-Green Belt

land before considering the release of Green Belt land. Therefore, the HMA Strategic Growth Study considered options to increase densities and release additional supply/previously developed land in non-Green Belt locations before examining Green Belt options, as well as considering the sustainability implications of strategic growth locations past the Green Belt. Ultimately, it was concluded that even if existing housing supply was increased through a significant uplift in densities across the HMA and additional urban supply was brought forward, as of 2017 there would still be a HMA-wide shortfall of around 48,000 dwellings up to 2036.

#### Local Plan Issues and Options October 2018 [PC4]

1.6 South Staffordshire's Local Plan Issues and Options October 2018 document and consultation recognised the unmet need across the HMA in Chapter 4 of the plan when considering levels of Growth. Five housing level of growth policy options were consulted on (options A – E), these ranged from meeting South Staffordshire OAN only with a no contribution (Option A) to a 20,000-home contribution (Option E).

1.7 As set out at paragraphs 4.16 – 4.18 of the document, the council proposed committing to test a minimum of 4,000 dwellings towards wider housing shortfalls and sought views on this approach.

#### Local Plan Spatial Housing Strategy and Infrastructure Delivery (SHSID) October 2019 [PC3]

1.8 From continuing Duty to Co-operate engagement (see table and appendices) it was clear that there was still a housing shortfall in the HMA. South Staffordshire Council also considered representations received to the previous Local Plan Issues and Options Consultation in October 2018. The SHSID tested a range of different spatial housing options (A-G) which involved meeting South Staffordshire's OAN while contributing 4000 homes to the unmet needs of the HMA. The council consulted on Spatial Option G being its preferred approach.

#### Local Plan Preferred Options November 2021 [PC2]

1.9 The council continued to engage with the other HMA authorities on the issue of the unmet housing need (see table of engagement and appendices). As set out in paragraphs 4.6 – 4.12 of the Preferred Options November 2021 document, engagement with the GBHMA local authorities indicated the extent of the housing shortfall up to 2031 appeared to have fallen significantly, whilst also indicating that the Black Country's urban capacity evidence showed a significant level of housing need arising into the later 2030s. This Plan consulted on retaining the 4,000-dwelling contribution towards the unmet needs of the housing market area.

#### GBBCHMA Development Needs Group - Draft Statement of Common Ground - August 2022 [DC6]

1.10 South Staffordshire Council played a lead role in progressing this SoCG [DC6] which provided a position across the GBBCHMA as at August 2022. Although it was not signed by all HMA authorities, it demonstrates South Staffordshire's is a pro-active authority when grappling with the housing shortfall across the HMA and meeting the Duty to Co-operate.

#### Cessation of the Black Country Plan – October 2022

1.11 The four Local Planning Authorities in the Black Country formally ceased work on the Black Country Plan in October 2022, instead deciding to undertake their own separate local plans. It is considered that the engagement that South Staffordshire Council carried out with the four Black Country Authorities on the Black

Country Plan is still relevant to the Duty to Co-operate process. The council continued to engage with the four Black Country Authorities through the Duty to Co-operate process whilst preparing their individual plans as set out in the table of engagement and associated appendices.

#### Publication Plan (Regulation 19) November 2022 [[PC1](#)]

1.12 The council consulted on a Publication Plan in November 2022. Based on continued Duty to Co-operate discussions, this Publication Plan proposed a housing target of 9,089 dwellings between 2018 and 2039. This allowed the district to meet its own housing needs over the plan period, whilst also making a 4000-home contribution to the unmet needs of the GBBCHMA.

#### Consultation on proposed reforms to the National Planning Policy Framework (NPPF)

1.13 In December 2022, the government launched a public consultation on proposed reforms to the National Planning Policy Framework (NPPF). Due to the uncertainty, work on the review of the Local Plan was paused in January 2023 awaiting clarity from the government on proposed changes to national planning policy. During this period the representations to the November 2022 Publication Plan (Regulation 19) consultation were reviewed. Considerable objections were received in relation to the amount of Green Belt proposed to be released by the plan in order to meet housing need, including the 4000-home contribution and the ever-changing picture on the level of housing shortfall. The council continued to engage with HMA authorities as set out in the full table of engagement and associated appendices.

#### October 2023 Duty to Co-operate Letter

1.14 In light of the proposed changes to the NPPF, the council pro-actively wrote to Neighbouring Authorities and authorities within the GBBCHMA under the duty to co-operate process to ask for an indication of what their position would be if the council were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the full housing needs of the district or a contribution to the GBBCHMA. A copy of this letter and responses received can found in 'Appendix 1 - Copy of October 2023 letter and responses' of the Duty to Co-operate Topic Paper Addendum December 2024 [[DC1](#)]. Follow-up emails were sent to those authorities that had not responded on 21.11.2023.

#### Publication Plan (Regulation 19) April 2024 [[CD1](#)]

1.15 The council continued to engage with its Duty to Co-operate partners whilst preparing for a new Regulation 19 Publication Plan consultation in April 2024. As set out in paragraphs 5.8 to 5.22 of the Plan, the change of circumstances led the council to test further spatial strategy options considering the ways in which housing growth could be distributed across the district, as detailed in the council's Spatial Housing Strategy Topic Paper 2024 [[EB14](#)]. Unlike the majority of previous options tested that sought to deliver a 4000-home contribution derived from the 2018 Strategic Growth Study, the new options tested (Options H and I) considered different levels of growth based upon capacity led approaches that limited Green Belt release compared to other options tested, and with a greater focus on the district's most sustainable locations. Having considered all of these different approaches previously tested in earlier iterations of the Local Plan, and their relative merits in the round, the council's preferred approach is Spatial Option I - a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. The outcome of this capacity-led approach was that there were suitable sites

available to deliver the spatial strategy (spatial option I). The capacity of these sites is sufficient to meet our own need plus a 640-dwelling contribution towards unmet needs of the GBBCHMA.

1.16 The council engaged on its proposed 640 dwelling contribution to unmet needs to the other authorities within the GBBCHMA as part of the Duty to Co-operate process. A summary of the responses from Duty to Co-operate partners to the Regulation 19 Consultation can be found in Section 3 of the Duty to Co-operate Topic Paper Addendum December 2024 [[DC1](#)].

Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA Statement of Common Ground Regarding Housing Shortfall Position at 29 November 2024 [[SST/ED21](#)]

1.17 This SoCG set out the HMA position at 29 November 2024. This includes setting out the shortfalls and the confirmed and potential contributions towards this unmet need. Table 2 of the SoCG sets out the apportionment of the contributions to those generating unmet needs. Section 6 of the SoCG agrees areas of further work to be undertaken by the GBBCHMA authorities. This SoCG has been formally signed by all HMA authorities and other relevant authorities other than Telford and Wrekin Council.

#### Commissioning of Strategic Growth Study Update

1.18 The GBBCHMA authorities and other relevant associated authorities have commissioned an update to the Strategic Growth Study which is currently underway and is anticipated to be finished July / August 2025.

#### Summary of how the outcomes of this engagement shaped the Local Plan

1.19 Ultimately, this evolution of DtC discussions has culminated in the detail of Policy DS4 in the submitted plan, which can be seen as a key output of this engagement. This policy commits to providing 4,726 homes over the period 2023-2041 to meet the district's housing target, whilst providing approximately 10% additional homes to ensure plan flexibility. This housing target includes the district's own housing requirement of 4,086 homes, plus a 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area which has emerged as part of constructive duty to co-operate discussions.

1.20 Table 1 shows that there were numerous meetings from 2018 with relevant bodies both individually and through relevant Working Groups. This evidences that the engagement was constructive, active and on an ongoing basis. In particular the GBBCHMA Working Group played a constructive role in informing the proposed spatial strategy for South Staffordshire. Every agenda includes 'Local Plan updates' where each authority proves an update as to the progress and thinking in their respective local plans. It was not – as some representors alleged – simply a 'talking shop'.

1.21 To choose one illustrative example of how this helped shape the strategy under examination, on 06.10.2022 Dudley announced they would withdraw from the preparation of the Black Country Plan in a bid to avoid release of Green Belt following substantial objection during public consultation. A joint press release on the 19.10.2022 confirmed that the Black Country Plan would cease and each authority would produce their own Local Plan (Appendix 6).

1.22 This was addressed at the Working Group. The meeting of the GBBCHMA Development Needs Group on the 01.11.2022 (page 105 – 107 Appendix 22) noted that SoCGs based at August 2022 were now subject to a significant change in circumstances with the abandonment of the Black Country Plan and therefore required reflection on the approach taken by the Black Country authorities. There were views of several HMA partners that the forthcoming NPPF consultation, which, based on statements by Michael Gove MP, the then Secretary of State for Levelling UP, Housing and Communities, was highly likely to be revising the approach to Green Belt release. Should this also materialise, views were expressed on a broadly consistent approach should be considered. It was agreed that an addendum to the SoCG should advise of the change in circumstances.

1.23 Following the publication of the draft revised NPPF in December 2022, a meeting of the GBBCHMA Development Needs Group on 24.01.2023 (page 123 – 126 of Appendix 22) acknowledged the proposed change to Green Belt policy and the focus for housing development would be in non-Green Belt locations and urban centres. The interpretation of national policy was subject to ongoing duty to co-operate discussions across the HMA (Appendix 22). As duty to co-operate partners, the approach and interpretation taken by neighbouring authorities within the HMA was then a key reflection for South Staffordshire in our own plan.

1.24 Like other authorities across the HMA, South Staffordshire recognised the direction of national policy was likely to change ahead of the final publication version of the Local Plan. Therefore, South Staffordshire felt it necessary to consider additional spatial strategy options. When the NPPF was finalised in December 2023, it broadly retained the NPPF consultation proposed approach to Green Belt. Bringing it all together and considering the responses to previous Local Plan consultations, the evidence base, the new NPPF and ongoing duty to co-operate discussions, the council proposed a strategy to meet its own needs together with a 640-home contribution to wider housing shortfalls, which required limited Green Belt release in the most sustainable villages in South Staffordshire. The Spatial Housing Strategy Topic Paper [EB14] details the exceptional circumstances which exist in South Staffordshire and the approach to limiting Green Belt release in line with national policy. In addition, three Black Country authorities, currently at EiP under the same transitional arrangements as South Staffordshire, have progressed Local Plans with no Green Belt release.

1.25 Whilst it is not a duty to agree, the council is confident that we have reached a constructive and effective position with the relevant bodies as is evidenced by the fact that all authorities (both individually and collectively as the GBBCHMA) have agreed the level of contribution from South Staffordshire and the distribution of said contribution.

**Section 2 – Duty to cooperate discussions with HMA authorities on change of spatial strategy and how this led to agreement to South Staffordshire’s contribution to unmet housing needs detailed in the Statement of Common Ground – November 2024 [SST/ED21]**

1.26 Following the letter to Greater Birmingham and Black Country Housing Market Area (GBBCHMA) authorities in October 2023, (which set out that South Staffordshire District Council (SSDC) was considering revisiting the Local Plan strategy to no longer revise Green Belt boundaries), discussions continued to take place on this issue up to the GBBCHMA Statement of Common Ground (SoCG) [SST/ED21] being agreed in November 2024. This took the form of two tiers of engagement, both at the individual authority level, and at the GBBCHMA level through correspondence and discussion. This ultimately informed authorities’ decisions to sign the November 2024 SoCG.

Individual authority level engagement

Letter of 24<sup>th</sup> October 2023

1.27 Following the pause to plan preparation in January 2023, it formally recommenced in summer 2023, with a revised Local Development Scheme subsequently agreed in September 2023. A letter was then sent to individual GBBCHMA authorities on 24<sup>th</sup> October 2023 requesting they provide an indication of what their position would be should the council revisit its strategy to no longer revise Green Belt boundaries. The summaries of response in relation to housing from the GBBCHMA authorities to this letter are set out in Appendix 33. This shows that for the majority of the authorities there was ‘no change of position’ between their response to the October 2023 letter and the signing of the SoCG. However, for the small number of authorities that did, a summary is provided in Appendix 33 as to why they did, and the detail is provided below.

1.28 Given that changes to the NPPF (proposed in December 2022) were still in draft, a considerable number of authorities provided general comments but did not articulate a firm position in their response, instead reserving their position to await confirmation on changes to the NPPF. Cannock Chase District Council (CCDC) did express concern with the prospect of SSDC not revising Green Belt boundaries, in particular indicating concerns if the approach meant that we could provide no contribution to the GBBCHMA shortfall, as well as being unable to meet our own needs. Having reflected and taken this on board, along with all other responses, the decision was taken not to progress a strategy that avoided all Green Belt release, but to amend Green Belt boundaries at the district’s most sustainable Tier 1 settlements.

1.29 This is just one clear example of construction and effective duty to cooperate discussions. It was raised as a possibility in DtC discussions that the council would not revise its Green Belt boundaries, a concern was raised about this by DtC partners, and the council took into account these concerns as part of the decision to release Green Belt to provide a higher level of housing than a non-Green Belt release strategy.

#### Letter of 8<sup>th</sup> March 2024

1.30 Having carried out additional work in the months that followed to develop the revised strategy, a further letter was then sent to individual GBBCHMA authorities on the 8<sup>th</sup> March 2024. This set out the council’s intention of progressing with a revised strategy which would result in a 640-home contribution. This letter also requested authorities enter into bilateral Statements of Common Ground (SoCG) to set out the respective positions. These bilateral SoCG took the form of an updated track change version of the previously suggested 2022 bilateral SoCG for the previous Regulation 19 plan. This enabled the other authorities to clearly see areas of change between the two Plans. Discussions via email and track changed comments on the draft SoCGs continued to take place over the following months, as evidenced in Appendix 34. The majority of these discussions related to factual changes to the SoCGs, however through this correspondence, where issues were raised by other authorities then these were considered and the SoCG amended accordingly.

1.31 As an example, through engagement on the SoCG with Dudley MBC (see Appendix 34) a difference in view emerged on the steps that should be taken to considering Gypsy and Traveller pitch supply. This led to a new section on ‘Matters of Disagreement on Gypsy and Traveller Provision’ being added to the SoCG, where SSDC continue to request that Dudley MBC explore publicly owned Green Belt sites, which is an approach not agreed with Dudley MBC due to their decision not to review their Green Belt. We appreciate this example does not concern conventional housing, but this is because housing concerns were not raised in the individual discussions with local authorities. This example is intended to highlight that it was entirely open to Duty to Cooperate partners to raise issues during the SoCG process, and when they did the council would engage with it properly and constructively. The fact that no issues in relation to housing were raised in this dialogue supports that individual authorities were satisfied with the effectiveness of discussions through the HMA process or had no concerns. But the opportunity was there for local authorities to raise issues and have them considered at an individual level. In summary, the email correspondence at Appendix 34 show that the

council was engaged with active and ongoing discussions with Duty to Cooperate partners and – where issues were raised – effectively and constructively reacted to them.

#### Bilateral meetings

1.32 The council were aware – as would be reflected in the individual SoCG – that a number of authorities wanted discussions about housing strategy and numbers to be conducted at a HMA level. However, the council were also open to having bilateral meetings with individual authorities.

1.33 Between the October 2023 letter and the HMA-wide SoCG being agreed in November 2024, for certain authorities (i.e. Cannock, Dudley, Lichfield and Solihull) direct meetings were held where requested, and/or we felt it would be beneficial to get further clarity on their response. Meetings took place with Solihull on 22<sup>nd</sup> November 2023, with Cannock on 8<sup>th</sup> January 2024, with Dudley on 9<sup>th</sup> January 2024 and with Lichfield on 16<sup>th</sup> January 2024. As an example, at the meeting with Lichfield, the contents of the letter and South Staffordshire's direction of travel in relation to changing its spatial housing strategy were discussed. Lichfield indicated general support for the approach South Staffordshire was taking of releasing some Green Belt (particularly in the context of the newly published December 2023 NPPF). Overall, this additional engagement with other authorities assisted in allowing SSDC to further explain and provide the rationale for our revised strategy and housing requirement.

1.34 North Warwickshire Borough Council (NWBC) unfortunately did not respond to the initial October 2023 letter, nor the follow up letter in March 2024. However, in their response to the April 2024 Regulation 19 consultation, they ticked the box that indicated that our approach did not comply with the Duty to Cooperate but provided no rationale for why they considered this to be the case. Given their late confirmation of this issue and the lack of clarity on the matter, between March 2024 and November 2024 nine attempts were made to engage NWBC on a draft SoCG in order to understand their concerns and to allow us to set out our respective positions. However, at the point of submission, no response from NWBC had been received (See Appendix 34). We now understand from officers at North Warwickshire Council that they erroneously identified Duty to Cooperate as their concern in their Regulation 19 representation, and they have now confirmed that their representation related instead to soundness.

1.35 The remaining authorities either didn't raise any concerns to our strategic approach to housing set out in our letter of 8<sup>th</sup> March 2024 (and accompanying draft bilateral SoCG), and/or agreed they did not consider it appropriate to engage on the issues of housing shortfalls on an individual authority level, but instead at the HMA level, as reflected in the signed bilateral SoCGs.

#### HMA level engagement

1.36 There were ten meetings of the GBBCHMA Development Needs group meeting between October 2023 and 29<sup>th</sup> November 2024 (the date of the GBBCHMA SoCG). Meeting minutes are provided at Appendix 22, although these only cover headline points of matters discussed and do not seek to record detailed discussions verbatim. Through these meetings, the review of Green Belt boundaries, and the issue of housing needs and cross boundary contributions were discussed in two ways.

1.37 Firstly, these matters were discussed in the context of the NPPF changes (initially draft and then final), and how these should be interpreted. The impact on Green Belt release and the resulting effect on housing numbers being met across the GBBCHMA was also considered by group members. This was discussed in

detail under item 6 of the GBBCHMA Development Needs Group Meeting of 16<sup>th</sup> January 2024. Attendees asserted that NPPF paragraph 145 gave authorities a much clearer direction that it was their choice to review Green Belt boundaries, and that a plan would likely not be unsound, purely on the basis of choosing not to release Green Belt to meet development needs, given this clear steer in national policy. The majority of authorities who expressed a view subscribed to this position; however, another highlighted that there may be some potential tension between paragraph 145 and the requirements under NPPF paragraph 35(a) in terms of meeting needs and being positively prepared.

1.38 Secondly, there was a standing agenda item of ‘Local Plan updates’, which SSC used to draw particular attention to these matters in South Staffordshire and seek views from the members of the GBBCHMA.

1.39 More specifically, it was during this agenda item of the GBBCHMA Development Needs Group meeting on 21<sup>st</sup> November 2023, that SSC orally reconfirmed the contents of the letter sent in October 2023, requesting views on our reconsideration of the Plan’s strategy and scoping of potential alternative options, including revisiting our approach to Green Belt. During this discussion, SSDC took the opportunity to provide further explanation on the council’s position first set out in the October letter. In particular, the potential for South Staffordshire to consider a non-Green Belt strategy was discussed. It was acknowledged by some that this approach seemed permissible under the draft NPPF (December 2022) wording. Some concern was raised around the scenario of South Staffordshire then being unable to meet its own housing needs and therefore increasing the shortfall.

1.40 Similarly, at the GBBCHMA Development Needs Group Meeting on 19<sup>th</sup> March 2024, a further oral update was provided under this agenda item as a follow up to the letter on 8<sup>th</sup> March, to confirm that the revised strategy being pursued by SSC would lead to a reduced contribution of 640 homes being provided towards GBBCHMA, and the rationale for this. This was a factual update and authorities in attendance were invited to ask questions, to inform and allow discussion to take place. In response to SSC’s update, some other authorities also aired similar views on reconsidering their approach to Green Belt release in light of the new national framework (NPPF - December 2023). No authority in attendance at this meeting raised any concerns with SSDC’s revised approach.

1.41 Furthermore, during the recurring Local Plan Update agenda item (and/or under all other agenda items) in all subsequent meetings, no requests were made by other authorities for SSDC to change our approach to Green Belt release or our contribution to unmet needs, delay our plan-making to await the updated Strategic Growth Study, or withdraw our plan. The council was also present at meetings, and the opportunity was always there for any authority to challenge or question our housing strategy. The council is therefore confident that there was ample allowance made within the meetings (following formal written correspondence in advance i.e. the letters of 24<sup>th</sup> October 2023 and 8<sup>th</sup> March 2024) for discussion between all authorities of SSDC’s revised approach to reviewing Green Belt boundaries.

1.42 The council expressly raised their position formally in writing and orally in GBBCHMA and positively invited Duty to Cooperate partners to share their views and concerns. This was the constructive, active and ongoing discussions that are required by Duty to Cooperate. The fact that no issues were raised – and this would then be enshrined in the GBBCHMA SoCG – illustrates the effectiveness of the discussions that were had at the HMA level.

#### Process of agreeing GBBCHMA SoCG

1.43 The drafting and subsequent agreement of the GBBCHMA SoCG was the key output of continuous engagement with HMA authorities, both on an individual level and at HMA-wide meetings. The scope of an updated SoCG was first proposed in a letter dated 20<sup>th</sup> June 2024 from Sandwell MBC sent to all HMA and related

authorities (see Appendix 10). The responses to Sandwell's letters were then used to inform the contents of a draft SoCG. For capacity reasons, at this point, Black Country authorities agreed that an officer of Dudley MBC would lead on its drafting and the collation of other authorities' comments.

1.44 A first draft of the SoCG was initially circulated by Dudley to the Black Country authorities only (as confirmed through minutes from Black Country Leads – Duty to Cooperate Meeting – 12<sup>th</sup> November 2024 (Appendix 38).

1.45 The SoCG was then raised as a discussion point (under agenda item 7 – Local Plan Update) at the GBBCHMA meeting on the 19<sup>th</sup> November 2024, prior to a draft of the SoCG being circulated to all GBBCHMA on the 21<sup>st</sup> November 2024 for comment.

1.46 The SoCG was again listed as an agenda item at the GBBCHMA Development Need Group meeting on 17<sup>th</sup> December 2024, allowing an opportunity for further discussion and scrutiny on the draft SoCG. Written comments were received from Birmingham, Bromsgrove/Redditch, Cannock, Lichfield, North Warwickshire, Sandwell, Solihull, South Staffordshire, Stratford-on-Avon, Tamworth, Walsall, Wolverhampton and Wyre Forest (see Appendix 35 for comments via email and/or track changes to the SoCG).

1.47 This oral discussion and written correspondence enabled individual authorities a further opportunity to raise any issues of concern, including issues with the 640-contribution proposed by SSC set out in Table 1 of the SoCG, and how this was then apportioned between the authorities declaring an unmet need, as set out in Table 2 of the SoCG. No concerns were raised on our 640 homes contribution through this process of agreement to the SoCG.

## Conclusion

1.48 Following the resumption of plan preparation from September 2023 to the Statement of Common Ground being agreed in November 2024, SSC engaged with all GBBCHMA authorities both at an individual and HMA level. Through written correspondence and oral discussions SSDC clearly articulated our change in strategy from that proposed in the 2022 Regulation 19 Plan, and the rationale for this change of approach.

1.49 As clarified in Appendix 33, for the majority of authorities, signing the SoCG did not represent a change of position from that expressed through their response to the October 2023 letter, or their response to our April 2024 Regulation 19 consultation. Whilst some authorities may have expressed disappointment that SSDC's contribution towards unmet needs had reduced, they did not express concern with SSDC's approach for arriving at the 640 contribution and the rationale for this, and did not consider this a reason to withhold agreement to it through the SoCG. Authorities who expressed disappointment with our lower contribution to unmet cross boundary housing needs recognised that the revised December 2023 NPPF did support our strategy.

1.50 There was also no assertion that SSDC had not engaged appropriately on this issue under the Duty to Cooperate. The monthly HMA meetings, supplemented with correspondence and meetings with individual authorities, were utilised as suitable forums for discussion on the revised strategy.

1.51 Comments of individual authorities and as a HMA group as whole reflected a more general disappointment that national policy changes introduced through the December 2023 framework would make the task of meeting housing needs more challenging. This position was reaffirmed in the Black Country Planning Leads Meeting of 9<sup>th</sup> April 2024 (available [here](#)), where the minutes discussing SSC's April 2024 Regulation 19 consultation confirm that "BC responses are likely to express disappointment at the changes but recognise that they are in accordance with the revised NPPF".

1.52 The authorities who most clearly expressed a view that SSDC had capacity to make a higher contribution (Walsall and North Warwickshire), whilst maintaining that view, recognised that our approach and contribution were in line with national policy under which the plan is being examined. Their specific point was that whilst they were in agreement with our approach and contribution and signed the HMA SoCG as such, if through our Examination process there was an opportunity to identify additional land to contribute further to the shortfall, then this would be welcomed.

1.53 Whilst progressing to April 2024 Regulation 19 stage and submission, all HMA authorities were engaged in written and oral discussion, specifically around SSC's revised strategy. Taking all of this into account, this is ultimately why all parties were content to sign the SoCG.

**Section 3 – Discussions on Table 2 of the Statement of Common Ground – November 2024 [SST/ED21] and how the position of apportioning cross-boundary contributions was derived**

1.54 Table 2 of the GBBCHMA Statement of Common Ground [SST/ED21] sets out the results of the methodology for apportioning proposed contributions to the GBBCHMA authorities with a declared shortfall (Birmingham, Dudley, Sandwell, Walsall and Wolverhampton). Table 2 is the amalgamation of all offers towards the shortfall (totalling 4240 dwellings) in emerging plans at the date of the SoCG. Therefore, the list of contributing LPAs and 'Local Plan contribution' is simply a factual record of this, on the date the SoCG was agreed – 29<sup>th</sup> November 2024. This is accompanied by Table 1 in the SoCG [SST/ED21], which also sets out the authorities with an evidenced housing shortfall, and their consultation stage at which these shortfalls were evidenced.

1.55 The principle of apportioning 'offers' was initially discussed by the five authorities with shortfalls on an individual basis with each potential contributing authority. For South Staffordshire's contribution, this was first discussed at a meeting between South Staffordshire District Council (SSDC), Birmingham and the four Black Country authorities on 31<sup>st</sup> October 2022. At the outset, City of Wolverhampton took the lead on developing a methodology for apportioning contributions, with an initial note provided prior to the meeting to inform the discussion (see Appendix 36). This was subsequently reflected in a bilateral Statement of Common Ground - November 2022 (See Appendix 37) between SSDC and Wolverhampton which confirmed that:

*“Work is progressing to agree the detailed method that will be applied to this apportionment and CWC consider that this apportionment would need to be confirmed by the time of the submission of the South Staffordshire Local Plan. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach. Whilst SSDC will work proactively with CWC and other local authorities generating unmet needs to agree and apportionment for its contribution, it does not consider it appropriate to delay submission of the South Staffordshire Local Plan to address this point.”*

1.56 Due to changes in national policy, the pause to the South Staffordshire Local Plan preparation and ongoing preparation of the Dudley, Sandwell and Wolverhampton Plans, the issue of apportionment was not addressed in 2023. It was however raised as an issue that needed to be resolved through Wolverhampton's [Issues and Preferred Options consultation](#) in February 2024 (para 5.18-5.22). Their proposed method was based upon net migration flows, having already discussed this with the other three Black Country authorities at this point. The results of this method were set out in their accompanying [Duty to Cooperate paper](#) (table 2.2), with 37% of the contribution from South Staffordshire going towards Wolverhampton. SSDC did not raise any objection to this approach in its response to the consultation.

1.57 In their response to SSDC's 2024 Regulation 19 consultation, City of Wolverhampton Council again raised the issue of apportionment, asking that it be agreed as soon as possible and stating:

*“In terms of the approach to calculate this apportionment, we recommend that migration patterns between South Staffordshire and those neighbouring authorities which can demonstrate unmet housing need would provide the starting point, with further refinement based on the scale and location of development proposed in the Plan and the proximity of these sites to Wolverhampton. The WLP Issues and Preferred Options Duty to Cooperate Statement recommends that some 37% of any contribution to meeting wider needs set out in the South Staffordshire Local Plan should be allocated to meeting needs arising in Wolverhampton. This figure is based on migration trends only. Taking into account the location of the growth opportunities set out in the Regulation 19 plan and their proximity to the City, a higher contribution may be appropriate in the order of 70% or 464 homes.”*

#### Agreeing apportionment through GBBCHMA SoCG

1.58 The Black Country authorities came to the view that agreeing contributions and apportionment of these would be preferable at the HMA level, rather than through agreements solely between shortfall and contributing authorities. The issue was then picked up in summer 2024 by Sandwell MBC who were the most advanced of the Black Country authorities preparing Plans, therefore they took the lead on addressing the issue of apportionment through a GBBCHMA SoCG. On 20<sup>th</sup> June 2024, Sandwell MBC wrote to all GBBCHMA authorities setting out the intention to prepare a Statement of Common Ground across the GBBCHMA, which amongst other matters would outline ‘...the method by which current and potential contributions to addressing the shortfall are apportioned to those Local Plan areas with an evidenced shortfall’. SSDC’s response (dated 11<sup>th</sup> July 2024) to the Sandwell letter confirmed ‘SSDC is not opposed to a method being agreed for apportioning contributions between authorities generating unmet needs, subject to this being agreed by all relevant parties.’

1.59 Subsequent to this, the approach of agreeing the apportionment through the GBBCHMA Development Needs Group SoCG was set out in the agreed bilateral SoCG (dated 29<sup>th</sup> July 2024) between SSDC and Sandwell MBC, confirming:

*“Given the scale and complexity of the housing shortfalls arising in the GMA, the Development Needs Group Statement of Common Ground is considered to be an appropriate vehicle by which to consider the issue holistically, including considering through a future update to the SoCG how contributions can be apportioned to meeting needs arising in individual areas where shortfalls arise.”*

1.60 Dudley MBC subsequently agreed to lead on the actual drafting of the GBBCHMA SoCG (see Black Country Leads meeting minutes from 16<sup>th</sup> October 2024 – available [here](#)). The draft SoCG was first circulated for comment amongst the Black Country authorities on 12<sup>th</sup> November 2024, before then being sent to all GBBCHMA authorities on 21<sup>st</sup> November 2024. This initial draft version included Table 2 which based apportionment on an approach of using net migration flow data (the same method as that consulted on by City of Wolverhampton Council through their Issues and Preferred Options in February 2024). As set out in Appendix 1 [SST/ED21] of the SoCG, migration flows between the shortfall authorities and each contributing authority were examined covering the period 2011-2019. The average proportion of net migration between each contributing authority and Birmingham and the Black Country authorities was then applied to each offer. In the case of South Staffordshire for example, 24% of net migration between the district and Birmingham/the Black Country was with Dudley; therefore, Dudley receives 24% of the contribution (153 homes).

1.61 On reviewing the draft SoCG, SSC was content with other authorities’ contributions and the method for apportionment proposed, if each of the ‘receiving authorities’ were content with the method and their proportion of the contributions being made, as referenced as a comment on page 15 of SSCs track change version of the SoCG (Appendix 35). All other GBBCHMA authorities were invited to comment on the SoCG and scrutinise the method and outputs. A number of

authorities provided comments through track changes (see Appendix 35), with none of these raising concerns with the method proposed. Hence Table 2 was agreed by all authorities through the final signed SoCG [SST/ED21].

#### **Section 4 – Discussions with HMA authorities about the consequences of the reduced contribution to unmet needs as a result of the change in strategy**

1.62 There is a natural overlap between this section (section 4) and section 2 (paragraphs 1.26 – 1.53). Therefore, the submissions and evidence provided as part of section 2 can also be said to evidence section 4, and we will not repeat everything set out as part of section 2. Instead, we will summarise the particular elements that show constructive, active, ongoing and effective discussions that were had in relation to the reduced contribution to unmet need.

1.63 The consequences of the reduced contribution as a result of the revised strategy were discussed both on a general strategic level (in relation to the revised NPPF), as well as from the more specific perspective of South Staffordshire's role in meeting unmet need. These are set out below, followed by an overview of the key output of these discussions (the updated Strategic Growth Study), demonstrating the consequences of the reduced contribution on housing shortfalls were considered and acknowledged on a HMA-wide basis.

#### **General strategic response to HMA shortfalls**

1.64 Discussions within the HMA about the consequences of the reduced contribution to unmet need were framed around the revised NPPF, whilst it was in draft form and when it was formally published in December 2023.

1.65 SSDC initially communicated to HMA authorities that it was considering a change of approach to not revise Green Belt boundaries (in response to the draft NPPF) in the letter of 24<sup>th</sup> October 2023, with it understood by all parties that this would have the effect of reducing the contribution towards HMA shortfalls (as discussed in more detail below). Concern was raised by some other authorities (despite a number of authorities within the GBBCHMA deciding to release no Green Belt such as Dudley and Sandwell) and so SSDC took account and noted the concerns at this early stage when the NPPF was not yet formally published.

1.66 Once the NPPF was finalised and published in December 2023, discussions on this issue continued through the GBBCHMA Development Needs Group meetings, most notably at the meeting on 16<sup>th</sup> January 2024 under agenda item 6. Views expressed at the meeting included that NPPF paragraph 145 gave authorities a much clearer direction that it was their choice to review Green Belt boundaries, and that a plan would likely not be unsound, purely on the basis of choosing not to release Green Belt to meet development needs, given this clear steer in national policy. The majority of authorities who expressed a view subscribed to this position, however another highlighted that there may be some potential tension between paragraph 145 and the requirements under nPPF paragraph 35(a) in terms of meeting needs and being positively prepared.

1.67 Through these discussions, it became clear that a number of authorities, notably Dudley and Sandwell, were also no longer proposing to amend Green Belt boundaries (which had been proposed through the previous draft Black Country Plan) as the NPPF supported this approach. Therefore, it was further acknowledged by the HMA group at this time that this change of strategy for a number of the Black Country authorities, together with the potential change in strategy proposed by SSC, would have the consequence of increasing housing shortfalls. Taking these discussions into consideration, alongside the concerns expressed by Cannock Chase DC in their response to our 24<sup>th</sup> October 2023 letter, SSC considered that the approach taken forward of releasing some Green Belt, but limited to the

district's most sustainable settlements, to be the correct one, as it would allow for an appropriate contribution to be made to the shortfall (rather than refraining from revising Green Belt boundaries in their entirety).

#### GBBCHMA Development Needs Group meeting discussions on South Staffordshire Council's reduced contribution

1.68 As outlined above, SSDC initially raised the potential approach of not revising Green Belt boundaries through the Local Plan in the letter of 24<sup>th</sup> October 2023. This letter also made clear to GBBCHMA authorities that the impact of national policy changes and a change in SSDC's strategy as a result, would affect the contribution, confirming:

*“This policy, if enacted, will obviously have significant Duty to Cooperate implications for authorities with a relationship to the unmet needs of the GBBCHMA, particularly those which proposed altering Green Belt boundaries on the basis of meeting unmet housing needs within the region.”*

1.69 At the GBBCHMA Development Needs Group Meeting of 21<sup>st</sup> November 2023, SSC orally confirmed that we were revisiting the Plan's strategy and scoping potential alternative options due to the forthcoming NPPF and the fact that another year was needed for the plan period; and that we were considering revisiting our approach to Green Belt that would result in either a reduced contribution, or making no contribution at all.

1.70 At the meeting of 19<sup>th</sup> March 2024, a further oral update was provided to HMA authorities confirming we would be revisiting our approach to Green Belt and changing our spatial strategy and the rationale for this. It was explained that this would result in a reduced contribution to the GBBCHMA shortfalls of 640 homes and therefore having implications for the wider shortfall. This was a factual update which provided an opportunity for others to ask questions and to inform and allow discussion to take place. Through these discussions it was never requested that we change our contribution, await the updated Strategic Growth Study (see below) or withdraw the Local Plan.

1.71 The above two sub-headings have shown that – as part of the Duty to Cooperate – the Council alerted the GBBCHMA to its potential change in strategy at an early stage to inform effective and constructive discussions.

1.72 This meant that GBBCHMA were aware of the consequences that the change in stance would have on the wider HMA unmet need. The initial concerns raised in relation to the prospect of SSC progressing a non-Green Belt release strategy were reflected on in the decision by SSDC to ultimately release some Green Belt (a decision that other some other HMA authorities, notably Dudley, Sandwell and Wolverhampton, refrained from doing).

1.73 SSDC then set out to the GBBCHMA the revised figure of 640 and the rationale for it. This made clear to the GBBCHMA what the council's contribution to the shortfall would be and what it would not be (with the clear consequence of there being a greater shortfall than if there had been a larger contribution from SSDC). The GBBCHMA's views were sought on whether this was an acceptable approach despite the consequences for the HMA's shortfall and no concerns were raised.

1.74 While the Duty to Cooperate is not a Duty to Agree, in this case the council expressly raised their position multiple times with the GBBCHMA and ensured there was every opportunity for Duty to Cooperate partners to raise a concern. None did, and the council therefore considers that no more could have done in relation to Duty to Cooperate and their housing contribution to the HMA: the council were transparent and open with the GBBCHMA and raised matters at an early opportunity to allow for discussion to take place. Said discussion informed the council's decision to release Green Belt, and the lack of further concern raised in the appropriate forum led the council to continue with the Local Plan.

1.75 However, it is not right that the GBBCHMA more widely – noting this is not an examination into a sub-regional HMA wide plan – did nothing when faced with the shortfall (which was not caused by SSDC’s change of position). This will be set out below.

#### HMA authorities’ response to the reduced contribution and increased shortfall

1.76 Through discussions at the GBBCHMA meetings, it was agreed by HMA authorities that it would not be appropriate to tackle shortfalls on an individual level, but as a collective through a refresh of the Strategic Growth Study. It was agreed that this would need a collective response and would need to be supported by future governance arrangements.

1.77 The refreshed growth study was initially proposed through the 2022 GBBCHMA SoCG [DC6] and discussed at the GBBCHMA Development Needs Group meeting of the 13<sup>th</sup> December 2022.

1.78 At an early stage, there was in principle potential support from a number of authorities, whilst others were unable to confirm a position following a period of flux initiated through draft changes to the NPPF (December 2022). The study gained firmer support from a larger number of authorities over the course of 2023 and 2024. This was influenced by the publication of the December 2023 NPPF, and the resulting confirmations from SSC that Green Belt boundaries would only be revised in part, or in the case of the Black Country authorities set out above, not at all.

1.79 The refresh of the study was discussed in the context of developing a brief for the work during GBBCHMA meetings. In total, this study was on the agenda ten times<sup>1</sup> between October 2023 and November 2024, facilitating extensive discussions on the study, including its proposed method for determining and considering options to address the shortfall.

1.80 During this period, whilst a draft brief had been prepared, changes to the NPPF made it difficult to know when to commence work to avoid it becoming out of date. Progress made with this demonstrates an acknowledgement of the consequences of a reduced contribution from South Staffordshire, an increased shortfall stemming from the Black Country, and a collective HMA-wide view on an achievable path to addressing these issues.

1.81 The current timeframe for the study is receipt of a draft report by the end of August. Final publication of the report will be dependent on the nature of the comments received to the draft report, and subject to agreement by all GBBCHMA authorities, however it is expected that the final study will be published sometime in autumn 2025.

1.82 The council did not believe it was appropriate or sound to wait for the study to be completed before embarking on this Local Plan. As set out in the Opening Remarks, part of the council’s intention with this Plan is that it is better to have a plan in place, rather than no plan at all which will not assist in meeting the HMA’s shortfall. Furthermore – for the purposes of DtC which this section concerns – the council can confirm that no DtC partner asked the council to consider delaying their plan until the Study was in place – although there was ample opportunity to do so.

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<sup>1</sup> GBBCHMA Development Needs Group Meetings and agenda item under which the Strategic Growth Study refresh was discussed: 21<sup>st</sup> November 2023 (item 7); 16<sup>th</sup> January 2024 (item 7); 20<sup>th</sup> February 2024 (item 7); 19<sup>th</sup> March 2024 (item 4); 21<sup>st</sup> May 2024 (item 6); 18<sup>th</sup> June 2024 (item 6); 16<sup>th</sup> July 2024 (item 6); 17<sup>th</sup> September 2024 (item 7); 15<sup>th</sup> October 2024 (item 6); 19<sup>th</sup> November 2024 (item 6).

## Conclusion

1.83 We have identified above where there is evidence for the discussions within the HMA about the consequences of the reduced contribution to the unmet need as a result of the proposed change of position by South Staffordshire.

1.84 The evidence shows that the HMA authorities were informed at an early stage about the potential reduction in housing to the HMA shortfall and their views were sought, which informed the Council's decision to release Green Belt. The evidence also shows that the HMA authorities were expressly informed of the council's intended contribution – and the associated consequences for the HMA shortfall – which allowed for discussion to take place.

1.85 That discussion led to the decision by the GBBCHMA to tackle the shortfall on a collective rather than individual basis, through a refresh of the Strategic Growth Study. However, at no time did the GBBCHMA request that the council delay or abandon their plan until said study was complete. This recognised the reality that it was better to have a sound plan which made an agreed contribution to the shortfall, than no plan at all with no clear route for contributing to the wider HMA shortfall.

**Table 1: Housing Duty to Co-Operate Timeline**

<b>Duty to Co-Operate Body / Partner</b>	<b>Ongoing Duty to Co-Operate</b>
Association of Black Country Authorities (ABCA) - <b>Appendix 1</b>	<p><a href="#">16.04.2018 – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</a></p> <p><a href="#">12.07.2018 - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</a></p> <p><b>12.07.2018</b> – letter from ABCA setting out key findings of 2017 Black Country I&amp;O consultation, including updated urban capacity evidence regarding the shortfall in housing needs from the Black Country urban area.</p> <p><b>12.07.2018</b> – duty to co-operate meeting with South Staffordshire and BC authorities to discuss Green Belt review, Strategic Housing Market Assessment, Local Plan updates and other strategic issues.</p> <p><b>23.08.2018</b> – letter from SSDC to ABCA to update on the progress of SSDC Site Allocations Document. It indicated commitment to immediately review the Local Plan, recognising cross-boundary unmet needs and the commitment to working with the Black Country in line with DtC.</p> <p><a href="#">30.08.2018 - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</a></p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><a href="#">11.10.2018 - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</a></p> <p><a href="#">06.12.2018 - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</a></p> <p><b>07.12.2018</b> – ABCA response to I&amp;O Consultation which expressed support for preferred level of housing growth and requested all of the 4,000 contribution be attributed to the Black Country. Indicated support for a mix of spatial options to deliver housing growth on the edge of the BC in line with the Strategic Growth Study. Welcomed constructive ongoing co-operation.</p>

**08.2018 – 07.2019** – joint commission of a cross boundary Green Belt Study and Landscape Sensitivity Assessment of potential greenfield development options.

**04.02.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**28.10.2019** – Black Country duty to co-operate officer meeting providing an overview on SHSID consultation and next steps. BC provided an update on urban capacity study, site assessments and cross-boundary sites meeting.

**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.12.2019** – ABCA response to SHSID Consultation showed support for the proposed contribution but reiterated that this should be attributed solely to the Black Country. Provided updated evidence on BC urban capacity, supported preferred approach Option G subject to some caveats on urban extensions, supported threshold for discounting sites solely on the basis of joint Green Belt and landscape study, requested impacts on wider road network are assessed and supported continued constructive work between the authorities.

**04.08.2020** – letter from ABCA to inform of provisional Black Country Plan timeline and provide an update on the strategic issues of housing and employment land needs arising in the Black Country. The Black Country Urban Capacity Review (UCR) has confirmed that the housing needs of the Black Country will not be met, and the shortfall will be around 27,000 homes. It also requested confirmation on whether any sites being promoted in South Staffordshire could reasonably be attributed to meeting part of the housing land needs. Suggests a Statement of Common Ground.

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.12.2020** – SSDC response to ABCA letter clarifying that SSDC preferred strategy and 4,000-dwelling contribution would require Green Belt release. Indicated that reforms in Planning for the Future could abolish DtC and therefore the council could not be sure that Green Belt release is warranted. This may delay agreement of cross boundary needs via a SoCG.

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**12.02.2021** – SSDC letter to ABCA reconfirming commitment to testing 4,000-dwelling contribution and this contribution reflected recommendations in the Strategic Growth Study. Indicated South Staffordshire would require further robust evidence of urban capacity and Green Belt release before releasing its own Green Belt. Indicated willingness to participate in a SoCG on housing, employment and G&T matters.

**29.03.2021** – Black Country officer response to letter of 12.02.2021 confirming discussions of housing need and supply had been ongoing between BC and SSDC through GBBCHMA meetings and direct discussions. Confirmed the latest estimate of unmet need is 26,920 dwellings and indicated that due to the constrained nature of the Black Country it would be unlikely to deliver additional housing land to meet South Staffordshire’s need. Indicated willingness to participate in SoCG at ‘appropriate stage’.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**28.07.2021** – ABCA response to SSDC letter confirming co-operation of SSDC with the Black Country and the anticipated shortfall to be 28,239 dwellings. Requested discussions in 2021 to agree proportion of 4,000-dwelling contribution to be allocated to the BC and confirmed no GBBCHMA authorities had decided to update the Strategic Growth Study or prepare alternative evidence. After BCP consultation and Birmingham Local Plan Review “further work will be required to enable agreement between neighbouring authorities both within and beyond the GBBCHMA”.

**16.08.2021 – 11.10.2021** – Black Country Plan Regulation 18 Consultation.

**08.10.2021** – holding response from SSDC to the BCP Regulation 18 Consultation (subject to a period of call-in to Overview and Scrutiny Committee) welcomes the attempt to maximise urban supply and agree there will be a substantial shortfall arising from the BC to 2039. Advised that work on increasing density needs to be more consistent and would welcome a re-examination of windfall allowances. Detailed comments provided on Green Belt site selection in Dudley and Green Belt site delivery in Walsall (page 61-63 of Appendix 1).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.10.2021** – duty to co-operate meeting with Black Country authorities discussing levels of growth and spatial strategy for housing and employment and duty to co-operate for both South Staffordshire and BC authorities. Discussions on transportation, education, Infrastructure Delivery Plan, health and the water cycle study.

**01.11.2021** – response from SSDC to the BCP Regulation 18 Consultation has been considered by Members through formal constitutional process and remains unchanged to the 08.10.2021 response.

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2021** – ABCA response to SSDC Preferred Options Consultation confirming constructive joint working and stating an estimated shortfall of 28,239 homes up to 2039 from the Black Country. Support for preferred housing growth option and 4,000 home contribution, requesting that the full contribution is attributed to the Black Country. Indicated South Staffordshire and Black Country should reach an agreement on cross-boundary issues and reflect it in a SoCG.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**26.04.2022** – letter from ABCA supporting SSDC’s proposal of a meeting of all authorities in the GBBCHMA and other neighbouring authorities with a functional relationship with the HMA. Provides an update on strategic housing issues, confirming a shortfall of 28,234 homes over the plan period and stating the current contributions from LAs. It is anticipated that the contribution from SSDC will be made available to the Black Country and requested that SSDC confirm this. Confirmation that work programme discussed in the 2021 SSDC duty to co-operate meeting is subject to ongoing work through the HMA group / meetings.

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**06.06.2022** – letter from SSDC to ABCA to advise that SSDC’s housing contribution is directed at the cumulative shortfall and requests to separate contributions without consistent evidence is fundamentally unrobust. Furthermore, these matters should be undertaken through DtC discussions with the HMA group and collaboration with both Birmingham and the Black Country is vital. Confirmation from SSDC that the proposed spatial strategy is based on clear evidence and that SSDC has sought to accommodate the recommendations from the Strategic Growth Study as far as possible (detailed timeline of actions on page 97-100 of Appendix 1).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**\*ABCA correspondence ceased when the Black Country Plan was withdrawn in October 2022\*.**

<p>Birmingham City Council – <b>Appendix 2</b></p>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>19.11.2018</b> – response from BCC to SSDC I&amp;O Consultation, agreeing the GBBCHMA was the most appropriate geography to plan housing needs across and that a SoCG was required. BCC suggested the recommendations in the Strategic Growth Study should be tested in the LP Review process and that identifying safeguarded land was unlikely to be appropriate.</p> <p><b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>04.02.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.04.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>05.06.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>19.09.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>27.09.2019</b> – SSDC response to questionnaire circulated by BCC. SSDC confirmed they were testing providing 4,000 homes towards the GBHMA unmet housing need, based on the Strategic Growth Study. SSDC expressed concerns that more recent GBBCHMA housing monitoring efforts had not re-examined the extent of the housing shortfall in the period beyond 2031.</p> <p><b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).</p> <p><b>25.10.2019</b> – SSDC response to BCC letter expressing concerns about the lack of clarity on the unmet housing need and the lack of audit trail on housing windfalls in GBBCHMA, confirming that SSDC monitoring data was accurate and highlighting that whilst emerging evidence suggested a housing shortfall within the GBBCHMA post 2031, this was not being addressed.</p> <p><b>05.11.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.12.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.12.2019</b> – BCC response to SHSID Consultation confirmed constructive and positive engagement between the authorities, latest evidence should show progress in reducing the housing shortfall and supporting preferred Option G and the 4,000-dwelling contribution to unmet needs of the GBBCHMA.</p> <p><b>12.02.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>02.06.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>03.12.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>08.01.2021</b> – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.</p>
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**25.02.2021** – BCC response to SSDC stating Birmingham welcomed and was fully supportive of approach taken by South Staffordshire to date. Indicated that a limited shortfall (2,597 dwellings) remained across the GBBCHMA to 2031 and a substantial shortfall (29,260 dwellings) across the Black Country remained to 2038. Shortfall may be exacerbated by 35% uplift. Welcome and support SoCG either across the HMA or a separate agreement between BCC and SSDC.

**26.02.2021** – BCC letter to DtC bodies setting out circumstances which may require a review of the Birmingham Development Plan. Seeking initial views on any strategic or cross boundary issues considered to be relevant.

**19.04.2021** – SSDC letter to BCC acknowledging needs may increase significantly due to 35% uplift. Stressed need for Birmingham to fully evidence maximisation of brownfield and underutilised land prior to exporting needs. If there is a significant step-change in unmet needs, the Strategic Growth Study must be updated to distribute this sustainably. Requested clarification on intentions and timescales for BCC Local Plan Review and role in preparing a GBBCHMA SoCG.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**29.06.2021** – BCC response to SSDC acknowledging South Staffordshire’s role as a ‘proactive participant’ in HMA discussions and in seeking to provide additional housing to meet shortfalls. BCC intention to review its Local Plan and that a Local Development Scheme had recently been approved for this. Indicated shortfalls were likely to remain in the HMA beyond 2031.

**19.08.2021** – duty to co-operate meeting discussing SSDC Preferred Options, including 4,000-dwelling contribution to GBBCHMA and BCC evidence gathering with Issues & Options to go out in Summer 2022. Further discussions on density, maximising urban capacity and the approach to housing shortfall, including whether BCC think the Strategic Growth Study needs to be updated. Likely that a bilateral SoCG would be appropriate given timing of different LPs.

**19.08.2021** – SSDC officer response to BCC HELAA methodology consultation.

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2021** – BCC response to SSDC Preferred Options Consultation acknowledging SSDC had been a proactive participant in HMA discussions and welcomed the 4,000-dwelling contribution. Noted BCC had commenced work on new Local Plan and indicated the HMA-wide shortfall was 6,300 dwellings to 2031. Indicated the Strategic Growth Study was likely to require updating to identify further solutions to strategic housing shortfalls.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth

Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**10. 2022** – Birmingham Local Plan Issues and Options Consultation.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on the apportionment of housing contributions, signing SoCG and timescales of plan making.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.11.2022** – response to Birmingham Issues and Options Consultation advising that a contribution of 4,000 dwellings will be made to the unmet need of the GBBCHMA, and that ongoing work will be required to determine how the contribution should be distributed between the authorities generating a shortfall. SSDC advised that BCC should participate in an update to the existing Strategic Growth Study and SSDC have been requesting this update since April 2021.

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**20.12.2022** – BCC response to SSDC Regulation 19 Consultation confirming SSDC have been a proactive participant in HMA discussions and in seeking to provide additional housing to meet shortfalls which is reflected in a contribution of 4,000 dwellings to the wider HMA ([STA22-004-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the

Government's intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

[24.01.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[21.02.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[21.03.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[18.04.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[16.05.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[18.07.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[26.09.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[24.10.2023](#) – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

[21.11.2023](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**30.11.2023** – response from BCC on 24.10.2023 letter to welcome on-going dialogue as both plans progress and acknowledgement that it is less likely Green Belt allocations will provide the solution to housing shortfalls should the proposed NPPF changes come into force.

[16.01.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[20.02.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.

[19.03.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

[21.05.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[18.06.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

[16.07.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**19.08.2024** – response to Birmingham Preferred Options Regulation 18 consultation welcoming the approach which has reduced the shortfall in Birmingham significantly. SSDC advised that the revised strategy following the pause in plan making results in a potential contribution to the GBBCHMA of 640 dwellings.

[17.09.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**14.10.2024** – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and BCC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA ([DC7](#)).

[15.10.2024](#) - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><a href="#">19.11.2024</a> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><a href="#">17.12.2024</a> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><a href="#">21.01.2025</a> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><a href="#">18.02.2025</a> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><a href="#">18.03.2025</a> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><a href="#">15.04.2025</a> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
Bromsgrove District Council – <b>Appendix 3</b>	<p><a href="#">16.04.2018</a> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">12.07.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">30.08.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">11.10.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>19.11.2018</b> – SSDC officer response to Bromsgrove District Plan Review Issues &amp; Options Consultation stating that the range of topics identified appear to be an accurate reflection of the strategic challenges which are likely to require consideration as the plan review evolves. Raised concerns regarding the level of detail within the I&amp;O document on the findings and implications of the West Midlands Growth Study or the scale and source of the housing shortfalls within the HMA.</p> <p><b>28.11.2018</b> – Bromsgrove District and Redditch Borough Council response to SSDC I&amp;O welcoming SSDC approach to identifying the Strategic Growth Study Areas of Search, however further detailed work will be required to determine the total outstanding requirement and distribution for the HMA unmet need. Welcome the opportunity to continue to discuss that role.</p> <p><a href="#">06.12.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>07.01.2019</b> - response from SSDC to the BDC I&amp;O has been considered by Members through formal constitutional process and remains unchanged to the 19.11.2018 response.</p> <p><a href="#">04.02.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">11.04.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">05.06.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">19.09.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).</p> <p><a href="#">05.11.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">11.12.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.12.2019</b> – BDC response to SSDC SHSID welcoming SSDC continued commitment to plan for its own housing need and make a contribution of up to 4,000 dwellings to the HMA unmet need. It is not fully possible to endorse the level of contribution at this stage without a current understanding of the shortfall and how the remainder will be dealt with. Wording amendment proposed to paragraph 2.2. SSDC</p>

approach in producing a consultation document which focuses solely on options for housing distribution and infrastructure presents questions which are unanswerable about the relationship with other uses.

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2021** – BDC response to Preferred Options Consultation supporting the approach of meeting needs within SSDC and consideration of the likely unmet needs of the Black Country and Birmingham.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

[21.06.2022 - Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**27.06.2022** – letter from BDC summarising findings from recent HEDNA and requesting views on likely housing, employment land and traveller pitch requirements, Green Belt release and the possibility of LAs taking some of BDC need requirement to reduce the level of Green Belt release required and unmet employment land needs that BDC should be considering.

[19.07.2022 - Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**01.08.2022** – SSDC response to letter from BDC supporting the principle of using the standard method in calculating housing need. Raised concerns at the language used in the HEDNA regarding joint working and advised that the shortfall from the Black Country is a strategic issue that the Bromsgrove Local Plan must address under duty to co-operate. Advised SSDC will be unlikely to assist Bromsgrove in avoiding Green Belt release to meet the needs identified as it is releasing a significant amount of its own Green Belt.

[16.08.2022 - Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

[01.11.2022 - Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

[13.12.2022 - Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**20.12.2022** – BDC response to Regulation 19 Consultation supporting the approach to meeting needs within administrative boundary and the infrastructure-led spatial housing strategy ([STA22-010-02](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

[24.01.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[21.02.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[21.03.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[18.04.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[16.05.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[18.07.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[26.09.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

	<p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.</p> <p><b>21.11.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.11.2023</b> – response from BDC and RBC to 24.10.2023 letter to advise they will respond on all issues within the Regulation 19 consultation.</p> <p><b>16.01.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>25.03.2025</b> – signed SoCG states that SSDC and BDC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA (<a href="#">SST/ED14</a>).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
<p>Cannock Chase District Council – <b>Appendix 4</b></p>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>15.08.2018</b> – SSDC response to CCDC Issues and Scope Consultation document stating SSDC supports the proposed timetable and welcomes the discussion regarding identified housing shortfall within the wider GBBCHMA.</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

**30.10.2018** – SSDC Issues & Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. ([I&O Here](#)).

**28.11.2018** – CCDC response to SSDC I&O Consultation supporting the overall scope and cross-boundary matters are addressed by topic. Housing growth options are considerable reasonable options to test and the proactive approach of SSDC in addressing the wider shortfall is welcomed and supported. Comments regarding the contribution of other authorities to the HMA shortfall.

**06.12.2018** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**04.02.2019** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**08.07.2019** – SSDC officer response to CCDC I&O Consultation supporting the approach towards examining a range of potential development scenarios which would contribute towards meeting locally generated and wider HMA housing needs. Support CCDC using the same methodology as SSDC to calculating contribution to the HMA shortfall.

**15.08.2019** – response from SSDC to the CCDC I&O has been considered by Members through formal constitutional process and remains unchanged to the 08.07.2019 response.

**31.08.2019** – duty to co-operate meeting addressing local plan timetables and GBBCHMA work. SSDC and CCDC agreed to work positively regarding housing, including on cross-boundary sites and consultation on Green Belt options. Further discussions on retail, leisure, environment and heritage.

**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**07.01.2020** – CCDC response to SSDC SHSID Consultation (late response) supporting the continued positive approach to meeting the wider HMA needs. CCDC welcome discussions as part of the site selection process in relation to any potential cross boundary sites and would welcome recognition of the district’s constrained nature and that it is currently considering capacity for proportionate dispersal as per the Strategic Growth Study.

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group ([agenda and minutes](#)).

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**25.02.2021** – CCDC response to 08.01.2021 letter advising that the Preferred Options is likely to commence in March 2021 and proposes a 500-dwelling contribution to the GBBCHMA shortfall, which is the lower end of the ‘proportionate dispersal’ option in the Strategic Growth Study. It may not provide an opportunity for SSDC to reduce its proposed LPR target.

**23.04.2021** – SSDC officer response to CCDC Preferred Options Consultation stating that a contribution of 500 dwellings towards the shortfall would align with the approach SSDC has undertaken, however there is no reference to the GL Hearn study in the explanatory text. The study is the primary evidential basis which provides the context for consideration of potential approaches to making good the wider HMA shortfall.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**09.06.2021** – response from SSDC to the CCDC I&O has been considered by Members through formal constitutional process and remains unchanged in regard to comments on housing. Additional comments on the possibility of development close to the South Staffordshire boundary and consideration needs to be given to the impact on local amenities and the road network.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.12.2021** – CCDC duty to co-operate letter to identify areas of agreement and disagreement on matters relating to evidence, GBBCHMA shortfall, CCDC local housing need and other strategic matters.

**08.12.2021** – SSDC response to 02.12.2021 letter advising that further discussions are required on the GBBCHMA shortfall and CCDC local housing need.

**15.12.2021** – CCDC response to SSDC Preferred Options Consultation supporting the approach to meeting the needs of SSDC within the administrative boundary and acknowledge the long-term approach to the consideration of needs arising from the HMA. Support the approach of infrastructure-led spatial housing strategy but do not wish to comment on individual sites at this time.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** – duty to co-operate meeting providing local plan updates and confirming agreement to sign GBBCHMA SoCG.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

[21.11.2023 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

**04.12.2023** – response from CCDC to 24.10.2023 letter to advise of own delay in plan making, respond to & provide own updates on housing, employment & G&T.

**08.01.2024** – duty to co-operate meeting discussing LP updates, including SSDC reviewing approach in light of NPPF changes. Full update on housing provision of each authority, employment work (including apportionment of WMI), G&T provision (including jointly commissioned work and SSDC need).

[16.01.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[20.02.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[08.03.2024 – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.](#)

**18.03.2024** – SSDC response to CCDC Regulation 19 Consultation welcoming the commitment to meeting CCDC housing need and offering to be an active partner in discussions on progressing an update of the evidence base for HMA unmet need.

**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**21.05.2024** – CCDC response to Regulation 19 Consultation supporting SSDC meeting its own OAN and will not further exacerbate the shortfall of the HMA. CCDC contend the Strategic Growth Study still has validity but does accept an update is now required ([STA24-010-01](#)).

[21.05.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[18.06.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[16.07.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[17.09.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

**02.10.2024** – signed SoCG states that SSDC and CCDC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA. CCDC have consistently presented a contribution of 500 dwellings to the unmet need. ([DC8](#)).

[15.10.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[19.11.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[17.12.2024 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[21.01.2025 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[18.02.2025 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[18.03.2025 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

[15.04.2025 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group \(agenda and minutes\).](#)

**\*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.\***

<p>City of Wolverhampton Council – <b>Appendix 5</b></p>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint plan in late 2022*</b></p> <p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>12.07.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>30.08.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.10.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).  <b>06.12.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>07.12.2018</b> – response to I&amp;O Consultation provided by ABCA.  <b>19.12.2018</b> – CWC response to SSDC I&amp;O supporting the preferred housing growth option of local housing need plus 4,000 homes to GBBCHMA and support for a mix of spatial options which deliver a proportionate amount of housing on the edge of the Black Country in line with the Strategic Growth Study.  <b>04.02.2019</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.04.2019</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>05.06.2019</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>19.09.2019</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).  <b>05.11.2019</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.12.2019</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>18.12.2019</b> – CWC response to SSDC SHSID supporting the preferred housing growth option of local housing need plus 4,000 home contribution to meet wider Black Country need. Request that the contribution is allocated wholly to the Black Country rather than to the rest of the HMA. Impact of developments on wider transport network needs to be assessed. Acknowledgement that CWC and SSDC have been working together constructively on planning issues.  <b>12.02.2020</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>02.06.2020</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>03.12.2020</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>08.01.2021</b> – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.</p>
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**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2021** – CWC response to SSDC Preferred Options confirming that CWC and SSDC have been working together constructively on planning issues of mutual interest. Support for the preferred housing growth option and request that the contribution is allocated wholly to the Black Country. Detailed comments on the site allocations and cross-boundary infrastructure.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**25.07.2022** – duty to co-operate meeting discussing LP updates, draft SoCG, updates on employment SoCG, G&T (including request to BC to reassess supply and advise a further letter will be forthcoming).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an

approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on the apportionment of housing contributions, signing SoCG and timescales of plan making.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.12.2022** – CWC response to Regulation 19 Consultation welcoming the 4,000-dwelling contribution to the unmet needs of the HMA and requesting that a significant proportion of this is secured for Wolverhampton. Discussions regarding the apportionment and how this can be calculated are detailed. Proximity of sites to the City boundary mean affordable housing provided on these sites should be available to City residents ([STA22-012-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**23.01.2024** – response from CWC to 24.10.2023 letter to advise on progress of own LP and brief points on housing and employment.

**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>09.04.2024</b> – SSDC response to Wolverhampton’s Regulation 18 Consultation expressing concerns that CWC had not explored all reasonable options in the alternatives presented in the draft plan when seeking to meet future housing requirements, specifically in relation to opportunities to increase densities. SSDC stated that Wolverhampton should continue to seek to maximise delivery within its own administrative boundaries before seeking to export need.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>28.05.2024</b> – CWC response to Regulation 19 Consultation confirming the SSLP has been prepared in a manner which is legally compliant and meets the duty to co-operate. CWC consider the revised approach undertaken by SSDC is, in principle, in accordance with the updated NPPF and therefore sound. Details on the apportionment of the 640-dwelling contribution and how this should be secured to Wolverhampton (<a href="#">STA24-012-01</a>).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>10.10.2024</b> – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and CWC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA (<a href="#">DC19</a>).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.01.2025</b> – SSDC response to Wolverhampton’s Regulation 19 Consultation confirming that SSDC will continue to work closely with CWC alongside other relevant partners through duty to co-operate arrangements to consider how the unmet need across Wolverhampton and the wider HMA can be addressed. SSDC would support a commitment to continued attempts to increase the supply of dwellings within Wolverhampton, including increased densities, reallocation of sites from other uses, housing area renewal proposals and exploring the potential release of Green Belt sites.</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
Dudley Metropolitan Borough Council – <b>Appendix 6</b>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

**12.07.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**30.08.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**11.10.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**30.10.2018** – SSDC Issues & Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. ([I&O Here](#)).  
**06.12.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**07.12.2018** – response to I&O Consultation provided by ABCA.  
**04.02.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).  
**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.  
**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.  
**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).  
**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.  
**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on the apportionment of housing contributions, signing SoCG and timescales of plan making.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**22.12.2022** – DMBC response to Regulation 19 Consultation supporting the level of housing provision within the plan. DMBC will continue to work with SSDC on how the 4,000-dwelling contribution should be attributed to ensure a coordinated approach. Work will continue on securing a GBBCHMA SoCG ([STA22-015-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the

Government's intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.07.2023** – duty to co-operate meeting with items on agenda including Local Plan updates, evidence base, duty to co-operate / HMA study update and AOB.

**25.09.2023** – duty to co-operate meeting discussing Local Plan updates (including DtC letters to stakeholders from SSDC), DMBC advised an update to evidence including the SHMA and Urban Capacity Study. SSDC advised an update to evidence including the SHMA and GTAA.

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.12.2023** – DMBC officer response to SSDC 24.10.2023 letter confirming Dudley's housing need/shortfall and that the housing supply will be clarified as DtC discussions progress at Regulation 19 stage of the Dudley Local Plan. Details on employment land provision, including loss of existing employment land and anticipated shortfall, and confirmation of contribution from SSDC to DMBC shortfall. Confirmation that DMBC have undertaken a review of sites and found that no deliverable site options were put forward, and therefore likely to have a shortfall. The response was formalised by Cabinet in February 2024.

**21.12.2023** – SSDC provided a response to DMBC Regulation 18 consultation stating that Dudley should continue to seek to maximise delivery within its own administrative boundaries before seeking to export need.

**09.01.2024** - duty to co-operate meeting discussing local plan updates for both DMBC and SSDC, SSDC 24.10.2023 letter, SoCGs and the Strategic Growth Study update.

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.

**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**21.05.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>29.05.2024</b> – DMBC response to Regulation 19 Consultation supporting the level of housing provision but request that the wording regarding the contribution to the unmet needs of the HMA is amended to “minimum” to account for any over delivery. The Black Country and other HMA authorities will apportion the contribution through a SoCG (<a href="#">STA24-015-01</a>).</p> <p><b>18.06.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>24.06.2024</b> - duty to co-operate meeting with items on agenda including Local Plan updates, SoCGs, Strategic Growth Study update and AOB (agenda only).</p> <p><b>16.07.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>04.09.2024</b> – duty to co-operate meeting discussing Local Plan updates (including completion of evidence base documents by DMBC such as the SHMA and delivery and viability work). Updated HMA SoCG will be progressed and a DMBC and SSDC bilateral SoCG.</p> <p><b>17.09.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>15.10.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>18.10.2024 – 29.11.2024</b> – DMBC Regulation 19 Consultation published which included policies on spatial strategy, the delivery of sustainable housing growth, employment land, gypsy and traveller provision and several strategic and non-strategic policies.</p> <p><b>04.11.2024</b> – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and DMBC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA (<a href="#">DC9</a>).</p> <p><b>19.11.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>29.11.2024</b> – SSDC response to DMBC Regulation 19 Consultation stating that SSDC will continue to work closely with DMBC alongside other relevant partners to consider unmet needs across the HMA. Advised that a 640-dwelling contribution would be made to the GBBCHMA through SSDC Local Plan and supported continued attempts to increase the supply of dwellings within Dudley, including exploring the potential of Green Belt sites.</p> <p><b>09.12.2024</b> – duty to co-operate meeting discussing Local Plan updates, the HMA SoCG and the Air Quality Study and associated SoCG.</p> <p><b>17.12.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>20.01.2025</b> – duty to co-operate meeting discussing Local Plan updates, the HMA SoCG (including resending with further comments received), two outstanding signatures on Air Quality SoCG and evidence base updates.</p> <p><b>21.01.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>18.02.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>10.03.2025</b> – duty to co-operate meeting discussing Local Plan updates, the HMA SoCG (chasing a few remaining signatures), noted that Wolverhampton are leading on the Black Country FEMA SoCG, and the Strategic Growth Study is underway.</p> <p><b>18.03.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>15.04.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p>
Lichfield District Council – <b>Appendix 7</b>	<p><b>16.04.2018</b> – <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>30.04.2018 – 11.06.2018</b> – Lichfield District Council Local Plan Review Issues &amp; Options Consultation published.</p>

**24.05.2018** – SSDC officer response to LDC I&O supporting the approach being adopted towards identifying potential development scenarios to contribute towards meeting the future housing requirement from the wider HMA.

**12.07.2018** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**30.08.2018** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**11.10.2018** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**30.10.2018** – SSDC Issues & Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. ([I&O Here](#)).

**22.11.2018** – LDC response to SSDC I&O Consultation supporting the approach undertaken with the I&O in relation to local objectively assessed need and the consideration of wider unmet housing needs.

**06.12.2018** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**04.02.2019** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**15.03.2019** – SSDC officer response to LDC Preferred Options Consultation welcoming the approach adopted by LDC which is based on a clear understanding of the issues facing the authority and the pressures arising from the shortfall identified within the wider HMA.

**11.04.2019** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**05.06.2019** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**19.09.2019** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**05.11.2019** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**11.12.2019** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**November 2019 – January 2020** – LDC Preferred Options Consultation published.

**16.01.2020** – SSDC officer response to LDC Preferred Options Consultation welcoming and supporting the approach by LDC in making a contribution of 4,500 dwellings towards the shortfall of the wider HMA. It is considered this is a reasonable and proportionate response to housing shortfalls and is based on the same evidence being used by SSDC.

**12.02.2020** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**02.06.2020** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**23.11.2020** – letter from LDC regarding the duty to co-operate for Green Belt, including that the housing requirement is unlikely to be met on sites within the urban area. Requested that LAs assess if there are any urban sites that may be used to meet LDC housing need. Invite to take part in SoCG covering housing issues.

**03.12.2020** - [Greater Birmingham and Black Country Housing Market Area Working Group \(agenda and minutes\).](#)

**15.12.2020** – response from SSDC stating there is insufficient supply of land in South Staffordshire to meet future housing requirements in the open countryside and SSDC are making considerable efforts to address cross-boundary needs. It is therefore not possible to contribute to LDC housing need. SSDC confirm participation in a SoCG.

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**29.07.2021** – duty to co-operate meeting discussing soundness issues with LDC contribution to the wider HMA unmet need. LDC advised that the previous proposed contribution of 4,500 dwellings is not deliverable in plan period as the strategic sites will not come forward. LDC advise that historic levels of delivery show options that suggest higher level of housing are not realistic.

**30.09.2021** – SSDC response to LDC Regulation 18 Consultation stating that SSDC has concerns with the approach adopted by LDC in making a contribution of 2,665 dwellings to the HMA shortfall as this is not sufficient and likely to push housing delivery to other, potentially less sustainable locations. The plan looks to only provide a contribution from 2027. Further details on concerns with the LDC Plan is set out on page 14 of Appendix 7.

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2021** – LDC response to SSDC Preferred Options Consultation welcoming the continuing positive dialogue with SSDC. LDC supports the commitment within the LP to provide homes to meet the unmet needs from the GBBCHMA. LDC confirmed their draft LP proposes a contribution to the shortfall.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**14.10.2022** – SoCG between LDC and SSDC covering housing, employment, G&T provision, transport and infrastructure matters, and natural and historic environment.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**22.12.2022** – LDC response to Regulation 19 Consultation confirming that the position in relation to strategic matters, including housing, has been refined and detailed in an SoCG. LDC supports the strategic level of housing growth proposed in the policy ([STA22-027-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**13.12.2023** – response from LDC providing update on own LP and responded on housing, employment, G&T points.

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.01.2024** – duty to co-operate meeting discussing Local Plan updates including timeline for new Lichfield Local Plan, SSDC letter from 24.10.2023, SoCGs, the Strategic Growth Study and Air Quality work.

**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.

**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**21.05.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**28.05.2024** – LDC response to Regulation 19 Consultation supporting SSDC in meetings its own OAN and welcoming the contribution of 640 dwellings towards unmet need within the wider HMA, however the reduced level of contribution will need to be robustly evidenced and justified in the context of emerging unmet housing needs ([STA24-027-01](#)).

**18.06.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.07.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**05.09.2024** – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and LDC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA ([DC10](#)).

**17.09.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**15.10.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**19.11.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**11.12.2024** – SSDC response for LDC Issues & Options Consultation noting that work on the previous plan ‘Local Plan 2040’ has now ceased following the decision to withdraw the plan from EiP. Plan preparation has effectively been reset with the current consultation restarting plan production and extending the plan period for 2043. Recognition of the need to seek to make a contribution to the wider HMA shortfall is welcomed. SSDC supports the examination of all reasonable options to increase the delivery of new residential development.

**17.12.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.01.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.02.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.03.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**15.04.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
<p>North Warwickshire Borough Council – <b>Appendix 8</b></p>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).  <b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>04.02.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.04.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>05.06.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>19.09.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).  <b>05.11.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.12.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>12.02.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>02.06.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>03.12.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>08.01.2021</b> – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.  <b>01.06.2021</b> – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.  <b>15.06.2021</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>19.10.2021</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. (<a href="#">Preferred Options Here</a>).</p>

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

	<p><b>24.01.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.02.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.03.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.05.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.07.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>26.09.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from NWBC.</p> <p><b>21.11.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.01.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>30.05.2024</b> – NWBC response to Regulation 19 Consultation stating the plan does not adequately address the unmet need in relation to the housing shortfall and the resulting reduction in contribution will put increasing pressure on other adjoining authorities (<a href="#">STA24-035-01</a>).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>23.05.2025</b> – signed SoCG states that SSDC and NWBC recognise the importance of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Matter of disagreement regarding SSDC alternative spatial strategy and resulting contribution to the unmet need of the HMA (<a href="#">SST/ED23</a>).</p>
Redditch Borough Council – <b>Appendix 9</b>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

**30.08.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.10.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**30.10.2018** – SSDC Issues & Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. ([I&O Here](#)).

**28.11.2018** – Bromsgrove District and Redditch Borough Council response to SSDC I&O welcoming SSDC approach to identifying the Strategic Growth Study Areas of Search, however further detailed work will be required to determine the total outstanding requirement and distribution for the HMA unmet need. Welcome the opportunity to continue to discuss that role.

**06.12.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**04.02.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**08.12.2021** – RBC response to SSDC Preferred Options with no substantial comments to make on the content of the document. RBC are not in a position to raise any specific matters regarding housing distribution in the GBBCHMA or comment upon the appropriateness of the level of contribution to the unmet need.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

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**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

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**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

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**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

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**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

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**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

	<p><b>24.01.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.02.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.03.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.05.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.07.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>26.09.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.</p> <p><b>21.11.2023</b> – response from BDC and RBC to advise they will respond on all issues within the Regulation 19 consultation.</p> <p><b>21.11.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.01.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>25.03.2025</b> – signed SoCG states that SSDC and RBC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA (<a href="#">SST/ED13</a>).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
Sandwell Metropolitan	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

<p>Borough Council – <b>Appendix 10</b></p>	<p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).  <b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>07.12.2018</b> – response to I&amp;O Consultation provided by ABCA.  <b>04.02.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.04.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>05.06.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>19.09.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).  <b>05.11.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>11.12.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>12.02.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>02.06.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>03.12.2020</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>08.01.2021</b> – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.  <b>01.06.2021</b> – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.  <b>15.06.2021</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>19.10.2021</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  <b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. (<a href="#">Preferred Options Here</a>).  <b>08.11.2021</b> – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.  <b>30.11.2021</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>
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**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on the apportionment of housing contributions, signing SoCG and timescales of plan making.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2022** – SMBC response to Regulation 19 Consultation supporting the contribution of 4,000 dwellings to the unmet needs of the HMA but preferring the contribution to have been apportioned based upon travel to work information ([STA22-038-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents

for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**06.04.2023** – SSDC response to Sandwell I&O Consultation following the Black Country Plan ceasing. It is acknowledged that much of the background work and evidence undertaken for the BCP will remain useful for the Sandwell Local Plan/ However, it must be ensured that the emerging Local Plan does not presuppose that the approaches taken in the BCP are still the best available. SSDC considers Sandwell should maximise housing delivery within its own administrative area before seeking contributions from neighbouring authorities.

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.07.2023** – letter from SMBC summarising duty to co-operate engagement to date on housing, employment and G&T accommodation. Request that SSDC offers clarification regarding the South Staffordshire Local Plan and the offers of housing and employment land set out in the SoCG previously signed in 2023.

**14.08.2023** – response from SSDC to update on the South Staffordshire Local Plan and that SSDC cannot confirm the next local plan consultation approach to housing and employment land or any possible contribution to the wider HMA. DtC correspondence will be prepared in early Autumn and re-iterate comments made to Sandwell I&O.

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**23.11.2023** – response from Sandwell to update on progress of their LP and to provide brief responses to the points raised by SSDC.

**15.12.2023** – SSDC responded to Sandwell MBC’s Regulation 18 Consultation stating that Sandwell should continue to seek to maximise delivery within its own administrative boundaries before seeking to export need.

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.

**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**21.05.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.06.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**20.06.2024** – letter from Sandwell explaining intended approach in relation to duty to co-operate for strategic housing issues.

	<p><b>11.07.2024</b> – response from SSDC with detailed overview of proposed spatial strategy for SSDC Local Plan and the 640-home contribution to the wider unmet need of the HMA. SSDC is not opposed to a method being agreed for apportioning contributions between authorities generating unmet needs, subject to this being agreed by all relevant parties.</p> <p><b>16.07.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>30.07.2024</b> – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and SMBC recognise the importance of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA (<a href="#">DC11</a>).</p> <p><b>17.09.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>15.10.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>01.11.2024</b> – SSDC response to Sandwell MBC’s Regulation 19 Consultation stating SSDC will continue to work closely with Sandwell MBC alongside other relevant partners to address the overspill requirement of 15,916 dwellings. Support continued attempts at increasing the supply of dwellings, specifically increased densities, reallocation of sites from other uses, housing area renewal proposals and exploring the potential release of Green Belt sites.</p> <p><b>19.11.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>17.12.2024</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>21.01.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>18.02.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>18.03.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p> <p><b>15.04.2025</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes)</a>.</p>
Shropshire Council – <b>Appendix 11</b>	<p><b>16.04.2018</b> – <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>12.07.2018</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>30.08.2018</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>11.10.2018</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>29.11.2018</b> – Shropshire Council Preferred Sites Consultation published (10 weeks)</p> <p><b>06.12.2018</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>04.02.2019</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p> <p><b>15.03.2019</b> – SSDC response to SC Preferred Sites Consultation supporting the broad approach within the plan. The decision to promote a high growth and balanced strategy to meet Shropshire’s needs is welcomed and provides a positive response to the challenge identified in the Economic Growth Strategy of promoting a ‘step change’ in economic activity and seeking to balance increased levels of housing growth and economic development. Welcome the opportunity for continued engagement in the plan preparation process.</p> <p><b>11.04.2019</b> - <a href="#">Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes)</a>.</p>

**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.07.2019** – Shropshire Council Strategic Sites Consultation published (10 weeks).

**15.08.2019** – SSDC response to Strategic Sites Consultation stating that SSDC considers the three preferred strategic sites represent a positive response to the challenge identified in the Economic Growth Strategy. Comments on J3 M54 and, if included, would likely require a further Regulation 18 consultation to allow proper consideration of the proposal.

**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**27.02.2020** – letter from Shropshire Council providing a detailed update on the Local Plan Review and options that have been considered for development. Seeking views from neighbouring authorities about their ability to accommodate some of the identified needs for development. If so, how much of the development requirements are you able to accommodate and details of suitable sites to meet the specific identified need.

**12.03.2020** – SSDC officer response to 27.02.2020 letter stating that due to the extent of Green Belt coverage in South Staffordshire and the requirement to meet our own needs and make a contribution to the unmet needs of the GBBCHMA, SSDC are not in a position to meet any of Shropshire’s identified need.

**15.05.2020** – response from SSDC to the 27.02.2020 letter from SC has been considered by Members through formal constitutional process and remains unchanged to the 12.03.2020 response.

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**22.06.2020** – duty to co-operate meeting with agenda items economic impact assessment study, project / site updates, Local Plan updates, discuss draft proposition and future group (agenda only).

**03.08.2020 – 30.09.2020** – Shropshire Council Regulation 19 Consultation.

**29.09.2020** – SSDC response to SC Regulation 18 Consultation reiterating previous comments that plan proposals constitute an appropriate strategic approach. If J3 M54 is identified for allocation in the future, SSDC would expect to see robust evidence to support this decision.

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**12.01.2021** – response from SC to the 08.01.2021 letter stating that Shropshire Council is proposing to contribute towards the unmet need of the Black Country for housing and employment. SC are unable to provide sufficient additional housing or employment land to enable SSDC to reduce its own proposed contribution to meeting these unmet needs. SC considers this a timely opportunity to prepare a SoCG.

**10.03.2021** – duty to co-operate meeting, no agenda or meeting notes are available. However, a follow-up email confirms the meeting occurred and proposes actions regarding the SoCG.

**26.05.2021** – SoCG signed by both South Staffordshire and Shropshire for Shropshire’s forthcoming Local Plan submission.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan

evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**02.09.2022** – correspondence from SC regarding ongoing duty to co-operate with SSDC as part of the Shropshire Local Plan Examination.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

**14.11.2023** – response from SC giving preliminary consideration to issues raised by SSDC, mainly that any decision is informed by proactive duty to co-operate discussions and thought is given to sustainable patterns of development.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.

**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**21.05.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.06.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.07.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**17.09.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>05.11.2024</b> – signed SoCG confirms that SSDC and SC are within separate housing market areas and no other housing related cross-boundary issues have been identified (<a href="#">DC12</a>).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
Solihull Metropolitan Borough Council – <b>Appendix 13</b>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>30.11.2018</b> – SMBC response to SSDC I&amp;O Consultation welcoming the contribution SSDC are intending to make towards the shortfall in the HMA. The approach SSDC should follow should recognise that additional flexibility may be required if there is emerging evidence that demonstrates recommended options are not suitable.</p> <p><b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>01.2019 – 03.2019</b> – Solihull MBC Supplementary Consultation published which sought views on potential additional and / or alternative sites to those proposed in previous iterations of the plan.</p> <p><b>04.02.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>15.03.2019</b> – SSDC response to SMBC Local Plan Supplementary Consultation reiterating concerns which had been previously expressed on the level of contribution that Solihull MBC propose to make towards the shortfall of the GBBCHMA. The draft plan proposes a 2,000-dwelling contribution, yet the close relationship between Solihull and Birmingham suggests a considerably higher contribution would be justified. The decision to defer SMBC response to the Strategic Growth Study findings until the publication of the Draft Submission Stage reduces the scope for meaningful engagement.</p> <p><b>11.04.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>05.06.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>19.09.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).</p> <p><b>05.11.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.12.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.10.2020** – draft SoCG sent by Solihull MBC.

**30.10.2020 – 14.12.2020** – Solihull MBC Submission Consultation published.

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**10.12.2020** – SSDC officer response to Submission Consultation reiterating previous concerns about the scale of contribution proposed to meet the GBBCHMA shortfall. It is considered that continuing with this approach risks the plan failing in meeting its statutory requirements. To support the approach, clarity on steps taken to ensure the approach to utilising the Green Belt review in site selection is broadly consistent with other authorities is requested. Should the examination into Solihull’s approach suggest that other deliverable land is available, SSDC encourage this is brought forward in order to avoid the deferral of the GBBCHMA’s post 2031 shortfall.

**17.12.2020** – response from SSDC to the SMBC Submission Consultation has been considered by Members through formal constitutional process and remains unchanged to the 10.12.2020 response.

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**01.02.2021 - 09.03.2021** – email chain between SMBC and SSDC regarding duty to co-operate meetings, the draft SoCG and any proposed amendments to it.

**18.05.2021** – signed SoCG by SMBC and SSDC covering housing need and opportunities and detailing matters subject to ongoing discussion and matters subject to disagreement.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**13.12.2021** – SMBC response to SSDC Preferred Options Consultation welcoming the contribution SSDC is intending to make towards the shortfall in the HMA. SMBC wishes to note that whilst SSDC may believe that a (presently) unconfirmed shortfall from the Black Country may contribute towards the exceptional circumstances needed to be demonstrated to release land from the Green Belt, this needn’t be the only strategy to dealing with the issue, and an alternative position that would constitute an appropriate strategy is to plan on the basis of

confirmed shortfalls demonstrated through successful examinations and relying on the need for plans to be reviewed at least once every five years.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.  
**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**22.11.2023** – duty to co-operate meeting discussing local plan updates from both SSDC and SMBC, in particular the pause in the examination for SMBC. Details on HMA SoCG and Strategic Growth Study update, West Midlands Strategic Employment Sites Study and G&T shortfalls.  
**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.  
**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.  
**21.05.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**30.05.2024** – SMBC response to Regulation 19 Consultation recognising that Solihull will be progressing their emerging plan using the greater flexibilities of the NPPF but raising concern with how the unmet need from the HMA will be dealt with. SMBC welcomes the opportunity to explore issues in more detail with SSDC through duty to co-operate ([STA24-041-01](#)).  
**18.06.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**16.07.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**17.09.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**15.10.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**29.10.2024** – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and Solihull recognise the importance of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA ([DC13](#)).  
**19.11.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**17.12.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**21.01.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.02.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.03.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<a href="#">15.04.2025 - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</a>
Stafford Borough Council – <b>Appendix 14</b>	<p><a href="#">16.04.2018</a> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">12.07.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">30.08.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">11.10.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>30.11.2018</b> – SBC response to SSDC I&amp;O Consultation considers that Option B would be the most appropriate to minimise the impact on the Green Belt. Other options will result in a significant inflow of new residents which could impact on adjacent areas. The adopted LP in Stafford Borough focuses housing provision at Stafford Town, without releasing Green Belt areas.</p> <p><a href="#">06.12.2018</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">04.02.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">11.04.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">05.06.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">19.09.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).</p> <p><a href="#">05.11.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">11.12.2019</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.12.2019</b> – SBC response to SSDC SHSID Consultation stating serious concerns about any urban extension to Stafford which does not provide appropriate infrastructure in Stafford to mitigate the impact. If SSDC decide to allocate land at the location in the north of the district, an appropriate policy should recognise that the occupiers will look to Stafford to provide their services. Further details and issues regarding this site are detailed.</p> <p><a href="#">12.02.2020</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>29.04.2020</b> – SSDC response to SBC I&amp;O Consultation supporting the broad approach within the I&amp;O document. Any growth greater than that identified through the OAN presents an opportunity for SBC to make a direct contribution to the wider HMA shortfall. It is the view of SSDC that it would be consistent with duty to co-operate requirements for SBC to actively consider a contribution to the HMA.</p> <p><a href="#">02.06.2020</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><a href="#">03.12.2020</a> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>08.01.2021</b> – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.</p>

**24.02.2021** – response from SBC to 08.01.2021 letter advising that SBC Local Plan is in the early stages of preparation, and it is not possible to assist SSDC in terms of unmet housing needs, providing additional housing supply to reduce the housing target or agree to cover any strategic housing needs.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**07.12.2021** – SBC response to SSDC Preferred Options Consultation stating concerns with Policy DS3 and Table 8 regarding an urban extension of Stafford Town. The location is less sustainable and deliverable than other sites in South Staffordshire and should be removed from the plan. Further issues regarding this site are detailed.

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and

acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.11.2022** – duty to co-operate meeting discussing Local Plan updates and confirming that SBC have made provision for at least 2,000 houses above the current LHN requirement which would be available to the wider region and SBC have not currently taken any decisions about authorities that may be assisted.

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.12.2022** – SBC response to Regulation 19 Consultation supporting the approach to housing taken in the plan. However, there are concerns with the urban extension of Stafford Town arising from Site 036c as it is not sustainable and does not provide infrastructure to mitigate its impact ([STA22-043-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**07.02.2023** – SSDC response to SBC Preferred Options acknowledging that SBC are proposing to meet their own housing needs in full and are not seeking contributions from any other neighbouring authorities. Any oversupply in housing presents an opportunity for SBC to make a direct contribution towards meeting the shortfall of the HMA. SSDC would encourage SBC to engage in dialogue with those authorities generating unmet needs within the GBBCHMA to consider whether there is justification for any surplus housing supply in Stafford Borough being attributed to those authorities.

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>23.11.2023</b> – confirmation that SBC cannot meet any shortfall from SSDC and provided comments on the latest position of the LP at SBC. On-going engagement concerning cross-boundary issues is welcomed.</p> <p><b>16.01.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>24.05.2024</b> – SBC response to Regulation 19 Consultation supporting the balance of housing provision across Tiers 1 to 3 based on access to facilities etc. Reiterated previous concerns about the proposed allocation of site 036c and details regarding this are explained in the representation (<a href="#">STA24-043-01</a>).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>04.09.2024</b> – signed SoCG confirms SSDC and SBC are in separate housing market areas but will continue to engage constructively on housing related issues (<a href="#">DC14</a>).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
Stratford on Avon District Council – Appendix 15	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>04.02.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

**15.03.2019** – SSDC response to Stratford on Avon Site Allocations Plan Further Focused Consultation stating that the opportunity should be taken within the Site Allocations Plan to include a commitment to an early Local Plan Review. The scope of the review should include a commitment to testing the evidence that has emerged since the adoption of the Core Strategy regarding the HMA shortfalls. Consideration should be given to indicating within the Site Allocations Plan that reserve sites identified in the SAP will be considered as making a contribution towards the shortfall.

**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.12.2020** – SSDC response to Stratford on Avon Site Allocations Plan Preferred Options Consultation reiterating that a commitment to an early Local Plan Review is required. The release of reserve sites to contribute to meeting the identified shortfall is supported but SSDC has concerns that the scale of these site releases has been based on arbitrary pro-rata basis.

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>16.05.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.07.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>26.09.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from SoADC.</p> <p><b>21.11.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.01.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>04.12.2024</b> – signed SoCG states that SSDC and SoA recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA. (<a href="#">SST/ED3</a>).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
Tamworth Borough Council – <b>Appendix 16</b>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p>

**11.10.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**06.12.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**04.02.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
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**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.  
**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
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**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
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**11.11.2022** – SSDC officer response to Tamworth Issues and Options Consultation confirming the document does appear to broadly reflect the range of challenges and opportunities which need to be addressed by the new Local Plan. SSDC would welcome inclusion of references to issues confronting the wider strategic context including the GBBCHMA shortfall.  
**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.  
**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.  
**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
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**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>27.07.2023</b> – response from SSDC to the TBC I&amp;O Consultation has been considered by Members through formal constitutional process and remains unchanged to the 11.11.2022 response.</p> <p><b>26.09.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.</p> <p><b>21.11.2023</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>23.11.2023</b> – noted the points from SSDC and had no further comments but welcomed engagement on the issues.</p> <p><b>16.01.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>04.07.2024</b> – signed SoCG confirms SSDC and TBC recognise the importance of developing a common evidence base across the HMA as far as feasible and practical to ensure that contributions to unmet needs are properly evidenced (<a href="#">DC16</a>).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
Telford & Wrekin Council – <b>Appendix 17</b>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p>

**06.12.2018** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
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**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**01.12.2020** – duty to co-operate meeting discussing Local Plan updates, housing & employment needs including the unmet need arising from the Black Country. Advised that WMI had been granted development consent and G&T evidence is being commissioned.  
**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).  
**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.  
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**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

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**21.11.2023** – reminder for above letter, no response from T&WC.

**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.01.2024** – SSDC response to Telford & Wrekin Regulation 18 Consultation stating that due to NPPF changes this is likely to place an increased focus on accommodating overspill development on those areas outside Green Belt policy constraints yet within reasonably close proximity to the West Midlands conurbation.

**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.

	<p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>07.11.2024</b> – signed SoCG confirms that SSDC and T&amp;WC are within separate housing market areas and no other housing related cross-boundary issues have been identified (<a href="#">DC17</a>).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
<p>Walsall Metropolitan Borough Council –</p> <p><b>Appendix 18</b></p>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>07.12.2018</b> – response to I&amp;O Consultation provided by ABCA.</p> <p><b>04.02.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.04.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>05.06.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>19.09.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>17.10.2019</b> – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. (<a href="#">SHSID Here</a>).</p> <p><b>05.11.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.12.2019</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p>

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**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

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**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

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**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on the apportionment of housing contributions, signing SoCG and timescales of plan making.

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**23.12.2022** – WC response to Regulation 19 Consultation welcoming the housing contribution to the HMA and requesting this is specifically allocated to the Black Country and that failing to do so makes the policy ineffective ([STA22-049-01](#)).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

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**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**22.11.2023** – provided a response to say authority needs to be obtained from Planning Committee prior to providing a formal response.

**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

	<p><b>20.02.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>08.03.2024</b> – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.</p> <p><b>19.03.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.06.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>16.07.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>12.08.2024</b> – formal response to Regulation 19 Consultation following officer response on 29.05.2024. WMBC contend the framework should be viewed as a whole and therefore the proposal to reduce the contribution to the wider HMA does not align well with the tests of soundness. WMBC consider that the need for changes to Green Belt boundaries should be established by the evidence of housing need at the strategic level (<a href="#">STA24-049-01</a>).</p> <p><b>17.09.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.10.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>06.11.2024</b> – signed SoCG states that under SSDCs revised capacity led strategy, 640 dwellings will be contributed to the GBBCHMA unmet need. SSDC and WMBC recognise the important of developing a common evidence base across the HMA as far as feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. Both authorities are party to the GBBCHMA Development Needs Group Statement of Common Ground which seeks to provide a programme of work and governance structure to address housing shortfalls in the HMA (<a href="#">DC18</a>).</p> <p><b>19.11.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>17.12.2024</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>21.01.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.02.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>18.03.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p> <p><b>15.04.2025</b> - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).</p>
Wyre Forest District Council – <b>Appendix 19</b>	<p><b>16.04.2018</b> – Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>12.07.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.08.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>11.10.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs. It proposed a preferred level of housing growth, alongside alternatives, reflecting the existing housing needs, past levels of housing delivery and recommendations within the Strategic Growth Study. (<a href="#">I&amp;O Here</a>).</p> <p><b>06.12.2018</b> - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).</p> <p><b>14.12.2018</b> – SSDC officer response to Wyre Forest Local Plan Pre-Submission Consultation stating that whilst SSDC does not consider the plan ‘unsound’, it does request that Wyre Forest reconsider the present approach of restricting considerations regarding a contribution to</p>

the HMA shortfall to a non-specified future review. It would be consistent with duty to co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current Local Plan process.

**07.01.2019** - response from SSDC to the WFDC Submission Consultation has been considered by Members through formal constitutional process and remains unchanged to the 14.12.2018 response.

**04.02.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.04.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**05.06.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.09.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.10.2019** – South Staffordshire Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery (SHSID) Consultation published which reconfirmed the commitment to test delivery of 4,000 dwellings towards the unmet need of the GBBCHMA and set out several spatial strategies for accommodating the target. Site selection criteria for future housing site selection included in consultation. ([SHSID Here](#)).

**05.11.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.12.2019** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**09.01.2020** – WFDC response to SSDC SHSID Consultation welcoming discussion of housing and employment needs in SSDC. WFDC considers favourably the strategy of Spatial Option G and strongly support the protection of the Green Belt.

**12.02.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2020** – signed SoCG by SSDC and WFDC detailing matters of agreement and disagreement, including comments provided by SSDC during previous consultations.

**02.06.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**03.12.2020** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**08.01.2021** – SSDC letter to GBBCHMA authorities updating on Local Plan progress and restating the commitment to testing a 4,000-dwelling contribution to GBBCHMA unmet needs. Advised this would require Green Belt release and requested an indication of whether other LAs could release sufficient non-Green Belt land to allow South Staffordshire to reduce or avoid need for GB release. Also requested indication of whether LA would participate in a SoCG covering strategic housing needs.

**01.06.2021** – SSDC letter to all adjoining and GBBCHMA authorities indicating intention to progress preferred options on the basis of the 4,000-dwelling contribution to the GBBCHMA unmet needs and that SSDC were not aware of any authorities intending to update the Strategic Growth Study or an alternative evidence base.

**15.06.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.10.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published indicating intention to progress with 4,000-dwelling contribution to GBBCHMA. Consultation was accompanied by a DtC Topic Paper which summarised progress to date and proposed engaging each GBBCHMA authority in a SoCG and participate in an updated Strategic Growth Study. ([Preferred Options Here](#)).

**08.11.2021** – SSDC letter to all GBBCHMA and adjoining authorities to request attendance at December 2021 Duty to Co-operate meeting and stated that 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 and HMA governance arrangements.

**30.11.2021** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.12.2021** – SSDC led duty to co-operate meeting to outline potential programme of working which includes reviewing the extent of the HMA, confirming the scale of housing shortfall across the HMA for at least 15 years and review of growth locations in 2018 Strategic Growth Study. Outcomes of meeting showed broad support for SSDC 4,000-dwelling contribution but no universal agreement on how to address HMA shortfalls or extent of these, differing approaches to use of Strategic Growth Study but no alternative HMA-wide evidence base to replace this, general agreement on updating the Strategic Growth Study and need for governance arrangements – proposed to take these future actions to officer working group meetings to develop SoCG.

**18.01.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**15.03.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.03.2022** – SSDC response to actions from GBBCHMA meeting confirming SSDC fully supportive of the SoCG having consulted Cabinet and the Planning Advisory Service and stressed the need for urgent progress on this to support the South Staffordshire Regulation 19 Consultation.

**19.04.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**17.05.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**21.06.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**19.07.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**16.08.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**18.08.2022** – draft SoCG circulated by SSDC to all GBBCHMA and other related authorities for signing following joint drafting and officer level agreement. It summarised the current emerging shortfalls to 2031 and beyond in the GBBCHMA, recorded key areas of agreement and acknowledged the document is part of an evidence base. Recorded key areas where agreement is still being sought, including the lack of an approach to accommodating the shortfall across the GBBCHMA and relative weight given to the Strategic Growth Study in local plan evidence bases. Set out agreed future work streams to include a framework for updating the Strategic Growth Study and scope of an advisory Member Board to guide future decisions (**Appendix 21**).

**01.11.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**13.12.2022** - Greater Birmingham and Black Country Housing Market Area Working Group (agenda and minutes).

**January – December 2023** – significant proposed changes to national planning policy (published in December 2022), specifically in relation to Green Belt policy, led South Staffordshire District Council to pause preparation of the Local Plan to await further clarity on the Government’s intentions, earmarked for Spring 2023. The decision was taken in July 2023 to start revisiting some evidence base documents for the Local Plan and, in September 2023, it was agreed that a further Regulation 19 Consultation would be prepared for Spring 2024. The revised NPPF was published in December 2023 and a Publication Plan reflecting the changes to national policy was subject to a further consultation period.

**24.01.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.02.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**21.03.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**18.04.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

**16.05.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.07.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**26.09.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. LAs were asked what their position would be if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the district or contribution to the GBBCHMA unmet need.  
**17.11.2023** – response raised questions on where the housing requirement will be met both in SSDC and the HMA but confirming that WFDC will not be in a position to offer any land to meet a shortfall.  
**21.11.2023** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**29.11.2023** – email to WFDC to advise of potential options for the housing requirement and that further DtC discussions will be held.  
**16.01.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**20.02.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**08.03.2024** – SSDC wrote to all neighbouring authorities and those within the GBBCHMA with a proposed update to the previous SoCG.  
**19.03.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.  
**21.05.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.06.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**16.07.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**22.07.2024** – signed SoCG confirms that SSDC and WFDC are within separate housing market areas and no other housing related cross-boundary issues have been identified ([DC20](#)).  
**17.09.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**15.10.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**19.11.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**17.12.2024** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**21.01.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.02.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**18.03.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).  
**15.04.2025** - Greater Birmingham and Black Country Housing Market Area Development Needs Working Group (agenda and minutes).

## **2. Employment Duty to Co-Operate**

2.1 In summary, the key outcomes of duty to co-operate engagement on the matter of employment are as follows:

- Recognition of employment need and supply representing a significant cross-boundary issue for consideration.
- Recognition of employment land shortfall in the Black Country.
- An in-principle agreement by South Staffordshire District Council (SSDC) to make a contribution to the Black Country shortfall.
- Recognition of Cannock Chase Council's request to rely on 10ha from West Midlands Interchange (WMI) towards their supply.
- Confirmation of the appropriate functional geography (Black Country FEMA and other authorities with strong or moderate economic transactions with the Black Country [[SST/ED27](#)]) for considering the strategic issue.
- A final, defined amount of employment land for SSC to contribute to Black Country and Cannock needs.

2.2 These discussion points and outcomes are set out in further detail below, as well as how these have shaped each iteration of the Plan, including the final submitted Local Plan.

2.3 It became apparent from the very start of plan preparation in 2018 that employment was a cross-boundary strategic issue, particularly with the Black Country authorities. The Black Country authorities consulted on their [Regulation 18 Issues and Options](#) in July 2017 and at that stage identified a need for 800ha of employment land. They also cited a gap between anticipated need and supply of employment land of some 300ha. South Staffordshire District Council (SSDC) responded to the consultation indicating its willingness to explore South Staffordshire's role in meeting evidenced unmet employment needs from the Black Country through preparation of the Local Plan.

2.4 Ultimately, the outcome of this DtC engagement was SSDC's recognition of the shortfall itself, as well as our potential role in meeting a proportion of it. This directly influenced the council's Issues and Options consultation document [[PC4](#)] in October 2018, which acknowledged at paragraph 4.24 that South Staffordshire is... 'likely to have a role in meeting wider employment land needs arising from within the FEMA' and that 'the greatest need is likely to come from the Black Country'. Employment growth options in South Staffordshire were also consulted on through the same consultation, including the option of allocating additional employment land to contribute to meeting employment land shortfalls in the wider FEMA (Table 6, Option C). The Issues and Options consultation was supported by an earlier iteration of our [Economic Development Needs Assessment](#) published in 2018. This identified a potential surplus of 19 to 38ha of employment land that could potentially contribute towards wider unmet needs, including from the Black Country.

2.5 At this time, the Black Country authorities were undertaking further evidence to understand if they could reduce their shortfall through new allocations, specifically through further exploration of their urban capacity and through a Green Belt Review. A key outcome of this was for SSDC and the Black Country Authorities to jointly commission a Green Belt Assessment [[EB18](#)] in late 2018 in order to ensure potential Green Belt release was informed by a consistent evidence base. This joint evidence was then used to inform the Council's preferred strategy and site allocations.

2.6 SSDC's engagement with the Black Country Authorities continued following the conclusion of the Green Belt Assessment. The Black Country Authorities wrote to all councils within the Housing Market Area on 4<sup>th</sup> August 2020, confirming an expected shortfall of between 292ha and 570ha. They also acknowledged that

whilst their Green Belt Review and further urban capacity work would allow exploration of further supply options and yield some additional capacity, a significant unmet need would remain. SSDC's response to the letter on 18<sup>th</sup> December 2020 set out its direction of travel on Duty to Co-operate matters including setting out an agreement in principle to making a contribution to the Black Country's shortfall:

*2.7 "On the matter of employment land provision, SSDC published an Economic Development Needs Assessment (EDNA) in 2018 which demonstrated a small oversupply of employment land over the plan period when South Staffordshire's own need and supply of employment land are considered. The Council will need to review this evidence closer to submission, but in principle SSDC would consider if any oversupply could be attributed to the Black Country, assuming that such an approach offered sufficient flexibility to SSDC in meeting our own needs. We also appreciate that the West Midlands Interchange (WMI) consent represents a strategic site that will meet sub regional needs, and as such, this consent will inform the potential contribution SSDC could make to Black Country unmet employment needs".*

2.8 The [Black Country Draft Plan](#) was consulted on from August to October 2021 and confirmed a 210ha shortfall of employment land based upon the findings of the Black Country EDNA update (August 2021). Through its response to this consultation, SSDC acknowledged that it shared a strong functional economic relationship with the Black Country but requested clarification from the Black Country authorities as to what they considered to be the "most appropriate functional geography" for addressing this strategic issue. SSDC considered that it was for the Black Country authorities (as those authorities generating the unmet need) to define this. It would also then form the basis of a Statement of Common Ground (SoCG) to apportion their unmet needs.

2.9 In relation to this apportionment, SSDC expressed its position through a Duty to Co-operate meeting with the Black Country authorities held on 21<sup>st</sup> October 2021; specifically, that our EDNA was being updated, and this would inform the proportion of employment land that South Staffordshire could provide to the Black Country authorities. The outcome of this discussion was also formally confirmed through the council's response to the Black Country Draft Plan, as well as the council's Regulation 18 Preferred Options [[PC2](#)] consultation. The latter specifically stated:

*2.10 "Given that South Staffordshire's EDNA was undertaken in 2017/18 it is our intention to prepare an updated EDNA prior to our Publication consultation to review whether the demand for employment land has changed, particularly in light of Brexit and Covid-19. This update will ensure that our employment evidence is up to date for submission of the Plan and will form the basis for agreement through a Statement of Common Ground on how much of the district's oversupply of employment land is available for export to meet unmet needs in the FEMA."*

2.11 Conscious of the critical need for cross boundary contributions to be secured through a SoCG, SSDC continued to strongly encourage the Black Country to lead on a SoCG to cover their unmet employment needs, as evidenced by SSDC's letter dated 18<sup>th</sup> November 2021 relating to unmet employment needs. At a follow up Duty to Co-operate meeting arranged following receipt of the letter, Black Country colleagues agreed to write to neighbouring authorities, the outcome of which was a letter dated 26<sup>th</sup> April 2022, with 'Request 3' at paragraph 16 of that letter (page 68 of Appendix 1) requesting confirmation of willingness to enter into a SoCG relating to employment land. The letter also requested that authorities confirm if they were willing to participate in a further West Midlands Strategic Employment Sites Study (WMSESS).

2.12 With a view to continuing dialogue on this matter, SSDC responded to the letter, now further confirming that South Staffordshire could contribute 103.6ha to Black Country employment land shortfalls based upon the findings of the council's 2022 Economic Development Needs Assessment [EB45]. SSDC also committed

to participating in an update to the WMSESS. The outcome of this Duty to Co-operate engagement, including with other authorities across the region, ultimately then saw the WMSESS jointly commissioned in January 2023 and the final report subsequently published in September 2024.

2.13 Despite continuing to push for the Black Country to lead on a SoCG (e.g. DtC Meeting with City of Wolverhampton Council - 25<sup>th</sup> July 2022) covering their employment land shortfall, the cessation of the joint Black Country Plan over summer/autumn 2022 meant it was clear that this was no longer possible. In order to maintain DtC engagement on employment, SSDC took the decision to prepare a SoCG focused on the South Staffordshire FEMA authorities (and Sandwell), with a draft circulated by SSDC to these authorities on 26<sup>th</sup> September 2022. A further outcome of this engagement was SSDC becoming aware that Cannock Chase District Council were seeking 10ha of WMI to contribute towards their employment land supply. Engagement on the draft SoCG led to a further Duty to Co-operate meeting to discuss on 2<sup>nd</sup> November 2022, where the wording of the SoCG was discussed and Stafford BC confirmed they did not expect to have an unmet need and would not require a proportion of WMI. The outcome of this meeting was a 'final officer agreed' version of the SoCG that committed a 103.6ha contribution to the Black Country and 10ha to Cannock. This was taken forward for signing with signatures received from Cannock, Dudley, South Staffordshire and Wolverhampton. However, due to the pause in plan preparation from January 2023, SSDC did not actively pursue outstanding signatures owing to the fact that it became apparent that a further Regulation 19 consultation was needed in South Staffordshire, requiring an updated SoCG.

2.14 The pause to plan preparation and the decision to undertake a second Regulation 19 consultation resulted in the plan period being extended to 2041, and an update to the council's EDNA being undertaken. As per the timeline schedule, meetings took place to discuss our employment position (page 12 of Appendix 6) The 2024 EDNA [EB44] update recalculated the council supply/demand balance and led to a reduced surplus that could be provided to the Black Country of 94.6ha i.e. a reduction of the 103.6ha set out in the November 2022 SoCG. However, following a reassessment of sites through the Employment Site Assessment Topic Paper 2024 [EB42] the allocation of an additional site at M6, Junction 13 meant that the contribution to the Black Country could increase to 112.2ha, an increase from that previously proposed. SSDC set this position out in an updated draft SoCG and distributed this to other authorities in the South Staffordshire FEMA on 14<sup>th</sup> March 2024. Over the following months, the SoCG wording was amended as appropriate in discussion with the FEMA authorities, then agreed and finalised, with the outcome of this engagement the final South Staffordshire FEMA SoCG- August 2024 [DC5]. This SoCG confirms agreement between all FEMA authorities that the contribution of 112.2ha to the Black Country authorities is proportionate, as well as the 10ha contribution of employment land to Cannock. A further SoCG [SST/ED27] led by the Black Country authorities in support of their Local Plan examinations has been prepared, which updates the Black Country shortfall (280.45ha to 2042), but concludes that the 112.2ha minimum shortfall proposed by SSDC is 'proportionate'. Representing a further outcome of the continued DtC engagement between SSDC and other authorities, this SoCG has now been signed by all parties, with the exception of Shropshire, with their position explained in a letter dated 28<sup>th</sup> April 2025.

#### Summary of how the outcomes of this engagement shaped the Local Plan

2.15 The issue of unmet employment land needs shaped the Plan from the start of plan preparation in 2018, with unmet needs from the Black Country being initially identified and cited through SSDC's Regulation 18 Issues and Options [PC4] consultation.

2.16 Ongoing engagement has also determined the most appropriate functional geography for addressing the cross-boundary issue, defined as those authorities with a strong or moderate functional link to the Black Country and confirmed through SoCG [DC5 and SST/ED27]. This cross-boundary collaboration has also seen

the preparation of the WMSESS 2024, the recommendations of which the council is committed to testing through the review of the Plan, as agreed through the aforementioned SoCGs.

2.17 As the plan progressed and as set out above, ongoing engagement continued to take place with authorities across the South Staffordshire FEMA to understand the scale of the unmet need (arising from the Black Country), as well as what level of contribution could be made by South Staffordshire to meet this need; alongside Cannock's position on requesting 10ha from WMI. All of this shaped each iteration of the Plan as follows:

**Table 2: Plan Stage & Proposed Contribution**

Plan Stage	SSC position
Issues and Option (Reg 18)	<u>Black Country</u> Potentially up to 530ha shortfall. SCC acknowledge role in meeting proportion of the shortfall.
Preferred Options (Reg 18)	<u>Black Country</u> 210ha shortfall. SSC agreement in principle to provide any oversupply to BC unmet needs (including proportion of WMI). No figure proposed at this stage
Publication Plan (Reg 19)	<u>Black Country</u> 210ha shortfall. Proposed contribution 103.6ha  <u>Cannock Chase</u> Proposed contribution of 10ha from WMI to ensure they are meeting their employment needs.
Publication Plan (Reg 19)	<u>Black Country</u> 153ha shortfall. Proposed contribution 112.2ha  <u>Cannock Chase</u> Proposed contribution of 10ha from WMI to ensure they are meeting their employment needs.

2.18 Ultimately, this evolution of DtC discussions has culminated in the detail of Policy DS4 in the submitted plan, which can be seen as a key output of this engagement. This policy commits to providing 112.2ha contribution to the Black Country and 10ha to Cannock, meeting both the legal Duty to Co-operate, as well as requirements of national policy, and will drive delivery of Strategic Objectives 2 and 6 of the Plan.

**Table 3: Employment Duty to Co-Operate Timeline**

Duty to Co-Operate Body / Partner	Ongoing Duty to Co-Operate
Association of Black Country Authorities (ABCA) – <b>Appendix 1</b>	<b>03.07.2017 – 08.09.2017</b> – Black Country Core Strategy Issues & Options Consultation ( <a href="#">I&amp;O Here</a> ). <b>06.09.2017</b> – SSDC response to Black Country I&O Consultation.

**12.07.2018** – letter from ABCA setting out key findings of 2017 Black Country I&O consultation and requesting consideration be given to whether Black Country employment needs could be accommodated in Local Plan reviews.

**12.07.2018** – duty to co-operate meeting with South Staffordshire and BC authorities to discuss Green Belt review, EDNA, M54 growth strategy, Local Plan updates and other strategic issues.

**23.08.2018** – letter from SSDC to ABCA to update on the progress of SSDC Site Allocations Document. It indicated commitment to immediately review the Local Plan, recognising cross-boundary unmet needs and the commitment to working with the Black Country in line with DtC.

**30.10.2018** – SSDC Issues & Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. ([I&O Here](#)).

**07.12.2018** – ABCA response to I&O Consultation supporting the option for SSDC to provide high quality employment land towards the BC needs.

**08.2018 – 07.2019** – joint commission of a cross boundary Green Belt Study and Landscape Sensitivity Assessment of potential greenfield development options.

**28.10.2019** – Black Country duty to co-operate officer meeting providing an overview on employment monitoring. BC advised that employment land position is likely to be unclear until apportionment of WMI is reached.

**04.08.2020** – letter from ABCA to inform of provisional Black Country Plan timeline and provide an update on the strategic issues of housing and employment land needs arising in the Black Country. It confirmed that there will be a shortfall in employment land to meet the needs of the Black Country. It also requested confirmation on whether any sites being promoted in South Staffordshire could reasonably be attributed to meeting part of the employment land needs. Suggests a Statement of Common Ground.

**18.12.2020** – SSDC response to ABCA letter recognising the potential oversupply of employment land in South Staffordshire, particularly at WMI, may contribute to Black Country needs. Indicated that reforms in Planning for the Future could abolish DtC and therefore the council could not be sure that Green Belt release is warranted. This may delay agreement of cross boundary needs via a SoCG.

**12.02.2021** – SSDC letter to ABCA committing to exploring whether South Staffordshire's oversupply of employment land could be attributed to the Black Country. Indicated willingness to participate in a SoCG on housing, employment and G&T matters.

**16.08.2021 – 11.10.2021** – Black Country Plan Regulation 18 Consultation.

**08.10.2021** – holding response from SSDC to the BCP Regulation 18 Consultation (subject to a period of call-in to Overview and Scrutiny Committee) welcoming clarity of the employment land requirement in the Black Country, however there is some ambiguity on the most appropriate functional geography for addressing unmet employment needs. Details on the Black Country EDNA are on page 63-64 of Appendix 1.

**21.10.2021** – duty to co-operate meeting with Black Country authorities discussing levels of growth and spatial strategy for housing and employment and duty to co-operate for both South Staffordshire and BC authorities. Discussions on transportation, education, Infrastructure Delivery Plan, health and the water cycle study.

**01.11.2021** – response from SSDC to the BCP Regulation 18 Consultation has been considered by Members through formal constitutional process and remains unchanged to the 08.10.2021 response.

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic

circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. ([Preferred Options Here](#)).

**18.11.2021** – SSDC letter to Black Country authorities stressing urgent need for Black Country to prepare a SoCG to distribute its emerging employment land shortfall, clarify its functional geography for employment, establish areas of agreement/disagreement and governance arrangements for co-operation on this issue. Indicated SSDC willingness to participate in SoCG on employment shortfalls, and that SSDC EDNA update would be completed in advance of South Staffordshire and Black Country Regulation 19 consultations.

**13.12.2021** – ABCA response to SSDC Preferred Options Consultation requesting the EDNA is completed and shared with Black Country authorities to determine how far South Staffordshire could contribute to unmet employment needs from the Black Country.

**12.01.2022** – meeting with City of Wolverhampton and Walsall Metropolitan Borough Councils on behalf of the Black Country authorities regarding the employment land shortfall, latest evidence base, Strategic Employment Study and next steps for addressing and meeting the unmet need.

**15.03.2022** – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.

**17.03.2022** – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.

**26.04.2022** – letter from ABCA supporting SSDC’s proposal of a meeting of all authorities in the GBBCHMA and other neighbouring authorities with a functional relationship with the HMA. Provides an update on strategic employment land issues, confirming a shortfall of 210ha and that the BC will look towards those authorities with strong and moderate economic transactions to accommodate the shortfall. Request confirmation that SSDC has, or will, explore opportunities to accommodate unmet employment land needs. Also request an indication on whether SSDC will participate in further work to address recommendations of the West Midlands Strategic Employment Sites Study (WMSESS). A SoCG will be pursued and an indication of whether an early review mechanism in the emerging SSDC Local Plan with regard to employment need would be considered by SSDC.

**06.06.2022** – letter from SSDC to ABCA to advise that SSDC recognises the clear functional relationship in relation to employment land and the principle of exploring surplus employment supply in South Staffordshire is acceptable. Detailed discussions on WMI and the apportionment of this is available on pages XX of Appendix XX. Reiterate that the Black Country should lead on the preparation of a SoCG with those that have a strong and moderate economic transaction with the Black Country. Confirmation that SSDC are willing to participate in an updated WMSESS, however the study must recognise the need for employment land has already been factored into local EDNA’s. The need for an early review would depend on the outcomes of future evidence base documents and duty to co-operate discussions, none of which can be prejudged – it cannot be automatically assumed that SSDC’s Local Plan Review will require early review.

**26.09.2022 – 11.2022** – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

	<p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p> <p><b>*ABCA correspondence ceased when the Black Country Plan was withdrawn in October 2022*.</b></p>
Birmingham City Council – <b>Appendix 2</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>19.11.2018</b> – response from BCC to SSDC I&amp;O Consultation which supported options allowing SSDC to contribute to the wider unmet needs in the FEMA.</p> <p><b>26.02.2021</b> – BCC letter to DtC bodies setting out circumstances which may require a review of the Birmingham Development Plan. Seeking initial views on any strategic or cross boundary issues considered to be relevant.</p> <p><b>19.08.2021</b> – duty to co-operate meeting discussing BCC approach to employment land and relevant FEMA evidence. BCC confirmed that consultants are working on HEDNA which will look at the FEMA.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>13.12.2021</b> – BCC response to SSDC Preferred Options Consultation restating the work prepared by Stantec indicated Birmingham had a 53ha share of the employment land at WMI and, as Birmingham will likely face employment shortfalls, the impact of WMI should be reflected in a SoCG.</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>10. 2022</b> – Birmingham Local Plan Issues and Options Consultation.</p> <p><b>02.11.2022</b> – response to Birmingham Issues and Options Consultation advising that as the Birmingham HEDNA is unclear as to whether SSDC is within the FEMA and the lack of functional overlap between Birmingham and South Staffordshire, it is not considered appropriate for SSDC to make a contribution towards Birmingham’s unmet employment need beyond the supply already identified at WMI.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>20.12.2022</b> – BCC response to SSDC Regulation 19 Consultation welcoming and supporting the approach of apportioning land at WMI to help address the shortfall of employment land identified in Birmingham (<a href="#">STA22-004-01</a>).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p>

	<p><b>30.11.2023</b> – response from BCC on previous letter to welcome on-going dialogue as both plans progress.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>19.08.2024</b> – response to Birmingham Preferred Options Regulation 18 consultation welcoming the work undertaken to ensure the employment land needs are met within the area and advising of ‘unclaimed’ land at WMI which could be utilised to meet the unmet needs of the wider market area.</p> <p><b>14.10.2024</b> – signed SoCG states SSDC and BCC are in separate functional economic market areas but will continue to work together collaboratively as part of the GBBCHMA Technical Officers Group to progress the necessary follow-on work identified in the West Midlands Strategic Employment Sites Study. Details on the surplus employment land available to meet unmet needs of the wider area from SSDC and the apportionment of WMI are available in the document (<a href="#">DC7</a>).</p>
Bromsgrove District Council – <b>Appendix 3</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>27.06.2022</b> – letter from BDC summarising findings from recent HEDNA and requesting views on likely housing, employment land and traveller pitch requirements, Green Belt release and the possibility of LAs taking some of BDC need requirement to reduce the level of Green Belt release required and unmet employment land needs that BDC should be considering.</p> <p><b>01.08.2022</b> – SSDC response to letter from BDC advising of significant shortfall in employment land arising from the Black Country and, as Bromsgrove are functionally related to the BC, there is an expectation that Bromsgrove will participate in the SoCG currently being prepared by the BC to distribute its unmet employment needs.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>21.11.2023</b> – response from BDC and RBC to advise they will respond on all issues within the Regulation 19 consultation.</p>

	<p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>25.03.2025</b> – signed SoCG confirms FEMA definitions between SSDC and BDC EDNA's are slightly different, however there is nothing within guidance to suggest that a FRMA defines an exclusive relationship and therefore SSDC and BDC will continue to work together collaboratively. SSDC surplus employment land and WMI apportionment discussed (<a href="#">SST/ED14</a>).</p>
Cannock Chase District Council – <b>Appendix 4</b>	<p><b>15.08.2018</b> – SSDC response to CCDC Issues and Scope Consultation document stating SSDC supports the proposed timetable and confirms that Cannock Chase and South Staffordshire are within a shared FEMA, suggesting consideration needs to be given towards collaborative working to identify and address issues which arise within the sub-regional market area geography.</p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>28.11.2018</b> – CCDC response to SSDC I&amp;O Consultation acknowledging that CCDC is within the FEMA and welcoming ongoing discussions in relation to meeting employment growth requirements and cross-boundary sites.</p> <p><b>08.07.2019</b> – SSDC officer response to CCDC I&amp;O Consultation stating that the latest economic evidence suggests that South Staffordshire shares a common FEMA with Cannock, Wolverhampton, Walsall and Dudley. The level of future employment requirements has not yet been determined but a close working relationship with the constituent FEMA authorities will be required to identify how any shortfall in employment land can be addressed.</p> <p><b>15.08.2019</b> – response from SSDC to the CCDC I&amp;O has been considered by Members through formal constitutional process and remains unchanged to the 08.07.2019 response.</p> <p><b>31.08.2019</b> – duty to co-operate meeting addressing local plan timetables and GBBCHMA work. Confirmation of FEMA relationship and possible Green Belt and non-Green Belt employment land options. Ongoing DtC to look at employment needs given cross-boundary linkages.</p> <p><b>23.04.2021</b> – SSDC officer response to CCDC Preferred Options Consultation supporting the commitment to providing a supply of 50ha of employment land during the plan period. It is considered that greater clarity would be provided by committing to a sufficient supply of identified sites rather than the present approach which suggest that of the requirement is likely to become available during the plan period. Welcome the commitment to ongoing dialogue with the FEMA.</p> <p><b>09.06.2021</b> – response from SSDC to the CCDC I&amp;O has been considered by Members through formal constitutional process and remains unchanged in regard to comments on housing. Additional comments on the possibility of development close to the South Staffordshire boundary and consideration needs to be given to the impact on local amenities and the road network.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>02.12.2021</b> – CCDC duty to co-operate letter to identify areas of agreement and disagreement on matters relating to evidence, local employment land need and other strategic matters.</p>

**08.12.2021** – SSDC response to 02.12.2021 letter advising that further discussions are required on the employment land need, particularly to understand how the role of CCDC has been considered in the emerging unmet employment land needs in the Black Country. Advised that the updated SSDC EDNA may result in surplus employment land from WMI.

**13.12.2021** – CWC response to SSDC Preferred Options confirming that CWC and SSDC have been working together constructively on planning issues of mutual interest. Request that the HEDNA is completed with due regard to WMI apportionment and WMSESS and shared with the BC to determine how far SSDC will contribute to unmet employment land needs.

**15.12.2021** – CCDC response to SSDC Preferred Options Consultation supporting the proposed employment allocation of WMI.

**15.03.2022** – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.

**17.03.2022** – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.

**26.09.2022 – 11.2022** – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.

**01.11.2022** – duty to co-operate meeting providing local plan updates, agreement that CCDC will review the draft FEMA SoCG and provide comments and discussions on the apportionment of WMI.

**02.11.2022** – duty to co-operate meeting on FEMA SoCG, including latest draft presented for comments and agreement within meeting (Appendix 23).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**20.12.2022** – CCDC response to Regulation 19 Consultation supporting the safeguarding of existing employment sites and the proposed allocation of WMI (STA22-010-02).

**January – December 2023** – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.

**04.12.2023** – response from CCDC to advise of own delay in plan making, respond to & provide own updates on housing, employment & G&T.

**08.01.2024** – duty to co-operate meeting discussing LP updates, including SSDC reviewing approach in light of NPPF changes. Full update on housing provision of each authority, employment work (including apportionment of WMI), G&T provision (including jointly commissioned work and SSDC need).

**14.03.2024** – SSDC wrote to all authorities within the FEMA suggesting updates to the previous SoCG.

	<p><b>18.03.2024</b> – SSDC response to CCDC Regulation 19 Consultation supporting the commitment to providing a 74ha supply of employment land but requesting clearer presentation on the components of this supply. Welcome an indication if supply is to be delivered through comprehensive site redevelopment or use of vacant areas of land.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> – CCDC response to Regulation 19 Consultation welcoming SSDC meeting their own identified employment land need and provide a considerable surplus towards the shortfall identified in the Black Country. CCDC welcome the apportionment of 10ha of employment land to CCDC (<a href="#">STA24-010-01</a>).</p> <p><b>02.10.2024</b> – signed SoCG identifies that SSDC and CCDC sit within the South Staffordshire and Cannock Chase FEMAs. Surplus employment land available in SSDC and WMI apportionment discussed. SSDC and CCDC consider a FEMA-wide SoCG is the appropriate mechanism by which to address strategic employment needs (<a href="#">DC8</a>).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
City of Wolverhampton Council – <b>Appendix 5</b>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>07.12.2018</b> – response to I&amp;O Consultation provided by ABCA.</p> <p><b>19.12.2018</b> – CWC response to SSDC I&amp;O supporting the employment growth option to allocate additional land to help address the unmet cross boundary employment land needs and request acknowledge that, if approved, the WMI application would contribute towards unmet Black Country need.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>25.07.2022</b> – duty to co-operate meeting discussing LP updates, draft SoCG, updates on employment SoCG, G&amp;T (including request to BC to reassess supply and advise a further letter will be forthcoming).</p> <p><b>26.09.2022 – 11.2022</b> – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the</p>

	<p>South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.</p> <p><b>06.10.2022</b> – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.</p> <p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p> <p><b>02.11.2022</b> – duty to co-operate meeting on FEMA SoCG, including latest draft presented for comments and agreement within meeting (<b>Appendix 23</b>).</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.12.2022</b> – CWC response to Regulation 19 Consultation supporting the contribution of employment land towards the unmet need in the Black Country (<a href="#">STA22-012-01</a>).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>23.01.2024</b> – response from CWC to advise on progress of own LP and brief points on housing and employment.</p> <p><b>14.03.2024</b> – SSDC wrote to all authorities within the FEMA suggesting updates to the previous SoCG.</p> <p><b>09.04.2024</b> – SSDC response to Wolverhampton’s Regulation 18 Consultation providing an update on its latest employment land need and provision, including on WMI.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>28.05.2024</b> – CWC response to Regulation 19 Consultation confirming the SSLP has been prepared in a manner which is legally compliant and meets the duty to co-operate. CWC supports the contribution of employment land towards the unmet need of the Black Country and advises this will need to be formalised in a SoCG (<a href="#">STA24-012-01</a>).</p> <p><b>10.10.2024</b> – signed SoCG confirms SSDC and CWC sit within the South Staffordshire FEMA. Surplus employment land available in SSDC and the apportionment of WMI is discussed. DMBC have a significant shortfall of employment land and the Black Country EDNA recommends that in meeting this shortfall, the Black Country authorities should engage with neighbouring local plan areas with strong or moderate economic relationships. SSDC and CWC consider a FEMA-wide SoCG is the appropriate mechanism by which to address strategic employment needs (<a href="#">DC19</a>).</p> <p><b>08.01.2025</b> – SSDC response to Wolverhampton’s Regulation 19 Consultation confirming that SSDC has identified a surplus of employment land and is available to contribute to addressing the employment land shortfall within South Staffordshire FEMA. Details on WMI, unclaimed land and how this can be apportioned included.</p>
Dudley Metropolitan Borough Council – <b>Appendix 6</b>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p>

**07.12.2018** – response to I&O Consultation provided by ABCA.

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. ([Preferred Options Here](#)).

**15.03.2022** – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.

**17.03.2022** – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.

**26.09.2022 – 11.2022** – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**02.11.2022** – duty to co-operate meeting on FEMA SoCG, including latest draft presented for comments and agreement within meeting (**Appendix 23**).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**22.12.2022** – DMBC response to Regulation 19 Consultation supporting the level of employment land provision within the policy and welcoming the contribution to unmet employment land needs of the Black Country. DMBC seek to agree the apportionment of the contribution and suggest this is through a FEMA SoCG ([STA22-015-01](#)).

**January – December 2023** – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).

**26.07.2023** – duty to co-operate meeting with items on agenda including Local Plan updates, evidence base, duty to co-operate / HMA study update and AOB.

**25.09.2023** – duty to co-operate meeting discussing Local Plan updates (including DtC letters to stakeholders from SSDC) and cross boundary work such as the WMSESS. SSDC advised the EDNA will be updated for the extended plan period and take into account completions from previous years, ensuring a clear position of employment supply and potential contributions to unmet need.

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.

**18.12.2023** – DMBC officer response to SSDC 24.10.2023 letter confirming Dudley’s housing need/shortfall and that the housing supply will be clarified as DtC discussions progress at Regulation 19 stage of the Dudley Local Plan. Details on employment land provision, including

	<p>loss of existing employment land and anticipated shortfall, and confirmation of contribution from SSDC to DMBC shortfall. Confirmation that DMBC have undertaken a review of sites and found that no deliverable site options were put forward, and therefore likely to have a shortfall.</p> <p><b>21.12.2023</b> – SSDC provided a response to DMBC Regulation 18 consultation providing an update on its latest employment land need and provision, including on WMI.</p> <p><b>09.01.2024</b> - duty to co-operate meeting discussing local plan updates for both DMBC and SSDC, SSDC 24.10.2023 letter, SoCGs and the Strategic Growth Study update.</p> <p><b>14.03.2024</b> – SSDC wrote to all authorities within the FEMA suggesting updates to the previous SoCG.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>29.05.2024</b> – DMBC response to Regulation 19 Consultation supporting the level of housing provision and welcoming the contribution to the unmet needs of the Black Country, particularly the text identifying the contribution from WMI to be a minimum. DMBC will continue to engage with SSDC under the duty to co-operate (<a href="#">STA24-015-02</a>).</p> <p><b>24.06.2024</b> - duty to co-operate meeting with items on agenda including Local Plan updates, SoCGs, Strategic Growth Study update and AOB (agenda only).</p> <p><b>04.09.2024</b> – duty to co-operate meeting discussing Local Plan updates (including wider joint evidence work being undertaken such as the Centres Update, Transport Modelling and EDNA). SSDC FEMA has been finalised and consensus agreed by all relevant LAs who are part to the SoCG.</p> <p><b>18.10.2024 – 29.11.2024</b> – DMBC Regulation 19 Consultation published which included policies on spatial strategy, the delivery of sustainable housing growth, employment land, gypsy and traveller provision and several strategic and non-strategic policies.</p> <p><b>04.11.2024</b> – signed SoCG confirms SSDC and DMBC sit within the South Staffordshire FEMA. Surplus employment land available in SSDC and the apportionment of WMI is discussed. DMBC have a significant shortfall of employment land and the Black Country EDNA recommends that in meeting this shortfall, the Black Country authorities should engage with neighbouring local plan areas with strong or moderate economic relationships. SSDC and DMBC consider a FEMA-wide SoCG is the appropriate mechanism by which to address strategic employment needs (<a href="#">DC9</a>).</p> <p><b>29.11.2024</b> – SSDC response to DMBC Regulation 19 Consultation stating SSDC has identified a potential surplus of employment land which is likely to be available to address the employment shortfall in the FEMA. Advised that WMI serves a wider market area, including Dudley, and there is surplus land here which remains ‘unclaimed’.</p> <p><b>10.03.2025</b> – duty to co-operate meeting discussing Local Plan updates, the HMA SoCG (chasing a few remaining signatures), noted that Wolverhampton are leading on the Black Country FEMA SoCG, and the Strategic Growth Study is underway.</p>
Lichfield District Council – <b>Appendix 7</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>30.09.2021</b> – SSDC response to LDC Regulation 18 Consultation stating that SSDC has concerns regarding the lack of indication of a potential role that Lichfield district could have in meeting the employment land shortfall of the Black Country. It is important the Lichfield addresses its potential role in helping to meet the shortfall of 210ha of employment land.</p>

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. ([Preferred Options Here](#)).

**13.12.2021** – LDC response to SSDC Preferred Options Consultation confirming LDC are able to meet their own employment needs but unable to assist in meeting unmet need.

**15.03.2022** – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.

**17.03.2022** – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.

**14.10.2022** – SoCG between LDC and SSDC covering housing, employment, G&T provision, transport and infrastructure matters, and natural and historic environment.

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**22.12.2022** – LDC response to Regulation 19 Consultation confirming that the position in relation to strategic matters, including employment land, has been refined and detailed in an SoCG. LDC supports the approach taken by SSDC in addressing local and wider need for employment land ([STA22-027-01](#)).

**January – December 2023** – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.

**13.12.2023** – response from LDC providing update on own LP and responded on housing, employment, G&T points.

**16.01.2024** – duty to co-operate meeting discussing Local Plan updates including timeline for new Lichfield Local Plan, SSDC letter from 24.10.2023, SoCGs, the Strategic Growth Study and Air Quality work.

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**28.05.2024** – LDC response to Regulation 19 Consultation supporting the approach SSDC has taken in addressing local and wider need in the Black Country for employment land ([STA24-027-01](#)).

**05.09.2024** – signed SoCG confirming SSDC and LDC are in separate functional economic market areas but will continue to work together collaboratively as part of the West Midlands Development Needs Group. SSDC supply of employment land and apportionment of WMI discussed. ([DC10](#)).

**11.12.2024** – SSDC response for LDC Issues & Options Consultation stating that SSDC has no specific comments in respect to the approach adopted by LDC in meeting employment needs but do suggest that the Local Plan should address the role which the district could have in meeting any employment land shortfall from the wider HMA.

	<p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
<p>North Warwickshire Borough Council – <b>Appendix 8</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from NWBC.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>23.05.2025</b> – signed SoCG confirms SSDC and NWBC are within separate functional economic market areas but will continue to work together collaboratively (<a href="#">SST/ED23</a>).</p>
<p>Redditch Borough Council – <b>Appendix 9</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p>

	<p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>21.11.2023</b> – response from BDC and RBC to advise they will respond on all issues within the Regulation 19 consultation.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>25.03.2025</b> – signed SoCG confirms SSDC and RBC are within separate functional economic market areas but will continue to work together collaboratively. SSDC surplus employment land and apportionment of WMI discussed (<a href="#">SST/ED13</a>).</p>
<p>Sandwell Metropolitan Borough Council – <b>Appendix 10</b></p>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>07.12.2018</b> – response to I&amp;O Consultation provided by ABCA.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>26.09.2022 – 11.2022</b> – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.</p> <p><b>06.10.2022</b> – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.</p> <p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p>

	<p><b>02.11.2022</b> – duty to co-operate meeting on FEMA SoCG, including latest draft presented for comments and agreement within meeting (<b>Appendix 23</b>).</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>15.12.2022</b> – SMBC response to Regulation 19 Consultation supporting the employment land contribution to the Black Country (<a href="#">STA22-038-01</a>).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>06.04.2023</b> – SSDC response to Sandwell I&amp;O Consultation following the Black Country Plan ceasing. A shortfall has been identified in the Black Country, SSDC have a surplus of employment land which is available to unmet needs of the FEMA. As there is a lesser relationship between SSDC and SMBC, there is an argument for the surplus land to be allocated to other BC authorities, however SSDC is willing to work proactively to agree how the contribution is apportioned. Details on WMI, including unclaimed land and apportionment options are identified.</p> <p><b>26.07.2023</b> – letter from SMBC summarising duty to co-operate engagement to date on housing, employment and G&amp;T accommodation. Request that SSDC offers clarification regarding the South Staffordshire Local Plan and the offers of housing and employment land set out in the SoCG previously signed in 2023.</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>23.11.2023</b> – response from Sandwell to update on progress of their LP and to provide brief responses to the points raised by SSDC.</p> <p><b>15.12.2023</b> – SSDC responded to Sandwell MBC’s Regulation 18 Consultation providing an update on its latest employment land need and provision, including the unclaimed land at WMI and how this can be apportioned.</p> <p><b>14.03.2024</b> – SSDC wrote to all authorities within the FEMA suggesting updates to the previous SoCG.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>30.07.2024</b> – signed SoCG confirms SSDC and SMBC sit within the South Staffordshire FEMA. Surplus employment land available in SSDC and the apportionment of WMI is discussed. SMBC have a significant shortfall of employment land and the Black Country EDNA recommends that in meeting this shortfall, the Black Country authorities should engage with neighbouring local plan areas with strong or moderate economic relationships. SSDC and SMBC consider a FEMA-wide SoCG is the appropriate mechanism by which to address strategic employment needs (<a href="#">DC11</a>).</p> <p><b>01.11.2024</b> – SSDC response to Sandwell MBC’s Regulation 19 Consultation identifying that SMBC have a significant shortfall of employment land. SSDC have a surplus of employment land and the contribution has been offered to SMBC even though the authority lies outside of the FEMA. Details on WMI including unclaimed land and apportionment options included.</p>
Shropshire Council – <b>Appendix 11</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>26.05.2021</b> – SoCG signed by both South Staffordshire and Shropshire for Shropshire’s forthcoming Local Plan submission.</p>

	<p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>14.11.2023</b> – response from SC giving preliminary consideration to issues raised by SSDC. SSDC’s position on employment is noted and SC would welcome further duty to co-operate discussions at the appropriate time.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>05.11.2024</b> – signed SoCG confirms SSDC and SC are within separate functional economic market areas but will continue to work together collaboratively (<a href="#">DC12</a>).</p>
Solihull Metropolitan Borough Council – <b>Appendix 13</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p>

	<p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>22.11.2023</b> – duty to co-operate meeting discussing local plan updates from both SSDC and SMBC, in particular the pause in the examination for SMBC. Details on HMA SoCG and Strategic Growth Study update, West Midlands Strategic Employment Sites Study and G&amp;T shortfalls.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>29.10.2024</b> – signed SoCG states SSDC and Solihull are in separate functional economic market areas but will continue to work together collaboratively as part of the GBBCHMA Technical Officers Group to progress the necessary follow-on work identified in the West Midlands Strategic Employment Sites Study. Details on the surplus employment land available to meet unmet needs of the wider area from SSDC and the apportionment of WMI are available in the document (<a href="#">DC13</a>).</p>
Stafford Borough Council – <b>Appendix 14</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>26.09.2022 – 11.2022</b> – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.</p> <p><b>02.11.2022</b> – duty to co-operate meeting on FEMA SoCG, including latest draft presented for comments and agreement within meeting (<b>Appendix 23</b>).</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.12.2022</b> – SBC response to Regulation 19 Consultation supporting the approach to addressing employment land provision and the preferred option will facilitate a mix of housing and employment (<a href="#">STA22-043-01</a>).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p>

	<p><b>07.02.2023</b> – SSDC response to SBC Preferred Options acknowledging SBC are currently proposing to meet their employment land needs in full and are not seeking contributions from any other neighbouring authorities. SSDC would encourage dialogue with the Black Country to explore if there is justification for any surplus employment supply in SBC being attributed to those authorities.</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>23.11.2023</b> – confirmation that SBC cannot meet any shortfall from SSDC and provided comments on the latest position of the LP at SBC. On-going engagement concerning cross-boundary issues is welcomed.</p> <p><b>14.03.2024</b> – SSDC wrote to all authorities within the FEMA suggesting updates to the previous SoCG.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>24.05.2024</b> – SBC response to Regulation 19 Consultation supporting approach to addressing employment land provision (<a href="#">STA24-043-01</a>).</p> <p><b>04.09.2024</b> – signed SoCG confirms SSDC and SBC sit within the South Staffordshire FEMA. Surplus employment land available in SSDC and the apportionment of WMI is discussed. SBC have no surplus employment land to be exported through DtC to the Black Country. SSDC and SBC consider a FEMA-wide SoCG is the appropriate mechanism by which to address strategic employment needs (<a href="#">DC14</a>).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
Stratford upon Avon District Council – Appendix 15	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from SoADC.</p>

	<p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>04.12.2024</b> – signed SoCG confirms SSDC and SoA are within separate functional economic market areas but will continue to work together collaboratively (<a href="#">SST/ED3</a>).</p>
Tamworth Borough Council – <b>Appendix 16</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the Wet Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>23.11.2023</b> – noted the points from SSDC and had no further comments but welcomed engagement on the issues.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>04.07.2024</b> – signed SoCG confirms SSDC and TBC are within separate functional economic market area but will continue to work together collaboratively (<a href="#">DC16</a>).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
Telford & Wrekin Council – <b>Appendix 17</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.12.2020</b> – duty to co-operate meeting discussing Local Plan updates, housing &amp; employment needs including the unmet need arising from the Black Country. Advised that WMI had been granted development consent and G&amp;T evidence is being commissioned.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black</p>

	<p>Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from T&amp;WC.</p> <p><b>16.01.2024</b> – SSDC response to Telford &amp; Wrekin Regulation 18 Consultation confirming that SSDC and T&amp;WC are in separate functional economic market areas. SSDC is undertaking an update to the evidence base which will include revisiting the EDNA which will inform decisions with respect to employment land commitments.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>07.11.2024</b> – signed SoCG confirms that SSDC and T&amp;WC are within separate functional economic market areas and no other housing related cross-boundary issues have been identified (<a href="#">DC17</a>).</p>
<p>Walsall Metropolitan Borough Council –</p> <p><b>Appendix 18</b></p>	<p><b>*Communication between SSDC and the Black Country Authorities was predominantly conducted through ABCA until the dissolution of their joint local plan in late 2022*</b></p> <p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>07.12.2018</b> – response to I&amp;O Consultation provided by ABCA.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p> <p><b>26.09.2022 – 11.2022</b> – draft SoCG circulated to all South Staffordshire FEMA authorities and Sandwell for officer comments. It summarised the current extent of the Black Country employment shortfall and existing contributions towards unmet needs within the South Staffordshire FEMA and proposed draft key areas of agreement, areas where agreement is yet to be achieved and potential areas of future work.</p> <p><b>06.10.2022</b> – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.</p>

	<p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p> <p><b>02.11.2022</b> – duty to co-operate meeting on FEMA SoCG, including latest draft presented for comments and agreement within meeting (<b>Appendix 23</b>).</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>23.12.2022</b> – WC response to Regulation 19 Consultation supporting the provision of employment land to unmet needs and stating willingness to enter into a SoCG in relation to apportionment of this land (<a href="#">STA22-049-01</a>).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>22.11.2023</b> – provided a response to say authority needs to be obtained from Planning Committee prior to providing a formal response.</p> <p><b>14.03.2024</b> – SSDC wrote to all authorities within the FEMA suggesting updates to the previous SoCG.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>06.11.2024</b> – signed SoCG confirms SSDC and WMBC sit within the South Staffordshire FEMA. Surplus employment land available in SSDC and the apportionment of WMI is discussed. Walsall, as part of the Black Country, have a significant shortfall of employment land and the Black Country EDNA recommends that in meeting this shortfall, the BC authorities should engage with neighbouring local plan areas with strong or moderate economic relationships. SSDC and DMBC consider a FEMA-wide SoCG is the appropriate mechanism by which to address strategic employment needs (<a href="#">DC18</a>).</p>
Wyre Forest District Council – <b>Appendix 19</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether additional land should be allocated to meet unmet employment needs in the wider FEMA. (<a href="#">I&amp;O Here</a>).</p> <p><b>09.01.2020</b> – WFDC response to SSDC SHSID Consultation acknowledging that employment growth options will be discussed in greater detail in future consultation. WFDC agree employment land should be located within sustainable locations with access to strategic road networks.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published confirming allocation of WMI strategic employment site allowing it to contribute to unmet needs of the wider FEMA. Indicated intention to update EDNA to address changing economic circumstances. DtC Topic Paper proposed actions including establishing a contribution to unmet employment needs, request Black Country authorities lead on a SoCG to distribute employment shortfalls and agree programme for West Midlands Strategic Employment Sites with GBBCHMA officer group. (<a href="#">Preferred Options Here</a>).</p> <p><b>15.03.2022</b> – GBBCHMA officer meeting seeking confirmation of each LPAs position on taking part in the West Midlands Strategic Employment Sites Study and a potential funding contribution of £5,000 per authority.</p> <p><b>17.03.2022</b> – SSDC response to actions from GBBCHMA meeting indicating support for financial contribution towards necessary follow-up work recommended in the West Midlands Strategic Employment Sites Study and stressed the need to involve as many authorities identified in the geography of this study as possible.</p>

	<p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised SSDC will need to update its EDNA to inform the 2024 Regulation 19 Consultation and this will update the employment requirement across an updated plan period.</p> <p><b>17.11.2023</b> – response raised questions on where the housing requirement will be met both in SSDC and the HMA but confirming that WFDC will not be in a position to offer any land to meet a shortfall.</p> <p><b>29.11.2023</b> – email to WFDC to advise of potential options for the housing requirement and that further DtC discussions will be held.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>22.07.2024</b> – signed SoCG confirms that SSDC and WFDC are within separate functional economic market areas but will continue to work together collaboratively. Details on SSDC surplus employment land supply and apportionment of WMI discussed (<a href="#">DC20</a>).</p>
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### **3. Gypsy and Traveller Duty to Co-Operate**

3.1 In summary, the key outcomes of duty to co-operate engagement on the matter of Gypsy and Travellers are as follows:

- Recognition of the likely shortfall in Gypsy and Traveller pitches in South Staffordshire since the start of the plan making process.
- The likely shortfall was further assessed through the South Staffordshire Council Gypsy and Traveller Accommodation Assessment 2021 [EB36]. The council has engaged with neighbouring authorities and authorities within the HMA on an ongoing basis including requesting assistance in meeting the unmet need in South Staffordshire on several occasions.
- As the Local Plan progressed, it became clear that limited site options were available, and South Staffordshire was likely to have a shortfall in pitches compared to the identified need.
- The council carried out a search on Staffordshire County Council owned land to see if any suitable sites could be identified.
- The council wrote to neighbouring authorities and authorities within the HMA on a number of occasions setting out what steps South Staffordshire were taking to meet the identified need and requested that authorities take similar steps in order to identify suitable pitches.
- South Staffordshire Council also responded to other relevant Local Authorities Local Plan consultations during this time requesting assistance in meeting the identified unmet need (see table and appendices for detail).

3.2 These discussion points and outcomes are set out in further detail below under key milestones as well as how these have shaped each iteration of the Plan, including the final submitted Local Plan. Please see the table of engagement (Table 4) and appendices for all Duty to Co-operate activities.

3.3 Through the council's Issues and Options consultation [PC4] October 2018, a potential shortfall of pitches was considered. The council consulted on policy options in meeting this need. However, it was not yet known what site options were available to meet the need and if a potential shortfall existed which the council would require assistance in meeting.

3.4 The future need for pitches was further assessed through the South Staffordshire Council Gypsy and Traveller Accommodation Assessment August 2021 [EB36] which identified a growing need for pitches within the district.

3.5 The council consulted on its preferred options Plan in November 2021 [PC2]. This Plan reflected the most recent GTAA [EB36] and Pitch Deliverability Study 2021 [EB37] to identifies family need and engage with families to explore what options they have, including amendments to site layout. The Preferred Options Plan identified the current 5-year need (72 pitches) for families that meet the planning definition could not be met on all existing sites. The assessment identified 42 deliverable pitch options which were proposed to be allocated. The Preferred Options Plan therefore confirmed a shortfall of pitches and that South Staffordshire required assistance in meeting its need.

3.6 Following the shortfall in pitches and the resulting unmet need being confirmed through the November 2021 Publication Plan, a letter was sent from SSDC in January 2022 to all neighbouring authorities and authorities within the GBBCHMA. A copy of this letter is provided in the Gypsy and Traveller Topic Paper [EB33]. This letter set out the latest position in relation to Gypsy and Travellers and the shortfall of pitches identified in the November 2021 Publication Plan. This letter formally requested assistance under the Duty to Co-operate to help meet these unmet pitch needs. The letter also requested that authorities take action to identify suitable

pitches which could potentially be contributed towards meeting South Staffordshire’s unmet needs. Responses to this letter are also provided in the Gypsy and Traveller Topic Paper, whilst no firm offers were received, some authorities indicated they would consider the request through future plan making.

3.7 Due to no firm offers of contributions being received in response to the January 2022 letter, the council sent a follow up letter in August 2022 (a copy is available in the Gypsy and Traveller Topic Paper along with responses and in the relevant appendix) setting out a number of specific steps we requested that the other authorities take in order to identify any suitable sites. This was to ensure that all possible avenues had been explored across neighbouring authorities and the GBBCHMA to meeting the unmet need for pitches in South Staffordshire. Again, no firm offers of contributions were received.

3.8 In October 2022, a Duty to Co-operate meeting was held between South Staffordshire Council, the Black Country Authorities and Birmingham City Council. One of the issues discussed was the identified unmet need in pitches in South Staffordshire and the actions being taken to identify sites to potentially help meet the unmet need.

3.9 South Staffordshire consulted on a Publication Plan in November 2022 [PC1], similar to the previous Preferred Options Plan, a shortfall of pitch provision remained against the 5-year need despite pursuing all options for increasing the supply of pitches and requesting assistance through the Duty to Co-operate.

3.10 Following a brief pause to work on the Local Plan in January 2023, the council wrote to all Duty to Co-operate Local Authorities in October 2023 to update them and seek views on various issues. As part of this letter (a copy is provided in Appendix 1 in the Duty to Co-operate Topic Paper Addendum December 2024 [DC1]), South Staffordshire asked for assistance in meeting its identified unmet need for pitches and requested that the authority set out what measures they had taken towards identifying sites which could help contribute towards meeting South Staffordshire’s unmet need. Again, no offers were received.

3.11 Due to the pause in plan making and extension to the plan period, an update to the Gypsy and Traveller Accommodation Assessment (GTAA) was carried out and published in March 2024 [EB34]. This study identified an increasing need for pitches with a 5-year need (2024 – 2028) of 92 pitches and a need of 162 pitches up to 2042.

3.12 The Submission Plan which was consulted on in April 2024 identified 37 pitches to meet this need despite exploring all possible options and engaging with relevant Duty to Co-operate authorities requesting assistance.

Summary of how the outcomes of this engagement shaped the Local Plan

3.13 Ultimately, this evolution of DtC discussions has culminated in the detail of Policy DS4 in the submitted plan. As set out in the policy, the council will continue to work with Duty to Co-operate bodies to explore options for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals that accord with Policy HC9. It is considered that the council has met both the legal Duty to Co-operate, as well as requirements of national policy.

**Table 4: Gypsy and Traveller Duty to Co-Operate Timeline**

Duty to Co-Operate Body / Partner	Ongoing Duty to Co-Operate
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<p>Association of Black Country Authorities (ABCA) – <b>Appendix 1</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>12.02.2021</b> – SSDC letter to ABCA committing to future engagement on G&amp;T. Indicated willingness to participate in a SoCG on housing, employment and G&amp;T matters.</p> <p><b>16.08.2021 – 11.10.2021</b> – Black Country Plan Regulation 18 Consultation.</p> <p><b>08.10.2021</b> – holding response from SSDC to the BCP Regulation 18 Consultation (subject to a period of call-in to Overview and Scrutiny Committee) welcoming the effort to ensure the Black Country fully meets its own G&amp;T need. Advised SSDC will be updating the GTAA and it is anticipated this will show a significant shortfall against the pitch needs. Request further information on whether the Black Country could accommodate any unmet need from South Staffordshire.</p> <p><b>01.11.2021</b> – response from SSDC to the BCP Regulation 18 Consultation has been considered by Members through formal constitutional process and remains unchanged to the 08.10.2021 response.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>06.10.2022</b> – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.</p> <p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p> <p><b>*ABCA correspondence ceased when the Black Country Plan was withdrawn in October 2022*.</b></p>
<p>Birmingham City Council – <b>Appendix 2</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>26.02.2021</b> – BCC letter to DtC bodies setting out circumstances which may require a review of the Birmingham Development Plan. Seeking initial views on any strategic or cross boundary issues considered to be relevant.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – <a href="#">letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</a></p> <p><b>23.02.2022</b> – response from BCC stating that as Birmingham have an unmet housing need, it is challenging to find appropriate sites to meet their own G&amp;T need and therefore unlikely to assist in meeting SSDC unmet need.</p> <p><b>08.08.2022</b> – <a href="#">letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</a></p> <p><b>05.09.2022</b> – all questions answered with overall response being the same as previous communication – may not be able to meet own need and therefore unable to assist in meeting SSDC need.</p> <p><b>10. 2022</b> – Birmingham Local Plan Issues and Options Consultation.</p>

	<p><b>31.10.2022</b> – duty to co-operate meeting with BC authorities, SSDC &amp; BCC on G&amp;T unmet needs. Full updates from BC authorities on progress with G&amp;T pitch provision.</p> <p><b>02.11.2022</b> – response to Birmingham Issues and Options Consultation requesting that if, as part of the plan formulation and evidence gathering, BCC consider there is a supply of suitable sites, that consideration is given to a contribution of pitches to SSDC’s unmet need.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>20.12.2022</b> (2022 Reg 19) – confirmation that SSDC has written to Birmingham to discuss unmet need and that as Birmingham has potential unmet need for G&amp;T that they are unlikely to assist with SSDC unmet need (<a href="#">STA22-004-01</a>).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>19.08.2024</b> – response to Birmingham Preferred Options Regulation 18 consultation advising of the shortfall within SSDC and requesting that, through plan preparation, a number of options are explored to ascertain if additional capacity is available.</p> <p><b>14.10.2024</b> – signed SoCG states that Birmingham are unlikely able to assist in meeting the unmet needs of SSDC but they have not yet explored options for a new publicly owned site and has not engaged site promoters regarding increasing pitch delivery (<a href="#">DC7</a>).</p>
Bromsgrove District Council – <b>Appendix 3</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>25.02.2022</b> – response from BDC to inform that current site is at capacity and likely to have their own unmet need, and therefore unlikely to assist in meeting SSDC unmet need.</p> <p><b>27.06.2022</b> – letter from BDC summarising findings from recent HEDNA and requesting views on likely housing, employment land and traveller pitch requirements, Green Belt release and the possibility of LAs taking some of BDC need requirement to reduce the level of Green Belt release required and unmet employment land needs that BDC should be considering.</p> <p><b>01.08.2022</b> – SSDC response to letter from BDC advising that South Staffordshire has sought to identify all deliverable opportunities for G&amp;T pitches and is likely to have a very significant shortfall. This was identified in a letter sent by SSDC on 14.01.2022 and BDC responded stating there is one public site and questioning the sustainability of relocating pitch delivery from SSDC to Bromsgrove. SSDC requests further dialogue to understand the steps BDC have taken to identify sites.</p>

	<p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>02.09.2022</b> – all questions answered with overall response stating that they will be looking to meet their own need only.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>21.11.2023</b> – advised that BDC continue to assess all sites submitted through the CfS process to determine their suitability (officer response).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>25.03.2025</b> – signed SoCG confirms previous communication and states that there is no free pitch provision in Bromsgrove, and they may approach site promoters to consider future options. SSDC are unclear as to what extent BDC may be able to assist in meeting the unmet need arising from SSDC (<a href="#">SST/ED14</a>).</p>
Cannock Chase District Council – Appendix 4	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>28.11.2018</b> – CCDC response to SSDC I&amp;O Consultation stating it is highly unlikely CCDC will be able to accommodate any unmet needs from other local authorities when it has already been unable to provide for its own needs to date.</p> <p><b>31.08.2019</b> – duty to co-operate meeting addressing local plan timetables and GBBCHMA work. Overview of G&amp;T needs and consideration of update to GTTAA to inform Preferred Options for SSDC. CCDC recently updated GTTAA and will send SSDC copy of study and brief.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>02.12.2021</b> – CCDC duty to co-operate letter to identify areas of agreement and disagreement on matters relating to evidence, housing, employment, CCDC local G&amp;T need and other strategic matters.</p> <p><b>08.12.2021</b> – SSDC response to 02.12.2021 letter advising that further discussions are required on G&amp;T pitch provision and the emerging evidence of unmet need for SSDC.</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>22.02.2022</b> – Local Plan Review means that current information is confidential.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p>

	<p><b>01.09.2022</b> – answered all questions and advised that no plots are available to meet their needs or unmet needs from elsewhere.</p> <p><b>01.11.2022</b> – duty to co-operate meeting providing local plan updates, provide an update on the progress of SSDC GTAA and confirmation that CCDC will build in plans to update G&amp;T evidence in draft SoCG.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>20.12.2022</b> (2022 Reg 19) – CCDC confirmed that they consider SSDC approach to deliver privately owned sites and pitches to meet the needs of existing G&amp;T families is supported and considers the policy sound (STA22-010-02).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>24.11.2023</b> – response from CCDC regarding SSDC letter which included a response to the consultants producing the update to the South Staffordshire GTAA and outlines the position of CCDC in detail.</p> <p><b>08.01.2024</b> – duty to co-operate meeting discussing LP updates, including SSDC reviewing approach in light of NPPF changes. Full update on housing provision of each authority, employment work (including apportionment of WMI), G&amp;T provision (including jointly commissioned work and SSDC need).</p> <p><b>18.03.2024</b> – SSDC response to CCDC Regulation 19 Consultation requesting that CCDC indicate whether all options for providing G&amp;T pitches have been explored and continuing discussions and engagement between the LAs on this issue.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.05.2024</b> (2024 Reg 19) – confirmation that CCDC consider the Local Plan to be sound, legally compliant and in compliance with DtC (STA24-010-01).</p> <p><b>02.10.2024</b> – signed SoCG states there is no capacity to accommodate the needs of other authorities in CCDC. There is no agreement between SSDC and CCDC on the G&amp;T provision through the SoCG (<a href="#">DC8</a>).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
City of Wolverhampton Council – <b>Appendix 5</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p>

	<p><b>01.03.2022</b> – response from the Black Country authorities stating that there is an overall unmet need in the Black Country and therefore unlikely to assist in meeting SSDC unmet need.</p> <p><b>25.07.2022</b> – duty to co-operate meeting discussing LP updates, draft SoCG, updates on employment SoCG, G&amp;T (including request to BC to reassess supply and advise a further letter will be forthcoming).</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>06.10.2022</b> – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.</p> <p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p> <p><b>31.10.2022</b> – duty to co-operate meeting with BC authorities, SSDC &amp; BCC on G&amp;T unmet needs. Full updates from BC authorities on progress with G&amp;T pitch provision.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.12.2022</b> (2022 Reg 19) – CWC acknowledges the scale of unmet need for G&amp;T pitches and commit to explore the potential for sites in Wolverhampton to help address the unmet need through the Wolverhampton Local Plan process (STA22-012-01).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>09.04.2024</b> – SSDC response to Wolverhampton’s Regulation 18 Consultation stating that SSDC are still requesting assistance in meeting an unmet need for G&amp;T pitches.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>28.05.2024</b> (2024 Reg 19) – work on the Wolverhampton Local Plan confirms that there are no opportunities within the City to deliver additional pitches to respond to this need (STA24-012-01).</p> <p><b>10.10.2024</b> – signed SoCG confirms previous communication and states that there are no suitable G&amp;T pitches in Wolverhampton which could address the shortfall of SSDC (<a href="#">DC19</a>).</p> <p><b>08.01.2025</b> – SSDC response to Wolverhampton’s Regulation 19 Consultation confirming a significant unmet need and requesting that all GBBCHMA authorities undertake the same steps as SSDC in exploring pitch options. SSDC would welcome an indication that all options have been explored including the potential to deliver a new public site / sites in the Green Belt.</p>
Dudley Metropolitan Borough Council – <b>Appendix 6</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p>

**01.11.2021** – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. ([Preferred Options Here](#)).

**14.01.2022** – letter sent from SSDC providing an update on the evidence base for G&T provision and seeking assistance to meet unmet G&T pitch needs.

**01.03.2022** – response from the Black Country authorities stating that there is an overall unmet need in the Black Country and therefore unlikely to assist in meeting SSDC unmet need.

**08.08.2022** – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on G&T unmet needs. Full updates from BC authorities on progress with G&T pitch provision.

**02.11.2022** – all questions answered and advised that a full review of sites has been undertaken, and the one identified will be put towards their own need. (Meeting on 31<sup>st</sup> October 2022 quoted in email).

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**January – December 2023** – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).

**25.09.2023** – duty to co-operate meeting discussing Local Plan updates (including DtC letters to stakeholders from SSDC), DMBC advised an update to evidence including the SHMA and Urban Capacity Study. SSDC advised an update to evidence including the SHMA and GTAA.

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.

**31.10.2023** – letter from ORS on behalf of SSDC requesting information on any G&T related planning issues that cross administrative boundaries between Dudley and South Staffordshire.

**30.11.2023** – response from DMBC to ORS letter advising that the main issue is DMBC unmet need for G&T provision and working with neighbouring authorities through duty to co-operate to assist in meeting the unmet need is an important issue in the DLP.

**18.12.2023** – DMBC officer response to SSDC 24.10.2023 letter confirming Dudley's housing need/shortfall and that the housing supply will be clarified as DtC discussions progress at Regulation 19 stage of the Dudley Local Plan. Details on employment land provision, including loss of existing employment land and anticipated shortfall, and confirmation of contribution from SSDC to DMBC shortfall. Confirmation that DMBC have undertaken a review of sites and found that no deliverable site options were put forward, and therefore likely to have a shortfall.

**21.12.2023** – SSDC provided a response to DMBC Regulation 18 consultation including recommendations that other authorities undertake the same process as SSDC in looking for G&T pitches.

	<p><b>09.01.2024</b> - duty to co-operate meeting discussing local plan updates for both DMBC and SSDC, SSDC 24.10.2023 letter, SoCGs and the Strategic Growth Study update.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>29.05.2024</b> (2024 Reg 19) – DMBC considers the policy to be sound and supports the level of G&amp;T pitch provision within the policy and the approach taken to identifying future site supply. DMBC are unable to contribute towards the unmet needs of SSDC (STA24-015-02).</p> <p><b>18.10.2024 – 29.11.2024</b> – DMBC Regulation 19 Consultation published which included policies on spatial strategy, the delivery of sustainable housing growth, employment land, gypsy and traveller provision and several strategic and non-strategic policies.</p> <p><b>04.11.2024</b> – signed SoCG confirms the previous communication between the authorities and states that Dudley are unlikely to meet their own need and therefore unable to assist in meeting the unmet needs of SSDC. A matter of disagreement is raised by SSDC requesting that DMBC continue to explore publicly owned land in the Green Belt which would be suitable for public G&amp;T sites (<a href="#">DC9</a>).</p> <p><b>29.11.2024</b> – SSDC response to DMBC Regulation 19 Consultation stating SSDC are seeking to ensure neighbouring and GBBCHMA authorities have undertaken the same steps as SSDC in exploring pitch options and advised on the options that should be considered. SSDC would welcome an indication that all options have been explored and that DMBC consider the potential for a public site in the Green Belt.</p>
Lichfield District Council – <b>Appendix 7</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>03.02.2022</b> – response to inform that LDC also has an unmet need and therefore is unable to assist in meeting SSDC unmet need.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>14.09.2022</b> – LDC advised that they gave no additional sites available to meet their current need.</p> <p><b>14.10.2022</b> – SoCG between LDC and SSDC covering housing, employment, G&amp;T provision, transport and infrastructure matters, and natural and historic environment.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>22.12.2022</b> (2022 Reg 19) – LDC acknowledges the position that SSDC is having to take regarding G&amp;T and supports the proposals in the relevant policy (STA22-027-01).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with</p>

	<p>G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>13.12.2023</b> – LDC will refresh its G&amp;T evidence base through the preparation of the Local Plan review but are currently unable to meet its own need.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>28.05.2024</b> (2024 Reg 19) – consultation response reiterates the response provided in 2022 (STA24-027-01).</p> <p><b>05.09.2024</b> – signed SoCG confirming previous communication and reiterating that LDC are unable to meet its own need and therefore unable to assist in meeting the unmet need of SSDC (<a href="#">DC10</a>).</p> <p><b>11.12.2024</b> – SSDC response for LDC Issues &amp; Options Consultation stating that SSDC have identified a shortfall and are seeking to ensure that neighbouring authorities undertake the same steps that SSDC have taken in exploring pitch options.</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
North Warwickshire Borough Council – Appendix 8	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from NWBC.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>23.05.2025</b> – signed SoCG confirms previous communication and states that NWBC are unable to assist in the provision of publicly owned pitches the meet the unmet needs of SSDC (<a href="#">SST/ED23</a>).</p>

<p>Redditch Borough Council – <b>Appendix 9</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>23.02.2022</b> – RBC concluded there is insufficient evidence to show that they could assist in meeting SSDC unmet need as it would not provide a sustainable solution to meeting the specific needs of the G&amp;T population in South Staffordshire.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>26.07.2023</b> – letter from SMBC summarising duty to co-operate engagement to date on housing, employment and G&amp;T accommodation. Request that SSDC offers clarification regarding the South Staffordshire Local Plan and the offers of housing and employment land set out in the SoCG previously signed in 2023.</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>21.11.2023</b> – advised that RBC continue to assess all sites submitted through the CfS process to determine their suitability (officer response).</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>25.03.2025</b> – signed SoCG confirms previous communication and states that SSDC consider the GBBCHMA is clear evidence of the functional link between the authorities and is unclear as to what extent RBC may be able to assist in meeting the unmet need arising from SSDC. RBC consider that the emphasis remains as stated previously (<a href="#">SST/ED13</a>).</p>
<p>Sandwell Metropolitan Borough Council – <b>Appendix 10</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p>

**14.01.2022** – letter sent from SSDC providing an update on the evidence base for G&T provision and seeking assistance to meet unmet G&T pitch needs.

**01.03.2022** – response from the Black Country authorities stating that there is an overall unmet need in the Black Country and therefore unlikely to assist in meeting SSDC unmet need.

**08.08.2022** – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.

**06.10.2022** – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.

**19.10.2022** – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.

**31.10.2022** – duty to co-operate meeting with BC authorities, SSDC & BCC on G&T unmet needs. Full updates from BC authorities on progress with G&T pitch provision.

**08.11.2022** – all questions answered and advised that there are no available plots on public sites and further work will take place to consider if there are any suitable publicly owned land sites.

**11.11.2022 – 23.12.2022** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**January – December 2023** – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).

**06.04.2023** – SSDC response to Sandwell I&O Consultation following the Black Country Plan ceasing. SSDC has identified a shortfall in G&T provision and are seeking to ensure that neighbouring authorities undertake the same steps as SSDC in exploring pitch options.

**24.10.2023** – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.

**23.11.2023** – response from Sandwell to inform that the CfS resulted in 18 submissions, none of which proposed G&T use.

**15.12.2023** – SSDC responded to Sandwell MBC’s Regulation 18 Consultation stating that SSDC was still requesting assistance in meeting an unmet need for G&T pitches.

**18.04.2024 – 31.05.2024** – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.

**11.07.2024** – response from SSDC with detailed overview of proposed spatial strategy for SSDC Local Plan and details regarding G&T shortfall and options SSDC have undertaken to identify additional supply. Confirmation that SSDC are unable to assist in meeting SMBC shortfall.

**30.07.2024** – signed SoCG confirms previous communication and states that Sandwell MBC has a shortfall of G&T pitches and is therefore unable to assist in meeting the unmet need of SSDC (DC11).

**01.11.2024** – SSDC response to Sandwell MBC’s Regulation 19 Consultation stating that SSDC have a significant shortfall in G&T provision and are seeking to ensure that neighbouring authorities are undertaking the same steps that SSDC have taken in exploring pitch options. It is not clear that in addressing G&T needs that all options have been considered by SMBC.

<p>Shropshire Council – <b>Appendix 11</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>26.05.2021</b> – SoCG signed by both South Staffordshire and Shropshire for Shropshire’s forthcoming Local Plan submission.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>03.03.2022</b> – response from SC stating there is a mismatch in the timing of Local Plan preparation cycles and the geography of Shropshire Council’s G&amp;T provision and main areas of demand would not facilitate provision in Shropshire to meet the unmet need for SSDC.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>07.10.2022</b> – all questions answered and concluded that the previous points regarding meeting the unmet need remain valid.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>14.11.2023</b> – response from SC giving preliminary consideration to the issues raised by SSDC. It is considered that the summary of Shropshire Council’s position provided within the 24.10.2023 letter accurately reflects the agreed position on this matter.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>21.08.2024</b> – SSDC provided a response to Shropshire’s GTAA consultation. Advised that SSDC can only deliver 37 pitches which is a significant shortfall and therefore Shropshire should allocate all suitable G&amp;T sites (<b>Appendix 12</b>).</p> <p><b>05.11.2024</b> – signed SoCG confirms previous communication and states that Shropshire is in the early stages of plan making and has not investigated the potential for any new additional public sites. Both agree that this issue can be reviewed further as the plan cycle progresses (<a href="#">DC12</a>).</p>
<p>Solihull Metropolitan Borough Council – <b>Appendix 13</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p>

	<p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>22.11.2023</b> – duty to co-operate meeting discussing local plan updates from both SSDC and SMBC, in particular the pause in the examination for SMBC. Details on HMA SoCG and Strategic Growth Study update, West Midlands Strategic Employment Sites Study and G&amp;T shortfalls.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>29.10.2024</b> – signed SoCG states that SSDC have written to Solihull MBC numerous times but are currently unclear as to what extent Solihull MBC may be able to assist in meeting the unmet need arising from SSDC as there is no confirmation as to the options that have been explored by Solihull. Solihull state there are no surplus pitches (<a href="#">DC13</a>).</p>
Stafford Borough Council – <b>Appendix 14</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>12.12.2019</b> – SBC response to SSDC SHSID Consultation stating SBC are not in a position to provide for any unmet need for G&amp;T pitch provision.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>07.12.2021</b> – SBC response to SSDC Preferred Options Consultation reiterating that SBC cannot provide for any unmet G&amp;T pitch provision.</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>08.02.2022</b> – SBC are not in a position to meet SSDC unmet need and there remains an outstanding requirement for new pitches to meet their own need.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>19.08.2022</b> – all questions answered and previous conclusions are still valid.</p>

	<p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>17.11.2022</b> – duty to co-operate meeting discussing Local Plan updates and SSDC identified a significant shortfall in G&amp;T pitches having considered site options in the Green Belt, land in County Council ownership and options as part of proposed residential developments. SBC indicated they do not have additional capacity for unmet need.</p> <p><b>22.12.2022</b> (2022 Reg 19) – confirmation that SBC cannot meet any shortfall arising from SSDC (STA22-043-01).</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>07.02.2023</b> – SSDC response to SBC Preferred Options confirming that SSDC have allocated all suitable sites for G&amp;T provision yet is left with a significant shortfall. It is unclear as to what extent SBC may be able to assist in meeting unmet pitch need arising from SSDC and have not received confirmation from SBC that publicly owned land, or land as part of housing allocations has been considered when exploring pitch options.</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>22.11.2023</b> – confirmed that there is no capacity to meet any shortfall at this time.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>24.05.2024</b> (2024 Reg 19) – confirmation that SBC cannot meet any shortfall arising from SSDC (STA24-043-01).</p> <p><b>04.09.2024</b> – signed SoCG confirms previous communications and states that SBC are unable to identify potential new G&amp;T sites to accommodate needs from SSDC. SSDC consider that not all potential pitch options have been explored (<a href="#">DC14</a>).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
Stratford upon Avon District Council – Appendix 15	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>02.03.2022</b> – response stating that the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not, in reality, meet any needs in SSDC.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p>

	<p><b>14.09.2022</b> – no answer to questions 2, 3 and 4 and previous communication reiterated for question 1. Advised that regional technical work would be supported by the council.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from SoADC.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>04.12.2024</b> – signed SoCG confirms previous communication and states that SoADC will be unlikely to assist in meeting the unmet need of SSDC given its own recently identified high level of need (<a href="#">SST/ED3</a>).</p>
Tamworth Borough Council – <b>Appendix 16</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>27.01.2022</b> – there are no public sites or pitches within the Borough which would allow Tamworth to accommodate any unmet need from SSDC.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>21.09.2022</b> – all questions answered and concluded that given the lack of identified need for pitches at this time, TBC are unable to offer assistance in meeting SSDC unmet need.</p> <p><b>11.11.2022</b> – SSDC officer response to Tamworth Issues and Options Consultation requesting that as part of plan formulation and evidence gathering, TBC consider if there is a supply of suitable new public sites that could contribute towards meeting a proportion of SSDCs unmet need for pitches. SSDC request that TBC explore the same broad options (Green Belt options, land in public ownership, opportunities within wider site allocations).</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p>

	<p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>23.11.2023</b> – confirmed that there are no potential sites within the borough that would accommodate pitches.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>04.07.2024</b> – signed SoCG confirms previous communication and states that there is no identified need for pitches within Tamworth and therefore no sites have been sourced. The parties agree it is unclear how Tamworth may be able to assist in meeting the unmet need arising from SSDC (<a href="#">DC16</a>).</p> <p><b>*All authorities within Staffordshire County attend a quarterly Strategic Development Officers Group (SDOG) where strategic planning matters are discussed, including Local Plan updates.*</b></p>
Telford & Wrekin Council – <b>Appendix 17</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.12.2020</b> – duty to co-operate meeting discussing Local Plan updates, housing &amp; employment needs including the unmet need arising from the Black Country. Advised that WMI had been granted development consent and G&amp;T evidence is being commissioned.</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>21.11.2023</b> – reminder for above letter, no response from T&amp;WC.</p> <p><b>16.01.2024</b> – SSDC response to Telford &amp; Wrekin Regulation 18 Consultation seeking to ensure that neighbouring authorities undertake the same steps that SSDC have taken in exploring pitch options to ensure confidence that DtC partners have taken a consistent approach when considering if they can assist in SSDC’s unmet needs.</p>

	<p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>07.11.2024</b> – signed SoCG states that T&amp;WC confirm their emerging G&amp;T evidence base indicates they will have a need to fulfil and therefore will be unable to assist in meeting the unmet need of SSDC (<a href="#">DC17</a>).</p>
Walsall Metropolitan Borough Council – <b>Appendix 18</b>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>01.03.2022</b> – response from the Black Country authorities stating that there is an overall unmet need in the Black Country and therefore unlikely to assist in meeting SSDC unmet need.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>06.10.2022</b> – Dudley Metropolitan Borough Council withdraw from the preparation of the Black Country Plan.</p> <p><b>19.10.2022</b> – joint statement from Dudley MBC, Sandwell MBC, Walsall MBC and City of Wolverhampton Council to confirm the end of the Black Country Plan and each authority will produce an individual Local Plan to provide a framework for the long-term planning of each area.</p> <p><b>31.10.2022</b> – duty to co-operate meeting with BC authorities, SSDC &amp; BCC on G&amp;T unmet needs. Full updates from BC authorities on progress with G&amp;T pitch provision.</p> <p><b>01.11.2022</b> – all questions answered and advised that the current permanent site is full and one site has been identified to meet their own needs.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>22.11.2023</b> – provided a response to say authority needs to be obtained from Planning Committee prior to providing a formal response.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>06.11.2024</b> – signed SoCG confirms previous communication and states that and states that the only permanent site within Walsall is full and no funding has been identified to enable the delivery of a new permanent site. The parties agree that they will continue to work together to establish if there is scope for new publicly run Green Belt sites (<a href="#">DC18</a>).</p>

<p>Wyre Forest District Council – <b>Appendix 19</b></p>	<p><b>30.10.2018</b> – SSDC Issues &amp; Options consultation published seeking views on several matters relevant to cross boundary unmet needs, including whether it is appropriate to continue with the current approach of seeking to meet pitch needs where family need arises. (<a href="#">I&amp;O Here</a>).</p> <p><b>01.11.2021</b> – SSDC Local Plan Review Preferred Options Consultation published stating the strategy will be to continue to deliver privately owned sites/pitches to meet existing family needs. The evidence supports an approach of allocating existing temporary or unauthorised sites to permanent, rather than allocating wholly new sites. (<a href="#">Preferred Options Here</a>).</p> <p><b>14.01.2022</b> – letter sent from SSDC providing an update on the evidence base for G&amp;T provision and seeking assistance to meet unmet G&amp;T pitch needs.</p> <p><b>17.03.2022</b> – WFDC allocated a site which satisfies the plan requirement shown by their own GTAA and are unable to allocate any further sites to meet SSDC unmet needs.</p> <p><b>08.08.2022</b> – letter sent from SSDC to inform authorities that further steps had been taken to explore if additional supply could be found (and these actions are detailed) and requesting answers to four questions regarding any available land or plots.</p> <p><b>12.09.2022</b> – all questions answered and conclusions are the same as those given previously.</p> <p><b>11.11.2022 – 23.12.2022</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>January – December 2023</b> – pause in plan preparation awaiting amendments to the NPPF (details in housing timeline).</p> <p><b>24.10.2023</b> – letter from SSDC to all neighbouring authorities and those within the GBBCHMA to provide an update on the Local Plan. Advised that an updated GTAA has been commissioned which will identify needs to 2041 and that call for sites, public consultations with G&amp;T sites and pro-active conversations with public bodies have been undertaken. SSDC can deliver 37 pitches against a previously identified need of 121 pitches. Requested an update to the steps taken to examine all potential pitch supply options.</p> <p><b>17.11.2023</b> – confirmation that WFDC will not be undertaking any further work on G&amp;T pitches or meeting the unmet need of any other authorities.</p> <p><b>18.04.2024 – 31.05.2024</b> – South Staffordshire Regulation 19 Consultation was published and all duty to co-operate partners were consulted.</p> <p><b>22.07.2024</b> – signed SoCG confirms previous communication and states that SSDC are unclear as to what extended WFDC may be able to assist in meeting the unmet need in SSDC and further public land within the area should be assessed. WFDC disagree that further assessment needs to take place and considers adequate provision was made for the duration of the plan period (<a href="#">DC20</a>).</p> <p><b>13.06.2025</b> - SSDC responded to WFDC GTAA survey, including continuing to request assistance in meeting SSDC’s unmet need for pitches.</p>
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#### **4. Air Quality Duty to Co-Operate (Appendix 24)**

4.1 A detailed timeline of duty to co-operate discussions and actions regarding air quality is provided in paragraphs 5 – 27 of the Statement of Common Ground between Cannock Chase District Council, City of Wolverhampton Council, Dudley Metropolitan Borough Council, East Staffordshire Borough Council, Lichfield District Council, Sandwell Metropolitan Borough Council, Stafford Borough Council, South Staffordshire District Council, Walsall Metropolitan Borough Council and Natural England in relation to air quality [\[document SST/ED4\]](#). For ease, these paragraphs have been extracted from the document and appended under Appendix 24.

## 5. Education Duty to Co-Operate (Appendix 25)

5.1 In summary, the key outcomes of duty to co-operate engagement on the matter of education are as follows:

- Identification of the thresholds at which a site would be required to deliver a new first/primary, middle and/or secondary school.
- Identification of which sites would need to deliver a new first school, as well as the land take required.
- Confirmation that delivery of the non-Green Belt sites alone in Codsall/Bilbrook may not ensure the sustainable operation of the first school.
- Confirmation that there is unlikely to be capacity at Middle/High school level to accommodate additional growth at Codsall/Bilbrook beyond that proposed in Plan.
- Confirmation of support from the education authority on SSC's approach to securing education contributions set out in Policy HC15.
- Consensus between Staffordshire and Wolverhampton on the principle of a self-containment approach to education mitigation – i.e impacts can be mitigated within individual authority boundaries without a requirement to transfer S106 sums cross boundary.

5.2 Staffordshire County Council are the Local Education Authority for Staffordshire and engagement has been ongoing throughout plan preparation to ensure that impact of development on education infrastructure is appropriately mitigated. Through their representations to the Plan they have advised SSDC on the threshold at which a new school would be required, the sites in the Plan that require delivery of a new school (Policy SA1 & SA2), the land take required for the school, as well as where other financial contributions to education infrastructure may be sought ([STA24-044-18](#)) and the process for securing these. The outcomes of this have been a requirement for new first schools at the strategic housing allocations East of Bilbrook (Policy SA1) and North of Penkridge (Policy SA2), with the land take in the policies also reflecting the advice provided by the education authority. This information from the education authority relating to land take and costs of delivery was also fed into the Local Plan Viability Study [[EB39-41](#)] as appropriate. A further outcome was Policy HC15: Education that sets out the policy relating to education contributions, with this approach supported by Staffordshire County Council.

5.3 More specifically, engagement also took place with Staffordshire County Council Education following the pause to the Local Plan in January 2023, in relation to scoping further spatial strategy options for assessment. SSDC sought to clarify with the education authority whether a strategy option was possible that would meet South Staffordshire's own housing needs without Green Belt release, and specifically whether the non-Green Belt sites (totalling 613 homes) in Codsall/Bilbrook could deliver the new first school and ensure it would operate with a sustainable pupil intake. Confirmation was received from the education authority that there was concern that pupils generated from the non-Green Belt land could be insufficient to fill and sustainably operate the new school. If it was viewed that the school would not operate sustainably on this basis, its delivery would be jeopardised. This would then impinge upon the delivery of the safeguarded land at Bilbrook/Codsall, that requires the new first school to mitigate its impacts. This correspondence contributed to shaping and refining Spatial Option H [[EB14 – EB14B](#)] for testing as a reasonable alternative, ensuring that a level of housing growth was included at Codsall/Bilbrook that would deliver a school which could operate sustainably. Clarification was also sought from the education authority as to whether Middle and High School capacity at Bilbrook/Codsall could support additional growth beyond that in the preferred spatial strategy (Option I). An outcome of this was confirmation that middle/high schools in the area were unlikely to be able to accommodate growth beyond that planned for, as referenced in paragraph 5.39 of the submitted plan. The information on capacity of schools has therefore directly influenced the preferred spatial strategy and associated policies in the plan, particularly in relation to housing growth at Codsall/Bilbrook.

5.4 In terms of cross boundary considerations, the only neighbouring authority to raise education was City of Wolverhampton Council, who requested that any development on the edge of Wolverhampton take education implications into consideration. Previous iterations of the plan included a large site on the boundary of Wolverhampton (land off Linthouse Lane). Through engagement between SSDC, Staffordshire County Council and Wolverhampton Council, it was agreed that it appeared likely that both South Staffordshire and Wolverhampton could deliver primary and secondary school capacity improvements within their own administrative boundaries. There would therefore be no requirement to transfer S106 sums cross boundary. This position was also set out in a Duty to Co-operate meeting between SSDC, Staffordshire County Council and the Black Country authorities, held on 21<sup>st</sup> October 2021. At this meeting, it was also agreed that a SoCG would be drafted with a commitment to ongoing dialogue and joint working to confirm the trajectory for new school opening. The intention was that this would be finalised following the 2022 Regulation 19 consultation and prior to submission of the Plan. However, following the pause to Local Plan preparation in January 2023, the revised submitted plan does not allocate any sites adjoining Wolverhampton's boundary with the potential to impact their education infrastructure. This is reflected in City of Wolverhampton Council's response to SSDC's 2024 Regulation 19 consultation, with no cross-boundary education issues raised. Therefore, whilst a formal SoCG was ultimately not required, this is considered a key outcome of this engagement with Wolverhampton.

#### Summary of how the outcomes of this engagement shaped the Local Plan

5.5 The issue of education has been considered through plan preparation with close working led by SSDC, with Staffordshire County Council as the local education authority in particular. This engagement has informed one of the reasonable alternative strategy options to test (Option H) and helped shape the level of growth for Codsall/Bilbrook in the proposed strategy, with impact on Middle and High School capacity a factor in this. Equally, engagement has instigated and shaped the requirement in Policies SA1 and SA2 for a new first school to be delivered on these strategic allocations, their broad locations on the concept plans ([Appendix F of the submitted plan](#)), and the land take required. Finally, representations received from Staffordshire County Council have also guided the approach to mitigating impacts on education outlined in Policy HC15 of the submitted plan.

## 6. Health Duty to Co-Operate (Appendix 26)

6.1 In summary, the key outcomes of duty to co-operate engagement on the matter of health are as follows:

- Understanding of capacity of existing facilities in the district.
- Confirmation that new on-site provision was not required but that a policy mechanism was needed to ensure impact on health infrastructure could be mitigated through financial contributions.
- Confirmation of which health facilities in Wolverhampton were likely to be impacted by developments in South Staffordshire adjoining Wolverhampton (included in earlier version of the Plan).
- Indicative financial contribution figure (per dwelling) to factor into viability study to confirm deliverability of allocations.

6.2 Early engagement took place with the relevant Staffordshire and Black Country Clinical Commissioning Groups (CCGs) (now Integrated Care Boards (ICBs)) in order to gain an understanding of health infrastructure capacity in South Staffordshire. The outcome of engagement with a representative of the CCG covering South Staffordshire was an understanding that 10,000 is the optimum number of patients per practice from a financial and operational sustainability perspective, and that based upon current patient numbers, GP practices in South Staffordshire were below that threshold.

6.3 In terms of cross boundary considerations, the only neighbouring authority to raise the issue of health provision was City of Wolverhampton Council, who requested that any development on the edge of Wolverhampton take health implications into consideration. As with education, this specifically related to the impact resulting from cross boundary sites adjoining Wolverhampton that were proposed for allocation in the 2022 Regulation 19 Plan. Having opened discussions with the local CCGs from an early stage of plan preparation, SSDC were pleased to receive representations to the Regulation 18 Consultation in December 2019. This set out early indications that on-site health provision would unlikely be required, but that it was necessary for developments to be adequately considered and provided for though planning obligations in respect of health care infrastructure [[PC3](#)].

6.4 This was reiterated at a cross-boundary health meeting chaired by SSDC on 23<sup>rd</sup> April 2021. It was also agreed at this meeting that representatives of the Black Country CCG would provide details of cross boundary impacts resulting from proposed sites on the boundary of Wolverhampton. A significant outcome of this meeting emerged later in 2021, with the provision of more detailed information relating to the primary care facilities impacted by the proposed developments on the boundary of Wolverhampton, and therefore where financial contributions should be directed. A further meeting initiated by SSDC took place on 24<sup>th</sup> January 2022 where SSDC raised their intention to include a health infrastructure policy, alongside a discussion of the amount of financial contribution that may be sought. The direct outcome of this was a formal letter from Staffordshire and Stoke-on-Trent CCG to SSDC, setting out an indicative figure of £900 per dwelling. This was a key consideration for testing site and plan viability, with the figure subsequently inputted into the viability study [[EB39-41](#)]. A further outcome of SSDC's engagement with the CCGs up to this point, was their subsequent attendance at technical workshops on the four proposed strategic housing allocations. This provided an opportunity to discuss health mitigation on a site-specific basis. For the Land North of Linthouse Lane workshop, it was reconfirmed by the CCGs that off-site health provision would be required. This was again reiterated in City of Wolverhampton's response to SSDC's 2022 Regulation 19 consultation ([STA22-012-01](#)); however, due to the omission of this site in the revised plan, Wolverhampton did not raise health as a cross-boundary matter in their 2024 Regulation 19 response

([STA24-012-01](#)). To the same consultation, and as a result of SCC's engagement from an early stage, the Black Country NHS ICB ([STA24-005-01](#)) formally confirmed their support for the policy approach in Policy HC14, stating:

6.5 *"...the ICB is of the opinion that the Draft South Staffs Local Plan makes a positive contribution to addressing the identified health issues. Policy HC14 Healthcare Infrastructure in particular is supported for recognising the connection between housing development, local population change and their potential impact on the Primary and Secondary Healthcare Network."*

6.6 It should also be noted that a representative from the Staffordshire and Stoke CCG now sits on the Staffordshire Strategic Development Officer Group (SDOG), that meets quarterly and provides an effective forum for understanding health issues to be considered through plan-making.

#### Summary of how the outcomes of this engagement shaped the Local Plan

6.7 Health provision has been a strategic matter considered from the early stages of plan making, particularly when sites adjoining Wolverhampton were being considered/proposed that would have cross boundary implications over two ICB geographies. From these discussions, it was clear that financial contributions towards mitigating impacts on health infrastructure were required (rather than new on-site provision). SSDC took this on board and used it to devise and shape Policy HC14, which requires financial contributions towards health provision. From a technical perspective, an indicative cost directly provided to SSDC by the local health authorities was appropriately factored into the viability study [[EB39-41](#)], which ultimately confirmed that the allocated sites in the Local Plan were deliverable when factoring in these and other policy costs.

## **7. Highways and Transport Duty to Co-Operate (Appendix 27)**

7.1 In summary, the key outcomes of duty to co-operate engagement on the matter of highways and transport are as follows:

- Agreement to the approach of using SATURN model for a high-level analysis of which junctions are likely to be impacted by strategic housing allocations.
- Agreement for the results of the SATURN model analysis to be passed to site promoters to consider through their Strategic Transport Assessments (STAs).
- Recognition that any impacts of sites on Wolverhampton's network can be considered and addressed when planning applications on relevant sites are submitted.
- Recognition of the need to consider the cumulative impacts of the Local Plan's proposals on the Strategic Road Network (SRN).
- A final SRN modelling technical note and confirmation from National Highways that 'based on the current evidence and responses provided to date, National Highways is able to offer support for the progression of the South Staffordshire Local Plan to Examination'.

7.2 Highways and transport were identified by South Staffordshire District Council (SSDC) as a key issue for the Local Plan to consider from the early stages of plan making [PC4, pg93], including consideration of the impact on local and strategic road networks. In their responses to SSDC at Regulation 18 consultation stages, City of Wolverhampton Council identified the potential for impacts on their network as a result of proposals in the South Staffordshire Local Plan and requested that the combined impacts of planned development from South Staffordshire and the Black Country be considered. At Regulation 18 stages National Highways confirmed that a suitable transport evidence base would be required with a view to identify any mitigation measures, should the evidence confirm these to be required. As the highways authority for Staffordshire, Staffordshire County Council confirmed through their response to the Issues and Options consultation (Appendix 28) [PC4] that they would "provide appropriate evidence to the District Council to help identify the potential highway and accessibility impact of strategic housing development locations..." and would consider "the impact of traffic generated from proposed new development sites. This could be informed by existing traffic volume and journey time data, spreadsheet models (to be developed) and available strategic traffic models".

7.3 Drawing all of these responses together, SSDC organised and chaired a cross-boundary highways meeting on 21<sup>st</sup> April 2021, between officers of SSDC, Staffordshire County Council and City of Wolverhampton Council. In order to develop the necessary evidence for the Local Plan, Staffordshire County Council requested access to National Highways' SATURN Model (prepared to support the case for the M54-M6 link road) and prepared a scoping note for how they proposed that this would be used. It was proposed that this would provide high level advice to identify distribution of trips from new development to junctions in surrounding areas and would then inform the scope of developer-led transport assessments by preferred sites to identify mitigation measures. This approach was agreed by all parties at the meeting in April 2021. Once the model had been obtained, SSDC arranged a further meeting for 21<sup>st</sup> September 2021 to enable City of Wolverhampton Council officers to input into the model, with impact from the previously proposed Linthouse Lane allocation of most interest. Through this meeting, City of Wolverhampton Council officers reconfirmed their agreement to the approach of using the model to help inform the geographical scope of developers' individual Transport Assessments. An outcome of this engagement was City of Wolverhampton Council providing comments on the model outputs, which were provided on 5<sup>th</sup> October 2021.

7.4 The principle of using this model to consider cumulative impacts was subsequently agreed between Staffordshire County Council and National Highways, as referenced in National Highways' response to the Regulation 18 Preferred Options consultation, confirming:

7.5 *“With regards to policies SA1 to SA4, we have sought to agree a methodology with SCC (as local highways authority). Our SATURN model prepared for the M54 – M6 link road proposal has been provided to SCC in order to determine the trip distribution and assignment of traffic for the Local Plan sites. This data is then to be provided to the site promoters and their advisors for their use in carrying out their own technical assessments. In consultation and agreement with us, such assessments will be used to identify the need for and form of any highway mitigation works on the SRN.”*

7.6 In December 2021, following the Regulation 18 Preferred Options consultation in October 2021 (**Appendix 29** – SCC response & **Appendix 30** CWC response) and having received a summary of the model findings through Staffordshire County Council’s representation to the consultation, SSDC was in a position to provide the model findings to the site promoters of the strategic sites in order to initiate their Strategic Transport Assessment (STA) work. An outcome of this was a series of scoping meetings between the site promoters of the strategic sites and the relevant highways authorities. Engagement continued to take place to agree the scope of the STAs (see Appendix B of submission document EB87 as an example) in the following months, ultimately resulting in STAs for all strategic sites. The outcome of the STAs meant that the SSDC considered it appropriate to carry forward the strategic housing allocations to Regulation 19 stage, as they did not present any overriding concerns that the sites were not suitable and deliverable from a highways perspective.

7.7 On 15<sup>th</sup> September 2022, a meeting took place with National Highways where the scope of a Statement of Common Ground (SoCG) was discussed. In addition, the approach of including potential mitigation measures in the IDP was discussed, with National Highways advising against being too specific on mitigation but recommending identification of junctions that would need further consideration through future planning applications. An outcome of this meeting was to seek to agree with National Highways these specific junctions that would need referencing in the IDP; however, despite requesting this information twice, unfortunately no response was received from National Highways and so it could not be included within the November 2022 iteration of the IDP.

7.8 A further key follow-up action from the meeting on 15<sup>th</sup> September 2022 was to begin drafting a SoCG, with a draft circulated to the highways authorities on 2<sup>nd</sup> November 2022. Comments/changes to this were received from all highways authorities, resulting in a final draft version circulated on 23<sup>rd</sup> November 2022 for final comment. The final outcome of this engagement was a signed SoCG dated December 2022. Through this SoCG, National Highways agreed that the cumulative impact on the SRN would need to be assessed but would be finalised at the planning application stage (**Appendix 31**).

7.9 Following the pause to Local Plan preparation in January 2023 and prior to the second Regulation 19 consultation in April 2024, site promoters for the allocated strategic sites began to develop the supporting evidence for planning applications, including Transport Assessments. Following the Publication Plan April 2024 consultation, an update to the December 2022 SoCG was proposed to reflect the up-to-date position at October 2024.

7.10 In their comments on the draft SoCG Staffordshire County Council suggested only minor wording tweaks (**Appendix 32**). Agreement was reached with City of Wolverhampton Council, confirming “that the combined impact of SSDC’s Local Plan proposals on CWC’s network can be considered and addressed when planning applications on relevant sites are submitted to SSDC...”. Meanwhile, clarification with National Highways was sought on whether a cumulative assessment was still required, given that two of the four previously proposed strategic sites had been removed from the Plan, the distance between the two remaining sites at Penkridge and Bilbrook, and that this requirement had not been explicitly identified in their 2024 Regulation 19 response.

7.11 Further engagement with National Highways in October 2024 clarified that they now considered that a cumulative assessment was required as part of plan preparation and suggested revised wording for the SoCG to cover this. This was a change of position from that agreed in the 2022 SoCG, whereby it had been agreed

that assessment/consideration of cumulative impacts could be finalised at the planning application stage. SSDC continued to engage with National Highways to attempt to understand the scope of the cumulative assessment required, with a response received on 27<sup>th</sup> November 2024. This again represented a change of position, with it requested that all allocated sites (not just strategic allocations) be included in the cumulative assessment. A key outcome of the engagement set out above was the October 2024 SoCG [[SST/ED5](#)], alongside an understanding on SSDC's part of the revised scope of the cumulative assessment that National Highways confirmed they required at this late stage.

7.12 Subsequent to this and after submission of the Plan for examination, transport consultants Sweco were appointed to undertake the cumulative assessment. A series of technical meetings took place at the start of 2025 where the methodology and assumptions for the assessment were developed in collaboration with National Highways. This is confirmed through a National Highways letter [[SST/ED22](#)] to the council dated 22 May 2025, where they consider the assessment to be proportionate to the level of assessment required at plan stage. A tangible outcome of this continued co-operation with National Highways was the cumulative assessment itself [[SST/ED22A](#)], which confirms that changes in delays as a result of Local Plan proposals are below the threshold that would cause concern and that performance issues at M54 J2A could be mitigated through optimization of the signals. In response [[SST/ED22](#)] to this assessment National Highways confirmed that they were able to support the progression of the Local Plan.

#### Summary of how the outcomes of this engagement shaped the Local Plan

7.13 The issue of highways and transport has been considered through plan preparation to ensure the plan is supported by a proportionate evidence base, whilst recognising that more detailed consideration will need to be undertaken at the Development Management stage. The wide-ranging evidence set out above has provided assurance to SSDC that impacts on the highway network, including the SRN, are mitigable, and comfort therefore that all allocations are deliverable, with costs associated with the STA recommendations also feeding into the viability study [[EB40](#)]. The main STA recommendations were also reflected in the IDP Appendix A (e.g. for Land East of Bilbrook 'Pendeford Mill Lane/Barnhurst Lane – signalisation') whilst recognising that the detail of such mitigation would need to be agreed at the Development Management stage and supported by a full Transport Assessment. This evidence also informed and shaped the concept plans for the strategic sites set out in Appendix F of the Plan.

**END**