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06.09.2017 – SSDC response to Black Country Core Strategy I&O

South Staffordshire Council response to the Black Country Core Strategy Issues and Options consultation

Purpose and scope of the review

Question 1 – Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? Yes/No; if not, what do you think should be the scope of the review?

It is acknowledged that the existing spatial strategy of focusing urban regeneration at the Growth Network has been successful. This strategy aimed to deliver regeneration in the Black Country and prevents the outward movement of people and investment from the MUA. The South Staffordshire Core Strategy was developed as a counterpoint to this and looked to limit development to meeting locally identified needs. Recent developments in the Black Country have shown this to be an effective strategy and therefore it seems sensible to explore if there is scope to stretch the existing spatial strategy in the first instance.

This acknowledged, it is clear that the challenges now faced are very different from those faced when the current Black Country South Staffordshire Core Strategies were developed. Principally, it is clear that the Black Country housing and employment shortfall (25,000 dwellings and 300ha of employment land) cannot be wholly met within the urban area and that some Green Belt release is inevitable. The NPPF (Paragraph 83) is clear that Green Belt boundaries should only be altered in exceptional circumstances, and as such, all reasonable non-Green Belt options should be fully explored. The Government's recent Housing White Paper makes it clear that demonstrating exceptional circumstances for Green Belt release is a high bar, and Green Belt boundaries should only be amended where authorities can demonstrate they have examined all other reasonable options, including effective use of suitable brownfield sites and estate regeneration. Therefore brownfield sites should be maximised as far as possible – both within and outside the existing Growth Network. Similarly, whilst recognising that estate regeneration is very challenging, if this option is not going to be pursued then the plan should set out the reasons why this is not considered a viable and deliverable option.

Key Issue 1 - Updating the evidence base

Question 2 – Do you think that the key evidence set out in Table 1 is sufficient to support the key stages of the Core Strategy review? Yes/No; If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas, please provide details.

The Council agrees that all the key evidence based studies identified with Table 1 are necessary. However, which evidence based documents are required may depend on which options for growth are progressed. It is acknowledged that a Landscape Character Assessment will form part of the HMA Strategic Growth Study however a Landscape Sensitivity Study considering the relative sensitivity of land cover parcels will also be required. The Issues and Options confirms that the Core Strategy will allocate strategic sites, and therefore dependent on which options for growth are pursued, it may be appropriate to undertake an assessment of the impact on heritage assets and their setting. Historic

England should be able to offer advice on this matter.

Key Issue 2 – Meeting the housing needs of a growing population

Question 3 – Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of **supply, are appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.**

The housing need for the Black Country for the period 2014-2036 as identified in the SHMA is considered robust and the anticipated supply seems appropriate in line with national guidance; therefore the initial housing requirement of 24,670 is supported. The Council also supports the ongoing work to consider if there are options for surplus employment land to be allocated for housing, as well as considering the potential to increase the density of housing allocations and the limited release of surplus open space. Clearly, the Black Country authorities will need to demonstrate that the potential sources of supply within the urban area have been fully considered in order for Green Belt release to be justified.

Key Issue 3 – Supporting a resurgent economy

Question 4 – Do you consider the employment land requirement identified for the Black Country up to 2036 in the EDNA is appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.

The recommendation that the Black Country should plan for 800ha of employment land (B1 (b), B1(c), B2 and B8 uses) as suggested within the Economic Development Needs Assessment (EDNA) appears robust and in line with national guidance. The Issues and Options paper goes on to confirm that 394ha of employment land is available or is likely to come forward in the Black Country over the plan period, including opportunities to intensify existing employment areas. It is then apparent that the Black Country authorities are seeking to rely on some 100ha of employment land in South Staffordshire when concluding that there is a residual need to identify some 300ha of employment land through the Core Strategy review.

As you are aware, South Staffordshire Council is progressing its Site Allocations Document that seeks to allocate 62ha of additional employment land at proposed extensions to i54 and ROF Featherstone to meet a proportion of the Black County's employment needs. Remaining employment land at our strategic sites is relied upon in the District's employment land supply to meet South Staffordshire needs and therefore any additional supply that South Staffordshire Council can contribute above the 62ha (including a proportion of land at West Midland Interchange should it be consented) would need to be agreed through Duty to Co-operate discussions and a Memorandum of Understanding. We will be undertaking our own EDNA next year which will consider our own need for additional employment land and will provide a clearer picture of how much additional employment land South Staffordshire could contribute towards the Black Country supply, if any. Until this work has been done and agreements have been reached about the amount of existing supply that can contribute to the Black Country need, it is not possible to say if the stated residual requirement for 300ha of employment land is appropriate. The Council would welcome further Duty to Co-operate
discussions with the Black Country authorities to establish if any unmet employment land

need from the Black Country can be met within the District.

Key Issue 6 – Reviewing the role and extent of the Green Belt

Question 5 - Do you agree with the proposed approach to the Black Country Green Belt Review? Yes/No; If not, what additional work do you think is necessary?

South Staffordshire Council is working closely with the Black Country authorities and others authorities within the HMA as the commissioning authorities for the Strategic Growth Study. In addition to this, the Council supports the Black Country authorities' approach of producing a more detailed Green Belt review to inform the Preferred Spatial Options Report. Currently officers are working with counterparts from the Black Country in ensuring that the more detailed Black Country Green Belt review uses a consistent methodology with the South Staffordshire Green Belt review that will be commissioned to support our Local Plan review at an appropriate stage.

Question 6 – Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? Yes/No; If not, what other key issues should be taken into account?

In the context of a partial review of the Core Strategy, the key issues as presented in Part 3 of the Issues and Options Report are considered appropriate.

Vision, Principles, Spatial Objectives and Strategic Policies

Question 7 - Do you think that the Core Strategy vision and sustainability principles remain appropriate? Yes/No; If not, what alternatives would you suggest?

In the context of a partial review of the Core Strategy, the Core Strategy vision and sustainability principles remain appropriate.

Question 8 - Do you think that the Core Strategy spatial objectives remain appropriate? Yes/No; If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?

It is considered that most of these objectives remain valid. However, as it is acknowledged that some Green Belt release will be necessary, additional objectives around delivering sustainable urban extensions, or other smaller Green Belt releases (the 'rounding off' option) may be necessary dependent on which growth option is progressed.

Considering the pressure for housing and employment land it may be that a further objective around maximising brownfield opportunities – both within the Growth Network and outside it – is required.

Question 9 – Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? Yes/No; If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?

The focus of the existing Core Strategy was to focus the majority of growth at the strategic

centres and regeneration corridors, known collectively as the Growth Network and set out in Policy CSP1, and to see more limited growth outside the Growth Network and reflected in Policy CSP2. It is therefore agreed that such overarching policies should be retained and updated to reflect new evidence.

Considering the requirements for new housing and employment land, it is welcomed that the Issues and Options Report acknowledges that Policy CSP2 will be amended and subject to significant change in order to accommodate housing and employment land and to reflect proposed changes to the Black Country Green Belt. As stated in response to Question 1, all reasonable options should be considered and therefore fully exploring development options outside the existing Growth network, both Green Belt and non - Green Belt, is essential.

Reviewing the Spatial Strategy

Stage 1: Strategic Options 1A and 1B – continuing the role of the Growth Network

Question 10 – In continuing to promote growth within the Growth Network, is there a need to amend the boundaries of any of the Regeneration Corridors in the existing Core Strategy? Yes/No; If so, which boundaries and why?

The Council supports the Black Country authorities in re-examining the boundaries of the regeneration corridors to explore whether this could result in additional sites for housing and/or employment land.

Question 11a – Do you support Strategic Option 1A? Yes/No; If yes, please explain why. If no, do you support Option 1B? Yes/No; If yes, please explain why. If you support the release of further employment land for housing, what should the characteristics of these employment areas be?

Whilst there may be scope for the release of some occupied employment land for housing in certain locations in the Growth Network (Strategic Option 1B), the loss of employment land would need to be offset in the Green Belt and therefore this option is unlikely to reduce the loss of Green Belt overall. It is also acknowledged that there are likely to be delivery and viability issues around Option 1B. On this basis, the bulk of the remaining housing and employment needs are likely to need to be met outside the Growth Network (Strategic Option 1A). However, before this is concluded, the authorities will need to demonstrate that there are no other deliverable sources of supply (e.g. estate regeneration) within the Growth Network.

Question 11b – Are there any current employment areas that might be considered suitable for redevelopment to housing? Yes/No; Please submit specific sites through the 'call for sites' form.

No comment.

Stage 2: Strategic Options 2A and 2B – Housing and Employment outside the urban area

Question 12a – Do you support Spatial Option H1? Yes/No; What criteria should be used to select suitable sites? e.g. ability to create a defensible new green belt boundary, size, access to existing residential services.

It is noted that both options outside the Growth Network (Strategic Option 2A and 2B) would involve Green Belt release. As stated in response to questions 1 and 16, all reasonable non-Green Belt options should be explored, and therefore the authorities will need to demonstrate that there are no other deliverable sources of supply (e.g. estate regeneration and increasing development density) within the urban area outside of the identified Growth Network. Once this has been demonstrated, it is considered that exploring a combination of Spatial Options H1 and H2 will need to be explored.

As Spatial Option H1 would see the 'rounding off' the edge of the Green Belt, including internal Green Belt wedges, it is envisaged that this will see the release of a number of small to medium sized sites. Considering the upfront infrastructure delivery for Sustainable Urban Extensions (SUEs) (Option H2) it is considered that from a delivery perspective, a number of these smaller 'rounding off' sites will need to come forward to ensure housing is being delivered over the short term (0-5 year period). The Issues and Options report confirms that this 'rounding off' option may not yield sufficient capacity to accommodate all the growth needs, and if this is the case, then a combination of 'rounding off' sites, as well as SUEs, are likely to be required to meet the growth requirements.
In terms of what criteria should be used to select such sites, this must be evidence led. Of particular importance will be the outcomes of the Strategic Growth Study and Black County Green Belt Review in terms of the contribution that these site play to the Green Belt. A Landscape Sensitivity Study will also be a key piece of evidence for determining the degree of landscape sensitivity, to ensure that areas of very high sensitivity remain undeveloped where possible. Access to services and facilities will need to be considered, however these sites by their nature will adjoin the urban area, and therefore in most cases there is likely to be adequate access to amenities. It is not considered that a size threshold should be imposed on these 'rounding off' sites; however sites should follow defensible boundaries, such as existing roads, watercourses and hedgerows where possible.

An important consideration when considering options for growth will also be the Cannock Chase SAC. The Council welcomes the continued involvement of the relevant Black Country authorities in the Cannock Chase SAC Partnership through the Core Strategy Review process. Any development proposals in the Core Strategy Review need to come forward in accordance with the most up to date evidence to ensure that development does not have an adverse impacts on European protected sites.

Question 12b – Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details (please submit specific sites through the 'call for sites' form).

To reiterate, it is important that site selection is evidence led, and therefore crucially, it is essential that all sites/areas with 'rounding off' potential are considered. This includes areas that haven't been put forward through the 'call for sites' but perform well in planning terms based on the evidence undertaken. Where necessary, land searches/land assembly should be undertaken to ascertain if these sites are available and deliverable.

Question 13a – Do you support Spatial Option H2? Yes/No; What should the characteristics of Sustainable Urban Areas (SUEs) be? e.g. minimum/ maximum size, mix of uses, mix of housing types, accessibility to other areas. What criteria should be used to select suitable sites? e.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements / services, proximity to the existing growth network, potential to support urban regeneration.

As set out in response to Question 12a, there is likely to be a requirement to allocate SUEs to meet the identified growth requirements in addition to smaller 'rounding off' sites. However, it is unclear if this option includes options for new standalone settlements in the Green Belt, or will just focus on SUEs that adjoin the urban area. It is suggested that, considering the scale of the housing and employment requirements, new standalone settlements could be considered at this early stage of plan preparation under this option.

It is considered that any SUE would need to provide a mix of house sizes and specialist housing (for example for the elderly) where there is evidence of need, and an appropriate level of affordable housing. The Council also believes there are options for new employment land to be allocated within SUEs. In particular there may be scope for modern industrial units aimed at SME businesses offering supply chain opportunities to serve established businesses in the area. Clearly sustainable development principles should be followed with good access to amenities, public transport, employment opportunities, sport and recreation and other green infrastructure.

An important consideration when considering options for growth will also be the Cannock Chase SAC. The Council welcomes the continued involvement of the relevant Black Country authorities in the Cannock Chase SAC Partnership through the Core Strategy Review process. Any development proposals in the Core Strategy Review need to come forward in accordance with the most up to date evidence to ensure that development does not have an adverse impacts on European protected sites.

Question 13b – What infrastructure do you think would be needed for different sizes of SUEs?

It is suggested that SUEs would typically need to be in excess of 750 houses to facilitate a primary school and it is likely that developments would need to be larger than this (in excess of 1000) to provide a local centre. A self-contained development is likely to be in excess of 2000 -2500 homes; with 5000 homes the typical threshold to facilitate a new high school.

Question 13c - Are there any potential locations that should be considered for SUEs (please submit through the 'call for sites' form) and what infrastructure would be required to support these?

It is important that site selection is evidence led, and therefore it is essential that all sites/areas with potential to accommodate an SUE are considered. This includes areas that haven't been put forward through the 'call for sites' but perform well in planning terms based on the evidence undertaken; for example the Strategic Growth Study, any further fine grain Green Belt assessment, Landscape Sensitivity Study and market capacity evidence. Where necessary, land searches/land assembly should be undertaken to ascertain if these sites are available and deliverable.

Question 13d - Do you think that the Core Strategy should set out detailed guidance for the development of SUEs (e.g. type and tenure of housing, specific infrastructure required), rather than details being determined at a local level in light of local policies? Yes/No; Any further comments?

The Council supports the Core Strategy setting out detailed guidance and broad parameters for design and layout of SUEs, including the type of tenure of housing, employment land requirements, infrastructure and service provision and open space requirements etc. It may be that these requirements are set out in a proforma for each proposed SUE, which then hooks to the relevant SUE allocation policy.

Question 14 – Do you think there are any other deliverable and sustainable Housing Spatial Options? Yes/No; If yes, please provide details.

As set out in previous responses, if Green Belt release is proposed then the authorities will need to demonstrate that all reasonable non-Green Belt alternatives have been considered. This should include exploring funding opportunities to deliver constrained brownfield sites, increasing site densities within the urban area and exploring any opportunities for estate regeneration.

As set out in response to Question 13a, at this early stage of plan preparation, Spatial Option 2a should consider options for new standalone settlement as well as SUEs that adjoin the urban area.

Meeting housing needs outside the Black Country

Question 15a - If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? Yes/No; What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?

If it is clearly demonstrated that housing need cannot be met within the Black Country by carrying out a robust and transparent assessment of all non-Green Belt and Green Belt options, then it is acknowledged that some of this housing growth will need to be exported to other authorities within the Greater Birmingham HMA. This could potentially be to neighbouring HMAs should it be robustly demonstrated that the shortfall cannot be met within the Greater Birmingham HMA. The Strategic Growth Study will provide an indication of where opportunities may exist outside the Black Country and these opportunities could then be explored further by the relevant authority through local evidence gathering.

It is clear that there are significant pressures for new housing, employment and Gypsy & Traveller provision and these key cross boundary issues will need to be addressed through our respective local plans. It is the Council's firm view that this is a two-way negotiation and the role that South Staffordshire might play in this regard needs to be very carefully explored. An equitable and fair approach, which recognises the environmental, physical and infrastructure constraints, as well as the availability of sites to meet specific needs, should be robustly evidenced when addressing these issues under the Duty to Cooperate.

Question 15b – Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details.

Potential locations outside the Black Country, similar to considering options for 'rounding off/SUEs within the Black Country, should be evidence led. Therefore, this could include areas that haven't been put forward through the 'call for sites' but perform well in planning terms based on the evidence undertaken; for example the Strategic Growth Study, any further fine grain Green Belt assessment, Landscape Sensitivity Study and market capacity evidence. Where necessary land searches/land assembly should be undertaken to ascertain if these sites are available and deliverable.

Question 15c - Do you think there are ways to ensure that exporting housing will meet the needs of people who would otherwise live in the Black Country? (e.g. transport improvements, provision of affordable housing, creation of employment opportunities) Yes/No; If yes, please provide details.

Whether development is delivered within the Black Country or is exported elsewhere it will need to comprise sustainable development that meets the needs of the people who live there. If housing is exported, it will be for the LPA(s) in question to allocate sites through their Local Plan alongside appropriate infrastructure having undertaken a Sustainability Appraisal to ensure that sustainable development is being achieved.

Strategic Option Area 2B – accommodating employment land growth outside the urban area

Question 16 – Do you support Spatial Option E1? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites? (e.g. quick motorway access) If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).

The Council supports Spatial Option E1 of extending the Black Country's existing employment sites on the edge of the urban area into Green Belt land where it is demonstrated that there is insufficient options for employment land within the urba area. It is considered that there is a need for a mix of employment sites, both in terms of use class, size and quality. Overall, it is likely that the authorities will need to provide a range of employment land from sites aimed at large advanced manufacturing companies, through to small scale modern fit for purpose industrial units aimed at existing SMEs and start-up businesses.

In most instances, good access to the strategic road network is a key criterion, particularly for logistics companies, however for more local quality manufacturing this may be less of a factor. Access to labour markets, including accessibility to employment via public transport is also seen as key site selection criteria.

Question 17 – Do you support Spatial Option E2? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites e.g. quick motorway access, good sustainable transport links? If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).

The Council supports Spatial Option E2 of providing new freestanding employment sites in sustainable locations in the Black Country's Green Belt where it is demonstrated that there is insufficient options for employment land within the Black Country urban area. New freestanding employment sites are more likely to be aimed at larger advanced manufacturing and/or distribution companies and therefore good access to the strategic road network is seen as key. Again, access to labour markets, including accessibility to employment via public transport is also seen as key site selection criteria.

Question 18 – Do you support Spatial Option E3? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites? (e.g. quick motorway access) If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).

The Council supports Spatial Option E3 of providing new employment land within Sustainable Urban Extensions (SUEs) in the Green Belt where it is demonstrated that there is insufficient options for employment land within the urban area. In particular, there may be opportunities within SUEs to provide modern industrial units on new business parks as part of a sustainable mixed use development. These are more likely to be aimed at existing SMEs and start-up businesses.

Question 19a – Do you support Spatial Option E4? Yes/No; Any further comments?

The Council acknowledges that alongside the other three spatial options, there may be a requirement to export employment growth to neighbouring areas. It is acknowledged that South Staffordshire has strong economic links with the Black Country as demonstrated by the fact that our emerging Site Allocations will provide an additional 62ha of employment land to meet Black Country needs.

The Black Country EDNA concludes that South Staffordshire and Birmingham are the areas with the strongest economic links to the Black Country, but acknowledges that there are also links with other adjoining areas e.g. Lichfield, Cannock and Bromsgrove. Clearly, the employment land requirements for the Black Country are significant, reflecting the growth aspirations of the Black Country and wider West Midlands Combined Authority. Considering the scale of the need, if it is demonstrated that Spatial Option E4 is an appropriate option, then options to export to all neighbouring authorities with an economic relationship to the Black Country should be considered under this option.

Question 19b - Should any factors be taken into account in an assessment of the opportunities? Yes/No; If yes, what should they be? (e.g. quick motorway access, strong transport links with the Black Country, good sustainable transport links with the Black Country)

It is agreed that good access to the strategic road network with good sustainable public transport links are important factors if the export option was to provide large scale

freestanding employment site(s). Further, consideration should also be given to which communities in the Black Country the sites will serve. Clearly, sites on the northern edge of the Black Country are less likely to serve residents in Dudley and Sandwell and vice versa. Therefore, if employment sites are provided outside the Black Country then this should be done in a way that avoids the overconcentration of sites in one area.

Question 20 - Do you think there are any other deliverable and sustainable Employment Land Spatial Options? Yes/No; If yes, please provide details.

No other options are suggested at this stage. It may be the case that a combination of all options is needed to meet the Black Country employment requirements. As set out above, assuming that the export option is required, all neighbouring authorities with an economic relationship to the Black Country should be considered under Spatial Option E4.

Delivering Growth – Infrastructure and Viability Introduction and scope

Question 21 – Do you think that changes are required to Policy DEL1 to ensure it covers both development within the existing urban area and any within the Green Belt? Yes/No; If yes, please provide details.

It is agreed that the policy may need to be reconsidered. Where Green Belt release for SUEs/employment land is proposed then it may be that there is a hook in the policy to link to site specific proformas/development briefs for these sites. These could clearly set out what infrastructure is required to be delivered, both on and off site.

Social Infrastructure

Question 22 – Do you have evidence of a requirement for new social infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.

We have no evidence with regard to social infrastructure needs in the Black Country.

Question 23 - Do you have evidence of social infrastructure that is no longer needed and where the site could be reallocated for alternative uses? Yes/No; If yes, please provide details.

We have no evidence with regard to surplus social infrastructure provision in the Black Country.

Question 24- Do you have evidence of pressure being placed on the capacity of current social infrastructure which could be exacerbated by new housing?

Yes/No; If yes, please provide details.

We have no evidence with regard to social infrastructure needs in the Black Country. However, it is acknowledged that new housing will put pressure on social infrastructure both within the Black Country, and the surrounding local areas and therefore the authorities will need to engage carefully with cross boundary social infrastructure providers to ensure that they understand the 'tipping point' at which new development
will facilitate the need for additional social infrastructure provision.

Question 25 – Will there be any new social infrastructure requirements necessary to serve large new housing developments? Yes/No; If yes, please explain the type and scale of any new social infrastructure required.

See response to Question 24.

Physical Infrastructure

Question 26 - Do you have any evidence of a requirement for new physical infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.

We have no evidence at this stage with regard to physical infrastructure needs in the Black Country.

Question 27 - Do you have evidence of pressure being placed on the capacity of current physical infrastructure which could be exacerbated by new developments? Yes/No; If yes, please provide details.

We have no evidence with regard to physical infrastructure needs in the Black Country. However, it is acknowledged that large scale new development (for example SUEs) are likely to require substantial upfront infrastructure provision.

Question 28 – Do you think physical infrastructure is necessary to serve large new housing developments? Yes/No; If yes, what type and scale of physical infrastructure is necessary?

See response to Question 27.

Delivery and Viability

Question 29 - Do you think there are any other tools or interventions that could be used to ensure enough infrastructure is provided by developments? Yes/No; If yes, please provide details.

Clearly infrastructure provision through Section 106 and 278 agreements and CIL will be essential. No other tools or interventions are suggested.

Question 30 - Do you have any suggestions around how the strategy can be developed in order to maintain the urban regeneration focus of the Black Country while at the same time bringing forward sites in the green belt?

Yes/No; If yes, please provide details.

It is considered that in order to maintain the urban regeneration strategy, a brownfield first approach should be explored to its fullest extent. Therefore, all funding options should be explored to try and deliver as many problematic brownfield sites as possible.

Funding for Site Development and Infrastructure

Question 31 – Do you think that the right scale and form of funding is available to support the delivery of the Core Strategy review? Yes/No; If no, what alternative sources of funding or delivery mechanisms should be investigated?

Both private and public sector investment will be needed to deliver the Core Strategy. The availability of funding sources will impact on viability, and therefore robust viability, delivery and infrastructure studies will be needed when determining if the proposed Core Strategy policies are feasible.

Review of Existing Core Strategy Policies and Proposals

Policy Area A - Health and Wellbeing

Question 32 - Do you think that the proposed approach to incorporate health and wellbeing issues in the Core Strategy review is appropriate? Yes/No; If no, please provide details

It is agreed that spatial planning and place making does have a key role in improving the health and wellbeing of residents and therefore incorporating a health and wellbeing into the Core Strategy is fully supported.

Question 33 – Is there more that the Core Strategy can do to address health and wellbeing issues in the Black Country? Yes/No; If yes, is a new policy needed to address such issues for example?

A number of policy areas, e.g. open space and sports provision, affordable housing delivery tie in with the health and wellbeing agenda and these will be picked up in other Core Strategy policies. There may however be a role for overarching health and wellbeing policy that ties these together to ensure it is clear on how development will be expected to contribute towards healthier communities.

Question 34a - Do you agree that the health and wellbeing impacts of large development proposals should be considered at the Preferred Spatial Option stage of the Core Strategy review through a Health Impact Assessment approach? Yes/No; Any further comments?

Undertaking a Health Impact Assessment for large developments in addition to considering their impact through the Sustainability Appraisal (SA) is supported.

Question 34b - What design features do you think are key to ensuring new development encourages healthy living, which could be assessed through the HIA process?

Applying good practice design principles, including provision of on site open space and links to existing green infrastructure will be essential. It is also important that larger schemes to include facilities for children's play and youth development.

Policy Area B - Creating Sustainable Communities in the Black Country Policy HOU1 - Housing Land Supply

Question 35 - Do you support the proposed approach to housing land supply? Yes/No; If no, please explain why.

The proposed approach to housing land supply is supported.

Policy HOU2 - Housing Density, Type and Accessibility

Question 36 - Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? Yes/No; If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?

The Council supports the proposal to increase the minimum net density of 35 dwellings per hectare to maximise brownfield housing delivery. Densities should be reconsidered through the emerging viability and delivery evidence and efficient use of land be promoted.

Question 37a - Do you think that the existing Policy HOU2 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why

The authorities should consider lowering or removing the threshold for applying density standards as in many instances high densities may also be appropriate for small sites of less than 15 dwellings.

Question 37b – If no, should it be reduced to 11 homes or more? Yes/No; If no what other threshold should be used and why?

The site size threshold could be reduced to less than 11 if there is evidence to suggest that this will not impact on deliverability.

Question 38 - Do you think that the current accessibility and density standards are appropriate for green belt release locations? Yes/No; If no, what standards should be applied in these locations and why?

It is important that efficient use of land is encouraged so as to limit Green Belt release as far as possible, particularly given the Housing White Paper's requirement to limit the need for Green Belt release by optimising the proposed density of development.
Therefore, where Green Belt release has been shown to be necessary, the minimum net density of any Green Belt release should not be set below the standards for the adjacent urban area.

Question 39 - Do you think separate accessibility standards are needed for particular types of housing e.g. housing for the elderly or affordable housing (as occupiers may be less mobile and more dependent on public transport)? Yes/No; If yes, please provide details.

As locations for residential development will principally focus on sites within the urban area

or Green Belt locations on the edge of the urban fringe, it is considered that none of these locations will be isolated with fundamental accessibility concerns. Therefore, separate accessibility standards for different types of development are not considered necessary. With regard to affordable housing, this should be provided on site where possible.

Question 40 - Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period? Yes/No; If no, please explain why.

Yes.

Question 41a - Do you support the introduction of a policy approach towards self and custom build housing in the Core Strategy? Yes/No; if yes, would you support:

Yes.

Question 41b - A target for each authority? Yes/No; Any further comments

Considering the low numbers on the register currently (nine for the entire Black Country), It may be most appropriate to set a target for each authority, rather than a percentage requirement for each large development coming forward. One potential approach could be to extrapolate need evidenced from the base periods to date, in order to determine how many plots each authority should be providing over the plan period.

Question 41c – A requirement for large housing sites to provide serviced plots? Yes/No; Any further comments?

See response to Question 41b.

Question 41d - Another approach altogether? Yes/No; If yes, please specify.

See response to Question 41b.

Question 41e - Do you support the use of a variety of local approaches to Houses in Multiple Occupation (HMOs) across the Black Country? Yes/No; If no, please explain why.

No comment.

Policy HOU3 - Affordable Housing

Question 42 - Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? Yes/No; If no, please explain why.

It is agreed that the annual affordable housing target should be directly informed by the 2017 SHMA.

Question 43a - Do you think that the existing Policy HOU3 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why.

It is agreed that the threshold requiring sites to provide a proportion of affordable housing set out in Policy HOU3 should be lowered to 11 homes or more in line with Government guidance.

Question 43b – If no, should it be reduced to 11 homes or more? Yes/No; If no, what threshold should be used?

See response to question 43a.

Question 44a - Do you think that the affordable housing requirement for eligible sites in Question 43 should be kept at 25% of the total number of homes on the site? Yes /No; Any further comments?

A requirement for 25% affordable housing seems reasonable considering the viability constraints that may be associated with some sites. This is also in line with the requirement identified in the SHMA.

Question 44b If no, should the percentage be increased to allow for the provision of affordable home ownership? Yes/No; If yes, what should the percentage be and why?

It may not be necessary to increase the affordable housing percentage requirement in order to increase the provision of affordable home ownership now that the Housing White paper appears to have removed the specific requirement to deliver starter homes (20%) on all sites over a certain threshold. The 10% requirement for affordable home ownership products can be met within the proposed 25% affordable housing policy. The split within this between shared ownership, starter homes and other types of affordable home ownership could then be dealt with by negotiation, considering the comments in
6.37 which note that most starter homes in the Black Country would not necessarily be genuinely affordable in all areas. This would also still leave a 15% requirement for rented products, which is only marginally below the 16.6% recommended in the SHMA.

Question 45 - Should an increased affordable housing requirement be set for Green Belt release sites, to reflect the likely financial viability of these sites? Yes/No; If yes, what should this be.

The SHMA confirms that the Black Country authorities should aim for 28.6% (23.3% if starter homes are excluded) of new housing to be affordable housing; therefore on this basis there may be limited scope to go above 25% on greenfield sites. However, considering that these could be large sites that would need substantial onsite infrastructure provision then a cautious approach should be taken to going above 25%. Setting an appropriate percentage should be directly informed by a high level viability study.

Policy HOU4 - Accommodation for Gypsies, Travellers and Travelling Showpeople

Question 46 - Do you agree with the proposed new gypsy, traveller and travelling showpeople accommodation targets? Yes/No; If no, please explain why.

The targets set out in Tables 4 and 5 are taken from the Black Country and South Staffordshire GTAA 2017 and therefore are deemed appropriate for identifying the Black Country's pitch/plot requirements. However, as you are aware the 2017 GTAA identified a

pitch requirement of 87 residential pitches for South Staffordshire for the period 2016- 2036, considerably above the pitch requirements for the four Black Country authorities combined. Historically, pitch provision in South Staffordshire has been in the Green Belt as no non-Green Belt options have ever been promoted. Therefore, assuming that this remains the case, there will be a requirement through our Local Plan review to demonstrate that we have explored other reasonable options to amending Green Belt boundaries including exploring whether other authorities can help to meet some of the identified development requirement, as set out in the Housing White Paper. As such, there will be a requirement through Duty to Co-operate discussions to explore whether there may be deliverable brownfield options in the Black Country to meet a proportion of the districts pitch requirements. On this basis, a flexible approach to setting pitch targets and exploring pitch/plot options is suggested.

It is clear that there are significant pressures for new housing, employment and Gypsy & Traveller provision and these key cross boundary issues will need to be addressed through our respective local plans. It is the Council's firm view that this is a two-way negotiation and the role that South Staffordshire might play in this regard needs to be very carefully explored. An equitable and fair approach, which recognises the environmental, physical and infrastructure constraints, as well as the availability of sites to meet specific needs, should be robustly evidenced when addressing these issues under the Duty to Cooperate.

Policy HOU5 - Education and Health Care Facilities

Question 47 - Do you think that Policy HOU5 should be expanded to cover other types of built social infrastructure and to set out standards for built social **infrastructure to serve major housing developments? Yes/No; If no, please explain why.**

Expanding Policy HOU5 to include a criteria based approach which requires service providers to demonstrate why health care and education facilities are no longer required or viable is welcomed. It is agreed that this approach should be expanded to other types of social infrastructure such as community centres.

Including standards for built social infrastructure to serve major housing developments set out in Policy HOU5 is also considered appropriate.

Question 48 - Do you agree that the requirement in HOU5, to demonstrate there is adequate alternative provision to meet the needs of the community served by a facility which is to be lost, should be reviewed? Yes/No; If yes, please explain why.

This policy should be reviewed to reflect a clear criteria based approach to considering the loss of social infrastructure, and should be expanded beyond health and educational facilities where appropriate. One of these criteria could relate to ensuring that the developer demonstrates that there is adequate alternative provision to meet the needs of the community.

Policy Area C - The Black Country Economy

Policy DEL2 – Managing the Balance between Employment Land and Housing

Question 49a – Is there still a need for existing Policy DEL2 in order to manage the release of poorer quality employment land for housing? Yes/No; If no, please explain why.

The existing wording for Policy DEL2 seems very broad, setting out completions to date and how many are expected to come forward within each regeneration corridor. A clearer approach may be to specifically identify areas of Local Quality Employment Land that is considered poor quality and therefore suitable for release for housing, either through a revised Core Strategy policy or through allocation documents.

Question 49b - If yes, should this policy be used to assess the release of employment land to alternative uses, other than housing? Yes/No; If yes, please explain why.

A revised policy could set out areas of poor quality employment land that could be suitable for release for housing or alternative uses, providing clarify on what uses may be acceptable.

Policy EMP1 – Providing for Economic Growth and Jobs

Question 50 – Do you think that the Core Strategy should continue to set a target for the total employment land stock in Policy EMP1? Yes/No; Please explain why. Do you think that distinguishing between Strategic High Quality Employment Areas and Local Quality Employment Areas is still appropriate? Yes/No; Please explain why.

It is considered that the authorities themselves are best placed to decide if there is any value in setting a target for the total employment stock within the Black Country. Setting a target for the additional employment land that is required is a clearer approach; however if possible, there may be a need to have a mechanism in place to ensure that any loss of existing high quality sites to other uses is compensated by new provision reflected in updated targets. Robust monitoring and national guidance encouraging authorities to review plans in whole or part every 5 years should ensure that any issues around the loss of existing high quality employment land can be addressed.

Policy EMP2 – Strategic High Quality Employment Land and Policy EMP3 – Local Quality Employment Land

Question 51 – Do you think that the criteria used to define Strategic High Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?

The criteria used to define High Quality Employment Areas are supported. There may however be scope to slightly amend the accessibility criteria to focus on good access the strategic road network, rather than just focusing on access to the motorway network.

Question 52 – Do you think that the criteria used to define Local Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?

The criteria used to define High Quality Employment Areas are supported.

Question 53 – Do you think that Strategic High Quality Employment Areas should continue to be protected for manufacturing and logistics uses, with the other uses set out in Policy EMP3 discouraged? Yes/no; If not, what alternative approach do you recommend?

The High Quality Employment Areas should be focused on advanced manufacturing and logistics and be protected for these uses.

Policy EMP4 – Maintaining a supply of readily available employment land

Question 54 – Do you agree that the current approach in Policy EMP4 is no longer fit for purpose and should be amended to reflect a portfolio based approach? Yes/No; If no, what alternative approaches would you recommend?

Removing the requirement to have a 'reservoir' of readily available shovel ready employment land is supported. The provision to review plans in whole or part every 5 years will help ensure that there is a constant supply of employment land, providing scope to allocate additional employment land if required. Ensuring provision for a balanced portfolio of sites is important

Policy EMP5 – Improving access to the labour market

Question 55 - Do you agree with the proposal to retain Policy EMP5? Yes/No; If no please explain why.

Policy EMP5 encourages the use of planning objections to be negotiated with developers of new job creating development in order to support recruitment and training of local people. This approach is fully supported as access to a skilled workforce is a key consideration for businesses.

Policy EMP6 – Cultural Facilities and the Visitor Economy

Question 56 - Do you agree with the proposal to update Policy EMP6 in line with current priorities? Yes/No; If no, please explain why

Updating the list of visitor attractions and facilities in Policy EMP6, which seeks to develop the visitor economy and cultural facilities of the Black Country is supported.

Policy Area D - The Black Country Centres

Policy CEN1: The Importance of the Black Country Centres for the Regeneration Strategy

Question 57 – Do you support the proposal to merge Policy CEN1 and Policy CEN2, given that both policies focus on the overall strategy in the Black Country, including the hierarchy of centres? Yes/No; if you have any comments on Policies CEN1 and CEN2 please provide details.

Merging these policies relating to the town centres seems logical.

Question 58 – Do you think there is any evidence to suggest that the hierarchy of centres is not appropriate going forward in the context of the regeneration strategy? Yes/No; If so, please provide details.

The Council has no evidence to suggest that the hierarchy of centres is not appropriate. However, the Retail Capacity and Town Centre Uses studies should be used to inform the hierarchy. It is recognised that a number of the Black Country centres – particularly the strategic centres – play an important role in meeting the higher order needs of our residents including access to hospitals, retail and leisure. Therefore, their continuing regeneration is fully supported.

Question 59 – Have all the appropriate centres within the Black Country been identified? Yes/No; If not, please specify additional centres.

From the Council's knowledge, It appears that all the appropriate centres within the Black Country have been identified.

Question 60 - Is there evidence to suggest that identified centres are no longer performing as a centre or at their identified level in the hierarchy? Yes/No; If yes, do you agree that they should be moved / removed within or out of the hierarchy? Please explain why.

We have no evidence on the performance of centres or relating to their level within the hierarchy of centres.

Question 61 - In addition to para 4.33 of the current Core Strategy should the revised Core Strategy include criteria for the creation of new centres that might be needed as a result of any additional housing identified through the plan?

Yes/No; Any further comments?

As an indicative rule, development of around 1000 houses or more are likely to require a new centre. Therefore, if the evidence suggests a need for new developments around this scale then clear criteria for the creation of new centres will be required. It may however be appropriate to have site specific infrastructure requirements for large strategic allocations (e.g SUEs) identified in the Core Strategy. These would include the requirements for new centres.

Policy CEN3: Growth in the Strategic Centres

Question 62 - Do you agree that the Strategic Centres should remain the focus for large scale comparison retail (clothes, white goods etc), office and major **commercial leisure development in the Black Country? Yes/No; Any further comments?**

It is logical for the existing strategic centres such as Wolverhampton and Brierley Hill to be the focus for retail, office and commercial leisure development. This is important for their continuing regeneration.

Question 63 - Do you agree that the targets for comparison retail floorspace and office floorspace should be revisited as part of this review to take into account current and future trends? Yes/No; Any further comments?

It is agreed that retail and office floorspace needs should be revisited.

Question 64 - Is there a need to set targets for convenience retail floorspace in the Core Strategy? Yes/No; Any further comments?

We have no evidence to confirm if there is a need to set a target for convenience retail floorspace. The proposed Retail Capacity and Town Centre Uses studies should be used to inform this.

Question 65 - Should the Core Strategy set any targets or policy requirements for leisure development in the Strategic Centres? Yes/No; Any further comments?

Targets for leisure development may be appropriate where supported by evidence of need. It may be appropriate to undertake an audit of sports facilities as part of this evidence gathering and consider cross boundary provision dependent on the evidence of need/demand. If this is deemed appropriate then close liaison with Sports England is recommended.

Question 66 - Should the Core Strategy set new housing targets for the Strategic Centres through the review? Yes/No; Any further comments?

The authorities will need to demonstrate that they have fully considered options for additional housing in the strategic centres, whilst recognising that other uses such as retail will also be the focus of these centres. The Council supports the authorities setting new housing targets for the strategic centres.

Question 67 - Do you think there are any other uses and/or developments that should be planned for in the Strategic Centres? Yes/No; Please provide details.

Retail, offices, housing, leisure and cultural facilities should be the focus of the strategic centres.

Brierley Hill Retail Pre-Conditions

Question 68 - Do you agree with the proposal to re-examine the detail and appropriateness of the existing conditions for retail growth at Merry Hill through the Core Strategy review? Yes/No; Do you have any further comment to make on this issue?

The Core Strategy review is considered the correct time to re-examine any conditions relating to retail growth at Merry Hill.

Policy CEN4: Regeneration of Town Centres

Question 69 - Should more types of uses be encouraged and more flexibility be allowed to ensure the regeneration and vitality of the Black Country Town Centres? Yes / No; Please explain why.

It is considered appropriate to encourage convenience shopping and other mixed use development (e.g. community centres) to support new residential development within the strategic centres.

Question 70 – Do you think there are any specific developments or uses that should be supported in any particular Town Centre? Yes/No; Please provide details.

No specific suggestions.

Question 71 - Should the Core Strategy set housing targets for the Town Centres? Yes/No; Please explain why.

Policy CEN5: District and Local Centres

The authorities will need to demonstrate that they have fully considered options for additional housing in the strategic centres, whilst recognising that other uses such as retail will also be the focus of these centres. The Council supports the authorities setting new housing targets for the town centres.

Question 72 - Should more types of uses be encouraged and more flexibility be allowed to ensure the regeneration and vitality of the Black Country District and Local Centres? Yes/No; Please explain why.

Flexibility of uses is encouraged in the Local Centres.

Question 73 - Are there are any specific developments or uses that should be supported in any particular District or Local Centre? Yes/No; Please provide details.

No specific suggestions.

The Centres Threshold Approach

Question 74 - In the context of the 'centres first' strategy, should the threshold approach be reviewed to consider the appropriateness, scale and impact of development in and on the edge of Strategic, Town, District and Local Centres? Yes/No; Please explain why.

No comment.

Question 75 - Should thresholds apply to all main town centre uses (Yes) or just retail uses (No)? Please explain why.

No comment.

Policy CEN6: Meeting Local Needs for Shopping and Services

Question 76 - Is the approach set out in Policy CEN6 appropriate in the context of supporting local community needs? Yes/No; Please explain why.

The approach of protecting local shops and small parades unless it can be demonstrated that they are no longer viable is supported. The authorities may want to consider setting out clear expectations on what evidence would be required to justify the applicants viability case.

Question 77 - Does the wording of the criteria clearly achieve the objectives of the centres strategy? Yes/No; Please explain why.

No comment

Question 78 - Should the policy clarify that this policy applies both to applications in edge-of-centre and out-of-centre locations, and should this also be referred to in the relevant centres policies? Yes/No; Please explain why.

Clarification that the policy applies to edge-of–centre and out-of-centre locations is supported

Question 79 - Should the policy set what types of uses this policy applies to and set out any further types of material considerations that could be relevant for the determination of certain proposals, for example, the location or concentration of hot food takeaways, premises selling alcohol or gambling operations? Yes/No; Please explain why

No comment

Question 80 - Should the policy clarify that those schemes of multiple units, where individual units are below the set figure, but the cumulative figure is above, also need to meet the relevant requirements of other centres policies? Yes/No; Please explain why

No comment.

Policy CEN7: Controlling Out-of-Centre Development

Question 81 – Do you agree that the approach of strong control over out-of- centre development is still appropriate in the context of the strategy to ensure the vitality and viability of the Black Country Centres? Yes/No; Please explain why.

This approach seems appropriate.

Question 82 - Is 200sqm (gross) an appropriate scale of development above which the impact tests should apply? Yes/No; Please explain why.

No comment.

Policy CEN8: Car Parking in Centres

Question 83 - Should Policy CEN7 provide more guidance on accessibility? Yes/No; If yes, please explain why.

No comment.

Question 84- Do you think that Policy CEN8 is still appropriate for managing car parking in centres and will ensure the network of Black Country Centres are maintained and enhanced over the plan period? Yes/No; Please explain why.

No comment.

Question 85 - Should Policy CEN8, with regards to pricing of car parks, continue to be applied to Strategic Centres to ensure that pricing of parking is not used as a tool of competition? Yes/No; Please explain why.

No comment.

Other Centres Issues

Question 86 – Do you think that there are other centre uses or centres issues that need to be addressed in the centres policies? Yes/No; Please provide details.

No specific suggestions.

Question 87 - As shopping, leisure and other commercial trends continue to change, should the revised Core Strategy have a policy to reallocate out-of- centre attractions that are no longer viable for town centre uses for alternative uses such as for employment uses or housing? Yes/No; If no, please explain.

As retail trends continue to change with the continued expansion of online shopping it is essential that Local Plan policies on centres strike the correct balance between ensuring that town centres uses cannot be too easily lost, whilst also ensuring there is flexibility to adapt to changing retail trends. Where retail, leisure or other commercial uses are not viable then reallocating these for housing or employment uses would be supported.

Policy Area E - The Black Country Transport Network

Question 88 - Do you agree that the overall transport strategy supports all of the Core Strategy spatial objectives? Yes/No; Please explain why.

The overall transport strategy of providing better use of existing capacity as well as providing new sustainable transport capacity to provide an integrated transport system for the West Midlands is supported. Achieving this will help support the Core Strategy Spatial Objectives.

Policy TRAN1 – Priorities for the Development of the Transport Network

Question 89 - Do you support the proposed changes to the priorities for the development of the transport network? Yes/No; Please explain why.

The updated transport priorities in TRAN1 are generally supported. However, reference of 'development of road to freight interchange facilities to serve the sub region' is vague. It is unclear if this is making specific reference to the development of a Strategic Rail Freight Interchange (SRFI), which by the Governments definition is an Interchange in excess of 60ha and capable of handling 4 trains a day, or a number of smaller RFI facilities within the Black Country. That said, Paragraph 6.1.40 of the Issues and Options makes specific reference to rail freight interchanges proposals coming forward at Bescot and Four Ashes (currently being promoted as West Midlands Interchange (WMI)) which suggests that the transport priority relating to rail freight at Para 6.1.36 may relate specifically to Four Ashes. As you are aware, the WMI proposal is in the Green Belt and is still at the pre-application stage and therefore any transport priorities that relate to this proposal are considered premature.

Policy TRAN2 – Managing Transport Impacts of New Development

Question 90 - Do you support the proposed changes relating to managing transport impacts of new developments? Yes/No; If no, please explain why.

Proposed changes to reference greater focus on choice of modes of transport for access to new developments, including electric vehicle charging infrastructure, provision for cycles etc. is supported.

Policy TRAN3 – The Efficient Movement of Freight

Question 91 - Do you support the proposed changes relating to the efficient movement of freight? Yes/No; If no, please explain why.

The proposed change to Policy TRAN3 is to remove reference to the 'principle road network' to be replaced with reference to the 'key route network' which is defined in the West Midlands Combined Authority 'movement for growth' plan. It is our understanding that the 'key route network' is a term used to describe the metropolitan main road network. The current reference in the policy is as follows:

Proposals which generate significant freight movements will be directed to sites with satisfactory access to the principal road network.

It is unclear from the Issues and Options report if this change is simply to provide consistent terminology with that used in the WMCA transport plan, or if this will result in a material change to the policy. Specifically, it is unclear if the reference to the principal road network was referring specifically to the road network within the Black Country?
Whereas the 'key route network' seems to refer to a wider area across the region. Clarification on this would be welcomed.

Policy TRAN4 – Creating Coherent Networks for Cycling and Walking

Question 92 - Do you support the proposed approach to providing a coherent network for walking and cycling? Yes/No; Please explain why.

The approach of providing a coherent network for walking and cycling is supported.

Policy TRAN5 – Influencing the Demand for Travel and Travel Choices

Question 93 - Do you support the proposed changes to Policy TRAN5? Yes/No; Please explain why.

The proposed inclusion of priorities in Policy TRAN5 around introducing new transport technologies such as ultra low emission vehicles is supported.

Policy Area F - The Black Country Environment Environmental

Infrastructure and Place-Making

Question 94 - Do you support the proposed changes relating to environmental infrastructure and place-making? Yes/No; If you think that any other changes should be made to Policies CSP3 or CSP4, please provide details.

The proposed changes to environmental policies to reflect adopted DPDs and include new proposals to address the environmental infrastructure needs of new developments in light of up-to-date evidence seems appropriate.

Question 95a - Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied?

Good plan making objectives such as providing comprehensive green infrastructure, integrated and accessible transport networks, access to employment and affordable housing provision are amongst those that make up the garden city principles. These requirements will be picked up through applying the relevant individual policies.

Question 95b - Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No; If yes, please explain why.

The may be more scope to apply the garden city principles on larger greenfield sites. Considering that there may be viability issues on some brownfield sites, it may be less realistic to apply the garden principles on these sites.

Policy ENV1 - Nature Conservation

Question 96 - Do you support the proposed changes relating to nature conservation? Yes/No; If no, do you think that any other changes should be made to Policy ENV1?

Updating the policy in line with the NPPF and the introduction of requirements for new development to incorporate biodiversity features, such as new natural green space, is supported.

Policy ENV2 - Historic Character and Local Distinctiveness

Question 97 - Do you support the proposed changes relating to Historic Character and Local Distinctiveness? Yes/No; If no, please provide details of any other changes that should be made to Policy ENV2.

Updating the policy in line with the latest national policy and guidance is supported.

Policy ENV3 - Design Quality

Question 98 - Do you support the proposed changes relating to Design Quality? Yes/No; If you think that any other changes should be made to Policy ENV3 please provide details.

Removing reference to requiring a specific code of sustainable home in line with national guidance is supported.

Question 99a - Do you think that national standards for housing development on water consumption should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.

This is considered for the authorities to decide in consultation with the water companies.

Question 99b - Do you think that national access standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.

Introducing an access standard so that a percentage of new builds would be usable or easily adaptable for those with disabilities is supported. However, in terms of the threshold of where this percentage is set, this would need to informed by viability evidence. It may be that it would not be viable to apply this policy on certain types of sites e.g. small brownfield sites; again this could be considered in the viability evidence.

Question 99c - Do you think that national space standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.

Applying the Nationally Described Space standard (CLG, March 2015) is supported should the evidence suggest that this would not impact on viability.

Question 99d - Do you think that the standards should be different for brownfield and greenfield sites? Yes/No; If yes, please explain how and why.

It may be appropriate to have different standards for brownfield and greenfield; this could be considered in the viability evidence.

Policy ENV4 - Canals

Question 100 - Do you support the removal of the reference made to canal projects? Yes/No; Do you think that any other changes should be made to Policy ENV4? Please provide details.

It is understood that part of the route of the Hatherton Branch Canal is safeguarded in proposed Policy EN4 of Walsall's Site Allocations Document. On this basis it is considered appropriate to remove reference to the restoration of the Hatherton Branch Canal from the Core Strategy, and for this to be considered at the more local level.

Policy ENV5 - Flood Risk, Sustainable Drainage (SuDS) and Urban Heat Island Effects

Question 101a - Do you support the proposed changes relating to Flood Risk, Sustainable Drainage and Urban Heat Island effects? Yes/No; Further comments?

The propose changes to align with national policy and guidance is supported.

Question 101b - Do you think that any other changes should be made to Policy ENV5? Yes/No; If yes, please provide details.

None suggested.

Policy ENV6 - Open Space, Sport and Recreation

Question 102a - Do you support the proposed changes relating to open space, sport and recreation? Yes/No; If no, please explain

It is not clear what specific changes are proposed, however if the existing policy is in line with national policy then it may be that the changes needed are minimal.

Question 102b - Do you think that Policy ENV6, taken together with national and local policies, provides sufficient protection from development for open space? Yes/No; If no, please explain

It is considered that paragraph 74 of the NPPF offers sufficient protection from development for open space.

Question 102c - Do you think that any other criteria need to be added to Policy ENV6, or any other changes should be made. Yes/No; If yes, please provide details.

None suggested.

Policy ENV7 - Renewable Energy

Question 103a - Do you think that Policy ENV7 should be changed to allow increased energy efficiency standards to be accepted in lieu of renewable energy provision for non-domestic buildings? Yes/No; If not, please explain

Increased energy efficiency standards for non-domestic buildings would be supported; however this would need to be supported by plan viability evidence confirming that this is achievable.

Question 103b - Do you think that the 10% requirement should be changed? Yes/No; If yes, please specify what percentage would be more appropriate and to what type of site it should apply.

Any percentage requirement relating to energy demand would again need to be supported by plan viability work.

Policy ENV8 - Air Quality

Question 104 - Do you support the proposed changes relating to Air Quality? Yes/No; If you think that any other changes should be made to Policy ENV8 please provide details.

Rewording the policy to reflect the approach in the more recent Black Country wide SPD on Air Quality and the West Midlands Low Emissions Towns and Cities Programme (WMLETCP) seems appropriate.

Policy Area G - Waste

Question 105 - Do you think that Policy WM1 identifies all of the key waste issues that need to be addressed in the Core Strategy, in accordance with national policy? Yes/No; If not, please specify what changes should be made to the Policy. If you have any evidence that can be referred to in the Waste Study, please provide details.

No comment.

Question 106a - Do you support the approach set out in Policy WM2? Yes/No; If no, please explain why.

No comment.

Question 106b – Are there any strategic waste management sites that no longer need to be protected? Yes/No; If yes, please provide details

No comment.

Question 106c – Are there any new sites that do need to be protected? Yes/No; If yes, please provide details.

None suggested.

Question 107 - Do you think that there are any strategic waste management proposals that should either be removed from or added to the list in Policy WM3? Yes/No; If so, please provide details.

No comment.

Question 108 – Do you agree that Policy WM4 provides an appropriate level of control over the location and design of new waste management facilities?

Yes/No; If no, what changes do you think should be made to the Policy?

No comment.

Policy Area H - Minerals

Question 109 – Do you agree that Policy WM5 provides an appropriate level of control over resource management for new developments? Yes/No; If no, what changes do you think should be made to the Policy?

No comment.

Question 110 - Do you think that Policy MIN1 identifies all of the key minerals issues that need to be addressed in the Core Strategy, in accordance with national policy? Yes/no; If no, what changes should be made to the policy?

No comment.

Question 111 - Do you agree with the proposed change to 'prior extraction' requirements, to maintain a size threshold in urban areas and increase the threshold for green belt sites to 3 ha? Yes/No; If no, what evidence do you have to justify an alternative approach?

No comment.

Question 112a – Are there any key mineral related infrastructure sites that no longer need to be protected? Yes/No; Please provide details

No comment.

Question 112b – Are there any other sites that do need to be protected? Yes/No; If yes, please provide details.

No comment.

Question 113 - Do you think that Policy MIN2 identifies all of the key aggregate minerals issues that need to be addressed in the Core Strategy up to 2036, in accordance with national policy? Yes/No; If not, what changes should be made to the policy?

No comment.

Question 114 – Do you have evidence of workable, viable deposits of brick clays outside the areas of search, which could justify defining new areas of search?

Yes/No; If yes, please provide details.

No.

Question 115a - Do you have evidence of any realistic possibility of fracking in the Black Country? Yes/No; If yes, please provide details.

No.

Question 115b - Do you think there are particular issues for the Black Country that would justify approaches different from those in national policy? Yes/No; If yes, please provide details.

No comment.

Question 116 - Do you think that Policy MIN5 identifies all of the key issues that need to be addressed in relation to new mineral developments in the Core Strategy, in accordance with national policy? Yes/No; If not, what changes should be made to the policy?

No comment.

Policy Area J - Growth Network Detailed Proposals

Question 117 - Do you agree with the proposed approach to updating and amending Appendix 2 and Tables 2 and 3 of the existing Core Strategy?

Yes/No; If not, what alternative approach would you suggest?

Updating Appendix 2 and tables 2 and 3 of the existing Core Strategy to reflect proposals in the adopted and merging SADs and AAPs is supported.

Policy Area K – Monitoring and Additional Policies

Question 118 - Do you agree with the proposal to streamline and simplify the Core Strategy Monitoring Framework? Yes/No; If no, please explain why

Streamlining the monitoring framework to focus on the key quantitative indicators which relate to the delivery of development is supported.

Question 119 – Do you think that a new Core Strategy policy is required? Yes/No; If yes, please explain why and provide details of the suggested policy.

If the authorities are required to allocate Green Belt sites then a new policy for this will be needed. It is likely that a proforma will be needed for each allocation setting out what will need to be delivered on site that hooks to the policy.

12.07.2018 - ABCA letter to SSDC

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

Our Ref: HP/CW
Date: 12 July 2018

Please ask for: Christine Williams
Direct Line: [REDACTED]

Dear Colleagues

Black Country Core Strategy Review
Duty to Co-operate: Strategic Housing Issues

As you will be aware the Black Country Authorities have commenced a review of our joint Core Strategy. As a key part of this review we completed our Issues and Options consultation in September 2017. This included a call for sites. We are currently in the process of reviewing the responses to consultation and are progressing various other work in connection with the review. This includes a number of key pieces of evidence including the second stage of our EDNA, and finalising an Urban Capacity Report.

We are keen to continue to work with neighbouring Authorities, including yours, on strategic matters – you may recall our most recent Duty to Co Operate meeting in February 2018 when we took the opportunity to update neighbouring LAs and to ask how you would like to continue to work with us on key strategic planning matters.

The purpose of this letter is to raise the issue of housing need across the Black Country – and how these can be met. You may be aware that we have allocated a significant number of sites for both housing and employment development through current local plan documents. We intend to update this work as part of the current review where this may be necessary.

Our most recent housing evidence sets out our housing need (up to 2036) – and whilst we acknowledge this might change as a result of updated government policy (which is anticipated to slightly increase our current OAN) we know that we cannot accommodate all our identified needs within the urban area of the Black Country.
This view is supported by our current work reviewing the urban capacity of the Black Country (see latest urban capacity report - May 2018 http://blackcountrycorestrategy.dudley.gov.uk/t2/) and the recently published Birmingham and Black Country HMA study. Even by increasing densities and looking to other sources of urban land supply, we still cannot accommodate all our housing and employment needs within the urban area.
Current estimates are that we may have a shortfall in the region of **22,000** dwellings and **300 ha** of employment land. However our review is focussing on continuing a brownfield first approach, building on the success of the current strategy, and we will continue to make every endeavour to accommodate as much of our need as possible in our urban areas before considering other locations in the Black Country or beyond.

At this stage we would be grateful if you were able to provide an update regarding your

strategic plan making, specifically your local plan review status. In addition, considering the situation faced by the Black Country, as set out above, and building upon the recently published Strategic Growth Study for the Greater Birmingham and Black Country HMA, we are asking for your Authority to consider whether it would be able and willing to accommodate any identified housing and employment development needs arising from the Black Country? This request covers all types of housing need as identified in evidence.

Such a scenario may arise where your existing or emerging plan is seeking to deliver levels of housing or employment land in excess of local needs. We are also keen to understand, in the context of plan reviews, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting some of the needs of the Black Country - with an initial focus on non- green belt locations in accordance with the existing and proposed national planning policy framework.

We ask that you consider this request and **respond in writing to blackcountrycorestrategy@dudley.gov.uk within 2 weeks of the date of this letter please.** We appreciate that this letter may raise difficult issues that need your consideration, however we would be grateful for an early response.

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

Yours sincerely

[REDACTED]

Sarah Norman
Chief Executive
Dudley Metropolitan Borough Council

[REDACTED]

Helen Paterson
Chief Executive
Walsall Metropolitan Borough Council

[REDACTED]

Jan Britton
Chief Executive
Sandwell Metropolitan Borough Council

[REDACTED]

Mark Taylor
Strategic Director
Wolverhampton City Council

12.07.2018 – SSDC and Black Country Authorities DtC meeting

South Staffordshire District Council and Black Country authorities officers meeting under the Duty to Co-operate (12/07/2018)

Officer Representatives

Black Country officers:
Ian Culley and Michelle Ross (Wolverhampton)
Mike Smith (Walsall)
Patricia Mccullagh (Sandwell)
Martin Dando (Dudley)

South Staffordshire officers:
Kelly Harris and Patrick Walker

1. Evidence Base updates and actions

Green Belt Review (GBR)
- Black Country officers confirmed all Black Country authorities had now resolved to commission joint GRB with SStaffs
- Agreed that dates for evaluating tenders/interviewing consultants to be sent out following meeting by Sandwell

Economic Development Needs Assessment (EDNA)
- South Staffs have first draft of part 1 EDNA (i.e. needs work), but need to agree corrections with consultants before circulating wider
- Agreed that once corrections had been agreed with consultants, Black Country authorities could have sight of the South Staffs draft EDNA part 1

M54 growth strategy
- Black Country officers clarified that work is being led by Shropshire, not Black Country
- South Staffs officers highlighted need for M54/M6/M6 toll link road to be progressed if further employment land to be released in South Staffs District, and the need for Black Country to highlight this in the study
- South Staffs officers raised need for implications of the study for additional housing growth to be made clear in correspondence

Cannock Chase SAC/HRA
- Walsall highlighted need for corrections to the proposed draft visitor survey questionnaire circulated through SAC Partnership to ensure correct information is collected
- Agreed by South Staffs and Black Country authorities that all relevant authorities need to participate in new visitor survey work to ensure robust shared conclusions
- Walsall and South Staffs officers raised need for all authorities to be aware of People over Wind/Sweetman2 EU court case in both plan-making and planning applications
- Walsall highlighted that the court case had implications for their allocations document

Strategic Flood Risk Assessment (SFRA)
- South Staffs officers raised intention to explore proposal for Staffordshire County Flood Risk Team to undertake SFRA (subject to EA agreement of methodology to be used) due to increased usability of work and likely cost savings

- Black Country officers indicated Black Country were likely to rely on external consultant for SFRA, due to lack of previous SFRA work undertaken by Staffordshire County Flood Risk Team

Retail
- Black Country officers raised intention to commission retail evidence to inform Black Country Core Strategy review
- Assessment to be split into two phases: Phase 1 to include household survey and existing centre health check, whilst Phase 2 to project likely expenditure and market interest alongside likely household growth locations
- Agreed that Black Country officers would send brief for retail evidence to South Staffs officers, to allow South Staffs to consider possibility of inclusion of South Staffordshire District into Phase 1 of the study proposed by the Black Country authorities
- South Staffordshire officers highlighted existing South Staffordshire member agreement to work on joint retail evidence with Black Country

Strategic Housing Market Assessment (SHMA) part 2
- South Staffordshire and Black Country officers recognised need to update part 2 of existing joint SHMA once new NPPF was finalised
- Agreed by South Staffordshire and Black Country officers that future updates to part 2 SHMAs covering respective local authority areas could be commissioned separately by South Staffs and Black Country, as long as all authorities have sight of redrafted work to ensure future methodologies are consistent

Transport
- Agreed that Black Country officers should share highways capacity evidence with cross-boundary implications with South Staffordshire officers when available, so that this can be forwarded to Staffordshire County Council in its capacity as a highways authority

Waste and Minerals
- Black Country officers highlighted that there were no current strategic waste issues, but South Staffordshire officers would be made aware when these are known

2. Local Plan updates

Black Country Core Strategy review update (Black Country officers)
- Draft Plan anticipated in Autumn 2019, Publication Plan anticipated in June 2020, plan submission anticipated in end 2020, EiP in early 2021, adopt end of 2021.
- Draft Plan likely to be a complete preferred options document including all Green Belt allocations and a full examination of urban area capacity (including role of existing allocations)

South Staffordshire Local Plan review (South Staffordshire officers)
- Issues and Options document slightly delayed until Autumn 2018 to ensure new draft NPPF can be accounted for in document
- Issue and Options document will include all options for broad locations for growth and a preferred level of housing growth; officer discussions with members regarding both matters are currently ongoing
- Preferred level of housing growth will include South Staffordshire's own local housing need and a contribution to wider HMA needs for testing and evidence gathering, based on existing joint evidence from the HMA (i.e. the Strategic Growth Study prepared by GL Hearn) – level of growth to be set out is currently confidential
- South Staffs contribution to HMA needs is based upon existing joint evidence of shortfall and

scale of measures required to address the shortfall, therefore if HMA shortfall significantly reduces through future Statement of Common Ground, South Staffs contribution would reduce
- South Staffs officers highlighted lack of public sites to meet Gypsy, Traveller and Travelling Showperson needs within District, and need for this to be discussed through Duty to Co-operate between South Staffordshire and Black Country authorities
- Walsall highlighted lack of ability of its authority to meet supply being established through its allocation document examination

23.08.2018 – SSDC response to duty to co-operate letter

South Staffordshire Council

Our Ref: GM
Your ref: HP/CW

Date: 23rd August 2018

Please ask for: Grant Mitchell

Direct Dial: 01902 696438

Email:

g.mitchell@sstaffs.gov.uk

Dr H. Paterson – Secretary to ABCA
Walsall MBC
The Civic
Centre
Darwall Street
Walsall
WS1 1TP

Dear Dr Paterson,

Black Country Core Strategy Review – Duty to Co-operate: Strategic Housing Issues

I refer to your recent letter regarding the above seeking an update from South Staffordshire Council on the review of our Local Plan which has been passed to me to respond to.

Firstly, I can confirm that following the Examination in Public of our Site Allocations Document (SAD) in December 2017, that we have recently been notified by the Planning Inspectorate that the document is 'sound' and will shortly be presented to our Members recommending formal adoption of that document. The SAD allocates land to deliver the residual amount (circa 1000 new homes) from our Core Strategy plus an additional 62 hectares of employment land to help meet the employment land shortfall in the Black Country.

Our SAD committed the Council to an early review of the Local Plan, partly in light of an increase to our own objectively assessed housing need but also in the knowledge that there remains a significant housing shortfall across the Housing Market Area that needs to be addressed. For a number of months our Members have been working with our officers on our new proposed approach to the review of our Local Plan and we will update you in the coming months on this, and work with you in line with the Duty to Co-operate.

We have committed, in the Council's Efficiency & Income Plan Route Map for 2018/19, see here, to publish an Issues and Options consultation in the financial year 2018/19. This Issues and Options paper will tackle the proposed approach in terms of meeting our own objectively assessed need and the appropriate level of contribution by this authority to the shortfall across the HMA. The new Plan will also look at our future employment land

requirements as well as any potential role we have in meeting any wider unmet employment needs through our Duty to Co-Operate responsibilities.

As soon as we are in a position to do so we will continue to engage with colleagues from the Black Country Authorities, as we have done successfully for a number of years with some notable successes such as i54 South Staffordshire.

South Staffordshire Council is clear on its obligations to work constructively and positively with our Black Country neighbours on a range of key issues, not least on meeting housing and employment needs. Likewise the Black Country Authorities will also play an important role in helping to meet some of our needs too and we look forward to continuing our ongoing co- operation and delivery with you.

Yours sincerely

[REDACTED]

Grant Mitchell

Assistant Director Enterprise & Growth

07.12.2018 – ABCA response to SSDC Issues & Options Consultation

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

Your Ref: localplanreview
Our Ref: HP/CW

Date: 7 December 2018

Please ask for: Christine Williams Direct Line: [R E D A C T E D]

Strategic Planning Team
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX
Via email : localplanreview@sstaffs.gov.uk Kelly.harris@sstaffs.gov.uk

Dear Strategic Planning Team

South Staffordshire Local Plan Review:
Issues & Options Consultation October 2018

Thank you for consulting the Black Country authorities on the Local Plan Review.

This letter summarises the response of the Association of Black Country Authorities (ABCA) to the South Staffordshire Local Plan Issues and Options Consultation. Detailed representations are set out in the Appendix to this letter.

ABCA wish to express support for the preferred housing growth option, which will provide enough new homes to meet local housing need and also make a 4,000 home contribution towards meeting the needs of the wider Greater Birmingham and Black Country Housing Market Area (HMA) up to 2036. It is acknowledged that the preferred housing growth option would represent a substantial 30% increase in housing completions compared to recent trends, and that higher growth options may not be sustainable.

Given the close proximity of the Black Country to South Staffordshire, the location of many potential growth sites on the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country, we feel it is reasonable that all of these additional 4,000 homes should be allocated towards meeting Black Country housing needs, rather than housing needs from other parts of the HMA and we request that this allocation is clearly referenced in the Local Plan. We appreciate that this is subject to the findings of the joint Black Country and South Staffordshire Green Belt Review and on-going work on the Black Country Plan.

In terms of the location of new housing, ABCA support a mix of spatial options which would deliver a proportionate amount of housing on the edge of the Black Country in line with the HMA Strategic Growth Study areas of search, subject to the findings of the joint Green Belt Review and other evidence.

ABCA support the employment growth option which will allocate additional employment land to meet unmet cross boundary employment needs for the Black Country. The potential for South Staffordshire to provide additional, high quality employment land to help meet the needs of the Black Country is welcomed. We also request that the Local Plan should acknowledge that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment and logistics provision.

ABCA request that consideration is given through the site selection process to the importance of protecting brick clay resources and active mineral workings in the Cheslyn Hay, Great Wyrley and Essington areas, as these are important brick clay resource areas which are a source of supply to Black Country brickworks.

Finally, ABCA welcome and support the constructive work which is on-going between the Black Country authorities and South Staffordshire Council, on planning issues of mutual interest, and fully expect this partnership approach to continue as the South Staffordshire Local Plan is developed in parallel with work on the Black Country Plan, particularly with respect to development proposals on the edge of the Black Country and the cross-boundary infrastructure and delivery issues which these may raise.

We trust that you will find our comments helpful, and we look forward to further engagement with South Staffordshire Council on these matters before the next stage in the plan process.

28.10.2019 – duty to co-operate meeting notes

Black Country Duty to Co-operate officer meeting notes 28/10/2019

South Staffs

- currently out for consultation on SHSID – running until 12th December; 8 week consultation to ensure docs are on deposit for over 6 weeks
- Sets out preferred Spatial Strategy to help filter sites
- Once consultation has ended further detailed work on sites for Preferred Options likely to commence
- Preferred Options delayed until Autumn 2019 to allow alignment with Black Country Draft Plan, allows time to account for WMI and Black Country employment monitoring but cannot be delayed beyond that – would welcome a prompt indication if there's any slippage on Black Country side
- Clarified that Black Country are no longer likely to be offering contribution to Bham of circa 3,000 dwellings as can't even meet their own needs

Black Country

- WMCA likely to be engaged for funding towards evidence to support timely submission
- Black Country political approval post general election an uncertainty – Dudley is a particular risk as it is completely evenly split between parties
- Black Country site assessments underway; Dudley would welcome technical meeting to discuss cross-boundary sites
- Urban capacity study to be published in November 2019, with subsequent update for Publication Plan in 2020
- Market capacity study brief being prepared by Black Country; important to consider South Staffs areas of search in north of the District when undertaking this; Black Country to send brief to South Staffs for comments
- Employment land; position likely to be unclear until WMI decision reached – Black Country monitoring situation currently being updated, likely minor increases from supply but situation likely to be similar in terms of shortfalls
- Bromsgrove oversupplying employment land (90ha) vs own needs
- Stratford SoCG; concerns over robustness of some of the assumptions they're asking for agreement to up to 2031 regarding housing numbers

Site assessments

- Black Country going through Green Belt Call for Sites currently
- Consistent approach needed across Black Country to assessment
- Black Country cross-boundary sites meeting; suggested South Staffs attend to scope out where cross boundary opportunities might affect
- Officers to consider whether Very High harm Green Belt and Moderate-High/High landscape sensitivity might be a reasonable cut off for sites to be considered; may consider this is in response to consultation

18.12.2019 – ABCA response to SSDC SHSID Consultation

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

Our Ref: HP/CW

Date: 18 December 2019

Please ask for: Christine Williams

Direct Line: [REDACTED]

Strategic Planning Team
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX
By email : localplanreview@sstaffs.gov.uk

South Staffordshire Local Plan Review:
Spatial Housing Strategy and Infrastructure Delivery Consultation 2019

Thank you for consulting the Black Country authorities on the Local Plan Review.

This letter sets out the response of the Association of Black Country Authorities (ABCA) to the South Staffordshire Local Plan Spatial Housing Strategy and Infrastructure Delivery Consultation. Complementary responses to specific consultation questions are set out in the Appendix to this letter. A separate consultation response will also be provided by City of Wolverhampton Council, subject to Cabinet approval on 22 January 2020.

ABCA again wish to express support for the preferred housing growth option, which will provide enough new homes to meet local housing need and also make a 4,000 home contribution towards meeting the needs of the wider Greater Birmingham and Black Country Housing Market Area (HMA).

Given the close proximity of the Black Country to South Staffordshire, the location of a number of potential growth sites forming part of preferred spatial housing option G on or close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country, we feel it is reasonable that all of these additional 4,000 homes should be allocated towards meeting Black Country housing needs, rather than housing needs from other parts of the HMA. We request that this allocation is clearly referenced in the Local Plan.

The Black Country has provided detailed evidence in the form of an Urban Capacity Review Update 2019 to support the case that there is a significant housing shortfall of around 26,900 homes in the Black Country up to 2038 which cannot be met in the urban area. Migration and commuting evidence also supports the strong links between South Staffordshire and the Black Country.

It should also be noted that the HMA Strategic Growth Study confirms that, at a strategic level, the majority of the Black Country Green Belt makes a principal contribution towards green belt purposes, and its capacity to accommodate large scale development is limited.

Market deliverability will also limit the capacity of the Black Country Green Belt up to 2038. In the case of the Birmingham Plan, the Peter Brett Associates (PBA) Delivery Study[1] concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan[2]. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands. As the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for delivery of housing, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham may well reasonably conclude that these two nominal housing market areas could only be expected to deliver up to 5,000 homes each over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities.

ABCA support the preferred spatial housing Option G, and the Infrastructure Delivery Plan, subject to:

- ensuring that sites selected for development are carefully located and planned to avoid areas of environmental sensitivity and green belt harm, and minimise impacts on infrastructure;
- ensuring that any urban extensions provide all necessary local shops, community facilities and primary school places on-site and that the needs of smaller sites on the South Staffordshire boundary can be met without putting additional pressure on infrastructure in neighbouring authorities.

In terms of the site selection process, we support the use of the jointly prepared South Staffordshire and Black Country Green Belt and Landscape Sensitivity Studies to prioritise sites for selection. However, we suggest that the appropriate threshold should be a combination of 'very high' green belt harm and 'moderate to high' or 'high' landscape sensitivity, rather than use of 'very high' green belt harm alone. This would make full use of the findings of the two studies and facilitate a consistent cross-boundary approach.

ABCA request that the impact of new Plan allocations on the wider transport network are assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, and that developments minimise trip generation through all available mechanisms.

ABCA support the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan.

ABCA also request that consideration is given through the site selection process to the importance of protecting brick clay resources and active mineral workings in the Cheslyn Hay, Great Wyrley and Essington areas, as these are important brick clay resource areas which are a source of supply to Black Country brickworks.

Finally, ABCA welcome and support the constructive work which is on-going between the Black Country authorities and South Staffordshire Council, on planning issues of mutual interest, and fully expect this close joint working and partnership approach to continue throughout the Plan preparation process as the South Staffordshire Local Plan is developed in parallel with work on the Black Country Plan, particularly with respect to development proposals on the edge of the Black Country and the cross-boundary infrastructure and delivery issues which these may raise.

We trust that you will find our comments helpful, and we look forward to further engagement with South Staffordshire Council on these matters before the next stage in the plan process.

Yours faithfully

04.08.2020 – ABCA letter regarding duty to co-operate matters

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

Our Ref: HP/CW

Date: 4 August 2020
Please ask for: Christine Williams

Direct Line: [REDACTED]

Dear Colleagues

Black Country Plan Review

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

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

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

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

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

Strategic Housing Issues

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change

following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able to accommodate all of our identified housing needs within the urban area of the Black Country.

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

Strategic Employment Land Issues

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

Potential contributions from Non-Green Belt Areas

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

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

Green Belt Areas

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

Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study[1] concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan[2]. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands.

As the majority of the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for potential delivery of housing in the Green Belt, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham, may reasonably conclude that the housing market areas in Dudley and Walsall could only be expected to deliver up to a maximum of 5,000 homes in each of the two boroughs (providing a maximum total of 10,000 homes) over the 15-year Plan period. We hope to publish further delivery evidence to refine this figure by the end of the year. On the basis of this approach, the Black Country is facing a 'gap' of some 17,000 homes that cannot be accommodated within the Black Country.

Turning to employment, the call for sites stage identified few additional sites for consideration on land within the Black Country Green Belt. We are considering these proposals but it is not anticipated that this will provide significant additional capacity.

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

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

Duty to Cooperate progress

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

Duty to Cooperate to date are summarised in the table below:

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

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

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

Statement of Common Ground

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

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

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

Timetable for Responses

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

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

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

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

Yours sincerely

18.12.2020 – SSDC response to ABCA 04.08.2020 letter

South Staffordshire Council

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

Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

18 December 2020

FAO:

Councillor Patrick Harley, Leader, Dudley Metropolitan Borough Council
Councillor Mike Bird, Leader, Walsall Metropolitan Borough Council
Councillor Maria Crompton, Deputy Leader, Sandwell Metropolitan Borough Council
Councillor Ian Brookfield, Leader, City of Wolverhampton Council

Dear Councillor,

RE: Black Country Plan Review

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

Thank you for your letter dated 04 August 2020 to South Staffordshire Council (SSC), which sets out the Black Country authorities' latest position on cross boundary matters; specifically, unmet housing and employment needs arising from the Black Country.

As the Association of Black Country Authorities (ABCA) will be aware, SSC initially proposed to test an up to 4,000- home contribution towards the housing shortfall in the Great Birmingham Housing Market Area (GBHMA) as part of our Local Plan Review Issues and Options consultation, published in October 2018. Subsequently, the Council published its Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in October 2019. In this, the Council confirmed its preferred infrastructure led strategy for new housing, which involved meeting our own needs, plus an up to 4,000 home contribution to wider unmet needs. This was proposed to be delivered through a combination of growth around our more

sustainable villages and through urban extensions to neighbouring urban areas, principally in locations adjoining the Black Country. Due to a lack of brownfield sites and insufficient sustainable non-Green Belt sites in the District, we believe that the exceptional circumstances for Green Belt release exist, and this would be the case should the Council only be planning for South Staffordshire's own needs.

On the matter of employment land provision, SSC 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 SSC would consider if any oversupply could be attributed to the Black Country, assuming that such an approach offered sufficient flexibility to SSC 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 SSC could make to Black Country unmet employment needs.

The above demonstrates SSC's direction of travel on Duty to Cooperate matters up to this point in our plan preparation and our commitment to engaging with ABCA on Duty to Cooperate matters, and we will continue to engage on strategic planning matters. However, it is acknowledged that the Government's Planning for the Future White Paper will have significant implications for our plan making. SSC have significant concerns on many of the White Paper proposals which we feel introduce considerable uncertainty for our plan preparation, and consequently what role SSC has in meeting cross boundary unmet needs. This is particularly the case given the White Paper's proposal to remove the Duty to Cooperate. It is unclear what the timescales are for introducing the new planning system and whether there will be sufficient justification for additional Green Belt release, beyond meeting our own housing requirement, in the new system. It is similarly not clear what the transitional arrangements for moving to this new system will be, and whether they will be sufficient to enable plans, at our stage of plan preparation, to progress through the current system.

SSC is committed to developing a sustainable, infrastructure-led plan, however it is unclear at this stage what level of development we will need to plan for, and what role the Council will be required to have, if any, in meeting cross boundary needs. Given this uncertainty, unfortunately SSC are not in a position at this time to make specific commitments on cross boundary matters that can be agreed through a Statement of Common Ground. We will keep our position under review and hope to have more certainty when the Government responds to the White Paper consultation. We will seek to continually engage with you as we work through these challenges.

I hope you understand our position on this matter and officers will be happy to discuss further if needed.

Yours sincerely

[REDACTED]

Councillor Roger Lees

Deputy Leader and Cabinet Member for Planning & Regulatory Services

08.01.2021 – SSDC letter regarding review of Green Belt

South Staffordshire Council

Please ask for: Ed Fox
Direct Dial: (01902) 696418 Email: e.fox@sstaffs.gov.uk

8th January 2021 Sent via email

Dear Sir/Madam,

South Staffordshire Council Local Plan Review – Review of Green Belt

As you will be aware South Staffordshire is currently undertaking a review of its Local Plan. One of the key reasons for this is an existing Local Plan Review policy (Policy SAD1) which was adopted by the Council in its Site Allocations Document 2018. This requires the District to review housing supply options to meet both the District's own housing needs and potentially unmet cross-boundary needs from the Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.

As a result of these pressures, the District is currently considering meeting ambitious housing targets through its emerging Local Plan Review, proposing to accommodate approximately 8,845 dwellings in the 2018 to 2037 period as set out in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation. This level of growth includes what the District believes to be a proportionate contribution of 4,000 dwellings to the unmet needs of the GBHMA, based on the current evidence of unmet needs in the GBHMA up to 2038[1] and the GBHMA-wide evidence base provided by the GBHMA Strategic Growth Study 2018. However, even if South Staffordshire delivered all current housing allocations, permissions and safeguarded sites for housing land, the District's most recent consultation suggests that only around 3,800 dwellings would be delivered in the District between 2018 – 2037. This is evidently well short of the level of growth the District is seeking to achieve in the Local Plan Review.

The Council will continue to review its housing land supply to inform its 2020 Preferred Options consultation. However, due to the District's rural nature and the lack of any towns or

cities in South Staffordshire, it is unlikely that achievable density uplifts to existing suitable land supply will significantly alter the capacity on existing sites. Whilst there are some areas of land beyond the Green Belt in the District, the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and the GBHMA Strategic Growth Study both suggest that it is unlikely to be sustainable or deliverable to focus all new housing allocations in the District on the limited area of Open Countryside in South Staffordshire. The District therefore considers that evidence to date suggests it is highly likely that South Staffordshire will need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBHMA's unmet housing needs.

Given the above, and in order to ensure the District meets its duties under paragraph 137 of the NPPF, would welcome your Council's latest position on the following matters, acknowledging that this may be subject to change through emerging national changes to strategic housing matters (the Planning for the Future White Paper);

- Whether or not your authority is able to assist with the unmet housing needs of the GBHMA, in particular those arising from the Black Country
- Whether or not your authority is able to provide sufficient additional housing supply to enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target
- What your authority would be prepared to agree with South Staffordshire District Council in a statement of common ground covering strategic housing needs in the District and GBHMA

To ensure we can progress these discussions in a timely manner, we would welcome a response from yourselves on the above by no later than 26th February 2021. If you would like to meet the Council's officers to discuss this further before this date, then please get in touch.

We look forward to hearing from you on this matter.

Yours faithfully,
[REDACTED]

Kelly Harris

Lead Planning Manager

12.02.2021 – SSDC letter regarding housing and employment land

South Staffordshire Council

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

Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

12 February 2021

FAO:

Councillor Patrick Harley, Leader, Dudley Metropolitan Borough Council
Councillor Mike Bird, Leader, Walsall Metropolitan Borough Council
Councillor Maria Crompton, Deputy Leader, Sandwell Metropolitan Borough Council
Councillor Ian Brookfield, Leader, City of Wolverhampton Council

Dear Councillor,

RE: Black Country Plan Review

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

You will recall that I wrote to you on 18 December 2020 in response to the ABCA letter of 04 August 2020 relating to cross boundary strategic matters, specifically unmet housing and employment needs. The
letter set out that South Staffordshire Council's (SSC) direction of travel on these duty to cooperate matters whilst recognising that the Government's Planning for the Future White Paper proposals, if
introduced, would have significant implications for our plan making. Specifically, it raised uncertainty on whether a contribution towards unmet needs in the Black Country through development (including Green Belt sites) in South Staffordshire would be justified given the White Paper proposal to remove the Duty to Cooperate. It was universally understood from the White Paper that the Government's intention was for new Local Plans coming forward

under the proposed new planning system were expected to be in place by the end of the Parliament. This inevitably created some uncertainty for how we progress our emerging Local Plan, and whether it could be adopted prior to the new planning system (envisaged through the White Paper) being introduced.

However, more recent communication from Government has provided additional clarity on timescales for the new planning system, with a Written Ministerial Statement (dated 19.01.21) suggesting that the White Paper proposals need further development; and reconfirming the Government deadline for new Local Plans being adopted by the end of December 2023 and in doing so the importance of having a plan in place. This additional clarification from Government enables us to proceed with our emerging Local Plan with greater reassurance that we will be able to adopt our Local Plan under the current planning system.
Given the above, SSC would like to reconfirm our commitment to testing a contribution of up to 4000 homes towards the Great Birmingham Housing Market Area (GBHMA) shortfall, having regard to the existing and emerging evidence of unmet needs within the GBHMA, including the Black Country's Urban Capacity evidence. To justify this contribution and demonstrate the exceptional circumstances for Green Belt release in South Staffordshire we will require further robust evidence confirming that urban capacity, and potential Green Belt release, within the Black Country has been utilised to its fullest extent possible. This information will be imperative for my fellow Members to fully understand that the Black Country authorities are doing everything possible to meet as much of their housing needs as possible and for us be in a position to progress the plan in this vein. As set out in our previous consultations, the level of contribution is based on testing the spatial recommendations of the GBHMA Strategic Growth Study (2018). This was done to ensure our Local Plan Review reflects the only consistent evidence base to date prepared by the GBHMA authorities for distributing unmet needs.

SSC is also committed to exploring if any potential oversupply in employment land in South Staffordshire can be attributed to the Black Country, assuming that updates to our respective employment land evidence base justify such an approach. Furthermore, it is recognised that other cross boundary matters, such as gypsy and traveller provision and cross boundary infrastructure considerations will need further engagement as our respective plans progress.

You will, I am sure, have received a letter from the MHCLG in relation to progression to the Black Country Plan. South Staffordshire have also received a copy of the letter and will be engaging positively with the MHCLG as we are keen to progress our plan in line with the requirement to have an adopted plan by the end of 2023.

To this end, we welcome being party to a Statement of Common Ground (SoCG) to support the Black Country Plan and welcome engagement with your officers in drafting this at the appropriate stage.

I hope this letter clarifies SSCs position on these matters and we look forward to our continued cooperation as we move forward with our plans.

Yours sincerely

[REDACTED]

Councillor Roger Lees

Deputy Leader and Cabinet Member for Planning & Regulatory Services

29.03.2021 – response to SSDC 08.01.2021 letter

CITY OF WOLVERHAMPTON COUNCIL

Dear Ms Harris,

South Staffordshire Local Plan Review – Review of Green Belt

Thank you for your letter of 8th January 2021 concerning the above. Apologies for the delay in responding. This letter has been discussed and agreed with officers of Dudley, Sandwell and Walsall Councils and it can be taken as representing the position of the four Black Country authorities.

Representatives of your authority and of the Black Country Councils have been cooperating on housing need and supply issues for some time, both through meetings at the Housing Market Area (HMA) level and through direct discussions between our authorities. These discussions have included that you would be writing to us in the way that you have to help demonstrate that South Staffordshire's emerging plan should be consistent with the National Planning Policy Framework.

As you are aware, the four Black Country Councils are currently preparing the Black Country Plan, which is intended to cover the period to 2039. The latest published information about our housing need and supply is set out in the Urban Capacity Review, which can be found at: https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/. The evidence shows that the Black Country has insufficient land within its urban area to meet our own need, with the latest estimated shortfall amounting to around 26,920 homes. In this situation we have been cooperating with other authorities, including South Staffordshire, to see if they can help to meet the Black Country's projected shortfall.

We are pleased to note that, further to recent discussions, your letter confirms that South Staffordshire intend to accommodate housing targets which will both meet local need and make a proportionate contribution to the Greater Birmingham and Black Country Housing Market Area's unmet housing needs, which include the Black Country's projected shortfall.

You will be aware that the Black Country Councils have undertaken a Green Belt Review: https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4i/. In view of the importance of the Black Country's Green Belt and the constrained nature of land within it, our evidence shows it will be challenging to identify and deliver sufficient sites to meet the Black Country's projected housing shortfall even after appropriate sites in other authority areas are taken into account. In the circumstances, we have to advise that the Black Country Councils are not able to offer any land for housing (within our urban areas or within our Green Belt) that might be attributed to meeting South Staffordshire District's housing need.

Notwithstanding the above, we remain committed to cooperation on issues of mutual / cross-boundary interest. We welcome the opportunity to continue to work with South Staffordshire District Council in a positive and constructive manner through the preparation of the Local Plan Review. This will include involvement in the preparation of Statements of Common Grounds to support both the South Staffordshire Local Plan and the Black Country Plan, at an appropriate stage.

We trust you find these comments helpful and look forward to further discussions with you.

If you would like to discuss our response please get in touch.

Yours sincerely

Michele Ross
Lead Planning Manager (Sub-Regional Strategy)
City Planning
City of Wolverhampton Council
Email: [REDACTED]@wolverhampton.gov.uk
Tel: [REDACTED]

08.10.2021 – SSDC letter regarding duty to co-operate matters

South Staffordshire Council

Our Ref: BCPlan/DtC/Oct21

1st November 2021

Please ask for: Kelly Harris

Telephone: 01902 696000

Email: k.harris@sstaffs.gov.uk

Black Country
Plan Planning &
Regeneration
4 Ednam Road
Dudley
DY1 1HL

Sent by email:

Dear Sir/Madam,

South Staffordshire District Council has sought to work closely alongside the Black Country authorities in addressing its strategic cross boundary issues, primarily its unmet housing needs and emerging potential employment land shortfall. We welcome the progress on the Black Country Plan to date and support the Black Country in its efforts to meet its own development needs as fully as possible whilst progressing Duty to Co-operate discussions with surrounding authorities to address any remaining shortfalls. The comments below outline where the District Council consider clarifications or alterations are required to the evidence which sits behind the proposed Draft Black Country Plan policies, in order to fully address national policy requirements and respond to regional evidence on unmet needs.

Urban Capacity Review Update May 2021

The published Black Country Urban Capacity Review Update May 2021 provides evidence of the extent of the housing shortfall arising from the Black Country's urban area, informing the housing requirement set out in Policy HOU1 of the consultation document. We note and

welcome the attempts to maximise urban supply set out in this document and agree with the conclusion that there will be a substantial shortfall arising from the Black Country urban area up to 2039. This is
consistent with the GBHMA-wide picture given in the GBHMA Strategic Growth Study 2018, which indicated a significant shortfall would remain at a GBHMA-scale up to 2036 even if significant density increases were realised in land supply across the GBHMA.

South Staffordshire therefore considers that the Black Country Urban Capacity Review Update May 2021 offers a reasonable basis on which to progress Duty to Co-operate discussions regarding the Black Country's urban housing shortfall within the GBHMA. However, before the extent of the
Black Country's urban capacity is finalised through the submitted Black Country Plan, there are matters that we believe could be more fully addressed within the document, that may then help to inform ongoing Duty to Co-operate discussions regarding the exact extent of the shortfall and the scale of contributions required to address it.

Firstly, we note that the urban capacity review has sought to identify urban land opportunities from annual updates of individual local authority SHLAAs, informed by regular call for sites exercises. We acknowledge that this approach largely conforms to the historic approach set out in Planning Practice Guidance for establishing housing land availability within an area. However, there is a need for greater consistency on how urban supply is assessed across the conurbation, given the Duty to Co-operate implications of shortfalls arising from this area. Specifically, Birmingham City Council have recently commissioned assistance from the PropTech sector to find innovative ways to survey its urban land supply, allowing it to identify and survey a far larger number of infill site opportunities than would otherwise be possible through a traditional SHLAA exercise. This is despite previous SHLAAs being found to be consistent with guidance at the time through the Birmingham Development Plan examination. This work does not appear to be limited to increasing densities in established urban centres and appears more reflective of the approach advocated by the more recently published National Model Design Code, which encourages "*[c]oding for the intensification of lower density areas that use land inefficiently*"[1] when planning for an efficient use of urban land. For consistency in approach across the housing market area to addressing the 35% urban uplift in housing needs, we consider that the Black Country should work with the West Midlands Combined Authority to explore similar approaches to identify further urban supply to meet its needs.

We would also welcome a re-examination of the approach to windfall allowances within the urban capacity review, which paragraph 2.1.11 confirms have been based upon past land supply trends on small sites (i.e. sites of 9 homes or less). This suggests that future trends will not have an impact upon windfall development realised within the Black Country and that there is no realistic scope for windfall development on sites or 10 or more homes. Whilst we understand the desire to pursue a conservative approach to such matters, we do not consider it fully reflects the opportunities for windfalls identified in paragraph 71 of the NPPF, which also requires expected future trends to be considered in establishing any realistic windfall allowance. We would support a slightly more ambitious windfall allowance that had regard to recent and upcoming permitted development changes (e.g. Class E to residential) that may not be fully reflected in current past trends, or the potential for landowner intentions to change during the plan period on non-residential uses.
Given the significant scale of the Black Country's housing shortfalls, we do not anticipate that exploring the approaches set out above would alter the need for Duty to Co-operate discussions to address housing shortfalls. However, they would offer greater comfort to

surrounding authorities within the GBHMA that the Black Country is truly maximising all available housing land within its urban area and help to reinforce the necessity of housing contributions from other areas of the GBHMA.

Green Belt site selection in Dudley

We welcome the findings of the Site Assessment Report: August 2021 and consider this to be a mostly robust piece of work to identify sites for selection. However, we do have some concerns regarding the lack of weight/regard given to the GBHMA Strategic Growth Study 2018 in the final site selection process, particularly in broad locations identified by the 2018 study in the Dudley area (Appendix A of that document).

It currently appears that only 860 dwellings are proposed on Dudley's Green Belt edge, in two sites forming the Kingswinford Neighbourhood Growth Area. However, previous correspondence received from the Black Country authorities in response to South Staffordshire's 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation indicated that there was potential for up to 5,000 dwellings to be delivered in Green Belt areas surrounding Dudley[2]. Whilst we appreciate this was only a high-level indication of capacity, it also appeared to be broadly consistent with the more detailed findings of the GBHMA Strategic Growth Study 2018. This recommended that the western edge of the Black Country (including Dudley) could accommodate 500-2,500 dwellings through dispersed housing development, whilst the southern edge of Dudley (around Halesowen) had the potential to accommodate a 1,500-7,500 dwelling sustainable urban extension based around garden village principles. Whilst neither option was without its potential constraints, these two areas of search were still considered on balance to be more sustainable, deliverable and less harmful to Green Belt purposes than other strategic development opportunities elsewhere within the GBHMA.

Given the acuteness of the regional housing shortfalls, it is important that the GBHMA Strategic Growth Study's recommendations are fully explored. In light of this, we do not consider that the Site Assessment Report: August 2021 has given sufficient weight to the findings of the GBHMA Strategic Growth Study 2018 and do not consider it currently offers a robust basis for establishing the upper end of Dudley's potentially suitable Green Belt capacity. Specifically, it currently appears that large numbers of site options have been discounted on Dudley's Green Belt edge not because they are truly undeliverable, but because they are not considered to be sufficiently suitable (e.g. sufficiently free from policy constraints) and have not arisen from a wider GBHMA-wide evidence base. This also affects many sites in broad areas recommended for growth by the GBHMA Strategic Growth Study 2018. Common reasons given in the site assessment conclusions for rejected sites in Dudley's Green Belt include:

- Levels of sensitivity/harm identified in the 2019 Green Belt Study and Landscape Sensitivity Assessments
  Additional local designations or officer judgements which duplicate factors already considered through the cross-boundary 2019 Green Belt/landscape sensitivity evidence bases (e.g. Areas of High Historic Landscape Value, judgements regarding settlement patterns, defensible boundaries and settlement gaps etc.)
- Comments regarding proximity to heritage assets which do not indicate whether heritage impacts could be mitigated or are likely to be significant, which do not appear to reflect an accepted Historic England methodology for understanding of the significance of a heritage asset[3]
- Constraints that are likely to be capable of mitigation/compensation through site

layout (e.g. minor areas of Sites of Local Importance for Nature Conservation (SLINC)/Sites of Importance for Nature Conservation (SINC) coverage within a site, slight overlap with Flood Zones on a site's boundary corner)

A list of the sites within Dudley's Green Belt that appear to be capable of delivery but have been discounted largely on the basis of the reasons given above are included in **Appendix 1** of this response.

We also note that many of the sites listed in Appendix 1 fall within areas of Very High harm Green Belt and Moderate-High landscape sensitivity[4], which the Black Country have previously indicated would be considered a significant constraint on site options[5]. We agree with the general principle of considering sites options' relative suitability based upon local Green Belt/landscape evidence and do not have any concerns with the threshold proposed. However, we do not believe it is appropriate to use such a threshold to discount strategic recommendations of the GBHMA Strategic Growth Study 2018, given the scale of the shortfall and knock-on impacts this will have on shortfalls elsewhere in the GBHMA. Green Belt purposes, landscape character impacts, sustainability and deliverability of such locations have already been considered at a GBHMA-wide level through the GBHMA Strategic Growth Study 2018. Therefore, in lieu of better HMA-wide evidence, it is imperative that the recommendations of the 2018 study are fully explored and delivered as far as possible.

If the Black Country are of the view that the GBHMA Strategic Growth Study recommendations cannot be accommodated in the specific areas of search proposed in that study (e.g. South of Halesowen) then it is imperative that other site options around Dudley's edge are explored fully to offset the loss of housing delivery this implies. This is particularly important as Dudley's administrative area holds significantly more areas of potential Green Belt than other Black Country authorities (aside from Walsall). To do otherwise risks shifting these pressures into less sustainable locations within the GBHMA which are more remote from the source of unmet need (the Black Country). We do not believe it would be sustainable or desirable for all Green Belt land in Dudley to be allocated without regard to suitability factors. However, the Site Assessment Report: August 2021 clearly shows there is a wide choice of land (as indicated in **Appendix 1** of this response) capable of accommodating a higher Green Belt housing supply figure in this area, consistent with the figures given in the previous 2019 correspondence from the Association of Black Country Authorities and the scale of locations identified for growth in the GBHMA Strategic Growth Study 2018. We would welcome further discussions with the Black Country authorities to ensure a consistent cross-boundary approach to this issue.

Green Belt site delivery in Walsall

Notwithstanding our concerns regarding Dudley's site selection process, we support the Black Country's efforts to identify housing growth within the Green Belt. Across the Black Country, the Draft Plan appears to release land capable of delivering 7,720 dwellings within the Green Belt up to 2039. The vast majority of this supply arises from Walsall, which is proposing 5,418 dwellings up to 2039 on Neighbourhood Growth Areas identified within the local authority's Green Belt.

South Staffordshire does not object to the sites selected in the Walsall area, subject to cross-boundary working to understand and mitigate any cross-boundary infrastructure impacts. However, we do have concerns that the figures given in the Draft Plan for the selected sites under- represent their true contribution to housing supply within the plan period (i.e. up to

2039). Having reviewed the sites in Tables 30 and 31 of the Draft Plan, we consider that the true capacity of the selected Neighbourhood Growth Areas identified in Walsall is likely to be around 1,715 dwellings higher than the figure given in the consultation document. This is due to what appear to be overly conservative estimates of larger site delivery affecting five housing sites allocated in the Walsall area. The site-specific reasoning behind this is given in **Appendix 2** of this response, but in summary assumptions used to estimate site delivery up to 2039 appear to be contrary to the assumptions given in paragraphs 4.55 – 4.69 of the Black Country Plan Viability and Delivery Study (May 2021).

We would request this matter is revisited to ensure that the true capacity of Green Belt release in Walsall is reflected in the submitted plan**.** Failing to do so will put unnecessary pressure on Green Belt elsewhere in the Black Country and in other neighbouring authorities.

Employment needs and functional geography

The clarity that the Draft Plan provides in relation to Black County's employment land requirement is welcomed, with it noted that that the plan will seek to provide for a minimum of 565ha up to 2039 with this figure based upon the findings of the Black Country EDNA update (August 2021).

The Draft Plan confirms that following site assessment, the plan has been able to provide for 365ha of this within the administrative boundaries of the Black Country. It is understood that this supply is made up of allocations within the urban area, redevelopment of existing employment premises, other site that have planning permission for employment developments and 48ha of employment allocations within Walsall's Green Belt.

It is recognised that this results in a shortfall of employment land, with paragraph 7.12 of the Draft Plan confirming:

"210ha or 37% of employment land need arising in the Black Country cannot be met solely within the Black Country. This unmet need should be exported, as far as possible, to authorities that have a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway. This work is ongoing and will be secured through the Duty to Co-operate and evidenced through Statements of Common Ground."

Whilst we recognise that cooperation on unmet employment needs is ongoing, the above statement is somewhat ambiguous as to what the Black Country authorities consider to be the most appropriate functional geography for addressing unmet employment needs. The PPG confirms that when addressing strategic matters under the Duty to Cooperate and confirming these through Statements of Common Ground, the geographical area for doing this will depend on the strategic matter being planned for and 'the most appropriate functional geographical area to gather evidence and develop policies to address these matters, based on demonstrable cross- boundary relationships'. It is therefore critical that clarity is provided on what you consider the functional geography for addressing your unmet employment needs is, in order to enable swift progress with Statements of Common Ground following our respective Regulation 18 consultations.

We recognise that South Staffordshire has a strong functional economic relationship with part of the Black Country, specifically Dudley, Walsall and Wolverhampton, but it is unclear from the statement above what other authorities the Black Country consider fall within the functional geography. The Black Country EDNA (2017) recognises South Staffordshire and

Birmingham as
areas 'areas of strong economic transactions with the Black Country' and Cannock Chase, Lichfield,
Tamworth, Wyre Forrest, Bromsgrove and Solihull as 'areas of moderate economic transactions with the Black Country' so it seems appropriate given the scale of the shortfall that solutions are
sought across the wider geography. It is also noted that Shropshire are proposing a contribution of 30ha of employment land towards Black Country employment needs and their evidence relating to the M54 growth corridor does appear to imply there are functional links between the Black Country and parts of east Shropshire, so including Shropshire within the functional geography is also considered appropriate.

It is also noted that the Black Country EDNA update (August 2021) concludes that the plan should seek to provide for around 30% B8 activity and 70% E(g)(ii)/(iii)/B2. It is unclear from the Draft Plan if the proposed employment allocations are along these lines and therefore whether the plan is seeking to deliver new employment along this split. Subject to a review of the South Staffordshire EDNA, it is expected that we will have a significant oversupply of B8 land (as a result of the WMI consent) and therefore your policy intentions for this issue may affect the contribution we can make towards your unmet employment needs. Confirmation of this is sought, and if the aim is to achieve this split, then details of the shortfall for B8 and E(g)(ii)/(iii)/B2 should be separately provided to inform Duty to Cooperate discussions, as well as confirmation of whether the most appropriate functional geographies differ between B8 and E(g)(ii)/(iii)/B2 needs.
In summary, we seek confirmation on the following:

1. Which authorities does the Black Country consider fall within the most appropriate functional geography for addressing your unmet employment needs?
2. Is it the Black Country's intention that the plan seeks to provide for 30% logistics (B8) needs and 70% commercial (E(g)(ii)/(iii)/B2)? If yes, then please could you provide a breakdown of what your shortfall is by use class.
3. If the Black Country are looking to provide for a split between B8 and (E(g)(ii)/(iii)/B2) uses, can it confirm what the functional geography is for each use (if different).

<u>Gypsy and Traveller allocations</u>
We welcome the Black Country's efforts to ensure that it fully meets its own Gypsy and Traveller allocation needs as set out in Policy HOU4 of the Draft Plan. South Staffordshire will shortly be publishing updated evidence regarding its own Gypsy and Traveller pitch needs as part of its Local Plan Review. This will comprise an updated Gypsy and Traveller Accommodation Assessment (GTAA), Pitch Deliverability Study and evidence of the likely capacity on potential public sites within the District. It currently appears that this will show a significant shortfall against the
District's plan period and 5 year pitch needs, which cannot be accommodated even when all existing Green Belt site release is maximised and all potential public traveller sites are explored. Given the Black Country's proximity to South Staffordshire and the extensive Green Belt supply South Staffordshire will have to explore we would welcome engagement on the following matters prior to the Black Country Plan later in 2021 to establish:

1. If the Black Country can remove/reduce the need for South Staffordshire to accommodate additional pitch needs within its Green Belt;
   and

2. Whether the Black Country can assist in accommodating South Staffordshire's remaining pitch needs once all deliverable Green Belt site options in South Staffordshire are accounted for.

Duty to Co-operate Statement July 2021

We note the findings of the Black Country Plan Duty to Co-operate Statement July 2021. However, we are not entirely clear from the published statement what the intended next steps are to

distribute the Black Country's housing and employment shortfalls. Specifically, there is no clear reference to the evidential basis that will be used to determine surrounding authorities' contributions to the GBHMA/Black County unmet housing needs or employment needs (if arising). Given the Black Country's role in currently generating the majority of unmet housing needs within the GBHMA, it is important that the Black Country clarifies where additional contributions to its unmet needs are required based on the existing GHBMA evidence base. It is equally important that the Black Country does not solely accept existing housing contribution offers proposed by other local authorities before deferring any remaining shortfalls to subsequent early reviews of Local Plans to address any remaining shortfalls. Such an approach would fail to engage with the existing HMA evidence base (i.e. the 2018 GBHMA Strategic Growth Study) and could risk undermining the progress of plans in the surrounding area.

Given the number of years the HMA has had to respond to its findings, it is important the Black Country ensures the findings of the 2018 GBHMA Strategic Growth Study are reflected in Duty to Co-operate discussions on unmet housing needs with surrounding authorities. In the first instance, we consider that the existing strategic growth locations recommended in each local authority area around the GBHMA should be fully explored and delivered as far as possible, given the cross- authority evidence base that sits behind them. We would only consider it appropriate to not bring forward these recommendations if a local authority could show these are truly not deliverable or that there are more sustainable options within its area that could accommodate a similar level of growth. We would welcome clarity on whether the Black Country intends to pursue such an approach to provide a framework for further Duty to Co-operate discussions prior to submission of the Black Country Plan.

Notwithstanding the comments made above, it is acknowledged that there is a significant possibility that the locations identified in the GBHMA Strategic Growth Study 2018 may not be capable of fully addressing regional housing shortfalls, particularly in light of the emerging review of the Birmingham Development Plan. To address this issue, we would support the Black Country and Birmingham Authorities in seeking to review and update the 2018 Strategic Growth Study and would welcome involvement in such a study. Any such review should:

- Build upon, rather than replace, the existing growth locations proposed in the 2018 Strategic Growth Study
- Offer an independent audit of urban capacity across the GBHMA, identifying areas where further work could identify further non-Green Belt housing supply
- Be based upon close engagement with the West Midlands Combined Authority and any other relevant Integrated Transport Authorities to ensure future growth locations are truly aligned to existing or proposed sustainable transport improvements

To deliver the findings of any reviewed HMA-wide evidence base we would also support any efforts to establish governance arrangements for the co-operation process on unmet housing needs. The lack of such a formal structure has created significant uncertainty in

current local plan reviews and could be crucial to the effective delivery of any future updated growth study recommendations.

Throughout the consultation period on the South Staffordshire Local Plan which is due to commence on the 1st November, we will continually assess any housing shortfalls within the context of duty to cooperate and our proposed approach to date. Further conversations regarding our proposed contribution may be required depending on the outcome of ongoing duty to cooperate conversations and the ongoing progression of Local Plans in our and neighbouring HMA areas.

We trust that the above comments assist the Black Country in finalising its approach prior to the submission of the Black Country Plan. Overall, the District Council is supportive of the efforts to date made by the Black Country Plan to address its development needs and intends to continue co- operating with the Black Country to address these issues, subject to further discussions on the matters set out above. We would welcome further discussions with officers to agree ways forward on these points.

Yours sincerely

[REDACTED]

Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise

21.10.2021 – duty to co-operate meeting minutes

Minutes of Black Country, South Staffordshire and Staffordshire Duty to Cooperate Meeting

Date – 21st October 2021
Venue – Teams

Attendees:
Ian Culley (Chair, Black Country Planning Leads)
Carl Mellor (Planning Manager, Dudley MBC & BCPlan Site Assessment lead)
Vicki Popplewell (Principal Planning Officer, Dudley MBC & BCPlan consultation lead)
Neville Ball (Principal Planning Policy Officer, Walsall MBC)
John Raine (Principal Planning Policy Officer, Walsall MBC & BCPlan Infrastructure Lead)
Andy Miller (Strategic Planning & Transportation Manager, Sandwell MBC & BCPlan Transportation lead)
Marianne Page (Service Manager – Transport Strategy, City of Wolverhampton)
Michele Ross (Lead Planning Manager, City of Wolverhampton & BCPlan Housing lead)
Kelly Harris (Lead Planning Manager, South Staffordshire Council)
Ed Fox (Strategic Planning Team Manager, South Staffordshire Council)
Patrick Walker (Senior Planner, South Staffordshire Council)
Mark Parkinson (Head of Planning Policy and Enabling, Staffordshire County Council)
James Chadwick (Principal Planning Policy Officer, Staffordshire County Council)

Issue	Key issues and actions
Levels of Growth and Spatial Strategies – Black Country Plan	
Plan status	Reg 18 Plan published for consultation September 2021.
Levels of Growth	Target of over 76,000 homes and 565ha of employment land.
Strategy	Strategy is an iteration of existing Core Strategy with the majority of development within the BC on brownfield land within the urban area. BC urban capacity of 41,000 homes and 306ha of employment land. This shortfall means the BCPlan has had to test capacity in the green belt. It allocates green belt sites which can provide 7,700 homes within the Plan period and further capacity beyond the Plan period for those sites which will be built out beyond 2029. The Plan also identifies 48ha of employment land on sites within the green belt. Strategy focusses urban development on the four strategic centres and the corridors which link them. A number of the green belt sites are close to the South Staffordshire boundary. This means there is a gap of around 28,0000 homes and 210ha of employment land which cannot be met within the BC. This has informed DtC with neighbouring local authorities.
DtC	DtC contributions currently 'on the table' provide around 8,000 homes and 102-126ha of employment land. These contributions are at different stages and expressed in different ways – some to the HMA as a whole and some specifically to the BC. But a shortfall of around 20,000 homes after taking into account the current DtC 'offers' remains.

Issue	Key issues and actions
	Across the HMA the current shortfall is calculated to 2031 and is around 3,000 homes. This may increase in the light of evidence informing the preparation of the Birmingham Development Plan when this is published later this year.
Levels of Growth and Spatial Strategies – South Staffordshire Local Plan	
Plan status	Consultation to run to 13th December 2021. Plan covers the period to 2038.
Levels of growth	Housing requirement of just under 9,000 homes made up of local need and 4,000 contribution to the wider HMA.
Strategy	Vast majority of growth directed to larger Tier 1 villages in the most sustainable locations close to transport infrastructure, plus locations on the urban edge of the BC. Four strategic housing allocations adjoining the BC – Cross Green (RoF site)(1,200 homes), Linthouse Lane (1,200 homes within Plan period), Bilbrook (848 homes) and Langley Rd (390 homes). Employment land supply is made up of the four existing strategic sites and the more recently consented WMI. The employment land evidence is being reviewed and due to be published in February. This will inform whether SStaffs can make a contribution to meeting unmet employment needs arising in the BC.
Infrastructure evidence – Black Country	
Transportation	The two key pieces of work are the Transport Modelling work and Accessibility Work. Accessibility work completed to inform the draft plan and mainly focussed on local accessibility. Transport modelling work has just been commissioned jointly between the BCAs and TfWM. Starting point is the existing LTP and will be based on three scenarios – 2039, 2032 (LTP refresh) and baseline (2024). National Highways will be involved in this work going forward. Key current issue for the work is to confirm which infrastructure projects should be assumed to be delivered for each of the three scenarios. Current assumptions are: • By 2024 key projects delivered are M6 J10 and M54/M6 link. • By 2032 key projects delivered are Walsall to Aldridge Railway extension and associated new stations, Brinsford Parkway, Wolverhampton to New Cross Rapid Transit and A449 Corridor. • By 2039 anticipate extension of BC rapid transit, electrification of Wolverhampton to Shrewsbury. TfWM are currently considering changes to the frequency of services on this line and whether this will happen prior to electrification. The modelling work should be completed in February to inform the Publication version of the Plan – identifying any constraints associated with the development proposals and required mitigation.

Issue	Key issues and actions
	Staffs Highways team are involved in the transport modelling work as there are a number of sensitive locations in southern Staffordshire which may be affected by development. JD requested further liaison with Nick Dawson and John Jarvis to understand these wider impacts on other southern Staffordshire districts. This to ensure consistency between the BC Transport model and the Staffs Transport model. MP advises that Brinsford Parkway should be delivered by 2028 and therefore in line with the 2032 date for the purposes of the modelling. Tettenhall Station is also being promoted by TfWM and will need to be considered in the model. Third piece of transport work is the Car Park Study. First stage complete and next stage to inform the Publication Plan. **Action – AM to share schedule of infrastructure Projects with SStaffs and Staffs to confirm that the assumptions on project delivery are accurate.** **Action – Staffs County Highways team to be invited to next Transport modelling meeting.**
Education	Draft BCPlan includes a new policy to secure funding from residential development for new education infrastructure given the scale and location of new housing proposed in the Plan. For the sites allocated in the Plan we have tested whether any should provide new schools within the site given their scale and capacity of existing provision. The Wolverhampton LEA team have advised the need for one new Primary School in the NE of the City. In Walsall there are a number of sites where new primary schools may be required and this is being confirmed with LEA colleagues to inform the Publication Plan. There is unlikely to be a need for new secondary school in Walsall but this to be confirmed at Publication stage. There have been ongoing discussions with Staffs and SStaffs over cross-boundary education provision over the last two years given anticipated scale and location of growth. At this stage it is understood that each LEA can provide for school place needs within their local authority area. IDP is in preparation and will be completed for the Publication Plan. This will confirm education and school infrastructure needs and how they will be met. In summary, it is understood that both Local Plans are likely to be able to accommodate their own demand for education infrastructure without the need for cross-boundary funding mechanisms to deliver infrastructure in another local authority area. The Linthouse Lane site will provide a new primary school which will accommodate demand from Staffordshire. Moving forward, it is critical that the timing of the delivery of new schools is coordinated on a cross-boundary basis to ensure that there is no excess capacity in new schools which may affect attendance at existing schools as best we can.

Issue	Key issues and actions
	This commitment to ongoing dialogue and joint-working to confirm the trajectory for new school opening should be the key element of the SoCG. **Action – JR to share IDP with Staffs and South Staffs colleagues.**
IDP	Utilities Infrastructure Study prepared by Stantec and considered gas, electricity, sewerage, communications and the findings of the Water Cycle Study. It identified some issues in relation to electricity and gas supply. The subsequent Infrastructure paper also produced by Stantec was tasked with understanding whether there were any critical infrastructure constraints associated with the scale and location of growth proposed in the Reg 18 Plan. It advised that there are no significant infrastructure strategic constraints subject to the findings of the Transport Modelling work. The IDP is well-progressed but needs to be updated in the light of the findings of the Transport Modelling work and ongoing dialogue with the LEAs particularly in Walsall. CCGs and NHS bodies have been engaged as part of the preparation of the draft Plan and they have not identified any specific infrastructure that will be required to support the delivery of the Plan. The plan does include a Policy that can secure funding for health infrastructure associated with specific development proposals where a need can be evidenced.
Infrastructure evidence – South Staffordshire	
IDP	Draft IDP will be published as part of the Preferred Options consultation. This to be updated for Publication Stage in the light of responses to the PO consultation and ongoing evidence.
Highways	Staffs CC are undertaking highway modelling work using the SATURN model as the starting point to test the impact of development proposed in the Local Plan. This work will inform identification of a package of mitigation to address impacts and high-level indicative costs. This package of projects is being informed by discussions with BC Transport colleagues. For Wolverhampton, the main outstanding issue for this modelling is around the Linthouse Lane development proposal and the access arrangements.
Education	Strategic sites are anticipated to require new primary school provision. No anticipated need for new secondary schools.
Health	Discussions with CCGs and NHS Trusts. SStaffs also considering a Policy mechanism to secure funding for new health infrastructure and this will be reflected in the viability study. MR suggested the Linthouse lane site could accommodate a new heathcare facility but the evidence for this from the CCGs is unclear at this stage.
SFRA and Water Cycle Study	SFRA completed. Scope of detailed Level 2 SFRAs will be confirmed in the light of responses to the PO consultation. Water Cycle Study completed and ongoing discussions with Severn Trent but no showstoppers identified. May be some local site-specific mitigation. Lead local flood authority have been engaged in site selection in relation to surface water flooding.

Issue	Key issues and actions
	Action – SStaffs to convene joint meeting with Black Country and Severn Trent to discuss any cross-boundary constraints in relation to sewerage capacity. MR to email SStaffs to set out potential cumulative impacts.
Summary	
Summary	There is a strong level of joint working and cooperation on cross-boundary infrastructure issues. There are no major areas of concern between the three parties in terms of any gaps in the existing evidence or the scope of emerging evidence. There are no proposals at this stage which raise significant cross-boundary concerns not being addressed by this evidence.

01.11.2021 – SSDC confirmation of 08.10.2021 response

From: Edward Fox
To: BlackCountryPlan
Cc: Kelly Harris; Ian Culley
Subject: RE: South Staffordshire Council response to Black Country Draft Plan.
Date: 01 November 2021 15:06:00
Attachments: ~WRD1255.jpg
SSDC Letter BC Draft Plan Response 011121 FINAL response.pdf
Appendix 1 - SSDC comments on Dudley site options.pdf
Appendix 2 - SSDC comments on Walsall site delivery.pdf

Dear Sir/Madam,

Further to our holding response to your draft plan (sent 8 October 2021), I can now confirm that the response has been considered by Members through our formal constitutional processes and remains unchanged.

Please therefore accept the attached as the Council's final response.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902696418
www.sstaffs.gov.uk

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18.11.2021 – SSDC letter regarding employment land

South Staffordshire Council

Sent via email to: blackcountryplan@dudley.gov.uk

18 November 2021

Please ask for: Kelly Harris
Direct Dial: (01902) 696418
Email: k.harris@sstaffs.gov.uk

FAO: Cabinet Members for Planning

Dear Councillor,

I'm writing to your authorities regarding the Black Country's emerging unmet employment needs and the work that is required under the Duty to Co-operate to address this strategic issue. The approach set out below follows independent support we have recently received from the Planning Advisory Service on this matter.

Policy EMP1 of the Black Country Draft Plan consultation suggests that around 210ha of the Black Country's needs cannot be accommodated within the Black Country and that work to redistribute this shortfall will be progressed through the Duty to Co-operate and evidenced through Statements of Common Ground. The Black Country's 2017 Economic Development
Needs Assessment indicates there are 8 local authorities outside the Black Country FEMA which nonetheless have a functional relationship to it[1]. We also understand that the August 2021 EDNA update reaffirms these relationships and suggests that other additional local authorities, including Stafford, Shropshire and Telford, could contribute towards meeting these unmet needs[2].

This all suggests there is a significant unmet employment need arising from the Black Country, a wide functional geography over which to distribute it and limited time left to address this matter before the Black Country and South Staffordshire publish their respective Regulation 19 local plan consultations. **Under the Duty to Co-operate it is therefore imperative that the Black Country makes urgent progress to distribute this shortfall via a Statement of Common Ground (SoCG).**

To achieve this, South Staffordshire would welcome a draft SoCG being prepared by the Black Country authorities at the earliest practicable opportunity, setting out:

- The extent and nature of the Black Country's unmet employment needs, as set out in the most recent evidence base documents on this matter
- What the Black Country considers to be the appropriate functional geographical area over which to distribute its unmet employment needs
- Work undertaken to date to establish contributions to unmet employment needs contributions to the Black Country, areas of agreement and disagreement regarding each local authority's potential contribution (or lack thereof) and the implications of any unresolved matters
- Governance arrangements for agreeing and updating SoCG and timetable for review and ongoing cooperation on this strategic issue

We would be happy to participate in any such statement as and when required. As previously discussed through Duty to Co-operate meetings and correspondence, South Staffordshire would encourage the Black Country to use the likely surplus supply emerging from South Staffordshire's employment supply (including the West Midlands Interchange site) to assist in meeting these shortfalls. We are currently updating our Economic Development Needs Assessment (EDNA) to quantify how much surplus land may be available in the District to assist with the Black Country's needs and will share the draft findings of this at the earliest opportunity to inform Duty to Co-operate discussions going forward. This work will have regard to the evidence produced to date through the iterations of the Black Country EDNA and the more recent work to establish the potential contribution to Black Country unmet needs from the West Midlands Interchange site.

We anticipate that the first draft of the updated South Staffordshire EDNA work should be completed by **the end of February 2022**. This should allow sufficient time for it to inform any draft Statement of Common Ground prepared by the Black Country and for areas of disagreement and agreement with the work to be flagged and addressed before our authority's respective Regulation 19 consultations in Summer 2022.

We would welcome confirmation that this is consistent with the programme of work the Black Country intends to undertake on the SoCG. If we are incorrect in our understanding regarding any of the above points we would also welcome confirmation at your earliest convenience of what steps the Black Country intends to undertake and when to address this strategic issue.

Yours faithfully,

[REDACTED]

Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise

13.12.2021 – ABCA response to SSDC Preferred Options Consultation

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

Our Ref: HP/CW

Date: 13 December 2021
Please ask for: Christine Williams

Direct Line: [REDACTED]

Strategic Planning Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

By email: localplanreview@sstaffs.gov.uk

Dear Strategic Planning Team

South Staffordshire Local Plan Review – Preferred Options Consultation 2021

Thank you for consulting the Black Country authorities on the South Staffordshire Local Plan (SSLP) Review Preferred Options. This letter sets out the response of the Association of Black Country Authorities (ABCA) to this consultation.
Complementary responses to specific consultation questions are set out in the Appendix to this letter. A separate consultation response will also be provided by City of Wolverhampton Council, following Cabinet approval on 8 December 2021.

The following principles underpin our response, with more detailed comments provided in italics:

Duty to Cooperate and Statements of Common Ground

- Acknowledgment that the BCA and SSDC have been working together constructively on planning issues of mutual interest and that this is expected to continue, not only in respect of development proposals, but also on infrastructure and delivery;

- Expectation that, as the BCP and SSLP both move towards Publication Plan (Regulation) 19 consultation in summer 2022, the BCA and SSDC will aim to reach agreement on all relevant cross-boundary issues and reflect this agreement in draft Statements of Common Ground to support each Regulation 19 Plan;
- Support for the preferred housing growth option of local housing need plus 4,000 homes to meet HMA need up to 2038;

- Given detailed evidence provided by the Draft BCP that the Black Country has a very significant housing shortfall up to 2039, and the close geographical, migration and commuting links between the Black Country and South Staffordshire, request that the full 4,000 homes should be specifically allocated to meet Black Country housing needs;

It is welcome that SSDC continue to be committed to offering 4,000 homes to meet the shortfall in the wider HMA. Given the proximity of the Black Country to South Staffordshire, strong migration and commuting links, the location of a number of proposed

growth sites close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country it is reasonable to claim all of the 4,000 homes being offered by SSDC towards meeting Black Country housing needs. The Preferred Options proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. This would represent a crucial contribution towards the estimated Black Country shortfall of 28,239 homes up to 2039, which is now clearly demonstrated through the Draft BCP and supporting evidence. We request that this allocation is clearly referenced in the Publication Plan.

- Support the longer-term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

- Request that the South Staffordshire HEDNA is completed, with due regard to the Black Country EDNA (2021), the West Midlands Interchange Apportionment Study (2021) and West Midlands Strategic Employment Sites Study (2021), and shared with the BCA as soon as possible to determine how far the SSLP will be able to contribute towards significant unmet employment land needs in the Black Country.

The SSLP has the potential to make a significant contribution towards addressing the large shortfall of 210 ha employment land evidenced by the Draft BCP and supporting 2021 EDNA. Therefore, it is of concern that no specific contribution can be offered because the employment land needs of South Staffordshire have not yet been established through the updated EDNA. This crucial piece of evidence must be completed as soon as possible, so that the figures generated can be used to inform the Publication BCP, SSLP and supporting Statements of Common Ground between the Black Country Authorities and SSDC.

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs including the Black Country. We request that this work is progressed as quickly as possible and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below.

Site allocations and cross-boundary infrastructure

- Noting the scale and location of the proposed extensions to the Wolverhampton urban area and to commit to require further work on infrastructure requirements and assurances that close joint working on all relevant planning issues will continue throughout the Plan preparation process, SPD preparation, pre- application and planning application processes;

- Request that a Supplementary Planning Document (SPD) and Infrastructure Delivery Strategy is also prepared for the Langley Road site;

- Request that the affordable housing secured on the Linthouse Lane, Cross Green and Langley Road sites is allocated through nomination rights for Wolverhampton residents, and that this requirement is set out in the Publication Plan;

- Request that the combined impact of SSLP and BCP developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, that effective sustainable transport solutions are provided to connect essential trips to the local network, and that developments seek to minimise trip generation through all available mechanisms;

- Support for the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP.

The Preferred Options set out in the SSLP proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. There is also a strong case for Wolverhampton residents to secure nomination rights for the 30% affordable housing proposed on these sites.

The Cross Green mixed use development will help meet the employment land needs of the Black Country in a location close to significant employment opportunities at the i54 and ROF Featherstone strategic employment sites. The development will help deliver Brinsford Strategic Park and Ride site which will increase access to the rail network and also addresses the HMA Strategic Growth Study recommendation for a strategic housing site in this locality.

However, the proposed allocations adjoining Wolverhampton raise cross-boundary infrastructure issues, particularly given the location of Draft BCP housing allocation in the north east of the City which will also impact on local infrastructure. If infrastructure impacts are not fully assessed and mitigated through the contributions of developers and infrastructure providers these developments could have negative impacts on

Wolverhampton infrastructure, including transport, public open space, education and health services. The developments could also have negative impacts on the environmental quality and amenity of immediately adjoining residential areas if not properly planned. Therefore, each development, including Langley Road, needs to be carefully masterplanned, based on sufficient detailed evidence, and it is vital that close joint working between SSDC and CWC continues on all relevant issues throughout the Plan preparation, SPD preparation and planning application processes.

In terms of transport infrastructure implications, close engagement will be required with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

Finally, ABCA welcome and support the constructive work which is on-going between the Black Country authorities and South Staffordshire Council, on planning issues of mutual interest. We fully expect this close joint working and partnership approach to continue throughout the Plan preparation process as the South Staffordshire Local Plan is developed in parallel with work on the Black Country Plan, particularly with respect to development proposals on the edge of the Black Country and the cross-boundary infrastructure and delivery issues which these may raise.

We trust that you will find our comments helpful, and we look forward to further engagement with South Staffordshire Council on these matters before the next stage in the plan process.

Yours faithfully

Appendix

Association of Black Country Authorities (ABCA) Response to South Staffordshire Local Plan Review Preferred Options Consultation Questions

Chapter 3

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

No

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs, including those arising in the Black Country. **We request that this work is progressed as quickly as possible** and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below (under Question 3).

Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

No

See answer provided to (b) below.

However, we support the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

Yes

Transport Infrastructure

In terms of transport infrastructure implications, close engagement will need to continue with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co- ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

Dudley Council will be keen to understand the highway impact of additional trips associated with the residential development sites, particularly on the A449 and A491 corridors around Wall Heath and Kingswinford.

Question 3: a) Have the correct vision and strategic objectives been identified?

No

We welcome the references in table 4 of the document to the need for the Plan to 'support the economies of adjoining areas and pressure to release land to meet a proportion of their unmet needs'. We also note the acknowledgement that the Black Country in particular has a significant unmet need for employment in the Local Plan period, and the need for the Plan to consider South Staffordshire's role in meeting any cross-boundary needs. This thinking is based on evidence in the form of the 2018 South Staffordshire EDNA and the 2017 Black Country EDNA, the latter subject to an update in 2021.

For consistency, **we request that the opportunity for the Plan to make a contribution towards wider unmet employment land needs is reflected in the Economic Vibrancy section of the Strategic Objectives of the Plan**. This would ensure consistency with the approach taken in Strategic Objective 2 which is related specifically to meeting unmet housing needs from the Greater Birmingham Housing Market Area.

Addressing the Black Country Employment Land Shortfall

Para 4.55 of the document confirms the Black Country Plan employment land shortfall of 210ha – the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the Plan should seek to provide for around 30% of B8 activity and 70% E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. Applying this apportionment to the delivery of the employment land supply identified in the draft Black Country Plan would suggest B8 supply of some 106ha and E(g)(ii)(iii)/B2 supply of 247ha.

Using this approach, and before taking into account any potential contributions through the Duty to Cooperate the shortfall by use class is therefore some 64-70ha B8 and 149-163ha E(g)(ii)(iii)/B2.

In accommodating this shortfall, in the first instance we will look to those authorities within

the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/) .
This suggests that a minimum of some 72ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be satisfied by this site should the South Staffordshire EDNA update confirm a surplus of employment land against local needs. We therefore request that this work is fully considered as part of the EDNA Update referred to above.

In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, and we are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford.

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

The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.

The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan

process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.

There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. We therefore **request that the Council engage with the Black Country and other relevant West Midlands local authorities in the follow-up work recommended in the WMSESS** and that this is reflected in the EDNA update.

In summary, we welcome the commitment in principle for the Local Plan to assist with meeting unmet employment land needs arising in the Black Country. The EDNA update will provide critical and timely evidence on the extent of any surplus from the existing supply, and whether additional opportunities would need to be considered both within the District and / or in adjacent areas having regard to the recommendations of the WMSESS.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

Yes

We support the longer term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

Chapter 5

Question 7:

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

Yes

However, the Langley Road site should also be subject to this approach, given the significant cross-boundary infrastructure and design implications of this development.

12.01.2022 – duty to co-operate meeting minutes

MEETING MINUTES

South Staffordshire Council (SSC) and Black Country (BC) Authorities Duty to Cooperate meeting – Employment Land

12th January – 1pm (via MS Teams)

Attendees

Ed Fox (EF) – South Staffordshire District Council

Kelly Harris (KH) – South Staffordshire District Council

Patrick Walker (PW) – South Staffordshire District Council

Ross Parker (RP) – South Staffordshire District Council

Ian Culley (IC) – City of Wolverhampton Council

Neville Ball (NB) – Walsall Metropolitan Borough Council

1) Introduction

2) Emerging SSC and BC Local Plans – employment position to date

EF – Employment land position set out in South Staffordshire District Council (SSDC) Preferred Options (PO) Local Plan (LP) is the current position. SSDC awaiting Economic Development Needs Assessment (EDNA) publication to update employment land evidence base as part of ongoing LP progress.

IC – The employment land shortfall of the Black Country (BC) is confirmed through the existing EDNA. The overall shortfall of employment land in the BC is currently only being in-part met by a firm, legally secured 30ha contribution from Shropshire. However, discussions are ongoing with SSDC, Solihull Metropolitan Borough Council (SMBC), Stafford Borough Council (SBC), Lichfield District Council (LDC), and Cannock Chase District Council (CCDC) to identify what further contribution can be made to the shortfall, but no firm offers in SoCG at present. In terms of SSDC, as per the Stantec Report, West Midlands Interchange (WMI) is anticipated to provide 70ha towards BC under-supply – this is set out in more detailed split of need/demand in the BC representation to SSDC PO consultation. Although for reference, the BC EDNA suggests the need is for a 70:30(%) split between B2:B8 with the B8 shortfall being met entirely by WMI and Shropshire contributions combined (subject to be formalised through a SoCG)

EF – Would BC accept a higher contribution of B8 if SSDC offered in excess of 70ha of WMI?

IC – Not currently, but representations made to the Regulation 18 BC Plan by development industry suggest employment land requirement of BC is higher than set out in the plan, including for B8, and further sites are required to meet need. BC will update evidence base pertaining the employment land requirement in light of representations received and include up-to-date assumptions from EDNA consultant. At the moment, BC under-supply is approx.

100ha post supply offers. Currently, any additional need would likely be for B2 not B8 although all employment sectors would be (re)assessed with the update not limited to B2.

3) Latest SSC and BC employment evidence
   - Need vs Supply
   - Undersupply/Oversupply (inc. by use class)
   - FEMA/Appropriate functional geography for meeting unmet needs

IC – BC will continue to request and push for employment contributions from other authorities including SMBC. LDC have undertaken a call for sites which has not identified any further opportunities for employment site allocations, however BC does not agree that this sole approach is robust.

NB – BC have pushed CCDC for further employment land offer, but it is recognised that CCDC have more constraints to delivery.

EF – It is SSDCs opinion that there are site options within CCDC around Kingswood Lakeside. SSDC are advocating the approach that as CCDC and SSDC are in the same FEMA, CCDC could claim some of WMI to meet their own need if there is availability after BC claim, so to facilitate BC claiming some of CCDC provision.

IC – BC agree with this approach and have made the same comment to the CCDC DtC consultation. If CCDC took approx. 15/20ha of WMI then it would free up opportunity for BC to use CCDC supply.

EF – What is the BC base date for employment policies and evidence base?

IC – April 2020.

PW – Which Local Planning Authorities (LPA) are currently being engaged on matters concerning BC employment land shortfall?

IC – All neighbouring LPAs regarding employment land and residential land shortfall. Acknowledge that EDNA says LPAs with strongest economic links as per the evidence base are; SSDC, Birmingham City Council (BCC), CCDC, LDC, Bromsgrove District Council.

EF – Agree with this approach being taken, but there is a case for Shropshire and perhaps SBC to also be included given functional links. SSDC to include SBC into emerging FEMA as per ongoing EDNA advice, but Sandwell to be explicitly excluded.

IC – Suggested that Solihull MBC could accommodate approx. 15ha of BC employment land need as they are exceeding their own need entirely.

EF – Requested confirmation that BC could draft a Duty to Cooperate (DtC) employment land letter the wider authorities and lead on necessary Statement of Common Ground (SoCG) on these matters.

KH – SoCG is an essential part of LP Examination in Public (EiP) process, so strongly recommends one for audit trail purposes that shows BC doing everything in their power to meet their employment land requirement.

PW – Recommend that the most appropriate geography to use for the DtC letter would be FEMA geography of areas of strong and moderate economic transactions set out in EDNA (alongside Shropshire and Stafford BC) and that these areas should also be included in drafting SoCG. It is

also important that authorities not contributing to BC employment shortfall have an agreed SoCG to evidence an agreement not to contribute. Additional DtC agreement may be appropriate with wider West Midlands authorities to confirm buy-in to the wider Strategic Employment Sites study, which may feed into meeting Black Country needs but is also a separate wider issue over a different geography.

NB/EF/IC – agree.

4) Strategic Employment Study implications for current plans

EF – Raised concerns that the West Midlands Strategic Employment Sites (WMSES) Study would have significant repercussions upon the SSDC and BC EiP process and subsequent progress and asked for clarity upon the SES Study publication date.

IC – Due to the study being strategic in nature, it is not expected to affect current round of LP reviews.

EF – WMSES Study needs to be strategic in nature and not broken down into too specific geographical sub-areas or employment uses which is already getting picked up via existing EDNAs. See the WMSES Study as sitting alongside a potential follow up Strategic Growth Study so that strategic cross boundary employment and housing can be considered in holistically.

KH – Asked if BC had received any comments regarding SES Study from any other LPAs other than SSDC.

IC – Confirmed only SSDC had provided a response and no other LPA had responded. Highlighted that only North Warwickshire Borough Council hold a strong interest in the study. **BC will look to secure agreement to WMSES Study from Housing Market Area (HMA) authorities at the HMA meeting of next week.**

5) Next steps for addressing /meeting unmet needs

PW – Asked if BC are able to start engaging LPAs through formal written letter on cross-boundary employment needs, leading into a SoCG later in 2022.

IC – **Confirmed that the BC would be able to start drafting the letter and subsequent SoCG**, in a similar approach to that taken concerning housing shortfall. Will start to send out such correspondence around the same time that representations to the BC plan are published which will be approximately February 2022. BC will reach out again through DtC letter at this time to remind neighbouring LPAs to continue to do as much as possible to meet unmet need and establish a commitment to this through BC led SoCG which explicitly reference SES Study to act as an audit trail.

KH – SoCG should include who is and who is not in the FEMA alongside under-supply of specific use classes.

PW – Suggested that within the DtC letter, BC explicitly name the LPAs which they have the closest economic ties with (e.g. authorities identified in the BC EDNA) and would therefore benefit from providing a response.

EF – BC leading on the SoCG and DtC letter makes sense due to the fact that it is their shortfall generating the need. Suggested the biggest challenge posed was defining the most appropraite geographies for each task.

IC – Agreed with recommend approach above and will use the LPAs listed in the BC EDNA.

EF – Provided overview of SSDC EDNA progress to date. This included a summary of the SSDC FEMA being proposed through this update. Indicated that SSDC had a need for approx 30ha employment land and were seeking recommendations from the EDNA consultant to ensure plan flexibility on this matter. SSDC will be looking to ensure recommendations are encouraged and defined through use classes (i.e. B2/B8).

IC – Sought to confirm what SSDC employment land supply was with WMI removed.

EF – Employment land supply is largely limited to i54 Western Extension and ROF Featherstone. Existing sites are largely built out bar some smaller plots within established sites. In total there is probably approximately 70-80ha available/deliverable with highest demand scenario in emerging EDNA being approximately 35/40ha.

IC – Confirmed that therefore, potentially around 40ha of SSDC employment land is available for neighbouring LPA under-supply (subject to confirmation in upcoming EDNA).

EF – Wished to confirm that invite had been received by IC for SSDC FEMA stakeholder session as part of ongoing EDNA work.

IC – Confirmed that invite had been received, and asked when the next FEMA will be published.

EF – FEMA will be published to stakeholders as soon as it is finalised – currently programmed for late February 2022.

6) Any other business

None

26.04.2022 – ABCA letter regarding duty to co-operate matters

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

Our Ref: HP/CW
Date: 26 April 2022

Dear Colleagues,

Black Country Plan Review

Duty to Cooperate: Strategic Housing and Employment land issues

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

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

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

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

Recent progress

1. The Regulation 18 BCP consultation took place between August and October 2021. We received around 20,800 responses and all of the representations can be viewed online via the link - https://blackcountryplan.dudley.gov.uk/bcp/ . The bulk of feedback centred around the potential use of green belt land for development and

we are currently reviewing all of the responses to inform the preparation of the Regulation 19 BCP programmed for consultation in the Autumn of this year.

2. We received responses from a number of neighbouring authorities – Bromsgrove, Cannock Chase, Lichfield, Redditch, Solihull, South Staffordshire, Stafford, Staffordshire and Worcestershire. These representations raised a variety of issues at a strategic level, recognising the broad scale of the shortfall and the need for ongoing and better aligned engagement going forward, in order to ensure a consistent and fair approach be taken to address longer term needs once the final shortfalls are confirmed.

3. The next sections of this letter summarise the current scale of the housing and employment land shortfalls and how we intend to address them.

Strategic Housing Issues

4. The Regulation 18 BCP identifies a housing shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 2031-39). This shortfall is based on the most up to date local housing need (including the 35% uplift for Wolverhampton), the most recent housing monitoring information and land supply on sites allocated in the draft BCP including land currently designated as green belt. The Regulation 18 BCP proposes that this shortfall is addressed via the Duty to Cooperate through 'exporting' to sustainable locations in neighbouring areas.

5. As part of the preparation of the Regulation 19 BCP, we are undertaking further evidence gathering in relation to urban land supply. This will involve an update of the existing Urban Capacity Study including a detailed assessment of the implications of the ongoing restructuring of some retail and commercial sectors which may 'free up' space in town and city centres. However, the scale of any additional capacity is likely to be limited and is not anticipated to make significant headway into the shortfall outlined above.

6. As set out above, through the Duty to Cooperate, we are pleased that some Local Plans have responded positively to our request initially raised in 2018 for assistance in addressing our future growth needs. Potential contributions through our Duty to Cooperate engagement to date are outlined in the table below.

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

Local Plan	Status	Potential contribution to meeting Black Country housing needs	Comments

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

1. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.

2. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the

Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.

3. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.

4. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.

5. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

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

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

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

Strategic Employment Land Issues

8. As is the case with housing needs, the Black Country is unable to meet its identified employment land requirements in full. The Black Country Plan employment land shortfall to 2039 is 210ha as set out in the Regulation 18 Black Country Plan – this figure the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the split of employment land provided for by the Plan comprise around 30% of B8 activity and 70% for E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. We are reviewing these requirements in the light of updated economic projections which include a more up to date understanding of the CV-19 recession recovery trajectory. This work may result in a refinement of the requirements but it is highly likely that our shortfall will remain.

9. In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

10. At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/). This suggests that a minimum of some 67ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be largely satisfied by this site should the programmed South Staffordshire EDNA update confirm a surplus of employment land against local needs. **This could reduce the Black Country employment land shortfall to 138ha. Any additional surplus of employment land arising from the South Staffordshire EDNA update would reduce the shortfall further.**

11. In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, **reducing the shortfall to some 108ha**. We are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford, but no contributions

have been put forward by those authorities and the BCAs will continue to press this matter through Local Plan examinations, particularly those authorities within the areas of strong economic transactions with the Black Country as listed above. We will also be seeking the participation of authorities listed in paragraph 14, and any others able to contribute to BCA employment shortfalls, in a Statement of Common Ground (SoCG) addressing this issue to inform the Black Country's Regulation 19 plan and will use the responses to this letter to inform the draft SoCG. **As is the case with housing, additional sources of land supply must be identified if the Black Country is able to meet its growth needs in full.**

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

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

13. The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.

14. The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.

15. There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. Through the HMA Group and liaison with those bodies who were party to the 2021 Study, a draft brief has been prepared to address the recommendations for the 2021 Study and strongly recommend that this work is progressed in partnership with the local planning authorities across the 2021 Study geography, and other areas which share a functional relationship with the Black Country, for example Shropshire.

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

Next steps

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

17. In the short term we will be continuing to engage with individual Local Plans to ensure 2018 Growth Study recommendations are maximised and to confirm current contributions to help address the Black Country shortfall, particularly in relation to those housing contributions which have been expressed at HMA level and not yet distinguishing a specific Black Country apportionment. For those Local Plans which are less progressed, we will engage in a positive and robust manner to ensure that the unmet needs of the Black Country are fully recognised and all opportunities to assist in meeting our needs are comprehensively explored. This will include opportunities identified in the 2018 Growth Study.

18. **But these current workstreams may not address our needs in full, and we strongly recommend to you that there is a compelling need to address this matter in a comprehensive and inclusive manner across a wide but functional geography.** We are also mindful of the forthcoming Birmingham Local Plan review and the potential for this to further increase the shortfall arising from the West Midlands conurbation. We outlined our suggestions on a potential programme of work as part of the 15th December South Staffordshire Duty to Cooperate meeting. This was shared with you in advance and we attach it to this letter. The key elements of this work programme are:

- To review the extent of the HMA in order to understand if this is the most appropriate geography by which housing needs and mechanisms to accommodate any shortfalls can be considered;
- To confirm the scale of the housing shortfall across the whole of the HMA over a

period of at least 15 years to inform the approach taken by current and emerging Local Plan reviews.

- A review of whether the growth locations identified in the 2018 Growth Study work remain appropriate and whether new growth areas should be identified for testing through Local Plan preparation. This work may well result in the need for a new Growth Study but we would not want to pre-judge the work before confirming that is the case.

19. This work programme is currently subject to ongoing discussions largely through the HMA officer group, and we recognise that the existing governance arrangements are in need of review to ensure that we have in place mechanisms to manage and oversee the implementation of this work. The nature of these governance arrangements and the parties involved should be informed by the evidence but at this stage, a Statement of Common Ground across the HMA geography and including other authorities which have a functional relationship with it which sets out the nature of how we work together going forward is essential. We strongly encourage your authority to fully engage in this work.

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

20. Turning to employment land, as with housing we will pursue a Statement of Common Ground with functionally related authorities to both secure current contributions and engage with less progressed Local Plans through the Duty to Cooperate to establish potential for further contributions. We have set out the compelling need for a follow-up study to address the recommendations of the 2021 West Midlands Strategic Employment Sites Study and have asked if your authority would be willing to participate in this work and assist with its resourcing.

21. Common to both the housing and employment land shortfalls is the final element of our strategy – for Local Plans to include an early review mechanism. This is important given the potential for there could continue to be a shortfall following the current round of Local Plan preparation. This shortfall should trigger the detailed evaluation of opportunities identified from the recommendations of the proposed work outlined above in relation to both housing and employment land through updated Local Plans. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. We consider that a failure to include an early review mechanism is a serious omission and must be addressed in order for the Plan to be sound.

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

Timetable for responses

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

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

Yours sincerely

06.06.2022 – SSDC response to ABCA 26.04.2022 letter

South Staffordshire Council

Association of Black Country Authorities
Walsall MBC
The Civic
Centre
Darwall Street
Walsall
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6 June 2022

FAO:

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

Dear Councillor,

RE: Black Country Plan Review

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

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

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

South Staffordshire District Council's (SSDC) proposed 4,000 contribution to unmet needs was based on findings of the GBHMA Strategic Growth Study 2018. This concluded there was a 60,000 dwelling shortfall up to 2036 across
the GBHMA, generated primarily by both Black Country and Birmingham. South

Staffordshire's contribution is directed at this cumulative shortfall and we have not sought to divide it between the Black Country and Birmingham to date as that original study did not divide either the shortfall across HMA or the recommended strategic growth locations between either shortfall.

If it is necessary to separate out HMA housing contributions in this manner then we are concerned that requests for HMA authorities to individually determine how to separate their contributions between Birmingham and the Black Country in this manner without any consistent evidence base is fundamentally unrobust and risks inconsistent approaches to this key issue across the HMA. Furthermore we are firmly of the view that this issue should be addressed through Duty to Co-operate discussions with the wider HMA group, rather than through individual letters from the Black Country to individual local planning authorities. Any proposals to split
contributions would affect Birmingham City Council's position so it is vital that, as a minimum, any agreed approach to splitting contributions is agreed in collaboration with Birmingham City Council as well as the Black Country.
Given the above, we do not consider that this letter is an appropriate forum for local authorities to propose the splitting of their HMA housing contributions. We consider that the opportunity to undertake this exercise, if it is necessary, is through the further work to review the 2018 Strategic Growth Study referred to in Request 5 of your letter. This would offer a chance for a consistent methodology to be agreed across all HMA authorities in a consistent and transparent way.

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

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

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

The Council then proceeded to test seven different spatial strategies for delivering the preferred level of housing growth (i.e. the District's needs plus 4,000 dwellings to HMA unmet needs) in the 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation. These included testing of a scenario (Spatial Option D) which sought to solely maximise new

allocations in the locations recommended for growth in the GBHMA Strategic Growth Study. The SHSID consultation ultimately chose an infrastructure-led strategy (Spatial Option G) which sought to deliver significant levels of growth in three of the four areas recommended for growth in the Strategic Growth Study, but a lesser level of growth on the western edge of the Black Country. Instead Option G sought to deliver an additional strategic site on the northern edge of the Black Country in addition to the locations recommended by the Strategic Growth Study, recognising this broad location's proximity to local authorities with unmet needs (Wolverhampton/Walsall) and better access to employment via sustainable transport than the western edge of the conurbation.

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

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

GBHMA Strategic Growth Study recommendation	Dwelling capacity indicated in GBHMA study	Capacity in Preferred Options 2021 and rationale for level of growth
Urban extension: North of Penkridge	1,500 – 7,500	1,721 dwellings across Penkridge, primarily in the north of the village. This aligns to the maximum amount of available land delivery north of the village (alongside additional existing commitments and safeguarded land) and the maximum amount of growth likely to be delivered on a urban extension during the plan period (1,200 dwellings).
Urban extension (employment-led): North of Wolverhampton in the vicinity of i54	1,500 – 7,500	1,200 dwellings in a single urban extension at Cross Green (Site 646). There are no other allocations in this area and the indicated capacity solely aligns to the maximum amount of growth likely to be delivered on a urban extension during the plan period (1,200 dwellings) and the available land in this broad location.
Proportionate dispersal: North of Codsall/Bilbrook	500 – 2,500	1,673 dwellings in Codsall/Bilbrook. This requires significant Green Belt release and aligns growth to levels discussed with the Education Authority to ensure delivery of a First School needed in the area.

Western edge of the conurbation between Stourbridge and Wolverhampton	500 – 2,500	390 dwellings on a site in South Staffordshire. This level of growth recognises that much of this broad location is adjacent to a local authority not generating unmet needs once its Green Belt has been explored (Dudley MBC) and the relatively lesser sustainability of this location compared to the Black Country's northern edge. The Council are mindful that this broad location also includes land within the Black Country and that the Black Country Draft Plan 863 dwellings on two strategic sites along the western edge of the conurbation (DUH208 and DUH211) and that cumulatively this would mean that 1,253 dwellings would be delivered in this broad location across both areas.

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

Consultation responses to the Preferred Options consultation from other HMA authorities were generally supportive of the 4,000 dwelling contribution. The Association of Black Country authorities were also supportive and re-stated their request for all of the 4,000 dwelling contribution to be attributed to the Black Country referencing commuting and migration links and the proximity of some allocations to the Black Country, but again no HMA-wide evidence was submitted to support this stance and no consistent methodology or agreement to roll such an approach out across the GBHMA was provided.

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

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

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

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

The 2021 Stantec Report apportions a total of 5ha of the 193ha total to South Staffordshire, leaving residual of 188ha for other authorities. The findings from South Staffordshire's EDNA based on a total share of 18.8ha would continue to leave an alternative total of 174.2ha for other authorities. For the avoidance of doubt assuming an unchanged Black Country claim of 67ha based on the 2021 Stantec Report this would comprise around 35% of the remaining 188ha total (excluding South Staffordshire) identified from that evidence. The equivalent percentage would comprise around 38% of the remaining 174.2ha based on the findings of our EDNA. We do not consider that this materially impacts the Black County Authorities continuing to base their request under the Duty to Cooperate on the basis of the 2021 Stantec Report.
Whilst we have taken a more in depth approach to calculating our share of WMI through our local evidence, we still consider that the Stantec Study is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec work whilst identifying a **67ha** share towards the Black Country, also identifies that this should be viewed as a minimum. Given this, together with the strong functional links between South Staffordshire and the Black Country and noting that no other authority has indicated to us that they require a share of WMI to meet their local needs, relevant evidence continues to indicate that a higher proportion of the site towards Black Country needs may be justified should it be required.

Our EDNA also considered our employment requirements exclusive of WMI, and isolated strategic supply/demand from local supply/demand. This identified the proportion of our pipeline of strategic sites that could potentially meet cross boundary needs and following the

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

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

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

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

SSDC can confirm we are willing to participate in an updated West Midlands Strategic Employment Sites Study (WMSESS). However, this is subject to the study recognising (and addressing) that the need for employment land has already been factored into assessments of employment need through local EDNAs. This issue will need to be carefully considered through this work to ensure that a forecast based ('labour demand') approach to identifying need does not double count need already identified through local EDNAs, and recognise that it may be that strategic employment sites meet both a local and regionally derived need simultaneously. This is very relevant to South Staffordshire where our latest 2022 EDNA confirms that the need for strategic employment sites is already 'baked into' our local labour demand forecasts as a result of large-scale strategic sites being delivered in recent years. This raises a critical point, noting the Council's response to your 'Request 3' and findings of the 2022 EDNA, the remaining pipeline of strategic sites in South Staffordshire remains critical to meeting the Council's identified need for land and floorspace and forms part of the basis upon which a contribution towards the Black Country's identified shortfall (in addition to WMI) has been identified.

Given the scale of these large employment sites and the markets they serve, we consider it

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

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

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

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

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

South Staffordshire's current Local Plan Review is already making a significant housing contribution towards the GBHMA's unmet needs, delivering growth within all of the strategic areas recommended in the current regional evidence base. It has also played a significant role in contributing to the Black Country's unmet employment needs and has already delivered substantial amounts of regionally and nationally important employment sites. All of this growth has required substantial existing or proposed Green Belt release within the District, a trend which is highly likely to continue in

future if further reviews are necessary given the District's rural nature and significant Green Belt coverage.

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

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

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

Yours sincerely

[REDACTED]

Councillor Terry Mason
Cabinet Member for Planning & Business Enterprise

06.10.2022 – Dudley MBC press release

Dudley will "go it alone" on housing and employment plan | Dudley Council News

Dudley will "go it alone" on housing and employment plan

Council bosses in Dudley have pulled out of a regional plan to identify housing and employment land in a bid to "listen to local people" on the use of green belt.

Dudley Council leader, Councillor Patrick Harley, says the council will draw up its own plan after cutting ties with the Black Country Plan.

Earlier this year, almost 20,800 people across the Black Country responded to consultation on the plan in the form of individuals, organisations and group responses and a further 18,000 people signed petitions. The vast majority were from Dudley.

Following the enormous feedback Dudley leaders have since said they would pull two sites from the plan – land south of Holbeach Lane, Kingswinford, and land in Swindon Road, Wall Heath.

But after the Black Country authorities failed to come to agreement on how the plan would progress, Councillor Patrick Harley said he could not allow the "overwhelming" feedback from the public to be ignored and therefore would be recommending to Dudley Council's cabinet that the authority should withdraw and draw up its own plan.

Councillor Patrick Harley, leader of Dudley Council, said:

At every stage of this plan we have made it clear that it must be led by the people who live here. I simply cannot stand by and allow decisions to be made which are contrary to the overwhelming feedback we have already received. This is clearly a very emotive subject and people feel very strongly about it. I must reflect that in the decisions I make for the people of this borough. We will therefore look to go it alone and look at what is needed to support a Dudley specific plan and setting out the timescales for that. A lot of the work we have carried out to date is still very relevant so it is not a matter of starting from scratch. There's a huge amount of feedback already from residents in Dudley borough and it is important we use that moving forward. But rest assured we will listen to local people and put them first at every stage of this plan.

19.10.2022 – Black Country Plan joint statement

Black Country Plan | Black Country Plan

The Black Country Plan 2039

Published Wednesday, 19th October 2022

A joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton.

“The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan.

“Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans."

If you require any further information regarding the local plans for each of the individual local authorities, please email them directly using the contact details below.

Appendix 2 – Birmingham City Council Documents

19.11.2018 – BCC response to SSDC Issues & Options Consultation

Planning and Regeneration

PO Box 28, Birmingham B1 1TU

19 November 2018

Dear Kelly,

South Staffordshire Council Local Plan Issues and Options (October 2018)

Thank you for consulting Birmingham City Council on South Staffordshire's Local Plan Issues and Options 2018.

Birmingham City Council welcomes the contents of the Plan (Issues and Options) and the opportunity for continued collaborative working with South Staffordshire through the Duty to Co- operate.

The document recognises the relevant strategic matters to be addressed between our authorities, particularly the need to meet unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area.

We agree with the issues that have been identified and support the options being explored. A detailed response to the consultation questions, as relevant to Birmingham City Council, is provided in the attached Appendix to this letter.

I trust that these comments are useful and

constructive.

Yours faithfully
Waheed Nazir
Corporate Director, Economy

Appendix – Birmingham City Council response to South Staffordshire Council Local Plan Issues and Options (October 2018)

Chapter 3: What does the Local Plan need to consider

Table 2: Strengths, Weaknesses, opportunities, threats

Question 1:

Are there any other strengths, weaknesses, opportunities and threats to South Staffordshire that you feel should be identified in the Local Plan? If yes, then please provide details.

Should anything be deleted?

Working collaboratively with neighbouring authorities to maximise development opportunities to serve the wider area and help to meet unmet housing and employment needs across the Greater Birmingham Housing Market Area could be identified as a further 'opportunity'.

Local Plan issues and challenges

Question 2:

Are there any other issues that the Local Plan can address in South Staffordshire?

No other issues to suggest.

Are the issues and challenges appropriate and sufficient to inform the Local Plan? If not, what should be added or deleted?

The Standard methodology for assessing housing need may require revisiting and subsequent adjustment following the most recent consultation by the Government on their approach.

Birmingham City Council welcomes and supports the recognition of the need to test for levels in the provision of homes to meet unmet needs from neighbouring authorities within the Greater Birmingham HMA as well as the need for the requisite Statement of Common Ground.

The stated intention to continue to support existing strategic employment sites at I54, ROF, Hilton Cross and Four Ashes is also supported given their importance as regional and national employment sites providing jobs to people across the West Midlands.

Vision and objectives

Question 3:

Do you have any comments on the vison, and objectives to deliver the vision set out above? If yes, then please provide details.

We would suggest that the Strategic Objectives section needs to acknowledge the need for co- operation between neighbouring Authorities in order to meet the overall housing

and employment needs for the wider sub-region. Given the shortfalls in housing provision within the conurbation in particular and the need to meet the wider strategic requirements set out in the Greater Birmingham and Black Country SGS, co-operation with neighbouring authorities to meet wider development needs across the Housing Market Area should be acknowledged as a Strategic Objective.

Table 3: Evidence base

Question 4:

Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not, what additional evidence is required?

The GB HMA Strategic Growth Study (SGS) has not been listed as part of the current evidence base on Pages 20 and 21 of the Issues and Options document. The South Staffs Local Plan Review will need to have regard to the SGS by testing its conclusions to determine whether any elements can be incorporated into the final adopted Plan and, if not, provide the evidence to justify if or when any other approach is to be taken.

Infrastructure Delivery Plan

Question 5:

Is the information contained in the Infrastructure Delivery Plan October 2018 the most up to date? If not please provide details. Are there any other specific infrastructure issues that the Local Plan should look to address? If no, then what further evidence is required?

The Council has no comments to add on this matter.

Chapter 4. Level of Growth

Table 4: Housing level of growth policy options

Question 6:

Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council's own needs and the needs of the wider Greater Birmingham Housing Market Area?

Until further more detailed work has been carried out on the feasibility and viability of specific development options, it is difficult for Birmingham City Council to comment on the merits of any specific option and whether it is appropriate and proportionate. However, the City Council will support the consideration of options which seek to maximise the delivery of housing in South Staffs to meet not just its own needs but help to meet a proportion of any unmet need identified within the GBHMA Growth Study or subsequent local plans in other authorities within the HMA. The testing of Option C as the level of potential capacity

identified for South Staffs in the GBHMA Strategic Growth Study is therefore welcomed by Birmingham City Council.

Question 7:

Are there any other options to consider, including a different housing requirement not included in the range of options above?

The options put forward already provide a wide range of household numbers and considerations which need to be tested – there are therefore no other suggested options for the City Council to suggest.

Question 8:

Is the plan period of 2018 – 2037 an appropriate response to the Government's guidance on meeting housing needs? Should we consider an alternative plan period?

The time period suggested will enable the Plan to have a 15 year horizon from the proposed adoption date in 2022 which is stipulated as a minimum in the latest NPPF. Although there may be benefits in having a longer plan period, this also means that the Local Plan review would need to plan for higher numbers of housing and increased employment provision over the longer time period. Given that the Government is stipulating that Plans will need to be regularly reviewed, new evidence may necessitate changes to housing and employment requirements in the short to medium term which means that the plan period suggested is preferable.

Question 9:

The NPPF requires us to approach all neighbouring authorities before releasing Green Belt for unmet housing needs and to plan for cross-boundary needs over the most appropriate functional geography. In light of this, is the Greater Birmingham Housing Market Area the most appropriate geography over which to address unmet housing needs?

We consider this to be the most appropriate geography given the ties through the Housing Market Area and the need to agree the distribution of housing need across the area in line with Duty to Cooperate requirements and the need to draw up Statements of Common Ground between the constituent local planning authorities.

Safeguarded land/reserve housing sites

Question 10:

Should the Council identify additional safeguarded land through the new Local Plan? If so, how much should be identified? Is there an alternative approach that the Council could take? The City Council agrees with the suggestion in the Issues and Options

document that the identification of additional safeguarded land may not be an appropriate response to the region's housing needs. Recent changes to the NPPF have placed an emphasis on ensuring that Local Plans are reviewed and updated every five years which would reduce the need for local planning authorities to identify additional safeguarded sites.

Table 5: Gypsy, Traveller & Travelling Showpeople policy options

Question 11:

Which of the option(s) (on Gypsy, Traveller and Travelling Show people) do you think should be pursued? Are there any other options to consider?

Local planning Authorities should seek to meet their own requirements set out in Gypsy and Traveller Accommodation Assessments (GTAAs) first before looking to other local authorities to meet any unmet need and possible export.

Table 6: Employment level of growth policy options

Question 13:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

As stated, significant sized employment sites such as Hilton Cross, Four Ashes and I54 have provided and will continue to provide investment opportunities of regional and national importance from companies such as JLR, MOOG and Eurofins. Option C would enable the Council to meet local employment needs as well as ensuring that those significant sites and investment opportunities remain as part of the portfolio of employment land to help serve the needs of the wider Functional Economic Market Area (FEMA) and the wider economy.

Chapter 5. Locations for Growth

Housing density

Question 17:

Should the Council introduce a minimum density standard of 35 dwellings per hectare on all housing sites? If not, what factors should the Council consider when considering setting minimum density standards?

NPPF encourages local planning authorities to set minimum density standards within their local plans (or a range that reflects accessibility and potential of different areas) and seeks to ensure that plans contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. A minimum density standard needs to be set at a level which can be evidenced and satisfactorily defended at examination.

Spatial distribution policy options

Question 19:

Which of the Spatial Distribution Policy Options (for housing growth) do you think should be pursued? Are there any other options to consider, including any strategy which aims to provide a mixture of the policy options set out above?

Birmingham City Council has no specific comments regarding which Option is to be pursued. However, at this stage, all options should be investigated to enable the amount of development land identified within the Plan Review to be maximised to meet the needs of South Staffs but also to pursue the potential meeting any unmet housing need within the wider GBHMA.

Table 8: Employment locations for growth

Question 20:

Which of the above option(s) do you think should be pursued? Are there any other options to consider, including a strategy which aims to provide a mixture of the spatial options set out above?

In line with the answer to Question 19, Birmingham City Council has no specific comments regarding which Option is to be pursued. Again, any options which seek to maintain a range of employment opportunities whilst maximising the potential to meet wider needs across the FEMA, including the protection of significant employment sites of strategic importance, would be welcomed and supported.

Question 21:

If it is appropriate for the Council to consider the delivery of new freestanding strategic employment sites, what criteria should be used in identifying new strategic sites for employment growth?

Freestanding strategic employment sites have the potential to draw their employment base from a wide geographic area. As such, their location does not need to be served by district centres but more strategically located for wider regional and national access near to motorway junctions and the rail freight network.

27.09.2019 – BCC request for monitoring and review of progress

Birmingham Development Plan (BDP) – Monitoring and Review of Progress

Progress of Neighbouring Authorities

Name of Local Authority: South Staffordshire District Council

Name of Officer: Kelly Harris

Position: Strategic Planning Team Manager

Email address: k.harris@sstaffs.gov.uk

Telephone Number: 01902 696317

Local Plan Review

1/ At what stage is your local authority with regard to reviewing its Local Plan. (Please include an indicative timetable)

South Staffordshire is currently preparing a Local Plan Review to address its local housing need (LHN), whilst also considering the potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA), including the Black Country. This is in accordance with Policy SAD1 of our Local Plan Review, which proposes that an early review of the Local Plan will be submitted to the Secretary of State for Examination by the end of 2021.

The more detailed Local Development Scheme which sits behind the Local Plan Review is available here;
https://www.sstaffs.gov.uk/doc/180479/name/Final%20LDS%20April%202019.pdf/

In summary, the key steps of the Local Plan Review are;

- Issues and Options Consultation (October-November 2018)
- Spatial Housing Strategy & Infrastructure Delivery Consultation (October-November 2019)
- Preferred Options Consultation (Summer 2020)
- Publication Consultation (Spring 2021)
- Submission to the Secretary of State (September 2021)

2/ In reviewing your Plan, is your local authority looking to make provision for housing over and above the local housing needs methodology projections (LHN).

If so, by how many? (This can be expressed as a range if not finalised)

To date, the Council has undertaken a 2018 Issues and Options consultation, which set out a range of potential levels of housing growth for the Local Plan Review over a plan period of 2018-2037. The Council's preferred housing target at this stage was to plan for the District's own LHN + up to 4,000 dwellings towards the unmet needs of the GBHMA, with a caveat that this would be revised down proportionately should the unmet needs of the GBHMA be significantly reduced. The Council's position at that point in time was based upon the most up-to-date information regarding the GBHMA's housing shortfalls that was available at that point in time, namely the GBHMA Strategic Growth Study 2018[1]. It also had regard to the adopted unmet housing need of 37,900 arising from the Birmingham Development Plan (2011-2031) and the emerging housing shortfalls arising from the Black Country Plan (2014-2036). The Council is about to undertake a consultation on potential spatial distribution options to meet this housing target, which reflects a strategy of testing housing growth options to meet the unmet needs of the GHBMA.

South Staffordshire District Council have sought to take a proactive stance in volunteering a contribution towards the unmet needs of the GBHMA, recognising the apparent scale and immediacy of the housing shortfall as evidence in the GBHMA Strategic Growth Study. However, since the preparation of this cross-authority evidence, the extent of the GBHMA's housing shortfall has become significantly less clear. The Black Country has published a recent Black Country Urban Capacity Review 2018, which comprehensively reviews potential supply within the Black Country and concludes that there is a shortfall of approximately 17,200 dwellings between 2017-2036. Equally, the Birmingham Strategic Housing Land Availability Assessment 2018 identifies a total supply of 61,403 dwellings in the city between 2011-2031, logically leaving a remaining shortfall of 27,600 against the Birmingham Development Plan targets up to 2031. However, no account is given of Birmingham's needs or supply up to 2036 or beyond, despite the 2019 NPPF's requirement that cross-boundary strategic matters should be dealt with rather than deferred as a test of soundness.

There is a lack of a clear audit trail across the GBHMA that sets out the extent to which these large housing shortfalls are or aren't being met up to both 2031 and 2036 (or beyond). This creates a confusing and uncertain position from which other authorities must plan, which is an unhelpful backwards step from the clearer positions set out up to 2031 and 2036 offered in the GBHMA Strategic Growth Study.

South Staffordshire has sought to work in a proactive manner to address the unmet needs being identified within the GBHMA, but clarity over the exact extent of unmet needs is needed to avoid delays in the District's plan preparation and to provide

[1] https://www.sstaffs.gov.uk/doc/178250/name/Greater%20Birmingham%20HMA_Strategic%20Growth%20Study_lowres%20FINAL%20version.pdf/

robust evidence to support any additional Green Belt release that may be required to meet the District's proposed housing targets.

To address this concern, the Council would urgently request a meeting with Birmingham City Council officers to clarify the extent of housing shortfalls within the GBHMA and the review of the Birmingham Development Plan.

3/ Are there any other issues in terms of progress on your Local Plan review that Birmingham City Council needs to be aware of?

Where relevant these are raised above.

Current delivery

4/ Does your local authority currently have a 5 year housing supply?

As confirmed in our Housing Monitoring and Five Year Housing Land Supply 2018-19, South Staffordshire can demonstrate a 5.75 year housing land supply as of 1st April 2019.

The assessment is available here:

https://www.sstaffs.gov.uk/doc/180616/name/Housing%20Monitoring%20and%205YHLS%202018-19.pdf/

5/ Is your local authority meeting the housing delivery targets set out in your current local plan?

If not, please give details as to what extent delivery targets are not being met.

The Council's current housing requirement, as set out in the 2012 Core Strategy, is based upon West Midlands Regional Spatial Strategy housing targets. As such does not reflect an up-to-date housing target. Notwithstanding this, the Council has met its housing target of 3,850 dwellings for the plan period following the adoption of its recent Site Allocations Document 2018, which allocated the remainder of housing land required to meet this target.

6/ Are there any other issues in terms of the supply and delivery of housing in your local authority area that Birmingham City Council needs to be aware of?

Where relevant these are raised above.

7/ Do you think it is necessary to meet with Officers from Birmingham City Council to discuss these matters in more detail?

YES / ~~NO~~

Thank you for filling out this questionnaire. Please return to:

25.10.2019 – SSDC letter regarding housing deal monitoring

South Staffordshire Council

Our Ref: HMA/WMCA Housing Monitoring

25 October 2019

Please ask for: Grant Mitchell
Direct Dial: (01902) 696438
Email:g.mitchell@sstaffs.gov.uk

Dear Ian

HMA/WMCA Housing Deal Monitoring

Many thanks for your letter dated 17th October 2019. We note the findings of the table produced at the last Greater Birmingham and Black Country HMA/WMCA housing meeting and the emerging findings with regards to the housing shortfalls up to 2031. We are however concerned at the lack of transparency in these figures and the inconsistency with what we had understood to have been agreed at the most recent meeting.

The statement that the shortfall has been addressed up to 2031 must be robustly evidenced, as (if accurate) it will inevitably cause a number of authorities from the wider housing market area to revisit their potential to contribute to unmet housing needs. If political support for contributing to unmet housing needs has been lost it is very unlikely it will be won back, undoing the work of many authorities in the wider housing market area to date. Therefore, any statement that the shortfall up to 2031 no longer exists must be capable of being robustly defended at examination, or risk causing delay and extra costs to numerous local authorities preparing plans in the housing market area and beyond. Certainty is needed on this point and the accuracy, transparency and robustness of the monitoring data is key to providing this.

In terms of the accuracy of the data, we can confirm that the data cited in the table which relates to South Staffordshire is consistent with our previous 2018 Five Year Housing Land Supply statement, which provided a clear audit trail of deliverable and developable housing site supply in the District as of 1st April 2018.

We are not, however, able to confirm that we are comfortable with the figures cited for other local planning authorities in the housing market area. In order for local authorities to robustly plan for the shortfalls of the housing market area in a timely manner, confidence is needed in the housing monitoring produced at a housing market area level, so that this can be relied upon as being robust at subsequent local plan examinations. It is therefore unhelpful that no clear audit trail or justification has been provided for each local authority to explain how a windfall of nearly 29,000 dwellings has arisen in the space of less than two

years since GL Hearn provided a robust independent audit of housing supply across the housing market area. Over this time no new plans and/or additional contributions to unmet needs having been included within the housing market area's supply, making the additional windfall up to 2031 even harder to explain.

It is also unhelpful that no clear and consistent picture is provided across the housing market area for shortfalls after the 2031 end date. Emerging evidence strongly suggests a significant shortfall arising emerging beyond this date and this issue will arise within the plan period of numerous Local Plan reviews underway in the region (e.g. Shropshire, Cannock, Lichfield, South Staffordshire, North Warwickshire, Solihull and Bromsgrove). The NPPF requires local authorities in the housing market area to plan for at least 15 years post adoption and to ensure strategic cross boundary issues are dealt with not deferred under the tests of soundness for plan making. We are therefore concerned that no single picture is currently presented for the housing market area beyond 2031 and the lack of a clear commitment from Birmingham to address their likely unmet needs in the period beyond this date.

In summary, aside from the figures which relate solely to housing supply in South Staffordshire, we have not been provided with sufficient information to be comfortable that the figures included in the table produced at the last Greater Birmingham and Black Country HMA/WMCA housing meeting are a robust basis for plan-making in the housing market area. We would welcome further engagement on this point before the position statement is finalised.

Yours sincerely

[REDACTED]

Grant Mitchell

Assistant Director Enterprise & Growth

11.12.2019 – BCC response to SSDC SHSID Consultation

Birmingham City Council

Kelly Harris
Strategic
Planning Team
Council Offices,
Wolverhampton
Road, Codsall,
South Staffordshire, WV8 1PX

11 December 2019

Dear Kelly,

South Staffordshire Council Local Plan - Spatial Housing Strategy and Infrastructure Delivery (October 2019)

Thank you for consulting Birmingham City Council on the South Staffordshire Council Local Plan - Spatial Housing Strategy and Infrastructure Delivery document.

Birmingham City Council welcomes the contents of the document and the opportunity for continued constructive and positive engagement with South Staffordshire through the Duty to Co-operate. The document continues to recognise the relevant strategic matters which need to be addressed between our authorities, particularly the need to meet unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area (referred to below as the HMA).

As you will be aware, adoption of the Birmingham Development Plan in January 2017 confirmed the housing shortfall to be met by other authorities in the HMA at 37,900 dwellings. The HMA authorities subsequently commissioned the Strategic Growth Study (by GL Hearn/ Wood), published in February 2018, which built upon the PBA work and other evidence to identify more specific options and broad locations for addressing the housing shortfall.

The latest formal position published by the HMA authorities in the HMA Housing Need and Land Supply Position (September 2018) updated the housing need and supply data and showed that the housing shortfall had fallen by 5,629 dwellings to 10,696 dwellings (unadjusted) to 2031.

The Position Statement is currently under review and is expected to show further progress in reducing the shortfall. Nevertheless, a shortfall is expected to remain

as a result of the Black Country Authorities' Local Plan Review.

Within the HMA, the strongest functional relationship exists between South Staffordshire and the Black Country. The Black Country Local Plan Issues and Options Document (2017) identified a potential shortfall of 22,000 homes and 300ha of employment land up to 2036. Whilst the Black Country has yet to establish how much of that potential shortfall it can accommodate itself, there is still likely to be significant unmet need which cannot be accommodated within the conurbation, particularly post 2031.

Birmingham City Council is therefore fully supportive of the approach taken by South Staffordshire in the Local Plan Review documents published so far. The City Council believes it is essential for local authorities such as South Staffordshire to test housing options which not only meet its own needs, but also can contribute towards meeting the unmet needs of neighbouring authorities within the HMA as stipulated in the National Planning Policy Framework (NPPF).

To this effect, the City Council supports South Staffordshire in their preference to pursue Spatial Option G, as stipulated within the document (Question 6), as the most robust, sound and sustainable strategy for accommodating its own needs as well as contributing towards unmet needs within the HMA. This will enable South Staffordshire to test an option which could provide up to 4,000 dwellings to meet unmet need within the HMA.

Options to consider the location of a new settlement within South Staffordshire beyond the Plan Period for the current Local Plan Review are also welcomed (Question 7) and are also in line with the findings of the Strategic Growth Study. This would depend on further evidence to establish future requirements and possible further unmet need for the wider HMA beyond 2037.

I trust that these comments are useful and constructive. If you require any further information or input from Birmingham City Council in support of your approach to your Local Plan Review, please do not hesitate to contact us.

Yours sincerely
Ian MacLeod
Interim Director, Inclusive Growth

25.02.2021 – BCC response to SSDC 08.01.2021 letter

Birmingham City Council

Planning and Development

Strategic Planning
Team Council
Offices,
Wolverhampton
Road, Codsall,
South Staffordshire, WV8

1PX Email:

localplans@sstaffs.gov.

uk

25 February 2021

Dear Kelly,

South Staffordshire Council Local Plan Review – Review of Green Belt

Thank you for your letter dated 8 January 2021 concerning strategic housing matters across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and implications for the forthcoming South Staffordshire Local Plan Review. As highlighted in previous correspondence in December 2019, Birmingham City Council welcomes and is fully supportive of the approach being taken so far in reviewing the South Staffordshire Local Plan.

As also stated at the time, the adoption of the Birmingham Development Plan (BDP) in 2017 confirmed a housing shortfall of 37,900 homes across the City primarily to be met by other authorities in the GBBCHMA. The latest position Statement published by the 14 HMA Authorities in September 2020 identifies a shortfall of only 2,597 homes across the whole HMA up to 2031.
However, the situation beyond 2031 is currently emerging as work progresses on the Black Country Plan and a review of the Birmingham Development Plan , it is envisaged that significant housing shortfalls will continue to be experienced within the HMA to and beyond 2031 which are pertinent to the timeframes of the South Staffs Local Plan Review. As you allude in your letter, the Black Country has already evidenced a potential shortfall of 29,260 dwellings between 2019 and 2038 through its 2019 Urban Capacity Review, which it will consider through the Black Country Plan review.

This position will be further exacerbated by recent changes to the Government's housing needs methodology which is to place a 35% uplift on top of the housing need for Birmingham (as well as for Wolverhampton) as one of the top twenty largest cities within England. Potentially, a significant pre-2031 shortfall will arise.

It is therefore evident that Birmingham City Council will be unlikely to assist in providing any additional housing to enable South Staffs to reduce its target. Although the situation in Birmingham is yet to be established, evidence shows that, historically and for many years, a substantial proportion of Birmingham's housing need has been met in other parts of the West Midlands.

Birmingham City Council has been instrumental in ensuring that the 14 local authorities which make up the GBBCHMA continue to work together to ensure that strategic housing requirements are met. As you suggest, whilst this process may be subject to change through emerging national changes to strategic housing matters as set out in the Planning for the Future White Paper, the City Council recognises the continuing importance for local authorities within the same HMA to work together on strategic matters. We would therefore welcome and support the development of an agreed Statement of Common Ground (SOCG) either across the HMA or as a separate agreement with South Staffs to support your ambitions in delivering housing growth over and above local need as a contribution towards any future unmet needs of the GBBCHMA up to 2038.

I trust that these comments are helpful. If you require any further information or input from Birmingham City Council in formulating the Local Plan Review, please do not hesitate to contact us at planningstrategy@birmingham.gov.uk.

Yours faithfully
Ian MacLeod
Acting Director, Inclusive Growth

26.02.2021 – BCC letter regarding review of Birmingham Development Plan



26 February 2021

Dear Colleagues,

Review of the Birmingham Development Plan

The City Council adopted the Birmingham Development Plan (BDP) in January 2017 and work has now commenced to undertake a review of the plan which will ascertain whether or not it needs updating. An assessment has been carried out using the Planning Advisory Service (PAS) Local Plan Review Assessment Toolkit.

This process has identified a number of issues and changed circumstances which the Council believe warrant consideration of an update of the BDP. These issues include:

- The housing requirement set out in the existing BDP does not reflect the standard methodology for calculating housing need. The effect of the revised standard methodology is significant as Birmingham will be subject to a 35% uplift on its housing number, as one of the 20 largest cities in England.
- Delivery of affordable housing in recent years has fallen short of Birmingham's current identified affordable housing requirement. The reasons for this need to be understood and action considered to address this.
- In June 2019, Birmingham City Council declared a climate emergency and committed to achieving carbon neutral status by 2030. Development plan policies will need to reflect and support this strategy throughout.
- Changes to the Use Classes Order which took effect from 1 September 2020 have undermined the effectiveness of a number of existing BDP policies.
- The Covid-19 pandemic has severely impacted the local economy as well as accelerating changes to working and shopping patterns which are likely to continue beyond the pandemic itself and will have implications for future planning strategies.
- Some growth areas within the existing BDP have been slow to deliver and need to be re-evaluated.
- Significant housing and employment land shortfalls have potentially been identified elsewhere within the conurbation, particularly in the Black Country where a shortfall has been identified up to 2039, as evidenced through its 2019 Urban Capacity Review Update as part of the review of the Black Country Plan.
- A number of changes have been made to the National Planning Policy Framework since the BDP was adopted.

Given the above, officers are starting to gather evidence in relation to these issues prior to seeking formal approval from the City Council to commence an update of the BDP. As part of

this process, the City Council is writing to you as a Duty to Co-operate partner to give you the opportunity to provide any initial views and highlight any strategic or cross boundary issues that you consider to be relevant in assessing whether the BDP should be updated and the scope of the update.

We would be grateful for a response 4 weeks from the date of this letter. If you wish to discuss the content of this letter further, please contact uyen-phan.han@birmingham.gov.uk (Planning Policy Manager).

Maria Dunn

Head of Development Policy

19.04.2021 – SSDC response to BCC 26.02.2021 letter

South Staffordshire Council

Maria Dunn
Head of Development Policy
Birmingham City Council
Planning and Development
PO Box 28
Birmingham
B1 1TU

Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

19 April 2021

RE: Review of the Birmingham Development Plan

Dear Maria,

Many thanks for your letter dated 26th February regarding the potential review of the Birmingham Development Plan 2017. We welcome Birmingham City Council's proactive stance in notifying Duty to Co-operate bodies of its intention to review its local plan and its seeking of views from such bodies at this early stage.

Strategic unmet housing needs and the 35% uplift to urban centres

As you will be aware, South Staffordshire District is a predominately rural Green Belt authority, containing no towns or cities. Currently, South Staffordshire District Council is working to accommodate unmet housing needs from the Greater Birmingham Housing Market Area (GBHMA), including those from the 2017 Birmingham Development Plan and the emerging Black Country Plan. As highlighted in recent correspondence with your authority, it is already highly likely that the existing housing shortfalls evidenced in the GBHMA Strategic Growth Study 2018 will require Green Belt release in the District's rural area.

To this end we have proposed to deliver additional housing growth to meet South Staffordshire's own needs whilst also seeking to accommodate an additional 4,000 dwellings towards the unmet needs of the GBHMA. As previously communicated, this approach reflects the likely capacity of strategic urban extensions and locations for dispersed housing growth recommended for delivery in the District by the GBHMA Strategic Growth Study 2018, which the Council was an active participant in. This approach has received support from both Birmingham City Council and the Association of Black Country Authorities to date.

Since the GBHMA Strategic Growth Study 2018 was prepared, the Planning Practice Guidance has been updated, requiring a further 35% uplift to the unmet needs of twenty urban areas (including Birmingham). The guidance indicates that this uplift should be "*met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations*". It goes on to clarify that in areas subject to the 35% uplift "*brownfield and other under-utilised urban sites should be prioritised and on these sites density should be optimised to promote the most efficient use of land*". It indicates that the purpose of this approach is to ensure sustainable travel patterns and to allow households to make the most of existing infrastructure. This is consistent with the NPPF requirement for the location of new development to help in the reduction of carbon emissions and Birmingham's commitment to be carbon neutral by 2030.

Reviewing the Birmingham Development Plan and GBHMA evidence base

Given the context set out above, every effort must be made to avoid the extra housing needs implied by the 35% uplift from being dispersed to the wider housing market area. We would therefore expect the following steps to be undertaken by Birmingham City Council in conjunction with Duty to Co-operate partners when reviewing the city's strategic housing needs and supply:

- Clarify the intended scope of any local plan review for Birmingham City Council, including the intended plan period and strategic approach to housing needs
- Provide a clear timescale for the plan's preparation, specifying at what stage the City Council anticipates it will be able to robustly demonstrate the maximum housing supply that could be realised over the reviewed plan period (including through further Green Belt land release within Birmingham's local authority area if necessary)
- Commit to preparing a thorough evidence base demonstrating how all sustainable brownfield and underutilised land within the city has been maximised before any housing needs are exported, including the thorough the use of design codes/local development orders to allow for the densification of existing areas within the city, as encouraged through recent changes to the NPPF and the Building Better, Building Beautiful Commission

If, following these steps, a significant change in unmet housing needs arising from the Birmingham City Council area is likely, an appropriate cross boundary evidence base must be prepared to ensure this can be addressed in a demonstrably sustainable manner. This is especially important as the Planning Practice Guidance indicates that *"[a]uthorities which agree to take additional housing from other areas may in turn require investment in infrastructure provision to support this"*[1].

Currently it is not clear that there is an evidence base across the GBHMA that would allow for such an approach. The West Midlands – Strategic Transport Plan, the West Midland Mayor's 2040 Plan for Metro and Rail in the West Midlands and the Transport For West Midlands 'Cycling and Walking Network' strategy primarily focus sustainable transport improvements on the Black Country and Birmingham conurbation in proximity to existing development. This is unlikely to support further efforts to sustainably increase the level of housing needs being exported from Birmingham and/or the Black Country.

To address this issue, the GBHMA Strategic Growth Study 2018 must be reviewed and updated to reflect any step change in unmet needs across the GBHMA. This must be done to

ensure that any additional strategic locations for housing growth are identified across the GBHMA in a consistent and evidence-led manner. Recommendations from any reviewed study must also align with current or (if necessary) updated Strategic Transport Plans and Local Cycling and Walking Infrastructure Plans for the West Midlands, to ensure housing growth and sustainable transport are truly aligned.

Without this work, exported housing needs from a review of the Birmingham Development Plan may act to slow the delivery of Local Plans in the surrounding area, by causing uncertainty and offering no method of consistently distributing unmet needs in a genuinely sustainable manner. It is therefore essential that, if necessary, Birmingham City Council engages its Duty to Co-operate bodies in such work throughout the preparation of any review of the Birmingham Development Plan. South Staffordshire District Council has been an active participant in the previous 2018 GBHMA Strategic Growth Study and would wish to be an active participant in any updated work on this matter.

Next steps

As set out in our letter dated 8th December 2020 there is a need to prepare a Statement of Common Ground (SoCG) between bodies contributing to the unmet housing needs of the GBHMA and those authorities with unmet needs. The Planning Practice Guidance states that *"[a]uthorities are expected, wherever possible, to detail cooperation in a single statement"*[2], having regard to the "*most appropriate functional geographical area to gather evidence and develop policies to address these matters, based on demonstrable cross-boundary relationships"*[3].

Given these national requirements, our assumption would be that Birmingham and the Black Country would lead on the preparation of a SoCG to distribute their strategic housing shortfalls across the housing market area, indicating where agreement had and had not been reached with Duty to Co-operate partners on these issues. If this is not likely to be forthcoming we would welcome a meeting with Birmingham and Black Country officers to establish the scope of a SoCG between Birmingham, the Black Country and South Staffordshire to support our Local Plan Review. Please let us know which approach Birmingham City Council is intending to pursue so we can respond appropriately.

Yours sincerely

[REDACTED]

Annette Roberts

Corporate Director Planning & Infrastructure

29.06.2021 – BCC response to SSDC 01.06.2021 letter

Strategic Planning
Team Council
Offices,
Wolverhampton
Road, Codsall,
South Staffordshire, WV8 1PX

Email:
e.fox@sstaffs.gov.
uk
localplans@sstaffs.
gov.uk

29 June 2021

Dear Annette,

South Staffordshire Council Local Plan Review

Thank you for your letter dated 1 June 2021 seeking the Council's approach to unmet housing need and its alignment with the existing Greater Birmingham and Black Country Housing Market Area (GBBCHMA) evidence base.

As you outlined, the 14 local authorities that comprise the HMA have continued to work together to regularly update housing land supply capacity across the whole HMA as well as identifying possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area through the 2018 Strategic Growth Study. South Staffs Council have been a proactive participant in HMA discussions and in seeking to provide additional housing to meet any shortfalls within Birmingham and the wider the HMA area. The City Council has therefore been grateful for the help and co-operation received from South Staffs in making significant progress thus far towards reducing that shortfall. This is reflected in the proposed contribution of 4,000 dwellings towards unmet need within the HMA in the review of your Local Plan and Birmingham City Council is fully supportive of the approach being taken.

The City Council has recently carried out a review of the Birmingham Development Plan (BDP) which concluded that an update of the Plan is required. A report is being considered by BCC's Cabinet on 29th June 2021 seeking formal approval to commence the update of the Plan as well as a revised LDS which sets out the

timetable for the update.

As work also progresses on the Black Country Plan, coupled with recent changes to the standard method for assessing local housing need (which will have a particular impact on both Birmingham and Wolverhampton), it is envisaged that significant housing shortfalls will continue to be experienced across the HMA beyond 2031. Whilst Duty to Cooperate arrangements remain in place, it will therefore remain crucial to ensure that future housing shortfalls within the HMA are considered and, if possible, met within local plan reviews in neighbouring local authorities. This position, and the strategic approach first reflected within the GBBCHMA Strategic Growth Study in 2018, is therefore likely to continue and further work and co-operation will be required.

I trust that these comments are helpful in clarifying Birmingham's position and the likely impacts on the future strategic need for housing across the GBBCHMA as a whole. If you require any further information or input from Birmingham City Council in formulating your Local Plan Review, please do not hesitate to contact us at planningstrategy@birmingham.gov.uk.

Yours faithfully

[REDACTED]

Ian MacLeod
Acting Director, Inclusive Growth

19.08.2021 – duty to co-operate meeting minutes

South Staffordshire DC and Birmingham CC Duty to Cooperate Meeting

19/08/2021

1pm-2.30pm

MS Teams

Meeting called by: SSDC

Attendees:

Edward Fox - Strategic Planning Team Manager

Patrick Walker - Strategic Planning Senior Officer

Kelly Harris - Lead Planning Manager

Bethany Firkins – Strategic Planning Assistant

Martin Dando - Principle Planning Policy Officer

Uyen Phan-Han -Planning Policy Manager

Maria Dunn – Head of Development Policy

Agenda

1) Introductions

2) Plan progress updates

3) Birmingham CC approach to maximising urban supply

4) Proposed Birmingham CC approach if shortfall is identified through emerging evidence

5) Statement of Common Ground - Birmingham CC intention to rationalise shortfall through single SOCG across the HMA?

6) AOB

Discussion:

Agenda item 2: Plan progress updates

EF: SSDC are at a stage of agreeing Preferred Options document, which will identify specific sites for housing to meet own need and give a 4000 dwelling contribution to the HMA. Preferred Options out for consultation rom 29th September to end of November.

After we will agree a Statement of Common Ground (SCG) and finalise with infrastructure providers. Plan to submit plan by end of 2022 with a year for examination.

MDunn: BCC currently at evidence gathering stage. Local Development Schedule (LDS) has been adopted at full council. Issues and Options consultation will go out Summer 2022. Carrying on a head but in a position to change to different plan type if planning bill comes in.

Agenda item 3: Maximising urban supply

EF: Expecting BCC review will result in uplift in house need, especially with 35% uplift set out by government.

Government sets out sites to accommodate uplift should be identified in urban area.

What is your approach to this?

UHP: BCC allocated funding through government Pathfinders scheme to use urban intelligence which will used to find infill land and maximise urban capacity. This is PropTech technology and it will identify brownfield opportunities.

Densification assumptions will be much higher and far exceed current policy – city centre density assumptions risen from 100 DpH to 400 DpH. Will be increasing density in urban centres and surroundings.

BCC will read SSDC HELAA comments in more detail.

EF: How long does the PropTech process take?

UHP: It is a 3-month MHCLG scheme. Expecting 1st draft of Urban Capacity Study by the New Year.

EF: PropTech process very interesting to SSDC as it may be relevant to Black Country. Has there been any discussions with Black Country about what they are doing and whether they might use this?

UHP: Unsure as no discussion. They refreshed their Urban Capacity Study recently. Not aware of any more details.

PW: SSDC would like to see the Black Country put more effort into maximizing brownfield land through Urban Capacity study to align with the government agenda.

Maximising brownfield is all of the Greater Birmingham Housing Market Area's (GBHMA) responsibility/issue, Consistency of approach across the HMA would be better. The Black Country are taking a traditional approach that doesn't consider agenda set out in White Paper, i.e changed approach to densification and Permitted Development Rights (PDRs) changes.

Have you had any discussions about a consistent approach with Black Country?

UHP: We have had no discussion. It might be too late in their process to do so.

PW: We want to ensure reasonable efforts have been made to maximise urban capacity if we are releasing GB.

EF: It's worth Black Country looking to use this technology as they will need to show exceptional circumstances and that they have done everything to maximise supply in order for green belt release to be justified. If neighbouring authority is using this technology then they should too.

MDunn: BCC will consider this in response to Black Country consultation. It is an impossible ask for BCC and Black Country to fully meet needs in urban areas.

EF: Still need to be showing we have done everything we can to try and maximise urban supply.

PW: We are working over a very complex geography and we need to address these points despite difficulty

Agenda item 4: Birmingham City Council approach to shortfall

EF: SSDC are working on assumption you will identify a shortfall? If so, what will be the process for addressing the shortfall. The Strategic Growth Study is the only evidence across the GBHMA, do you think this will need to be updated?

UHP: There will be a high level of unmet need. The current evidence is 4 years old so would make sense to do an update but we don't know what authorities are thinking. Will need to communicate.

KH: SSDC are asking these questions as we are concerned that we won't have a sound plan if we don't address these issues. There have been failures in other parts of the country where there has been failure to tackle difficult issues.

EF: Dealing with unmet need is not just a case of distributing numbers. A follow up of the SGS would take it beyond the numbers and look for sustainable locations across the HMA. SSDC raised this previously to BCC in letter. HMA needs to holistically look at transport plans to tackle this sustainably which is not happening at the moment. The Black Country Reg 18 consultation is out and a lot of authorities have not contributing a sufficient amount to tackle unmet need

PW: Would be really useful to know BCC views on progression of addressing shortfall following on from this meeting.

Agenda item 5: Statement of Common Ground - Birmingham CC intention to rationalise shortfall through single SOCG across the HMA?

EF: Does BCC think the best approach is an SoCG across the whole HMA, or unilaterally between authorities. It is quite challenging between 14 authorities. Welcome you views on this?

MDunn: Joint approach very difficult due to local authorities at different stages of place. SoCG to be done unilaterally due to timing issue, but they need to be consistent

PW: Would this mean signing one with yourself and with Black Country after SSDC Preferred Options

MDunn: Due to timing and inconsistency of disagreements needs to be SoCG's are to be done separately as it is easier to overcome issues

Agenda item 6: AOB

EF: What is your approach to employment land? HMA is in place for housing but do you have FEMA evidence? Most local authorities are identifying FEMA's unilaterally off own evidence, creating overlapping evidence/functional geographies, meaning planning for cross boundary employment needs challenging

UP: Consultants are currently working on BCC's HEDNA and will be looking at a FEMA.

EF: What should be the role of a follow on study from the LEP Strategic Employment Study (2021)?

MDando: Does this refer to the logistics study of the three Staffordshire LEP?

EF: Yes, the Black Country are discussing doing a follow on study.to that piece of work

MDand: BCC don't have any plans for a study at this stage

EF: There is a hook in NPPF that function areas for logistics are larger than local. SSDC need some clarification and a plan

MDand: The previous study was done north of the HMA in Staffordshire. BCC will want to do the study around the conurbation

KH: If BCC have any further thoughts after today on the issues raised, please keep dialogue going as we will need answers to these questions and don't want to be trying to answer them on our own. BCC views are important as a massive part of the HMA

MDunn: Target date for next meeting?

KH: Meeting useful after SSDC Preferred Options consultation live on 28th September

Actions

- SSDC to send over minutes to BCC
- SSDC and BCC to arrange follow up meeting after SSDC Preferred Options consultation goes live
- BCC to share any further thoughts on questions/issues raised after this meeting with SSDC

19.08.2021 – SSDC response to BCC HELAA methodology consultation

South Staffordshire Council officer response to Birmingham City Council HELAA methodology consultation.

Sent 19/08/21 via email

Identifying sites/broad locations (3.9 – 3.14)

The approach suggested is broadly supported, however it is unclear from the information provided how the Council intends to identify opportunities to systematically intensify the City's urban area in order to increase housing supply. The methodology suggested currently gives no indication of increased efforts made by Birmingham City Council to self-contain the 35% urban uplift to its housing need rather than exporting it[2]. Given the pressures unmet needs from Birmingham could place on both the City's Green Belt and Green Belt in the wider HMA, this creates uncertainty that the City Council will truly maximise non-Green Belt land supply prior to concluding exceptional circumstances exist[3].

In light of these issues and the potential Duty to Co-operate implications raised it is requested that the City Council engage with wider GBHMA authorities to set out in detail on how it will densify its existing urban area prior to concluding an unmet housing need exists. Any further discussions on this matter should show how the Council will encourage and account for new opportunities to increase both urban and suburban housing supply within the existing built form of the city, using methods such as those set out in the National Model Design Code[4].

Developable Area and Density assumptions (3.20 – 3.31)

The assumptions used to estimate the development potential of sites are supported as an indicative starting point for new sites as they reflect the findings of the GBHMA Strategic Growth Study 2018 (by ensuring a minimum of 40 dwellings per hectare) whilst acknowledging of the increased development potential of the city centre area is also welcomed.

Suitability, Availability and Achievability assumptions (3.34 – 3.48)

The "policy-off" approach to assessing sites is noted and supported. We support the broad approach taken in Table 5 to identifying suitable, potentially suitable and not suitable sites and use of SHELAA to filter sites to be considered through the Local Plan Review evidence base. However, it would provide greater clarity if a definition could be given of what would constitute an "isolated" site within the Green Belt.

Lead-in time and Build Rate assumptions (3.49 – 3.57)

It is acknowledged that the Council has limited existing evidence of build rates on large-scale house-based sites at this point in time. However, the build rates for large housing sites of 500+ and 1000+ dwellings assumed in this chapter appear to rely far too heavily on potentially unrepresentative national averages set out in the Lichfields 'Start to Finish' report. This means

[2] Planning Practice Guidance 'Housing and economic needs assessment' Paragraph: 035 Reference ID: 2a-035-20201216

[3] NPPF 2021 Paragraph 141

[4] See for example: National Model Design Code Part 2 – Section U.1.i Efficient Use of Land

the assumptions used appear to have no regard to the local property market in Birmingham and also appear inconsistent with previous and current local evidence of large-scale housing site delivery in Birmingham.

Examples of this issue can be seen by comparing the assumptions with the current Birmingham 2020 Five Year supply statement[5]. This indicates that the large-scale SUE at Langley will deliver 3,042 homes across the 15 year period from 2020, based on direct engagement with the Langley Consortium. The exact lead-in times assumed on this site are unclear within the statement itself, but even if the site were to commence immediately they would still imply a minimum 202 dwellings per annum (DPA) average build rate across this period. In reality this rate will likely be even higher once lead-in times are factored in. The statement also allows for the full site capacity of 800 dwellings to be delivered on the Former North Worcestershire Golf Club (site S1052) within the next 10 years, based on engagement with a volume housebuilder with significant experience of delivering such sites (Bloor Homes). Accounting for a 2 year lead-in time, this appears to imply a 100 DPA build rate, despite the site being within an area of lower property values compared to other areas of the city[6].

Assuming that four consecutive sales outlets will be achieved on the Langley SUE and that two will be achieved on the Former North Worcestershire Golf Club, both sites' delivery rates appear broadly consistent with the Council's own the previous Birmingham Development Plan evidence base[7] (which indicated an anticipated range of 47-62 DPA per outlet on large scale greenfield sites, depending on the strength of housing market recovery). This shows that direct engagement with delivery bodies and previously endorsed evidence on build rates from the Birmingham Development Plan suggest delivery on 500+ dwelling housing site will significantly outpace the assumptions given in the Lichfields report.

The continued applicability of these previously endorsed local assumptions is given further weight by the areas of Birmingham likely to be capable of delivering new large (500+) housing sites in future. It currently appears that the majority of the City Council's non-developed areas with potential to accommodate such site typologies are on greenfield land options the north-east of the local authority area. This area of the city contains some of the highest house prices within the wider housing market area[8] and could realistically be expected to achieve higher annual sales rates (and therefore housing completions) than much of the wider local authority and housing market area. The importance of having regard to the type of land options likely to realise future large-scale housing schemes in Birmingham is also reinforced by the Lichfields report itself, which suggests that on average large-scale greenfield sites achieve a 34% higher build rate than brownfield sites of a similar size.

Taking all of the factors above together, we strongly suggest that the build rates for 500+ and 1000+ home schemes should be revisited. A more robust estimate of build-rates could be achieved by the City Council establishing a realistic estimate of sales rates per outlet and

[5] Available here: https://www.birmingham.gov.uk/downloads/file/19179/appendix_5_year_land_supply_north_and_south

[6] Emerging Draft Birmingham HEDNA Figure 1.1

[7] Paragraph 2.26 of 'Housing delivery on greenbelt options: January 2013' (Peter Brett Associates)

[8] Draft Birmingham HEDNA Figure 1.2

outlets-per-site (dependent on site size). These assumptions could then be checked through engagement with developers on the Council's current large-scale site options and could ultimately be further supported through Statements of Common Ground with specific sites. This approach would ensure delivery assumptions on large scale site options would be reflective of the local Birmingham market and likely future site typologies, rather than over-relying on unrepresentative national averages. We would expect to see this matter properly addressed as part of any future HELAA, to ensure that Birmingham's potential housing capacity is not unduly constrained through the review of the Birmingham Development Plan.

It is also noted that a 7 year lead-in time period is assumed for 1000+ housing sites. We note that this reflects the national averages in the Lichfields report but would suggest that this figure can be brought down significantly through appropriate early-years phasing and upfront work in advance of any planning application being submitted between the Council and a prospective developer. Such work could occur prior to a site's formal allocation through the review of the Birmingham Development Plan. As such, we would expect future site-specific delivery trajectories to seek to shorten this lead-in time wherever possible and would welcome the final HELAA acknowledging that site-specific Statements of Common Ground with developers may achieve shorter lead-in times than the average assumptions indicated in this section.

Windfall allowances (3.79 – 3.81) & Non-implementation rates (3.86 – 3.90)

It is noted that the windfall allowances proposed are based on past trends from the last 20 years within the city and that these allowances represent a slight increase above those examined through the Birmingham Development Plan. Notwithstanding this, it is a concern that paragraph 3.81 suggests that windfalls will likely exceed the allowances set out, as they do not account for future trends likely to result from changes to permitted development rights which will also contribute to supply. This raises a concern as it suggests that the land supply estimates produced by the HELAA will consciously underestimate delivery from these sources of supply.

We also query why a non-implementation rate has been deemed necessary. The previous Birmingham Development Plan was found sound without any such discount, with the inspector endorsing the City Council's approach. The Birmingham Development Plan 2017 appears to have been a significant underestimate of the city's true urban supply, despite including no non-implementation rate[9]. It is therefore unclear why there is now a need to revise the approach previously found sound. Furthermore, national policy changes made since the plan's adoption in 2017 do not appear to impose new duties to use non-implementation rates, instead setting out greater requirements for urban authorities to truly maximise their urban supply rather than discount it[10]. A non-implementation allowance would also be a concern as it runs contrary to the stance set out by Birmingham in the latest published GBHMA position statement[11].

[9] The adopted Birmingham Development Plan, based on the 2014 SHLAA, estimated a future supply of 51,100 homes in the city between 2011-2031. The most recent 2020 SHLAA estimates this has now increased by over 16,000 dwellings (to 67,529 dwellings), despite the Birmingham Development Plan remaining unchanged.

[10] For example, Planning Practice Guidance 'Housing and economic needs assessment' Paragraph: 035 Reference ID: 2a-035-20201216 and National Planning Policy Framework 2021 Paragraph 141

[11] See Table 4 in the 'Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing

Given the potential consequences for authorities in the surrounding GBHMA if the HELAA goes on to identify a shortfall in housing supply we request that this section is revisited to offer a more realistic and robust estimate of future housing supply. This should involve removal of the newly proposed non-implementation allowance and a re-examination of the potential contribution of permitted development changes to windfall supply, including changes affecting Class E development.

Next steps (Duty to Co-operate)

We have previously written to your authority in April of this year stressing the need for an updated GBHMA-wide evidence base to assess the potential for and sustainably distribute any potential additional housing shortfalls arising within the GBHMA. We request that the amendments set out in this letter are made to the HELAA methodology and suggest that Birmingham clarifies the evidence base and mechanisms for sustainably distributing any resulting unmet housing needs likely to arise in future, including how this will be aligned with future sustainable transport infrastructure investment plans.

Need and Housing Land Supply Position Statement

(July 2020)'

13.12.2021 – BCC response to SSDC Preferred Options Consultation

Strategic
Planning Team
Council
Offices,
Wolverhampto
n Road,
Codsall,
South Staffordshire, WV8 1PX

Email: localplans@sstaffs.gov.uk
13 December 2021

Dear Strategic Planning Team,

South Staffordshire Council Local Plan Review – Preferred Options November 2021

Thank you for consulting Birmingham City Council on the Preferred Options document for the South Staffordshire Council Local Plan Review.

The City Council welcomes the approach being taken in the Local Plan Review particularly with regard to the strategic matters of housing and employment provision identified within the Preferred Options as well as the opportunity for continued close working and dialogue with the City Council and other local authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) as part of Duty to Cooperate arrangements.

Unmet housing needs from the wider housing market area.

A housing shortfall of 37,900 within Birmingham was first identified during the development of the Birmingham Development Plan. Since then, the 14 local authorities that comprise the HMA, including South Staffs, have been working together to regularly update housing land supply capacity across the whole HMA and identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. The latest published Position Statement by the 14 Authorities in September 2020 identified a shortfall of only 2,597 homes across the whole HMA up to 2031, with a significant proportion of this shortfall met by Birmingham City Council itself, mainly through high density windfall schemes not previously identified coming forward in and around the City Centre. However, a further update has since been drafted, due for publication in December 2021, showing that the shortfall has now risen to 6,302.

Whilst the Position Statements demonstrate that some progress has been made, work has

continued on the Black Country Plan which has identified a housing shortfall within its area of 28,239 homes in the recent publication of their Draft Plan (August 2021). This shortfall, coupled with recent changes to the housing need methodology, which will have a significant impact on Birmingham and Wolverhampton, will have a further significant impact on housing shortfalls experienced across the HMA both up to and beyond 2031.

It is therefore important that the 14 local authorities that comprise the HMA continue to work together to identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. The issues were partially explored through the 2018 Strategic Growth Study but the City Council's position is that this work now needs updating to further identify solutions to strategic housing shortfalls which are likely to continue within the West Midlands.

Birmingham City Council has recently commenced work on the Birmingham Plan to replace the BDP and evidence has been commissioned to carry out a Housing and Employment Development Needs Assessment (HEDNA) as well as a Housing and Employment Land Availability Assessment (HELAA). These two studies, coupled with wider urban capacity work, will establish Birmingham's position over the next few months on land supply for strategic housing and employment uses and establish any potential levels of shortfall. Given that recent changes to the methodology for housing need could result in significant increases in Birmingham's housing requirement, (along with the fact that Birmingham has always been a net exporter of housing for a number of decades), it is envisaged that significant housing shortfalls will continue to be experienced in the City once all of the latest evidence is established and applied to a new timeframe for the Plan up to 2042.

South Staffs Council have been a proactive participant in HMA discussions and in seeking to provide additional housing to meet any shortfalls within Birmingham and the wider the HMA area. This is reflected in the Preferred Options document which specifically attempts to maximise housing provision within South Staffs to provide an additional 4,000 dwellings across the local authority area as a contribution towards meeting shortfalls identified elsewhere within the HMA, effectively doubling the original housing requirement for the District. This position is particularly welcomed by the City Council which, as previously stated, has been grateful for the help and co-operation received from South Staffs in making significant progress thus far towards reducing that shortfall.

Strategic employment land

The Preferred options document identifies a significant amount of strategic employment sites within its area totalling 553.5 hectares. The City Council recognises the importance of these sites in serving a wider area and supports the provision made within the Local Plan review. This is particularly important for Birmingham and the Black Country as the majority of the conurbation does not have the land capacity to support strategic sites of this size. This includes the new site known as the West Midlands Strategic Rail Freight Interchange (SRFI) which, along with the other identified sites, represents an important

source of large employment sites serving not just South Staffs, but the whole of the West Midlands providing 193 ha of new strategic warehousing on a total (gross) land area of 297 ha. It will also generate a significant number of jobs (around 8,500) and covers a wide labour catchment area.

The employment issues and consequences of the SRFI have been examined by Stantec in a Response Paper jointly commissioned by South Staffs and the Black Country. This has included a study of the apportionment of land on the SFRI site and provides an estimate of the distribution of the 'need' being addressed by the SRFI between plan making councils in the market or service area as appropriate. The Study acknowledges the position previously established by Savills on behalf of the SRFI that the site relates closely to, and will serve, the Black Country and Birmingham markets.

The land share assumptions were calculated based on each authority's projected population increases under the 2018-based Population Projections which was then balanced against the proportionate share of each authority's existing strategic warehousing floorspace. On this basis, the study concluded that the Black Country's share of the overall SRFI land area is 72 ha or 37% of the total but also that Birmingham's share is 53 hectares which is still quite a substantial proportion of the site.

As mentioned, the City Council has recently commissioned a HEDNA as part of its evidence base for the new Birmingham Plan. Early indications of the findings of the HEDNA show that the Birmingham Plan will continue to face challenges in meeting its own employment land needs although the exact amount and the nature of the employment need will only become apparent once development options and urban capacity work have been fully evaluated. It is therefore important that the impact of the SRFI, along with other strategic employment sites, and the implications for Birmingham's employment land supply are fully reflected within any Statement of Common Ground agreed between the City Council and South Staffs as part of the formulation of both Local Plans.

Longer term growth aspirations for a new settlement.

The Preferred Options document also makes provision for the long-term aspirations of South Staffs Council to explore potential options within the district for a sustainable independent new settlement which has the capacity to accommodate the future housing and economic needs of the district. It is recognised that such a settlement will not provide housing for the current plan period but forms an option for the Council to explore in future plan-making. Again, this is welcomed by the City Council in setting out future growth options at an early stage. A revised and updated Strategic Growth Strategy for the whole of the GBBCHMA would also assist in further clarifying whether this would be a viable option for a future Local Plan Review and help towards the continued housing supply issues faced by the West Midlands and the HMA.

Summary

In summary, Birmingham City Council is fully supportive of the approach and commitment

made by South Staffs in helping to address the long-term strategic housing and employment issues faced by the West Midlands and the GBBCHMA. I trust that these comments are helpful and the City Council looks forward to continued engagement with South Staffs through Duty to Cooperate arrangements and in jointly formulating Statements of Common Ground, particularly for the issues highlighted above, to assist with the progression of both the South Staffs Local Plan Review and the Birmingham Plan.

If you require any further information or input from Birmingham City Council in formulating your Local Plan Review, please do not hesitate to contact us at planningstrategy@birmingham.gov.uk.

Ian MacLeod
Director of Planning, Transportation and Sustainability

22.02.2022 – BCC response to SSDC 14.01.2022 letter

Our Ref:

IW/1530t

r 23

February

2022

SENT VIA E-MAIL ONLY TO: k.harris@sstaffs.gov.uk

FAO: Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise

Dear Councillor Mason

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14 January 2022 seeking assistance to help meet unmet Gypsy and Traveller pitch needs in South Staffs as part of your 2021 Local Plan Review.

Birmingham Development Plan (2020-2042)

As you may be aware, Birmingham City Council itself has recently commenced an update of the Birmingham Development Plan as well as updating the evidence base that underpinned the existing Plan. As part of that evidence base, the needs of Gypsies and Travellers is being considered as part of the overall need for housing across the City.

To this effect, evidence has recently been commissioned to carry out a Housing and Employment Development Needs Assessment (HEDNA) as well as a Housing and Employment Land Availability Assessment (HELAA) and urban capacity work. The HEDNA, as part of its remit, has undertaken an estimate of Gypsy and Traveller requirements across the City based on the most recent Gypsy and Traveller Needs Assessment (GTAA) which was completed in February 2019. On this basis, the HEDNA estimates that the projected need for Gypsy and Traveller pitches for the new plan period up to 2042 would be 30 permanent pitches. This figure will be verified though a more detailed needs assessment to be carried out in the near future.

Since the 2019 GTAA was carried out, site searches have been regularly undertaken to identify suitable sites to accommodate the projected shortfall in gypsy and traveller pitches in Birmingham. Unfortunately, such sites have yet to be identified and this is compounded by the fact that the vast majority of potential sites have also been earmarked for other housing types due to a significant shortfall in housing need across the whole of Birmingham.

The shortfall in general housing need was first established when the Birmingham Development Plan was adopted confirming a shortfall of 37,900 homes primarily to be met by other authorities in the Greater Birmingham and Black Country Housing Market Area.
Given that recent changes to the methodology for housing need could result in significant increases in Birmingham's housing requirement, along with the fact that Birmingham has always been a net exporter of housing for a number of decades, it is envisaged that significant housing shortfalls will continue to be experienced in the City once all of the latest evidence is established and applied to a new timeframe for the new Birmingham Plan up to 2042. It is therefore anticipated that the new Birmingham Plan will also identify significant shortfalls in the capacity to accommodate its general housing need.

Meeting Unmet Gypsy and Traveller Pitch Needs in South Staffs

Given that Birmingham has an unmet housing need in its current Plan (BDP) and that early evidence strongly suggests that this will continue, or be further exacerbated in the new Birmingham Plan, the City is likely to continue facing capacity issues over the new plan period. This situation will make it challenging to find appropriate sites for Gypsy and Traveller provision to meet Birmingham's own needs, notwithstanding the needs of neighbouring local authorities, given the likely pressures to find sites for all housing needs across the City. For these reasons, it is therefore unlikely that Birmingham will be able to assist in meeting any unmet Gypsy and Traveller pitch needs in South Staffs.

Birmingham City Council has been instrumental in ensuring that the 14 local authorities that make up the Greater Birmingham and Black Country Housing Market Area (HMA), which includes South Staffs, continue to work together to ensure that strategic plan requirements are met. Although, on this occasion Birmingham is unlikely to be able to assist, the City Council is still committed to continuing to work with South Staffs District Council, alongside other local authorities making up the HMA, to ensure that strategic issues can be addressed as much as possible.

In the meantime, if you require any other information or input from Birmingham City Council in support of your approach to the Local Plan Review, please do not hesitate to contact us.

Yours sincerely
Councillor Ian Ward

Leader of Birmingham City Council

05.09.2022 – BCC response to SSDC 08.08.2022 letter

Birmingham City Council

Sent via email

FAO: Councillor Terry Mason
Cabinet Member for Planning and

Business Enterprise 05 September 2022

Email: k.harris@sstaffs.gov.uk

Dear Councillor Mason,

South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 8 August, 2022 further to your previous letter dated 14 January 2022 and our response dated 16 February 2022 concerning assistance to help meet unmet Gypsy and Traveller pitch needs in South Staffs as part of your 2021 Local Plan Review.

Birmingham City Council's previous response concluded that it was unlikely that we would be able to assist in meeting any unmet Gypsy and Traveller pitch needs in South Staffs as part of your Local Plan. This is mainly due to the City Council experiencing significant unmet housing need due to land supply constraints, (including unmet needs for general housing), meaning that potential sites for Gypsy and Traveller pitches to assist South Staffs are likely to be earmarked for other housing types due to the significant shortfall being experienced. Birmingham City Council are currently preparing to replace the Birmingham Development Plan (2017) with a new local plan, the Birmingham Plan, and early evidence gathering suggests that this housing shortfall will, potentially, be at least as large as last time.

In addition, as part of that evidence base, the needs of Gypsies and Travellers is being considered as part of the overall need for housing across the City. As set out previously, early evidence suggests that it is likely that the City Council will need to identify further sites to meet their own needs for Gypsy and Traveller accommodation in addition to the likely significant requirements to meet general housing needs.

In answer to your specific questions, I would therefore confirm the following on behalf of Birmingham City Council;

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

As set out above, evidence work towards the new Birmingham Plan is currently underway and indications are that the City Council will not be able to identify sufficient land to meet its own requirements for general housing need due to

significant land supply constraints. It is likely that the City Council will also need to identify further sites to meet its own gypsy and traveller needs in addition to general housing needs and it is therefore unlikely that any plots could be identified to meet the Gypsy and Traveller Needs for South Staffs in addition to those identified to meet Birmingham's likely Gypsy and Traveller needs.

2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Preparation for the new Birmingham Plan is still in its early stages with adoption scheduled for 2026. As part of that process, the City Council will be considering all options for the delivery of Gypsy and Traveller requirements across the City to meets its own needs including site options within the Green Belt if considered appropriate following the gathering of further evidence. This will be carried out during 2023 when the Preferred Options document for the Birmingham Plan is being prepared.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this? This is something which the City Council has not yet done. The City Council is looking at site options on publicly owned sites first and foremost, preferably within Council control. If sufficient publicly owned sites cannot be identified, the Council will then consider approaching and engaging with site promoters to see if any further sites can be identified. Again, this is something which will be considered in the lead-up to the publication of the Preferred Options document towards the end of 2023.

4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

As set out in the answer to question 3, the City Council have only considered publicly owned sites so far, preferably those within the control of the Council. Further work in identifying such sites is on- going and will continue into the near future in preparation for the Preferred Options document for the new Birmingham Plan.

I trust that this answers the questions raised by you at this stage in relation to Birmingham. As stated in the previous letter, the City Council supports the approach taken by South Staffs Council to your Local Plan Review and is committed to continuing to work with you, alongside other local authorities making up the HMA, to ensure that strategic issues can be addressed as much as possible.

Yours sincerely,
Ian MacLeod
Director - Planning, Transport & Sustainability

31.10.2022 – duty to co-operate meeting minutes

South Staffs Council, Black Country Local Authorities, Birmingham City Council

DTC Meeting 31.10.2022

Attendees:

Kelly Harris (KH) - South Staffordshire District Council

(SSDC) Ed Fox (EF) - SSDC

Patricia McCullagh (PM) – Sandwell Metropolitan Borough Council

(SMBC) Michelle Ross (MR) – City of Wolverhampton Council (CWC)

Vicki Popplewell (VP) – Dudley Metropolitan Borough Council

(DMBC) Maria Dunn (MD) – Birmingham City Council (BCC)

Uyen-Phan Han (UPH) - BCC

Liz Forster (LF) – Walsall Metropolitan Borough Council (WMBC)

Neville Ball (NB) – WMBC

Gypsy and Traveller unmet needs:

EF – BCC has responded but Black Country authorities haven't to date
KH – Are there plots on public sites? Site options for **new** public sites, including in Green Belt? Engaged with site promoters to see if there's opportunity for new public sites? Considered publicly
owned land? This is what South Staffs have done, need to understand what others

have. VP – have recently re-examined site options; can come back in writing

KH – need to understand the process others have gone through

NB – one Council public site is full, just opened a temporary transit site with 6 pitches, haven't considered options for new sites other than a existing SAD non-GB allocation; goes towards existing needs, haven't discussed public sites with GB housing sites but have with non-GB housing sites, non- GB sites indicated it would affect viability to do so.

MR – latest G&T assessment isn't published yet, likely to be published in January. 1) No, 2) No, 3) No
- could do that during consultation on Issues and Options, 4) Yes - could do further work at

January consultation to examine this. Will examine but can't respond with any substance before January.

PM – Will be examining these four areas through Issues and Options on Sandwell plan. 1) No, 2) No,
3) No but will examine through Issues and Options and 4) have looked at some for transit sites but not any further.

Apportionment of housing contributions:

IC – have discussed this with Bham previously but see a need to separate out housing contributions between 4 BC LPAs and BCC. May be significant for justifying Green Belt exceptional circumstances. From Shropshire examination the earlier this is sorted out the better. Most progressed offer is Shropshire (signed SoCG) and some are expressed to BC specifically (e.g. Lichfield). Others aren't attributed to any individual LPAs.

IC- Have proposed an approach in circulated note based on net migration flows between importing and exporting authorities. Based on authorities mainly to north and west of conurbation as this is where majority of local plan activity is at this point. Based on a migration based method, % figures in Table 2 of the circulated note could be used as basis for separating out offers between four BC authorities and BCC. Would like to see this reflected in the SSDC SoCGs to provide certainty.

IC – Might be argued that if LPA area doesn't have a shortfall then it shouldn't be receiving offers from neighbouring LPAs. CWC want to use this approach as soon as possible to allow local plans to progress.

MD – Want to understand how lack of BC plan impacts shortfalls and want to see how contributions would be distributed across LPAs where a contribution would be given to LPA without a shortfall
(e.g. if Walsall's needs are met, where does Lichfield's contribution go). What happens to individual LPAs within the Black Country which can meet their own need, but which could have a role in assisting with Bham's shortfall?

IC – If moving to four individual local plans it pushes preparation back a year, may not be the case that some LPAs which were meeting own needs still can

NB – May not reflect people moving from Sandwell to other BC authorities, which in turn then have residents moving to shires

MD – If we can't treat as collective HMA shortfall (Bham preference) then the % are a sensible way to go about it but does appear to make life difficult for Sandwell which has a large shortfall but no direct relationships.

IC – Sandwell's strongest relationships are with Dudley, Wyre Forest, Bham. If Wyre Forest was more
progressed then this approach would give Sandwell a stronger argument for asking

them. MD – Should we be looking across the whole HMA then?

KH – Probably for **next** iteration of HMA SoCG if we're going down that route. Also need to be mindful that Wyre Forest isn't in HMA. Need to be mindful of what we can agree **now** for SoCG.

IC – Would seek agreement on approach to apportionment if not number at this stage.
KH – Over the next couple of months could Bham and Black Country work together on

this? MD – Would need the next couple of months to work this out.

IC – Could SoCG commit to doing apportionment based on evidence of functional relationships between LPAs?

MD – would need to check with senior management given that approach to date has been to push for singular HMA shortfall

IC – Would like to have agreement to work together on how to apportion in areas of

agreement MD – Agree it would be better to show we have a way forward on this

KH – If BCC can get wording to us by end of this week that would enable us to put in

AGREED – BCC to provide wording by the end of this week to put into each SoCG on way forward for apportionment

Timescales for plan-making

KH – Any update from BC LPAs on this in light of individual plans being pursued?
MR – CWC LDS indicates consult in Spring 2023, Reg 19 Summer/Autumn 2023, examination 2024, adopt 2025

NB – WMBC LDS going to cabinet this week, going back to Reg 18, Issues and Options after elections next Summer, submit March 2026

VP – DMBC looking to incorporate Brierly Hill AAP into plan, Reg 18 plan after elections in June/July 2023, not agreed submission/adoption timescales at this stage.

MD – Submission 2025, adoption 2026 for BCC, can't sit still and wait for new system
IC – Apportionment will be important if plans are all operating to different timescales
PM – LDS in December 2022, looking to do one Local Plan with Issues and Options February/March 2023, adoption early 2026

Signing statements of SoCG

KH – HMA SoCG; signed copy from Bham, SSDC's likely to be signed subject to scrutiny, going to be chasing today. Individual SoCGs need to be agreed at officer level this week (prior to consultation) but any idea of timescales for formal sign off?

IC – End of November for CWC

MR – should education be included at this stage?
PW – could reflect current position on school places; that each CWC and SSDC working with education authority confirm that each area can accommodate its own growth in school places

MD – Can likely do BCC's under delegated sign off
MR – Would sign off be delayed until submission next year?
KH – Need sign off as soon as possible to support Regulation 19. Will happily participate in updated SoCG with CWC and others at submission stage but that needs to be in addition to Regulation 19 stage SoCG, not instead of.

AGREED – Officer comments back by end of the week with aim to sign individual SSDC SoCG after this.

AGREED – Dudley, Sandwell and Walsall to confirm individual decision making processes in light of ABCA no longer being decision making signatory

02.11.2022 – SSDC response to BCC Issues & Options Consultation

Sent via email to:
planningstrategy@birmingham.gov.uk
[REDACTED]@birmingham.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

02 November 2022

South Staffordshire Council response to Birmingham Local Plan Issues and Options consultation

Dear Sir/Madam,

Thank you for your letter dated 3rd October 2022 and for providing South Staffordshire Council an opportunity to respond to Birmingham City Council's Issues and Options consultation.

South Staffordshire District Council's response to Birmingham City Council's letter (3rd October 2022) and Issues and Options consultation is set out below under the relevant consultation questions and questions set out in the letter.

Whether at this stage you are able to make a contribution to addressing the shortfall arising from the Birmingham Local Plan

South Staffordshire District Council (SSDC) have already proposed a 4,000 dwelling contribution to the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This contribution was based on the findings of the GBBCHMA Strategic Growth Study 2018, specifically the minimum indicative capacity of the four strategic growth typologies recommended to be taken forward in South Staffordshire. SSDC has communicated this position to Birmingham City Council (BCC) and other Duty to Cooperate partners for a number of years, initially declaring this proposed approach in the 2018 Issues and Options consultation. To date, SSDC have received support from BCC for its approach. As communicated through recent Duty to Cooperate discussions, SSDC is committed to working with BCC and the four Black Country authorities to determine how this contribution to unmet needs should be distributed between the urban authorities generating a housing shortfall.

Before any housing shortfall is finalised from Birmingham's urban area, SSDC would want to understand how BCC has sought to fully maximise its urban capacity and the steps it intends to undertake to maximise Green Belt release within its own authority boundary before seeking further Green Belt contributions from other local authorities. To ensure a consistent approach to addressing these issues BCC should as a matter of urgency participate in work to update the existing GBBCHMA Strategic Growth Study 2018 ('the 2018 study') before Birmingham's Regulation 18 Preferred Options consultation is prepared. This would offer an opportunity for significant changes in housing shortfalls that have occurred since the 2018 study to be considered holistically across the GBBCHMA, ensuring that a consistent joint evidence base sits behind any residual shortfalls to minimise future disagreements about the extent of contributions required.

Updating the 2018 study in this manner would also allow all relevant Duty to Cooperate partners to consider criteria for strategic development locations both within and beyond the Green Belt before BCC concludes on the extent of any Green Belt release within its own area to meet its unmet needs. This is necessary to ensure the sustainability and accessibility of any strategic Green Belt releases made in Birmingham is considered consistently across the GBBCHMA prior to a shortfall from Birmingham being exported to others areas' Green Belt. SSDC has been consistently requesting that an update to the 2018 study be progressed since April 2021 and would be a willing participant in any such study to ensure the strategic need for Green Belt release is considered consistently across the GBBCHMA. SSDC also recognises and welcomes BCC's participation in drafting a statement of common ground across the GBBCHMA Development Needs Group to provide shared principles and an advisory governance structure to steer such work.

In addition to the above matters on general housing needs, SSDC has also recently published an updated Gypsy and Traveller Assessment which has identified a need for 121 pitches during the plan period to 2039. South Staffordshire Council wrote to BCC (and other GBBCHMA and neighbouring authorities) in August 2022 where we set out that we had only identified a supply of 37 pitches to allocate against a 5-year requirement of 72 pitches. In the letter we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

We understand that as you are at the beginning of your plans preparation there will still be a lot of evidence to prepare and consider including relating to your gypsy and traveller needs. SSDC therefore request as part of your plan formulation and evidence gathering that you consider if there is a supply of suitable new public sites in BCC's area that could contribute towards meeting a proportion of SSDC's unmet needs for pitches. In doing this, we would expect BCC to explore the same broad options (e.g. Green Belt options, land in public ownership, opportunities within wider site allocations etc.) that SSDC has so we can be satisfied that our Duty to Cooperate partners are taking a consistent approach to exploring pitch options.

With regards to the 73ha employment shortfall we would query the relevance of South Staffordshire in addressing the unmet needs of Birmingham. The Birmingham HEDNA is unfortunately slightly unclear as to whether there is evidence that South Staffordshire is within the Functional Economic Market Area (FEMA). Paragraph 1.3 of the HEDNA indicating that the FEMA comprises of the Greater Birmingham and Solihull LEP, the Black Country LEP, North Warwickshire and Straford-on-Avon.
However, it then ambiguously states that "[t]here is also a case to be made for South Staffordshire to be included in this definition due to its close links to the Black Country". Regardless of whether or not the FEMA is ultimately defined as including South Staffordshire, we would query whether it is appropriate to request South Staffordshire assist in meeting Birmingham's employment land needs, as South Staffordshire appears to be mentioned in the HEDNA purely by virtue of its relationship to the Black Country, not Birmingham. This identified lack of functional overlap with Birmingham is consistent with South Staffordshire's latest EDNA 2020-2040, which identifies its FEMA as solely consisting of Stafford, Cannock, Wolverhampton, Walsall and Dudley.

The only area of the District which displays any functional relationship with Birmingham is the West Midlands Interchange site, which is an exceptionally large scale site of both regional and

national significance with a very wide travel to work area. A study from the Black Country Plan evidence base indicates that around 53ha of land from West Midlands Interchange can be attributed towards Birmingham. We would suggest that Birmingham consider whether this land supply could contribute towards its unmet needs.

Given all of the above and the lack of a clear functional relationship between Birmingham and South Staffordshire, we do not at this stage think it is appropriate for South Staffordshire to consider making a contribution towards Birmingham's unmet employment need beyond the supply already identified at the West Midlands Interchange site. We request that Birmingham approaches local authorities with functional links to Birmingham itself if further contributions are required but will continue to work with Birmingham on this issue as the evidence base develops.

If you are committed to continuing discussions both through the HMA working group and with BCC independently, as required, to work towards accommodating the shortfall

SSDC has a strong track record of proactively engaging with BCC both through the GBBCHMA Officer Working Group and independent meetings and correspondence with BCC regarding SSDC's
contribution to HMA unmet needs. This is evidenced through SSDC's role in establishing the GBBCHMA Development Needs Group statement of common ground, which sets the framework for future updates of the GBBCHMA SGS and future governance arrangements to deliver the recommendations of such studies. SSDC will continue to work proactively with BCC to provide mechanisms to address the shortfall in a manner informed by consistent and robust evidence across the relevant strategic geographies.

8. What is your preferred option or combination of options?

SSDC encourages BCC, prior to considering Green Belt release, to fully explore the following options to increase urban housing supply in order to ensure any housing shortfall from BCC's area is fully minimised:
Option 1 Increase housing densities
Option 2 More active public sector land
assembly Option 5 Utilise some employment
land for housing

SSDC support the proposed approach to increasing densities, particularly within the City Centre. In assessing where to consider release of some employment land for housing, consideration should be given to the quality of the employment land, the potential suitability of the site in terms of access to public transport and services and the potential ability to produce higher density, space efficient dwellings were this land to be released for housing. This will ensure losses in the City's employment supply only occur where a greater material benefit for its housing supply can be realised.

It appears likely that there may be a shortfall remaining once BCC has fully explored the above options and has confirmed with HMA authorities that their surplus non-Green Belt land supply cannot fill this gap (which all evidence to date suggests is incredibly unlikely). In this instance BCC should then examine Option 6 – Release Green Belt for housing. The extent of strategic Green Belt release locations proposed in the Birmingham Local Plan should in the first

instance be led by the findings of an update to the GBBCHMA Strategic Growth Study 2018, before being refined by local evidence. This is to ensure strategic Green Belt release options in and around Birmingham are compared with other Green Belt release options elsewhere in the HMA, ensuring the Birmingham Local Plan does not discount Green Belt options that are better performing in sustainability terms than Green Belt sites elsewhere in the GBBCHMA. Failing this, BCC should agree a consistent set of site selection criteria to guide Green Belt release with other GBBCHMA authorities, to ensure that it is not asking other LPAs to release Green Belt sites to meet its shortfall that BCC would not itself consider suitable in its own area.

18. Where should new gypsy and traveller sites be located?

For the reasons set out above, Birmingham City Council should thoroughly explore the options for public pitches set out in South Staffordshire's Duty to Cooperate letter of August 2022 to examine whether it can provide public pitches towards South Staffordshire's unmet needs. Specifically, the Birmingham Local Plan should examine the potential for new or expanded public sites (including within the Green Belt), fully explore public land options for their potential for new pitch delivery and requesting that new strategic allocations set aside land for new public traveller sites.

37. How do you think the shortfall in the supply of employment land should be addressed?

For the reasons set out above, we do not at this stage think it is appropriate for South Staffordshire to consider making a contribution towards Birmingham's unmet employment need beyond the 53ha of supply already identified at the West Midlands Interchange site. We request that Birmingham approaches local authorities with functional links to Birmingham (rather than the Black Country) if further contributions are required but will continue to work with Birmingham on this issue as the evidence base develops.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

30.11.2023 – BCC response to SSDC duty to co-operate letter

Birmingham City Council

30th November 2023

Sent via email: e.fox@sstaffs.gov.uk

Dear Ed,

South Staffordshire District Council – Duty to Cooperate Update

Thank-you for your recent latter relating to Duty to Cooperate. We welcome the update on the South Staffordshire District Local Plan and the progress being made to work towards adoption.

With regard to housing, Birmingham City Council has a significant housing shortfall in its emerging Birmingham Local Plan. Whilst this figure is subject to refinement as the Plan progresses, the estimate at the Issues ad Options stage was a shortfall of 78,500 dwellings to 2042. The shortfall is exacerbated by the challenges in the Black Country and anticipated shortfalls across the Black Country area.
Birmingham City Council welcomes the ongoing work to address this challenge and agrees that further work needs to be undertaken at the Housing Market Area level, and possibly beyond to identify options for addressing the shortfall.

Whilst Birmingham City Council see neighbouring authorities, including South Staffordshire, as being fundamental in helping to address the shortfall, we acknowledge that should the NPPF be published as per the consultation draft, then it is less likely that Green Belt allocations will provide the solution to meeting the housing shortfall. Birmingham City Council would not object to a Plan purely because it did not include Green Belt allocations, should it be consulted on in the context of the NPPF, if drafted as per the recent consultation.

With regard to Gypsy and Traveller sites, Birmingham City Council are continuing to explore all options to provide sites to meet the need arising within the Council's own area. Work is on-going to update the Gypsy and Traveller Needs Assessment, and this will provide the latest need figures to inform the Preferred Options.

We welcome the on-going dialogue as both plans progress, and the opportunity to update the Statement of Common Ground. Should you wish to discuss the matters raised in more detail, we are happy to meet with you to do so.

Yours sincerely

[REDACTED]

Ian MacLeod

Director of Planning,Transport & Sustainability

19.08.2024 – SSDC response to BCC Regulation 18 Consultation

Sent via email to:
planningstrategy@birmingham.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

19th August 2024

South Staffordshire Council response to Birmingham City Council Local Plan Regulation 18 consultation

Dear Sir/Madam,
South Staffordshire Council (SSC) welcomes the opportunity to comment on the Draft Birmingham Local Plan (BLP) Regulation 18 Preferred Options consultation document.

South Staffordshire District Council's response to Birmingham City Council's Preferred Options consultation is set out below and is focussed on those specific elements of the plan which raise cross boundary issues. Since the launch of the consultation by Birmingham City Council, the Government has issued a draft revision to the NPPF with potentially significant implications for the production of the current round of local development plans. The comments submitted below were framed in relation to the existing policy framework, we have however referred to potential implications of the proposed NPPF changes in a section on other matters.

Strategy

South Staffordshire broadly welcomes the primary objectives of the preferred development strategy and the aims of seeking to secure and enhance the regional role of the city of Birmingham and to
accommodate as much of the city's development needs within the boundaries of the city.

We support the work undertaken by BCC since the Issues and Options stage to identify additional potential redevelopment opportunities and to re-examine the potential for higher minimum densities in central and well connected locations to deliver greater levels of residential development. It is understood however that a shortfall has been identified in meeting the residential requirement and that the City Council is seeking to export this requirement through Duty to Cooperate agreements with neighbouring authorities.

Shortfalls have also been identified for both employment and Gypsy and Traveller pitches. Apart from a contribution towards B8 provision situated at the West Midland Interchange(see below), it is the stated intention of the plan to meet these other development needs within the boundaries of the city.

The Plan has not sought to consider amendments to existing Green Belt boundaries beyond those identified in the previously adopted plan at the Langley Sustainable Urban Extension, Peddimore and Former Yardley Sewage Works within the authority area. This approach reflects the changes to the National Planning Policy Framework (NPPF) in December 2023 and which currently states that there is no requirement for Green Belt

boundary alterations when plans are being updated or reviewed though authorities may choose to make such boundary amendments where exceptional circumstances are fully evidenced and justified.

Housing Provision

The (current) standard method calculates a total future housing requirement figure for the city of 149,180 dwellings during the plan period (2020-2042). The Preferred Options plan has identified a potential supply of 103,027 dwellings leaving a shortfall of 46,135 dwellings. This shortfall is a reduction on the requirement previously identified and is a result of a comprehensive review of potential development sites in 2023 which identified an additional capacity of 32,843 dwellings. The City Council is also seeking to increase density levels in the most accessible locations including a minimum density of 400 dwellings per hectare in areas within 400m of the City Centre. South Staffordshire Council welcomes the approach taken by the City Council in seeking to identify additional housing sites within the urban area. We would welcome some indication of what measures may be considered to address any potential shortfalls in supply should they arise as result of the non- delivery of identified brownfield sites and regeneration areas within the Growth Zone areas.

The City Council is seeking to export the shortfall in housing supply through Duty to Co-operate arrangements. Given that the Birmingham and Black Country Housing Market Area (HMA) geography is primarily composed of net exporting metropolitan authorities and rural shire authorities comprising significant amounts of Green Belt it is unclear how readily this surplus requirement will be absorbed through duty to cooperate arrangements within the HMA. Whilst acknowledging the work already undertaken by BCC, South Staffordshire would support an ongoing process of assessment to identify any further possible uplifts in supply in order to minimise the net requirement to be exported to other authorities. It is the view of South Staffordshire that this should include an examination of the role of additional land releases from the green belt within the BCC plan area to meet future requirement

SSC paused Local Plan production following completion of a Regulation 19 Publication Plan consultation in December 2022 in light of proposed Government changes to national planning policy. South Staffordshire Council has now recommenced work and has recently completed a consultation on an updated Publication Plan (Regulation 19). It should be noted that SCCs preferred strategy in its April 2024 Regulation 19 consultation is to meet the housing needs of our communities by focus growth primarily on the districts most sustainable Tier 1 settlements including some Green Belt release at these settlements on sites assessed as suitable through our site assessment process. This does result in a potential 640 home surplus based on our current standard method requirement that potentially could be attributed to unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

Gypsies, Travellers and Travelling Showpeople

SSC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need for 162 pitches during the plan period.

SSC wrote to BCC (and other GBBCHMA and neighbouring authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches this is set against a revised 5-year requirement of 92 pitches, and

therefore confirming we had a significant unmet need for pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the city for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

It is noted that the Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2023/24 identified a need for an additional 12 permanent pitches in Birmingham over the next five years, the plan does not provide an indication of the total requirements over the full plan period. It is proposed that the five year requirement will largely be met from the extension and wider use of existing sites. It is not clear that all the options identified above have been explored to determine if additional capacity could be available. SSC would welcome an indication that all such options have been explored and we look forward to continuing to engage with BCC on this issue.

Employment Land Need

South Staffordshire Council supports the approach within the Preferred Options plan of accommodating future employment land needs within the administrative boundaries of the city. The Birmingham City Housing and Economic Development Needs Assessment (HEDNA) 2022 identified an evidenced need for 295.6 hectares of employment plan during the plan period. At the issues and options stage BCC committed to investigating further sources of supply to address the then identified shortfall of 73.64 hectares. Work on an urban capacity study and a review of the existing Core Employment Areas has concluded that sufficient land can be identified to meet employment needs during the plan period within the BCC plan area. Whilst South Staffordshire welcomes the work undertaken to identify this additional supply, a significant element of future land supply is still to be subject to landowner agreement. We would welcome reassurance on the steps which are being taken to secure these sites to ensure that they will contribute to the employment land supply during the plan period.

West Midlands Interchange

A Strategic Rail Freight Interchange (West Midlands Interchange (WMI)) is situated within South Staffordshire though this serves a wider market area (including Birmingham). Through our 2022 EDNA & 2024 update SSC identified a requirement of 18.8 ha of the WMI land to meet our labour demand requirements up to 2041. SSC has acknowledged that there is surplus employment land at WMI that is currently 'unclaimed' and that could be utilised to meet the unmet needs of the wider market area.
Whilst we have taken a more in-depth approach to calculating our share of WMI through

our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 53ha of the site towards the B8 employment land needs of Birmingham, and it is noted that this figure has been included within the employment land supply figure identified within the draft plan.

Other Matters

The proposed changes to the NPPF if adopted would result in a fundamental change to the method of calculating housing need and the introduction of a less restrictive approach to the principle of releasing green belt land to accommodate development requirements. Where green belt land releases are considered necessary these are to be informed by the production of an assessment to determine the degree to which green belt land fulfils the stated purposes which merit green belt designation. The changes to the NPPF envisage the introduction of a category of 'Grey Belt' land.
These are sites in the green belt land which were previously developed and also land which has been assessed as not clearly fulfilling stated green belt purposes. Sustainably located grey belt sites will be a preferred location where green belt releases are considered necessary.

The indicative housing needs figures accompanying the proposed NPPF suggest a reduction in the housing requirement within the BCC area compared to that calculated using the previous standard method. This new calculation would remove the shortfall and potentially generate a small surplus based on an identified supply of 103,027 dwellings. There would still be a need however to include sufficient provision to address the need for plan flexibility to address any issues with site delivery. Such a requirement would suggest that in line with the approach in the proposed amendments to the NPPF that a review of the green belt in the BCC plan area would be necessary.

I hope you find our response helpful as you progress your Local Plan and look forward to continuing to engage constructively with BCC through preparation of our respective plans.
Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

Appendix 3 – Bromsgrove District Council Documents

19.11.2018 – SSDC response to BDC Issues and Options Consultation

From:	Harris, Kelly
To:	"strategicplanning@bromsgroveandredditch.gov.uk"
Cc:	Fox, Edward; Mitchell, Grant
Subject:	South Staffordshire Council"s response to the Bromsgrove District Plan Review
Date:	19 November 2018 16:47:44

Dear Sir/Madam,

South Staffordshire Council's interim response to the Bromsgrove District Plan Review Issues and Options consultation

South Staffordshire Council welcomes the opportunity to submit comments at this early stage of the plan preparation process. The Council supports the commitment made by Bromsgrove District Council to have reviewed the plan and adopted by 2021. It is recognised that this consultation is the first stage in what will be an ongoing dialogue and South Staffordshire is confident that both authorities will be able to work cooperatively to address the issues of mutual interest and concern.

The Issues and Options Paper covers a broad range of topics and issues. In submitting this representation we have sought to provide our initial thoughts on those issues which we consider are the matters of joint relevance and concern, most notably in relation to housing supply issues where both authorities share a broader inter-related geography.

Strategic Issues for Bromsgrove District (Chapter 4)

The range of topics identified in this section would appear to be an accurate reflection of the strategic challenges which are likely to require consideration by the district as the plan review process evolves and form a sound basis for formulating a preferred strategy option once additional detail and evidence has been produced.

However, South Staffordshire Council does have some concerns with respect to the level of detail within the Issues and Option Document relating to the findings and implications of the West Midlands Growth Study. Strategic Issue 3 'Rebalancing the housing market' identifies a range of housing provision though these figure relate to differing plan period timescales and not to varying levels of annual housing growth. It is considered that a more meaningful approach would have included a range of annual housing growth options, thereby setting out options for the district to contribute towards the wider Housing Market Area shortfall.

Strategic Issue 5 'Co-operating with the West Midlands conurbation' does cross reference and provide a link to the GBHMA Strategic Growth Study the Issues and Options document. There is however little explanation of the context supporting the study regarding the scale and source of the housing shortfalls within the HMA or any consideration of the study findings; including the possible identification of a new settlement between Bromsgrove and Birmingham which the study recommends should be tested through the local plan making process. It is considered that the Issue and Option stage is an ideal opportunity to enable the discussion on such matters and to generate debate on what possible approaches may be taken forward to address these issues. South Staffordshire Council is currently consulting on its Local Plan Issues and Options where we have identified the HMA Strategic Growth Study areas of search in our district, and are seeking views on a number of broad spatial options that could align with these areas of search.

It is hoped that the opportunity will be taken prior to publication of a preferred option to enable these matters to be discussed and for the role which Bromsgrove may play towards meeting this shortfall to be made more explicit. We welcome the opportunity to maintain dialogue with you through the preparation of our respective Local Plans.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made. We trust that the comments are useful and look forward to ongoing discussion with you on cross boundary issues throughout the preparation of our respective Local Plans.

Regards,

Kelly Harris

Strategic Planning Team Manager Strategic Planning

South Staffordshire Council

Tel: 01902696317

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28.11.2018 – BDC & RBC response to SSDC Issues and Options Consultation

Local Plan Review Consultation Response Form

Part A: Your Details (Please Print) Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	**Agent's Details (if applicable)**
Title	Mr	
First Name	Mike	
Last Name	Dunphy	
E-mail Address	[REDACTED]@bromsgroveandredditch.gov.uk	
Job Title (if applicable)	Strategic Planning & Conservation Manager	
Organisation (if applicable)	Bromsgrove District Council & Redditch Borough Council	
Address	Town Hall Walter Stranz Square Redditch	
Post Code		
Telephone Number		

The South Staffordshire Local Plan review Issues and Options document is being consulted on for a period of 8 weeks from Monday 8 October to 5pm Friday 30 November 2018. For advice on how to respond to the consultation, and how to fill in this form please see the guidance notes on the Council's website at: www.sstaffs.gov.uk/localplanreview or call 01902 696000.

Please note:

- Comments must be received by **5pm on Friday 30 November 2018**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However your contact details will not be published.

Part B: Please complete a new Part B for each representation you wish to

make. Name: Mike Dunphy

Organisation: Bromsgrove District Council & Redditch Borough Council

1. Which part of the Local Plan review Issues and Options consultation paper does this representation relate to?

Chapter	4: Housing Level of Growth 5: Locations for Growth
Paragraph	
Table	
Question (if applicable)	Questions 6 and 7
Other document eg SA, HRA	

2. Please set out your comments below

Please note that these comments represent the views of Officers only and have not been subject to Member endorsement:

We welcome South Staffordshire's approach to identifying the WMHMA Strategic Growth Study (SGS) Areas of Search within its District and the opportunity to seek views on a number of broad spatial options.

Paragraph 4.18 of the Issues and Options consultation document states that the Council's preferred level of future growth is *Option C – to provide enough housing to meet South Staffordshire's Objectively Assessed Housing Needs, and provide enough land to accommodate a minimum of an additional 4,000 dwellings towards the wider housing shortfalls from the HMA*. It is noted that South Staffordshire Council considers that this represents a proportionate contribution towards both its own housing needs and the needs of the wider HMA. Without a similar exercise being carried out in other authorities we are unable to comment on or endorse this number as being the correct proportion.

It is important to note that further detailed work will be required to finally determine the total outstanding requirement and distribution for the WMHMA housing need as new evidence arises. Within this context we would welcome the opportunity to continue to discuss further the role that each of the LPAs can play in meeting the wider WMHMA housing needs as we work towards developing our respective preferred options.

The SGS is an independent study undertaken by GL Hearn on behalf of the WMHMA. Each of the 14 LPAs within the HMA will need to test whether the broad locations put forward within the SGS are appropriate in light of the local factors which are unique to each area.
For example, infrastructure provision, environmental constraints and local housing market delivery rates. They will also need to consider how these potential locations

would support their individual emerging spatial strategies to meet their own housing needs.

As such, it should be noted that the identification of the broad locations within the SGS are not binding on the local authority and each authority should continue through their plan review process, to consider alternative locations (some of which may arise following consultation).

07.01.2019 – SSDC response to BDC Issues and Options Consultation

From:	Fox, Edward
To:	"strategicplanning@bromsgroveandredditch.gov.uk"
Cc:	Harris, Kelly
Subject:	FW: South Staffordshire Council"s response to the Bromsgrove District Plan Review
Date:	07 January 2019 14:34:10

Dear Sir/Madam,

South Staffordshire Council's response to the Bromsgrove District Plan Review Issues and Options consultation

You will recall that my colleague Kelly Harris wrote to you on 19th November 2018 to provide South Staffordshire Council's interim response to The Bromsgrove District Plan Review Issues and Options (see email below). She informed you that the response was subject to formal agreement through the Council's formal scrutiny process. I can now confirm that this has now concluded with no amendments proposed to the interim response.

Therefore, please accept the text below as the Council's formal response to the consultation:

South Staffordshire Council welcomes the opportunity to submit comments at this early stage of the plan preparation process. The Council supports the commitment made by Bromsgrove District Council to have reviewed the plan and adopted by 2021. It is recognised that this consultation is the first stage in what will be an ongoing dialogue and South Staffordshire is confident that both authorities will be able to work cooperatively to address the issues of mutual interest and concern.

The Issues and Options Paper covers a broad range of topics and issues. In submitting this representation we have sought to provide our initial thoughts on those issues which we consider are the matters of joint relevance and concern, most notably in relation to housing supply issues where both authorities share a broader inter-related geography.

Strategic Issues for Bromsgrove District (Chapter 4)

The range of topics identified in this section would appear to be an accurate reflection of the strategic challenges which are likely to require consideration by the district as the plan

review process evolves and form a sound basis for formulating a preferred strategy option once additional detail and evidence has been produced.

However, South Staffordshire Council does have some concerns with respect to the level of detail within the Issues and Option Document relating to the findings and implications of the West Midlands Growth Study. Strategic Issue 3 'Rebalancing the housing market' identifies a range of housing provision though these figure relate to differing plan period timescales and not to varying levels of annual housing growth. It is considered that a more meaningful approach would have included a range of annual housing growth options, thereby setting out options for the district to contribute towards the wider Housing Market Area shortfall.

Strategic Issue 5 'Co-operating with the West Midlands conurbation' does cross reference and provide a link to the GBHMA Strategic Growth Study the Issues and Options document. There is however little explanation of the context supporting the study regarding the scale and source of the housing shortfalls within the HMA or any consideration of the study findings; including the possible identification of a new settlement between Bromsgrove and Birmingham which the study recommends should be tested through the local plan making process. It is considered that the Issue and Option stage is an ideal opportunity to enable the discussion on such matters and to generate debate on what possible approaches may be taken forward to address these issues. South Staffordshire Council is currently consulting on its Local Plan Issues and Options where we have identified the HMA Strategic Growth Study areas of search in our district, and are seeking views on a number of broad spatial options that could align with these areas of search.

It is hoped that the opportunity will be taken prior to publication of a preferred option to enable these matters to be discussed and for the role which Bromsgrove may play towards meeting this shortfall to be made more explicit. We welcome the opportunity to maintain dialogue with you through the preparation of our respective Local Plans.

Kind regards

Ed
Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire Council

Tel: 01902696418

From: Harris, Kelly

Sent: 19 November 2018 16:48

To: 'strategicplanning@bromsgroveandredditch.gov.uk'

Cc: Fox, Edward; Mitchell, Grant

Subject: South Staffordshire Council's response to the Bromsgrove District Plan Review

Dear Sir/Madam,

South Staffordshire Council's interim response to the Bromsgrove District Plan Review Issues and Options consultation

South Staffordshire Council welcomes the opportunity to submit comments at this early stage of the plan preparation process. The Council supports the commitment made by Bromsgrove District Council to have reviewed the plan and adopted by 2021. It is recognised that this consultation is the first stage in what will be an ongoing dialogue and South Staffordshire is confident that both authorities will be able to work cooperatively to address the issues of mutual interest and concern.

The Issues and Options Paper covers a broad range of topics and issues. In submitting this representation we have sought to provide our initial thoughts on those issues which we consider are the matters of joint relevance and concern, most notably in relation to housing supply issues where both authorities share a broader inter-related geography.

Strategic Issues for Bromsgrove District (Chapter 4)

The range of topics identified in this section would appear to be an accurate reflection of the strategic challenges which are likely to require consideration by the district as the plan review process evolves and form a sound basis for formulating a preferred strategy option once additional detail and evidence has been produced.

However, South Staffordshire Council does have some concerns with respect to the level of detail within the Issues and Option Document relating to the findings and implications of the West Midlands Growth Study. Strategic Issue 3 'Rebalancing the housing market' identifies a range of housing provision though these figure relate to differing plan period timescales and not to varying levels of annual housing growth. It is considered that a more meaningful approach would have included a range of annual housing growth options, thereby setting out options for the district to contribute towards the wider Housing Market Area shortfall.

Strategic Issue 5 'Co-operating with the West Midlands conurbation' does cross reference and provide a link to the GBHMA Strategic Growth Study the Issues and Options document. There is however little explanation of the context supporting the study regarding the scale and source of the housing shortfalls within the HMA or any consideration of the study findings; including the possible identification of a new settlement between Bromsgrove and Birmingham which the study recommends should be tested through the local plan making

process. It is considered that the Issue and Option stage is an ideal opportunity to enable the discussion on such matters and to generate debate on what possible approaches may be taken forward to address these issues. South Staffordshire Council is currently consulting on its Local Plan Issues and Options where we have identified the HMA Strategic Growth Study areas of search in our district, and are seeking views on a number of broad spatial options that could align with these areas of search.

It is hoped that the opportunity will be taken prior to publication of a preferred option to enable these matters to be discussed and for the role which Bromsgrove may play towards meeting this shortfall to be made more explicit. We welcome the opportunity to maintain dialogue with you through the preparation of our respective Local Plans.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made. We trust that the comments are useful and look forward to ongoing discussion with you on cross boundary issues throughout the preparation of our respective Local Plans.

Regards,

Kelly Harris

Strategic Planning Team Manager Strategic Planning

South Staffordshire Council

Tel: 01902696317

Have you visited our website? https://www.sstaffs.gov.uk

12.12.2019 – BDC response to SSDC SHSID Consultation

Local Plan Review Consultation Response Form

Part A: Your Details (Please Print) Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	**Agent's Details (if applicable)**
Title	Mr	
First Name	Mike	
Last Name	Dunphy	
E-mail Address	[REDACTED]@bromsgroveandredditch.gov.uk	
Job Title (if applicable)	Strategic Planning & Conservation Manager	
Organisation (if applicable)	Bromsgrove District Council	
Address	Town Hall Walter Stranz Square Redditch	
Post Code	B98 9AH	
Telephone Number	01527 881325	

The South Staffordshire Local Plan review **Spatial Housing Strategy & Infrastructure Delivery** document is being consulted on for a period of 8 weeks from Thursday 17 October until 5pm Thursday 12 December 2019. For advice on how to respond to the consultation form please email localplanreview@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Thursday 12 December 2019**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However your contact details will not be published.

Part B: Please complete a new Part B for each representation you wish to

make. Name: Mike Dunphy

Organisation: Bromsgrove District Council

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation paper does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	
Other document eg SA, HRA	

Bromsgrove District Council welcomes the opportunity to comment on South Staffordshire's Spatial Housing Strategy and Infrastructure Delivery consultation. Please note that these comments represent the views of Officers only at this stage and have not been subject to Member endorsement. It is planned to take this response to the meeting of Bromsgrove's Cabinet on 15th January 2020 for approval and then to full Council on the 22nd January, and we will update you after this time.

We welcome South Staffordshire Council's continued commitment to plan for not only its own housing needs, but also to make a contribution of **up to** 4,000 dwellings towards unmet needs in the wider HMA (para 2.2). However, we do note the subtle change in wording from the Issues and Options consultation which stated the Council's preferred option at this stage was to provide "*a **minimum** of an additional 4,000 dwellings towards the wider housing shortfalls from the HMA*" (I&O Option C). As with our previous comments, it is not possible to fully endorse this level of contribution at this stage, without an up to date understanding of the shortfall and how the remainder will be dealt with. We do however support South Staffordshire's positive efforts so far in their Local Plan Review on working to address the HMA shortfall.

The final sentence of para 2.2 states that if there is evidence that the shortfall across the HMA has significantly reduced prior to Submission of the Local Plan Review, then South Staffordshire Council will reduce its contribution to meeting unmet needs proportionately. Until an up-to-date level of shortfall has been quantified and agreed across the HMA, it is premature to make this assumption, particularly given that the 2018 GBHMA Strategic Growth Study focused on the shortfall to 2031, which falls midway through the proposed Local Plan Review plan period. Given that many local authorities have commenced plan reviews which extend beyond the timeframe of the GBHMA SGS, it is possible that there will be further unmet needs which the HMA constituent authorities will need to address. The wording at para 2.2 could therefore be altered in future versions of the Local Plan Review to acknowledge that the opposite is also possible.

We note at para 2.3 that in response to the Government's standard methodology, South Staffordshire's housing requirement for the period 2018-2037 has fallen from the level of 9,130 dwellings in the 2018 Issues and Options consultation to 8,845 dwellings in this consultation.
Apart from local affordability data which has been used to inform the housing options, Gypsy and Traveller work which is ongoing, no reference is made to any further evidence

base work in relation to housing needs. Given that the standard methodology gives a minimum annual housing need figure, is any further work proposed to consider a higher housing need figure, particularly given that evidence on employment needs is currently lacking? The relationship between housing and economic development needs should be explored together through the evidence base.

It is noted under Spatial Housing Strategy Option G that: "*Urban extensions are provided across all neighbouring authorities within the Greater Birmingham Housing Market Area (GBHMA) with unmet housing needs to ensure that the district's contribution to the GBHMA shortfall is met in locations from which households are being displaced*." Whilst Bromsgrove District has committed to review its Green Belt to accommodate the remaining housing needs of the adopted Bromsgrove Development Plan and the future needs of the District Plan Review, the suitability of land within the Green Belt for development has not yet been assessed. This is one of the next key pieces of work in the Bromsgrove District Plan Review process. There is the potential for there to be a shortfall in the amount of suitable land available for development. This means that, together with the requirement under para 137 of the NPPF regarding establishing exceptional circumstances to justify the amendment of Green Belt boundaries, we will need to discuss the potential for the development needs of our district to be accommodated by our neighbouring authorities, including South Staffordshire.

Spatial Housing Strategy Options B, D, E, F and G all include a proposed area of search for an urban extension along the western edge of the Black Country, with the indicative number of dwellings associated with this broad location ranging from 619 (Option B) to 1106 (Option D) [Appendix 4: Indicative Growth Tables]. This is shown as a hatched area along the western edge of the Black Country on the associated diagram and this extends down to south of the district and its border with Bromsgrove district. Whilst Bromsgrove district only has a small common boundary with South Staffordshire, we would be keen to learn of the precise location of any planned urban extension in this vicinity at the earliest stage possible, so that any cross boundary impacts can be understood and explored.

Whilst we understand South Staffordshire's approach in producing a consultation document which focuses solely on options for housing distribution and infrastructure at this stage, this presents questions which are unanswerable at this stage about the relationship with other uses, namely employment land. We therefore welcome the acknowledgement at para 5.4 of South Staffordshire's role in the employment market area and that future employment land allocations in the area are likely to come from the Black Country authorities. We are interested to understand more detail of this proposal, preferably through Duty to Cooperate discussions prior to the finalisation of a Preferred Options document.

We look forward to continuing to work with South Staffordshire Council both through our roles in the GBHMA and during ongoing discussions in respect of the Duty to Cooperate as we work towards developing the next stages in our respective Local Plan Reviews.

25.02.2022 – BDC response to SSDC 14.01.2022 letter

Bromsgrove District Council
www.bromsgrove.gov.uk

Cllr Terry Mason
South Staffordshire Council C/o Kelly Harris
Lead Planning Manager Strategic Planning

25th February 2022

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Dear Councillor Mason,

I write in response to your letter dated 14th January 2022 regarding gypsy and traveller pitch provision in South Staffordshire. In considering the request in your letter, we note the findings of both the 2021 South Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA) and Pitch Deliverability Study. Please note that this letter represents the views of officers only at this stage and are not binding on the Council.

Bromsgrove District Council is in the process of finalising its own GTAA. Draft findings indicate that there is a need for a further 11 traveller pitches and 3 travelling showperson plots to be provided within the Bromsgrove District Plan Review period to 2040. Within the district there is currently only one publicly owned site comprising of 23 pitches. This site is at capacity and there is no scope for this to be extended. All other sites are in private ownership and provide for a maximum of 3 pitches each.

Given the Green Belt designation covering the majority of Bromsgrove District, the Council does not have an extensive land portfolio in order to assist in meeting our own needs or those of other authorities.

The GTAA consultants were also tasked to look at a variety of sources to find potential sites in the District where any future need identified through the assessment could be accommodated. To date, this process has not resulted in any sites being identified. Unless some or all of our need can be met by one of our neighbouring authorities through the Duty to Cooperate, we are in the position where it is likely we will have to release land from the Green Belt to allocate sites in private ownership for traveller provision. Given the need to evidence and justify exceptional circumstances in order to alter Green Belt boundaries

(2021 NPPF - Para 140 and 2015 PPTS – Policy E) , we will first focus on demonstrating exceptional circumstances in order to meet our own locally derived needs for traveller pitches and travelling showperson plots.

I note that para 7.26 of the South Staffordshire GTAA concludes that net pitch requirements are driven by locally identifiable need (and by inference not in-migration). There is also no reference to the movement patterns of travellers residing in South Staffordshire to suggest there is a strong connection with Bromsgrove District, and this was not found in our own GTAA either. We would therefore also question the evidence for and sustainability of providing pitches in Bromsgrove District to meet locally arising needs.

Therefore we must unfortunately conclude in this instance that we are unable to assist South Staffordshire Council in meeting your unmet need for gypsy and traveller provision. However we look forward to engaging with you on other Duty to Cooperate matters as both of our plans progress.

Yours sincerely,

Mike Dunphy

Strategic Planning and Conservation Manager
Bromsgrove District Council

27.06.2022 – BDC duty to co-operate letter

Bromsgrove District Council
www.bromsgrove.gov.uk

Dear Colleagues,

27th June 2022

Bromsgrove District Plan Review – Duty to Cooperate (DTC)

Bromsgrove District Council (BDC) is currently progressing the review of the Bromsgrove District Plan. In order to move towards a preferred option, we wish to obtain your views on a number of key considerations.

We have now published a Housing and Economic Development Needs Assessment (HEDNA) which recommends draft housing and employment requirements to be included in the plan for the period to 2040. In summary they are as follows:

HEDNA

- A housing requirement of 383 dwellings per annum in line with the Government's local housing need standard methodology (N.B. this is a 2021 based figure, using 2020 affordability ratios)
- An industrial land requirement of between 21-28 hectares, with a current supply deficit of between 6-13 hectares
- An office space requirement of between 37,000-45,000sq m, with a current supply deficit of between 5,000-13,000 sq m.
- Possible inclusion of an industrial led employment park of

approx. 25 hectares The HEDNA can be viewed via our website at

www.bromsgrove.gov.uk/districtplan

As a duty to cooperate partner it is important that we have your views on the questions posed below.

1. The above section outlines the likely housing, employment land and traveller pitch requirements the review of the Bromsgrove District Plan will contain. Please can you confirm whether you view these as acceptable requirements for inclusion in Bromsgrove's Plan. If you disagree, please explain why.

As you are aware, Bromsgrove is a Green Belt authority with 89% of the district designated as such, and with the remainder either already developed or allocated for development. BDC in its extant District Plan and early consultation on the Plan review,

stated the need to review the Green Belt and release land to meet future development needs. Officers believe this still to be the case, although the Council needs to ensure that exceptional circumstances exist to release this land as per the NPPF. As a member of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and a DTC authority, we would ask if you could consider taking some of Bromsgrove's emerging growth requirements to minimise Green Belt release in the District. If you are able to accommodate some of BDC's development needs, please indicate the type and amount you are able to accommodate. Likewise, if you are unable to accommodate some of our development needs, please can you provide sufficient justification to support your position.

1. Whilst Bromsgrove is predominantly a Green Belt authority, we are also equally aware of our obligations through the NPPF to assist with accommodating any unmet need from neighbouring authorities where it is practical to do so. It is our understanding that the housing shortfall that exists across the Greater Birmingham and Black Country Housing Market Area is being driven by a lack of supply in the Birmingham City and the Black Country Local Authority areas. That being the case, are there any other additional unmet housing needs originating from within your authority area that we need to consider?

2. Are there any other unmet development needs, such as for employment land that we should be considering?

3. Does your Council have any views on what, if any contribution, Bromsgrove should be making towards meeting the needs of the wider housing market area? Please provide the reasons for your views and evidence of the exceptional circumstances needed to justify releasing some of Bromsgrove's Green Belt to meet such needs.

4. Do you have any other shared strategic issues such as cross boundary infrastructure needs that you would like to raise at this stage?

Ultimately any agreement between our authorities will need to be reflected in a Statement of Common Ground, but in the shorter term a response setting out your authority's initial position on these matters would be greatly appreciated.

If you would like to meet with Council Officers to discuss any of your answers or the issues raised above in more detail, please contact me on [REDACTED].

We would request that all responses are sent to us by 31st July 2022.

Yours faithfully,

Strategic Planning and Conservation
Manager Bromsgrove District Council

29.07.2022 – SSDC response to BDC 27.06.2022 letter

South Staffordshire Council

Sent via email to:
@bromsgroveandredditch.gov.uk

Please ask for: Kelly Harris

Direct Dial: (01902) 696418

Email: k.harris@sstaffs.gov.uk

29 July 2022

Bromsgrove District Plan Review – Duty to Cooperate (DTC)

Dear Mike,

Please see below for South Staffordshire District Council's responses to the questions highlighted in Bromsgrove District Council's duty to cooperate letter dated 27th June 2022. The responses are numbered to the corresponding questions set out in the letter.

Response to Question 1.

We do not have the capacity to critically review the detailed methodology for arriving at Bromsgrove's housing, employment and traveller pitch requirements. If there are key methodological assumptions used within the HEDNA that would raise duty to cooperate implications in Bromsgrove's view then these should be highlighted by Bromsgrove in duty to cooperate discussions with South Staffordshire and other functionally related authorities to ensure consistency with other evidence bases within the wider region.

Notwithstanding this, we support the principle of using the standard method in calculating housing need, as this should be used in all but exceptional circumstances in line with PPG. We note that the local housing need is determined to be sufficient to accommodate the projected job growth in Bromsgrove District through either a reduced level of out-commuting or increase in economic activity rates. If these underlying assumptions would

require other local authorities to reduce their level of in-commuting when aligning their own housing and job growth then we would expect these to be clearly set out by Bromsgrove under the Duty to Cooperate and agreed prior to finalising the District's housing target.

We are also concerned at the language used in 2.67 - 2.70 of the HEDNA, which appears to suggest that joint working between authorities to meet the Black Country Plan shortfall can only begin once the plan target has been examined. This appears in conflict with both the requirements of national policy and recent case law examples, which is a significant concern given that the latest draft Black Country Plan identifies a 28,000 home shortfall even after Green Belt release.

As early as 2018 the GBBCHMA has acknowledged that there is a thorough evidence base[1] detailing scale of shortfall across both Birmingham and Black Country, indicating this would be at least 48,000 dwellings by 2036 (even if non-Green Belt densities were fully maximised) and that significant Green Belt release would be required to meet this shortfall. This is significant as a key component of the post 2018 NPPF tests of soundness is that cross-boundary strategic matters should be dealt with rather than deferred, with joint working evidenced in statements of common ground. The Planning Practice Guidance reinforces this in its guidance on the Duty to Cooperate,
stating that "*...[i]nspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates...*".

The implications of this guidance in practice can be seen from multiple case-law examples. For example, Waverley Borough Council, a predominantly Green Belt and AONB local authority, was required by a planning inspector to proactively take 50% of Woking's potential unmet need in 2019. This was despite Woking's final unmet need being unexamined, as it had been identified in a 2015 SHMA which post-dated their existing 2012 Core Strategy. The following court of appeal judgement[2] supported the inspector's approach, concluding that the judgement of how much of an authority's unmet need to accommodate is inherently imprecise, but nonetheless is a matter that local plans can address. This point is further reinforced by the recent failure of Tonbridge and Malling's local plan[3]. In
this instance, the local authority did not engage with Sevenoaks District Council's emerging shortfall. This shortfall had not been examined as it was in a Regulation 18 plan prepared by Sevenoaks and could have been anywhere between 600 – 7,000 dwellings. Nonetheless the failure of Tonbridge and Malling to provide a response to this issue in its local plan led to a failure of the Duty to Co-operate.

Given all of the above it is clear that Bromsgrove's local plan will have to address the Black Country's housing shortfall based on the evidence available to date. Regardless of the final extent of the Black Country's housing
shortfall, which could be subject to change, it is a clear that this is a strategic issue that the Bromsgrove local plan must address under the Duty to Co-operate, rather than deferring the issue until after the Black Country Plan is examined.

For similar reasons, it is not considered appropriate for the Black Country's employment shortfall to be deferred until an inspector has conclusively established the exact unmet need and supply figures, as paragraph 2.80 of the HEDNA appears to suggest. We note that there are two options presented for Bromsgrove's FEMA, both of which involve part or all of the Black Country, meaning that shortfalls arising from the Black Country are a strategic issue which Bromsgrove need to consider. The Black Country's 2021 Draft Plan and previous Duty to Cooperate letters have consistently communicated the need for contributions towards the Black Country's unmet employment needs and, as per the post NPPF 2018 case-law and national guidance above, it would not be appropriate for Bromsgrove to defer this issue until the examination of the Black Country Plan has concluded.

Response to Question 2.

South Staffordshire District Council has been consulting on iterations of its emerging local plan since 2018, which proposed to deliver 4,000 homes towards the unmet needs of the GBBCHMA. This reflected the findings of the Strategic Growth Study 2018, the adopted Birmingham Development Plan and the emerging Black Country Plan, all of which suggested a very significant housing shortfall arising from the conurbation (Birmingham and the Black Country), particularly in the period beyond 2031.

Similar to Bromsgrove, South Staffordshire District is over 80% Green Belt, with the remainder either developed, allocated or in the limited area of open countryside remaining in the north of the district. In light of this, South Staffordshire's previous 2019 and 2021 Regulation 18 plans have both concluded that the district will already have to propose significant Green Belt release to both meet its own housing needs and its proposed 4,000 contribution to the GBHMA unmet needs, as there is very limited capacity for sustainable site options beyond the district's Green Belt or within existing villages. Equally, South Staffordshire has also had to release Green Belt to meet its own and wider subregional employment needs in 2018, and is also having to propose 232ha of Green Belt release at the West Midlands Interchange through its emerging local plan review.

As the above demonstrates, South Staffordshire is already releasing significant Green Belt land to meet both its own needs and the existing and emerging needs of other local authorities, where these authorities have already sought to release Green Belt prior to exporting their unmet needs to other areas. Given this context, South Staffordshire is unlikely to be able to assist Bromsgrove in avoiding Green Belt release to meet the needs identified in its recently published HEDNA. In light of the Green Belt release already proposed in multiple GBBCHMA local authorities to meet housing needs we would also question whether it is appropriate for Bromsgrove to add to these pressures by not allocating Green Belt land to meet its own development needs.

Response to Question 3.

Aside from the unmet needs of the Birmingham and Black Country urban areas, work on South Staffordshire's emerging local plan suggests that it will not be able to meet its gypsy and traveller pitch requirement for 121 pitches over 15 years or 72 pitches over the five year period, being able to provide only 42 additional pitches towards this. In identifying this shortfall, South Staffordshire has sought to first identify all deliverable opportunities to expand/intensify its existing gypsy and traveller sites, all of which are in the Green Belt. It has also completed an audit of all publicly available land in the Council's ownership to identify opportunities for a public land site. However, all of these site options appear to have constraints that would prevent them from being delivered (e.g. existing recreation/environmental designations). It is completing an audit of all County Council land within the district, but it is not anticipated that this will reveal additional pitches based on the draft work to date. As such, it is likely that a very significant shortfall will remain between the district's gypsy and traveller needs and its deliverable pitch supply.

This cross boundary strategic issue was set out in the Duty to Cooperate letter sent by South Staffordshire District Council on 14 January 2022. We have received a response from Bromsgrove which indicates that the district's land options are heavily constrained by Green Belt and that there is only one public site in Bromsgrove which is currently at capacity. Given this and the fact that need in South Staffordshire did not appear to be driven by in- migration, the response questioned the sustainability of relocating pitch delivery from South Staffordshire to Bromsgrove.
Whilst we understand Bromsgrove's concerns on this point, South Staffordshire District currently has no additional opportunities to deliver sites to meet the specific families' needs identified in the GTAA, nor does it appear to have the opportunity to deliver additional public sites on land within it or the County Council's control, even when Green Belt land is examined. We would therefore welcome further dialogue to understand what steps Bromsgrove has undertaken to consider the potential for additional public sites on similar land typologies within its own area, as the district has a significant shortfall that requires the assistance of other authorities in order to be met.

Response to Question 4.

As Bromsgrove officers will be aware, there is a significant and emerging shortfall in employment land arising from the Black Country, even after Green Belt site options are examined. As Bromsgrove is a functionally related authority to the Black Country, particularly to the authorities which generate much of its shortfall (e.g. Sandwell), we would expect Bromsgrove to participate in the Statement of Common Ground currently being prepared by the Black Country to distribute its unmet employment needs. South Staffordshire and Bromsgrove are also within the geography set out in the West Midlands Strategic Employment Sites Study 2021, and both authorities should continue to work together to progress the necessary update to this work through the GBBCHMA Development Needs Group.

Response to Question 5.

As the only consistent (albeit high level) assessment of Green Belt, landscape, sustainability, deliverability and accessibility available across the GBBCHMA, we consider it vital that Bromsgrove's contribution to unmet needs should be informed by the recommended growth locations identified in the GHBBCMA Strategic Growth Study 2018, or subsequent updates of this work as and when this becomes available. This is particularly important as the position statement published alongside the Strategic Growth Study 2018 stated that this study was a "thorough
evidence base to take matters forwards through the local plan review process"[4]. Until such time as this evidence is updated, it is therefore imperative that Bromsgrove fully tests and seeks to accommodate site typologies recommended in the GBBCHMA Strategic Growth Study 2018, or other more sustainable options with similar benefits to this study's growth recommendations.

The Strategic Growth Study recommends that a new settlement (10,000-15,000 dwellings) between Birmingham and Bromsgrove/Redditch should be taken forward as this broad location performs better than many other strategic growth options identified in the Strategic Growth Study. It also recommends that there is also an area of dispersed housing growth ('proportionate dispersal') recommended around Hollywood (500 – 2,500 dwellings).

The study did acknowledge that it was uncertain whether a 10,000+ dwelling new settlement could be accommodated in the land available between Bromsgrove/Redditch and Birmingham and in reality, it is unlikely this amount of housing growth could be delivered within a 15 year plan period. However, it is still important to explore strategic growth options in this broad location, as a key reason for large scale development being recommended between Birmingham and Redditch was the public transport provision in this area, particularly its proximity to rail[5], a fact which has not fundamentally changed since the Strategic Growth Study was published. Given this we would suggest that a more realistic capacity for this recommendation may be 1,500 dwellings. This recognises that any strategic growth location between Birmingham and Bromsgrove/Redditch is likely to be closer in scale and function to an urban extension/garden village, rather than a new town (which the 10,000+ dwelling scale appears to imply).

Bringing the above together, we would request that Bromsgrove make a minimum contribution of at least 2,000 dwellings to the unmet needs of the GBBCHMA, based on the most up-to-date and consistent evidence on the capacity of broad locations within the GBBCHMA (the 2018 Strategic Growth Study). This reflects the realistic minimum capacity of a strategic growth location between Bromsgrove/Redditch and Birmingham (1,500+ dwellings) plus the minimum capacity of proportionate dispersal around Hollywood (500+ dwellings). It may be that local site assessment processes identify better locations for accommodating this unmet need contribution (e.g. areas with better rail access to Birmingham or proportionate dispersal locations of lesser Green Belt harm).

There may also be scope to go significantly above this figure if the 3,400 dwellings previously

allocated for Redditch are no longer required for Redditch's unmet needs, as suggested in the HEDNA. This could offer additional supply that can be put towards wider GBBCHMA unmet needs in addition to the delivery of areas recommended by the GBBCHMA Strategic Growth Study. Notwithstanding this potential oversupply, it is vital that Bromsgrove commits to delivering the locations recommended for growth in the GBBCHMA Strategic Growth Study, or other location which have similar merits. To do otherwise would risk dispersing growth from Bromsgrove to other Green Belt areas of the GBBCHMA, which the Strategic Growth Study 2018 indicates will likely perform worse in terms of Green Belt, landscape, sustainability, deliverability and accessibility.

Response to Question 6.

Beyond the matters raised above relating to GBBCHMA unmet housing needs, unmet Black Country employment needs and unmet South Staffordshire gypsy and traveller needs, we do not have any other shared strategic issues to raise at this stage.

I trust the above is clear but should you wish to clarify any of our responses then please do not hesitate to contact me.

Yours sincerely

[REDACTED]

Kelly Harris

Lead Planning Manager – South Staffordshire Council

02.09.2022 – BDC response to SSDC 08.08.2022 letter

Bromsgrove District Council
www.bromsgrove.gov.uk

Cllr Terry Mason
South Staffordshire Council C/o Kelly Harris
Lead Planning Manager Strategic Planning

1st September 2022

Re: South Staffordshire Council Gypsy and Traveller pitch provision – August 2022

Dear Councillor Mason,

I write in response to your letter dated 8th August 2022 regarding unmet needs of Gypsies and Travellers in South Staffordshire. Please note that this letter represents the views of officers only at this stage and are not binding on the Council.

Specifically, your letter asked for confirmation of the four following points:

1) **Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?**
As detailed in our response to you in February 2022, there is one public traveller site in Bromsgrove District which has a capacity of 23 pitches. The site is very popular and there are currently no free pitches.

2) **Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?**
We are currently continuing to explore options as to how we will meet our own identified need of 11 traveller pitches and 3 travelling showperson plots. As set out in our previous response, given the Green Belt designation covering the vast majority of the District, it is very likely that this need will be accommodated within the Green Belt. We can confirm that we are considering both publicly run and privately run sites.

3) **Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide**

indicative timescales for this? At this stage we believe we may be able to accommodate our requirement without approaching privately owned sites. However if our favoured options prove undeliverable, we would consider other options, which could include a publicly run site as part of a wider allocation.

4) **Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?**

We can confirm that we have considered all publicly owned land that was either promoted to us through the Call for Sites process or that we were aware of, as possible locations for meeting traveller needs.

I trust this evidences the thorough process that has been taken Bromsgrove District in identifying potential sites for Gypsies and Travellers and demonstrates consistency with your own approach. Furthermore, I hope this letter satisfies the need for futher dialogue between our Local Authority areas raised by Ms Harris in recent correspondence regarding the Bromsgrove District Plan Review (Duty to Cooperate letter dated 29 July 2022), specifically in relation to the Question 3 response.

Yours sincerely,

Mike Dunphy

Strategic Planning and Conservation Manager
Bromsgrove District Council

21.11.2023 – BDC & RBC response to SSDC 24.10.2023 letter

From: Michael Dunphy - Strategic Planning and Conservation Manager

To: Alex Evans

Cc: Edward Fox; Kelly Harris; Patrick Walker

Subject: RE: South Staffordshire - Duty to Cooperate Update Letter

Date: 21 November 2023 17:10:17

Attachments:

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Alex

Thank you for your letters to Bromsgrove District Council and Redditch Borough Council, we note the contents. In response to the substantive issue you raise about the proposed changes to Para 142 of the NPPF, and the approach South Staffordshire DC may take in relation to the changes. I can confirm that BDC and RBC will respond fully on this issue in due course once they have had chance to review the NPPF changes and consider the implications for plan making. We expect this to form part of any response we submit at regulation 19 stage.

From a Bromsgrove perspective only, you have request an update on the steps being taken to examine all potential gypsy and traveller pitch options. I can confirm BDC continues to assess all sites submitted through the Call for Sites process and from other sources to determine their suitability for meeting the development needs of the District, including those of the traveller and travelling showperson communities.

Please be aware that at this stage this is only an officer response and doesn't represent the formal view of either Bromsgrove District Council or Redditch Borough Council

Thanks Mike

Mike Dunphy
Strategic Planning and Conservation Manager Bromsgrove
District and Redditch Borough Councils Tel: 01527 881325
Email: [REDACTED]@bromsgroveandredditch.gov.uk

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From: A.Evans@sstaffs.gov.uk < >
Sent: Tuesday, November 21, 2023 11:09 AM
To: Michael Dunphy - Strategic Planning and Conservation Manager
< >
Cc: Edward Fox < >; Kelly Harris < Patrick Walker
<>; Alex Evans
Subject: [Possible Spoofed Email..]FW: South Staffordshire - Duty to Cooperate Update Letter

Dear Mike,

I just wanted to send a reminder that we are after responses to the attached letters by the end of Friday this week.

If you are unable to meet this deadline, please could you indicate when we would be likely to get receive your responses.

Please let us know if you have any queries.

Kind regards,

Alex

Appendix 4 – Cannock Chase District Council Documents

15.08.2018 – SSDC officer response to CCDC Issues and Scope Consultation

From:	Fox, Edward
To:	"planningpolicy@cannockchasedc.gov.uk"
Cc:	Clare Eggington; Harris, Kelly
Subject:	SSDC response to Cannock Chase Scoping and Issues Paper.
Date:	15 August 2018 10:56:24

Dear Sir/Madam,

South Staffordshire Council's interim response to the Cannock Chase Council Local Plan Review Issues and Scope Consultation Document

South Staffordshire Council welcomes the opportunity to comment on Cannock Chase Council's Local Plan Review Issues and Scope Consultation Document. As this response relates to a Duty to Cooperate matter, our response will need be an individual Decision of our Cabinet Member for Planning and Business Enterprise Cllr Bob McCardle, and therefore please accept the response below as the Council's interim response pending completion of the Council's constitutional process to agree the comments. Once the response has been agreed with Members, I will write to you again to confirm the Council's formal response.

South Staffordshire Council welcomes the opportunity to submit comments at this initial stage of the process. The Council supports the timetable as outlined in paragraph 1.11 culminating in a proposed adoption date of September 2021. It is recognised that this is just the first stage in what will be an ongoing dialogue and South Staffordshire is confident that both authorities will be able to work cooperatively to address issues of mutual interest and concern.

The Scoping and Issues Paper covers a broad range of topics and issues. In submitting this representation we have sought to provide our initial thoughts on those issues which we consider are the matters of joint relevance and concern, most notably in relation to housing supply issues and economic development considerations where both authorities share an inter-related geography.

Plan Strategy (CP1) and Housing Land (CP6)

We welcome the discussion regarding the identified shortfall within the wider GBHMA and the acknowledgement of the work undertaken by the constituent authorities in supporting the publication of the GL Hearn Growth Study. The recognition in para 5.2 that the revised plan strategy will need to take into account the wider West Midlands including the shortfall in

housing supply is supported. In addition to identifying potential strategic growth options the GL Hearn study promoted the need for small and medium sites to be identified to contribute to increasing the supply of housing within the HMA. It was considered that such sites could have a particularly significant role to play in the short to medium term prior to the release and development of the larger strategic site options. In promoting such sites the study was clear that consideration is likely to be required to releasing Green Belt sites and that this should be undertaken within the context of a finer grained Green Belt assessment. It is suggested that such a fine grained study would provide a key element in the evidence base of a future plan review and should be incorporated in the review process.

Economic Land (CP8)

Work undertaken as part of the Local Plan review in South Staffordshire has indicated that Cannock Chase and South Staffordshire are within a shared Function Economic Market Area along with Dudley, Walsall and Wolverhampton. This is recognition of the strong economic inter-relationships which exist between the authorities and suggests that consideration needs to be given towards collaborative working to identify and address those issues which arise within this sub-regional market area geography.

Biodiversity and Geodiversity (CP12)

National policy promotes the mapping of ecological networks including the hierarchy of designated sites and areas identified for enhancement restoration of creation. Collaboration and sharing of information with respect to the mapping of such networks has potential mutual benefits given the potential that such networks will have cross boundary linkages.

We trust that the comments are useful and look forward to ongoing discussion with you on cross boundary issues throughout the preparation of our respective Local Plans.

Kind regards

Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire Council

Tel: 01902696418

28.11.2018 – CCDC response to SSDC Issues & Options Consultation

South Staffordshire Council Local Plan Issues and Options consultation 2018

Response of Cannock Chase Council

Local plan Issues and Challenges

Question 2: are there any other issues that the Local Plan can address in South Staffordshire? Are the issues and challenges appropriate and sufficient to inform the local plan? If not what should be added or deleted

The plan is very comprehensive and its scope is supported overall. In terms of cross boundary matters, these are addressed in our representations relating to particular topics. However, the plan appears to make no reference to the Hatherton Canal Restoration Project, which is safeguarded under policy SAD8 of the recently adopted site allocations document. The reviewed Local Plan will need to reflect the latest position in terms of progress with this project, and all of the local authorities impacted by the route of the canal restoration project will need to continue to engage to ensure consistency of approach.

Evidence base

Question 4: Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not what additional evidence is required?

It is possible that further evidence may be required in order to understand and mitigate for any cumulative impacts of the plan proposals upon the Cannock Extension Canal SAC particularly in relation to air quality, a matter which has already been highlighted via the North Warwickshire Local Plan HRA and which required Appropriate Assessment to be undertaken. The advice and guidance of Natural England will need to be sought and local authorities impacted will need to continue to engage in dialogue as plans evolve.

Infrastructure Delivery Plan

Is the information contained in the Infrastructure Delivery Plan October 2018 the most up to date? If not please provide details. Are there any other specific infrastructure issues that the Local Plan should look to address? If no, then what further evidence is required?

Consideration should be given to any cross boundary infrastructure implications arising from the preferred spatial strategy, having regard to the current and potential future demand for infrastructure. Up to date evidence on infrastructure provision will inform this and both Councils will need to continue to keep engaging to ensure that the most up to date position is clearly understood in terms of evidence which has been / is due to be commissioned (see also questions 6, 65, 66). Furthermore, both councils need to continue to work together to obtain information from external infrastructure providers to ensure that cross boundary implications are understood and addressed (for example health, especially relating to Norton Canes / Great Wyrley where health infrastructure is closely linked, and Huntingdon).

There also needs to be reference to the Hatherton Canal Restoration Project, which is safeguarded under policy SAD8 of the recently adopted site allocations document. The reviewed Local Plan will need to reflect the latest position in terms of progress with this project, and all of the local authorities impacted by the route of the canal restoration project will need to continue to engage to ensure consistency of approach (see also Q2).

Housing level of growth policy options

Question 6: Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council's own needs and the needs of the wider Greater Birmingham Housing Market Area?

The housing growth policy options are considered reasonable options to test, and the proactive approach of South Staffordshire Council in addressing the wider shortfall is welcomed and supported. It is understood that the approach utilises the findings of the Greater Birmingham HMA Strategic Growth Study 2018, drawing upon the study recommendations for areas of search options and the scale of those potential options e.g. urban extensions. It is recognised that housing growth levels need to be realistic in order to be deliverable. For these reasons it is agreed that Option C represents an appropriate and proportionate housing target.

As the detail of the plan is developed, impacts upon infrastructure capacity should be considered, including potential cross-boundary implications (see question 5) and the two councils will need to work constructively together on these matters. In particular, this will apply to any sites close to Cannock Chase Council's boundary (g Huntingdon, Great Wyrley), and any growth options which have cumulative impacts such as along the A5 corridor especially due to issues relating to air pollution given the AQMA designations and the Cannock Extension Canal SAC. Further dialogue will also be needed between the two Councils, Highways England and other appropriate bodies as there are serious concerns over the limited capacity at Chruchbridge junction on the A5 and the implications of the scaled back M54 / M6 Toll link road proposals on the ability to achieve cumulative growth. This will need exploring further in order to achieve practical solutions to enable both Councils to move forward and address their needs as the plans evolve (see Q66) .

As the Council will be aware, impacts upon the Cannock Chase SAC are also a key consideration given that parts of South Staffordshire District lie within the current 'zone of influence' for adverse impacts upon the SAC and South Staffordshire's proactive and ongoing role in the SAC Partnership is welcomed and supported. The potential for impacts upon the Cannock Extension Canal SAC will also need to be considered (see above, and question 4) and discussions are ongoing in relation to this matter.

Question 9: The NPPF requires us to approach all neighbouring authorities before releasing Green Belt for unmet housing needs and to plan for cross- boundary needs over the most appropriate functional geography. In light of this, is the Greater Birmingham Housing Market Area the most appropriate geography over which to address unmet housing needs?

As the starting point, yes. However, there are other Local Authorities not so constrained by Green Belt with strong links to the HMA (eg Telford, whose origins as a new town stemmed from previous West Midlands 'overspill'). These authorities should be playing a positive role in helping to address the shortfall and this is a matter which is ongoing but which has not yet been resolved.

Gypsy, Traveller & Travelling Showpeople policy options

Question 11: Which of the above option(s) do you think should be pursued? Are there any other options to consider?

It is noted that one of the options considers the potential for unmet needs to be addressed in neighbouring authorities. In its Local Plan Review Issues and Scope consultation (2018) Cannock Chase District identified that meeting the Gypsy, Traveller and Travelling Showpeople requirements of its own District (from Local Plan (Part 1)) had proved problematic, primarily due to a lack of available sites for this use. It is therefore highly unlikely that Cannock Chase District Council 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 and is itself highly constrained by both Green Belt and AONB designations. We therefore consider that it is reasonable for South Staffordshire District Council to pursue the option of testing Green Belt sites within its own District to meet Gypsy, Traveller and Travelling Showpeople needs.

Cannock Chase District Council is currently in the process of updating its evidence base in relation to Gypsy, Traveller and Travelling Showpeople needs and will be consulting on options for meeting future requirements as part of its Issues and Options consultation (due early 2019). The Council would welcome further discussions in relation to the potential for the meeting of local needs via cross boundary working under the Duty to Cooperate as part of its Local Plan Review process.

Employment level of growth policy options

Question 13: Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Question 14: Do you agree that the EDNA (stage 1) has been undertaken in line with national guidance and is a robust starting point for planning for future employment needs?

It is noted that the EDNA identifies Cannock Chase District as lying within the FEMA for South Staffordshire District. Cannock Chase District has recently commissioned its own EDNA and will consider the South Staffordshire evidence accordingly. The Council would welcome ongoing discussions under the Duty to Cooperate in relation to the meeting of employment growth requirements as part of the evidence base work and Local Plan Review policy options.

Spatial distribution policy options

Question 19: Which of the Spatial Distribution Policy Options do you think should be pursued? Are there any other options to consider, including any strategy which aims to provide a mixture of the policy options set out above?

It is noted that a number of the spatial policy options include sites which lie on the boundary with Cannock Chase District, or could potentially be cross boundary sites with Cannock Chase. The Council would welcome detailed discussions under the Duty to Cooperate on any cross boundary sites; on any sites close to our boundaries (e.g. Huntingdon, Great Wyrley); and on any options where there are likely to be cumulative impacts (e.g. traffic levels / air quality on A5). (see response to Q 6 and Q66). As part of its Local Plan Review Issues and Options consultation (due early 2019) Cannock Chase District Council will also be setting out its spatial distribution policy options.

Employment locations for growth

Question 20: Which of the above option(s) do you think should be pursued? Are there any other options to consider, including a strategy which aims to provide a mixture of the spatial options set out above?

The Council would welcome detailed discussions under the Duty to Cooperate on any potential cross boundary sites; on any sites close to our boundaries and on any options where there are likely to be cumulative impacts (e.g. traffic levels / air quality on A5). As part of its Local Plan Review Issues and Options consultation (due early 2019) Cannock Chase District Council will also be setting out its spatial distribution policy options (see also response to Question 14).

Village centres and retail policy options

Question 60: Which of the option(s) do you think should be pursued? Are there any other options to consider?

Cannock Chase Council would support further retail provision which could meet the local needs of growing communities within South Staffordshire. However, we would seek to be assured that it would not negatively impact upon existing centres in neighbouring areas. South Staffordshire Council should consider and take into account how their retail needs are served by existing centres within Cannock Chase district as part of the evidence base and subsequent policies.

Question 65:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Support Option B**.** Bus services are currently declining nationally at 4%pa. Bus services have become infrequent, slow and expensive and require financial support to continue, which can only be secured through S106 contributions. The April 2018 reduction in the County Council subsidy to £1.3m had led to cutbacks in services and frequency, particularly in evenings and Saturdays and Sunday services withdrawn completely. South Staffordshire has been particularly affected by the cutbacks. As a non-constituent member of the West Midlands Combined Authority, Cannock Chase Council is committed to introduce the Swift Travelcard in 2019, in partnership with TfWM and bus operators, which will be valid on bus services from Cannock to Wolverhampton and Stafford, passing through South Staffordshire District Council area and available to its residents. It is hoped this initiative will improve the

patronage and viability of these services.

The importance of rail services need to be mentioned in the Local Plan as the Chase Line serves South Staffordshire residents at Landywood station and adjoining areas of Cheslyn Hay and Great Wyrley. This rail corridor also lies within the Greater Birmingham and Black Country Housing Market Area. Today 38% of passengers travelling into Birmingham at peak times choose to travel by rail; this is a dramatic increase from the 17% who chose to travel by rail in 2001. Forecast demand shows continuing strong growth in passengers commuting in to Birmingham of 49 per cent in just 10 years from 2013 to 2023, and 114 per cent by 2043. The £100m Chase Line electrification project is nearing completion and from May 2019, will be served by 4 coach electric trains, operating faster, cleaner, quieter services to Birmingham and extending to Birmingham International(Airport/NEC) with one train an hour operating to London Euston via Milton Keynes.

Question 66: Are there any areas where highway capacity is a concern where

a) Development should be restricted; or
b) Where new development could facilitate road infrastructure improvements

M54 to M6/M6T link road - The Council has previously supported the M54 to M6/M6(Toll) Link Road, which lies within the SSDC area. In late September 2018, Highways England confirmed the Preferred Route for the M54 to M6/M6Toll Link Road as Option B West with minor modifications, which the Council supported in October 2017. However, the benefits are somewhat diminished in the revised scheme, as it will no longer include a direct link from the M6 to the M6 Toll. This element was subject to other contributions, which have not been secured and traffic will still has to traverse Junction 11, Laney Green. A seamless link onto the M6 and M6 Toll would have alleviated congestion and ensured that no further pressure is placed on J11. While this is the final scheme, it is still to be considered as a Nationally Significant Infrastructure Project under the Planning Act 2008 and will require a Development Consent Order. There will be further opportunities to influence the design. The scaled back scheme is a concern because of the potential implications for growth and the two councils will need to continue to work together with Highways England and other bodies to ensure that practical solutions to highway capacity can be found (see Q6).

Churchbridge Junction, A5/M6T/A460/A34 – Capacity at this junction remains of concern, part of which lies within South Staffordshire District. The £2.9m, 2014, Pinchpoint scheme, was originally intended to have a design life to 2028 to coincide with the Cannock Chase Local Plan. Unfortunately, the Highways Agency (now Highways England) were unable to fund traffic modelling and it now has a design life to 2020. It is noted that congestion issues remain at the junction, which may potentially impact on future residential and employment growth on this corridor.

Highways England's, South Midlands Route Strategy, March 2017, on page 21 states "Congestion at the A5 Churchbridge junction may affect growth sites in Cannock included in the local plans. Safety issues at Churchbridge and the Wall and Weeford interchanges could be exacerbated by future traffic growth. Proposed SRFI at Four Ashes, west of the M6 may increase traffic levels on the A5 at Churchbridge."

Again, capacity is a major concern because of the implications it has for growth options

cumulatively across the two districts and solutions will need to be found by working with Highways England and other bodies (see Q6).

Air Quality remains an issue on the A5 corridor and the Bridgtown Air Quality Management Area has been extended west to the Walsall MBC boundary. To the east, it already connects with the Wedges Mills AQMA. HGVs remain the main source of pollutants. Action plans are in place but the impacts of further growth on this corridor will need to be understood. There are also particular implications for impacts on the Cannock Extension Canal SAC. Work is ongoing via the SAC partnership and with Natural England to understand the issues further and assess what actions may need to be taken

Question 67:

Should the Local Plan include a policy that requires development to incorporate electric charging points? Should there be a threshold for the number of new dwellings on a new development where this would be required?

Comment: Yes. Electric vehicles will become increasingly important, particularly as new petrol and diesel road vehicles will be banned from 2040.

Cannock Chase AONB and SAC

Question 75: We believe that Core Strategy Policy EQ2 should be updated to accord with the emerging evidence for the SAC set out above; do you agree with this approach and are there any other options to consider?

Agree with the approach and support continued partnership working to address impacts upon the Cannock Chase SAC.

Dialogue will need to be going in relation to the Cannock Extension Canal SAC understand and take account of any mitigation measures which might be required as as a result of the cumulative impacts of development on the A5 corridor (see question 4, 6 and 66).

08.07.2019 – SSDC officer response to CCDC Issues & Options Consultation

From:	Fox, Edward
To:	"planningpolicy@cannockchasedc.gov.uk"
Cc:	Harris, Kelly; "Sarah Jones"
Subject:	RE: SSDC response to Cannock CCDC Issues and Options consultation
Date:	08 July 2019 10:04:00

Dear Sir/Madam,

PROPOSED COUNCIL RESPONSE TO THE CANNOCK CHASE DISTRICT COUNCIL LOCAL PLAN REVIEW 2018-2036 ISSUES AND OPTIONS CONSULTATION

Thank you for providing South Staffordshire Council with the opportunity to comment on the Cannock Chase Issues and Options Document. As this response relates to a Duty to Cooperate matter, our response will need be an individual Decision of our Cabinet Member for Planning and Business Enterprise Cllr Brian Cox, and therefore please accept the paragraphs below as the Council's interim response pending completion of the Council's constitutional process to agree the comments. Once the response has been agreed with Members, I will write to you again to confirm the Council's formal response.

We welcome the publication of the Issues and Options document and support the approach towards examining a range of potential development scenarios which would contribute towards meeting both locally generated and wider Housing Market Area housing needs. Whilst Cannock Chase has not identified a preferred option at this stage, South Staffordshire Council would support the District Council using the same methodology as South Staffordshire has for calculating your contribution towards the GBHMA shortfall. This would reflect the lower range of the 'proportionate dispersal' recommendation in the 2018 GL Hearn Growth Study and would equate to a 500 dwelling contribution.

Our latest economic evidence suggests that South Staffordshire shares a common Functional Economic Market Area (FEMA) with Cannock, Wolverhampton, Walsall and Dudley. The level of future employment requirements has not yet been determined however we look forward to continuing our close working relationship with the constituent FEMA authorities to explore how any identified shortfall in employment land supply can be addressed.

It is anticipated that there will be an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues which arise once there is a clearer indication of future growth locations. These issues include potential impact of growth on the A5 corridor in relation to air quality and the Cannock Chase Extension Canal SAC.

Your sincerely

Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire Council

Tel: 01902696418

15.08.2019 – SSDC formal response to CCDC Issues & Options Consultation

Planning Policy

Cannock Chase Council

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Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

Sent via email to:
planningpolicy@cannockchasedc.gov.uk

15 August 2019

South Staffordshire Council response to the Cannock Chase Council Local Plan Review 2018-2036 Issues and Options consultation

Dear Sir/Madam,

Thank you for providing South Staffordshire Council with the opportunity to comment on the Cannock Chase Issues and Options Document.

We welcome the publication of the Issues and Options document and support the approach towards examining a range of potential development scenarios which would contribute towards meeting both locally generated and wider Housing Market Area housing needs. Whilst Cannock Chase has not identified a preferred option at this stage, South Staffordshire Council would support the District Council using the same methodology as South Staffordshire has for calculating your contribution towards the GBHMA shortfall. This would reflect the lower range of the 'proportionate dispersal' recommendation in the 2018 GL Hearn Growth Study and would equate to a 500 dwelling contribution.

Our latest economic evidence suggests that South Staffordshire shares a common Functional Economic Market Area (FEMA) with Cannock, Wolverhampton, Walsall and Dudley. The level of future employment requirements has not yet been determined however we look forward to continuing our close working relationship with the constituent FEMA authorities to explore how any identified shortfall in employment land supply can be addressed.

It is anticipated that there will be an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues which arise once there is a clearer indication of future growth locations. These issues include potential impact of growth on the A5 corridor in relation to air quality and the Cannock Chase Extension Canal SAC.

Yours faithfully

[REDACTED]

Ed Fox

Assistant Team Manager (Local Plans)

31.08.2019 – duty to co-operate meeting minutes

Duty to Co-operate meeting between planning policy officers from Cannock Chase District Council (CCDC) and South Staffordshire District Council (SSDC)

Date: 31st July 2019

Location: South Staffordshire Council offices

Attendees:

Kelly Harris (SSDC)

Ed Fox (SSDC)

Sushil Birdi (CCDC)

Sarah Jones (CCDC)

Apologies: none

Local plan timetables / other docs

- SSDC adopted SAD Sept 2018. Next stage of Local Plan Review will be Preferred Spatial Strategy (for housing only) with consultation in October 2019. Will identify broad locations, not specific sites. That will be for the next stage, Preferred Options, in summer 2020 which will also contain detailed policies and strategy for other land uses, including employment. October 2019 consultation will not cover employment strategy as South Staffs are awaiting progress of the Black Country Core Strategy review to inform their employment land requirements. The Black Country timetable has been recently updated- Preferred Options likely to be Autumn 2020.
- CCDC consulted upon Issues and Options in May-July 2019. Currently processing responses and due to report these to Cabinet in October 2019. The LDS will also be updated at this point. Preferred Options now likely to be in early-mid 2020. Adopted first Neighbourhood Plan in November 2018, for Hednesford and there are a further 3 designated neighbourhood areas currently progressing plans.

GBBCHMA work

- SSDC and CCDC continue to work together as part of the GBBCHMA working group. Noted that the 'position statement' to confirm current position of the shortfall up to 2031 is being progressed. SSDC and CCDC agreed it would be useful for the position up to 2036 to be updated also for clarity for ongoing Local Plan Reviews, and also in respect of the response to Solihull's recent request for Statements of Common Ground. This could be raised at the next GBBCHMA meeting in September.

Housing – inc G&T

- SSDC are considering refreshing the 'Balancing Housing Markets' SHMA report for South Staffordshire for 2020 to address affordable housing needs. It will not revisit the 'Part 1' of the SHMA (e.g. local housing needs – will rely on standard methodology).
- Gypsy and Traveller needs – SSDC latest evidence identifies a need for 87 Gypsy and Traveller pitches and 3 Travelling Showperson plots up to 2036. Considering update of GTTAA to inform Preferred Options. CCDC recently published updated GTTAA as part of Issues and Options consultation. Identified lower need of 29 pitches compared to current local plan requirement of 41 pitches and applied 'planning definition' of travellers as per NPPF and case law. Identified need for 10 plots for travelling showpeople which is above current local plan requirement of 4 plots. No transit pitches are required at present. CCDC to send SSDC copy of study and brief. CCDC continue to struggle to identify quantum of sites to meet requirements- current planning application for first new pitches in number of years under consideration (approx. 3 pitches). SSDC was able to accommodate requirements from existing Core Strategy via Site Allocations but the higher requirements identified in updated GTTAA are likely to be challenging.
- SSDC and CCDC agreed to continue working positively together as part of the DtC to look at cross boundary housing sites, including land at Longford Island/Wellington Drive.
- SSDC and CCDC confirmed they are both consulting on Green Belt options as part of the strategies for meeting housing needs, but recognised that the exceptional circumstances case needed to be fully made.

Employment

- SSDC and CCDC EDNA's both identify one another as part of the respective local authorities FEMA's. SSDC and CCDC confirmed they are both consulting on Green Belt options as part of the strategies for meeting employment needs, but recognised that the exceptional circumstances case needed to be fully made. SSDC identified that they have limited site options for employment land within non-Green Belt locations. CCDC identified they have urban capacity and Rugeley Power Station may provide some additional non-Green Belt land capacity, but this would only potentially just meet the minimum employment needs identified in the EDNA.
- SSDC and CCDC discussed site option at Junction 11, Hilton Park. The agents for this site had recently submitted a representation to CCDC Issues and Options consultation suggesting it as an option for meeting cross boundary needs. SSDC identified that they had undertaken numerous correspondence with the site promoters, including as part of the recent SAD. The site is potentially constrained by lack of access as the new proposed M6/M54 link road dissects the site.
- SSDC and CCDC agreed to continue to work positively together as part of the DtC to look at employment needs given cross boundary linkages.

Retail and Leisure

- SSDC and CCDC both considering updates to Retail Assessments to inform local plan reviews. Will take into account cross boundary catchments as part of the assessment work. CCDC has previously used WYG.
- CCDC currently undertaking updated Open Spaces Assessment by Red Kite.
- CCDC has recently published updated Indoor Facilities and Playing Pitches Assessments/Strategies undertaken by KKP. Noted that the recent closure of Cannock Cricket and Hockey Club within SSDC may impact upon the recommendations of these reports due to cross boundary linkages. CCDC are due to receive training on how to monitor the assessments to keep them up to date. SSDC undertaking update also by KKP. This will take into account closed Cannock Cricket and Hockey Club as currently ongoing.

Green Belt

- SSDC have undertaken joint Green Belt Review with the Black Country, produced by LUC. To be published alongside Preferred Spatial Strategy in October 2019. CCDC responded to methodology. To consider any further responses as part of the October 2019 Local Plan consultation.
- CCDC has Green Belt Review from 2016 also undertaken by LUC. To consider any updates required as Local Plan progresses, taking into account neighbouring LPA updates.

Environment and Heritage

- SSDC and CCDC have taken part in joint Southern Staffordshire SFRA and Water Cycle Study update. Draft reports progressing.
- SSDC and CCDC are considering ways to address biodiversity evidence base and off setting requirements jointly as part of the Joint Ecological Approach Group with other Staffordshire authorities. CCDC considering commissioning SWT to undertake same work they are producing for Stafford and Lichfield; Phase 1 Habitat Survey and Nature Recovery Mapping. Awaiting publication of the DEFRA biodiversity metrics to inform policy approaches. CCDC to send SSDC brief provided by SWT and contacts for the work.
- Cannock Chase AONB Partnership and Cannock Chase SAC Partnership - SSDC and CCDC agreed to continue to work positively as part of both partnerships to ensure that appropriate protection is provided to these sensitive cross boundary sites.
- SSDC and CCDC considering commissioning update to Staffordshire Renewable Energy Study jointly with other Staffordshire LPAs. SSDC to circulate updated brief shortly for comments and will be presented at SDOG in September.
- CCDC due to undertake Heritage Impact Assessment to inform site selection. SSDC also producing heritage evidence base to inform site selection which will consist of first phase high level assessment and second stage detailed assessment for preferred sites. CCDC draft work undertaking internally previously applies similar principles but given change in staffing resources this work is now likely to be commissioned externally.

Viability

- SSDC undertaking viability assessment, produced by DSP consultants. SSDC outlined the consultants methodology is quite flexible to be able to accommodate a range of options including design standards, affordable housing requirements etc.
- CCDC due to commission viability assessment- not yet tendered for.

Other

- SSDC and CCDC considering site selection methodologies. CCDC recently consulted on draft methodology as part of Issues and Options with separate processes for non-Green Belt and Green Belt sites. Considering how the methodology may be influenced by the size of site allocations. SSDC and CCDC to share methodologies as they progress.

07.01.2020 – CCDC response to SSDC SHSID Consultation

South Staffordshire response

Cannock Chase Council supports the continued positive approach to meeting wider Housing Market Area needs and acknowledgment of the necessity to reconsider the levels of provision as the quantity of the shortfall is reviewed on an ongoing basis.

It is noted that this stage of the consultation covers housing growth only; is strategic in nature; and that individual site are not yet being considered. However, it is understood that the preferred strategic spatial approach will inform the future selection of development sites and broad locations are identified as part of the Preferred Spatial Strategy Option G. As part of this, it is noted that paragraph 2.7 of the consultation document states 'the distribution of housing growth proposed in this consultation may alter to reflect specific site opportunities once these are assessed in more detail.'

Cannock Chase Council would welcome continued discussions as part of the site selection process in relation to any potential cross boundary sites and sites that lie in proximity to the Cannock Chase District boundary. It is noted that as part of the indicative preferred spatial strategy there appear to limited levels of additional housing proposed (in addition to existing allocations and safeguarded land) in areas adjacent to Cannock Chase District, primarily at Huntington and Cheslyn Hay/Great Wyrley.

As outlined in the Cannock Chase District Local Plan Issues and Options (May 2019) the Council is currently considering options for accommodating its own housing needs, and potentially those of the wider HMA. The document identified that after taking into account the existing urban capacity for development, and the potential capacity arising from the former Rugeley Power Station redevelopment, there would be a shortage against the District's own housing needs alone (before consideration of wider HMA needs). This necessitates consideration of further urban capacity options (such as increased densities or reallocating employment land) that may be available within the District. However, should this not provide sufficient supply then the District may need to consider the release of Green Belt land for future development. As part of the process of demonstrating 'exceptional circumstances' to release Green Belt sites, the Council would also need to undertaken discussions with neighbouring authorities to consider the ability for the District's needs to be met elsewhere (as per paragraph 137 of the NPPF).
It is noted that the consultation document identifies that the spatial strategic options related to non- Green Belt options within South Staffordshire District (i.e. existing capacity from permissions/completions/allocations and future options within the 'Open Countryside') do not provide for the level of growth being considered and need to be considered in the context of deliverability and sustainability considerations (as per para 138 of the NPPF). It is noted that the Council is therefore considering options which lie within the Green Belt too (paragraphs 4.9-4.10).

The document recognises the unmet needs of the adjacent Black Country authorities in its assessment of options. Cannock Chase Council would welcome recognition of the District's constrained nature too and that it is currently considering capacity for 'proportionate

dispersal' (small urban extensions) options within the southern part of the District, as identified in the Strategic Growth Study (2018). This may necessitate consideration of cross boundary site options accordingly. It should also be noted that sites in proximity of the Cannock, Hednesford and Heath Hayes urban area potentially represent sustainable locations in terms of accessibility to existing services, but with the need to consider upgrades to infrastructure provision accordingly.

25.02.2021 – CCDC response to SSDC 08.01.2021 letter

Date: 25th February 2021
Reference: SSDC/DtC/Feb21
Contact Officer: Heidi Holllins

Dear Kelly and Ed,

South Staffordshire Council Local Plan Review –Review of Green Belt

Thank you for your letter of 8th January 2021. Cannock Chase District Council is supportive of your approach to your Local Plan Review and the potential contribution to the Greater Birmingham and Black Country Housing Market Area shortfall. The approach is consistent with the GL Hearn/Wood Strategic Growth Study.

Cannock Chase is proposing to consult on a Preferred Option of the Local Plan in March 2021 and this will be presented to Cabinet 4th March 2021. The Preferred Option proposes a 500 dwelling contribution to the GBBCHMA shortfall. The HMA wide Strategic Growth Study recognised the constraints within Cannock Chase and recommended an approach that tested between 500 and 2,500 unit contribution to the HMA within the 'proportionate dispersal' category.

The proposed contribution is at the minimum level and currently represents the extent of our contribution. It is within the range that Cannock was expected to contribute it may not therefore provide the opportunity for South Staffordshire to reduce your proposed Local Plan Review housing target.

We would be happy to explore the scope of Statements of Common Ground between our authorities and our approach to the GBBCHMA shortfall following our Preferred Option consultation.

Yours sincerely,

[REDACTED]

Dean Piper

Head of Economic Prosperity

23.04.2021 – SSDC officer response to CCDC Preferred Options Consultation

From:	Edward Fox
To:	"planningpolicy@cannockchasedc.gov.uk"
Cc:	Kelly Harris
Subject:	South Staffordshire Council holding response to Cannock Chase Preferred Options
Date:	23 April 2021 08:43:00

Dear Sir/Madam,

Thank you for consulting South Staffordshire Council on the Cannock Chase Preferred Options Draft Local Plan. Please be aware that our response below is still in the process of being agreed by Members through our constitutional processes, so please accept this as a holding response to your consultation. I will write to you again to confirm when our response has been formally agreed.

Thank you for providing South Staffordshire Council with the opportunity to comment on the Cannock Chase Preferred Options Draft Local Plan.

We welcome the publication of the Preferred Options Plan and support the commitment towards contributing towards the GBHMA housing supply shortfall. In our submission to the Issues and Options consultation we noted that a contribution of 500 dwellings towards the shortfall would align with the approach South Staffordshire has adopted in responding to the recommendations within the 2018 GL Hearn Study. This approach is welcomed however we note that there is no reference to the GL Hearn study in the explanatory text supporting the proposed 500 dwelling contribution. It is suggested that references to this study be included prior to submitting the plan for public examination. The GL Hearn study represents the primary evidential basis which provides the context for consideration by the GBHMA constituent authorities of potential approaches to making good the wider Housing Market Area shortfall. The omission of reference to the study removes the principal justification for the proposed 500 dwelling contribution within the draft plan. The proposed contribution now appears as an apparently arbitrary response to an issue which the plan recognises is significant and which needs to be addressed. Whilst we welcome the proposed contribution of 500 homes towards unmet HMA needs, South Staffordshire would support any further suitable site opportunities for proportionate dispersal identified within Cannock that would increase this contribution, should these be forthcoming at a later date.

We support the commitment within the Preferred Options Plan to providing a supply of 50 hectares of employment land during the plan period. This figure is within the range identified in the recently published Cannock Chase District EDNA 2020 study. It is considered that greater clarity would be provided by committing to a sufficient supply of identified sites

rather than the present approach which suggests that part of the requirement is 'likely to become available during the plan period'. We welcome the commitment to ongoing dialogue with respect to potential employment requirements arising within the Functional Economic Market Area (FEMA) and we look forward to continuing our close working relationship to explore how any identified shortfall in employment land supply can be addressed.

It is anticipated that we will continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues including the potential impact of growth and air quality on designated sites of nature conservation value.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

09.06.2021 – SSDC formal response to CCDC Preferred Options Consultation

South Staffordshire Council

Planning Policy
Cannock Chase Council
Civic Centre
Beecroft Road
Cannock
WV11 1BG

Please ask for: Ed Fox
Direct Dial: (01902) 696418
Email: e.fox@sstaffs.gov.uk

Sent via email to: planningpolicy@cannockchasedc.gov.uk

09 June 2021

South Staffordshire Council response to the Cannock Chase Council Local Plan Preferred Options draft consultation

Dear Sir/Madam,

Thank you for providing South Staffordshire Council with the opportunity to comment on the Cannock Chase Preferred Options Draft Local Plan. This is the Council's formal response to the consultation following a holding response sent on 23 April 2021.

We welcome the publication of the Preferred Options Plan and support the commitment towards contributing towards the GBHMA housing supply shortfall. In our submission to the Issues and Options consultation we noted that a contribution of 500 dwellings towards the shortfall would align with the approach South Staffordshire has adopted in responding to the recommendations within the 2018 GL Hearn Strategic Growth Study. This approach is welcomed however we note that there is no reference to the GL Hearn study in the explanatory text supporting the proposed 500 dwelling contribution. It is suggested that references to this study be included prior to submitting the plan for public examination. The GL Hearn study represents the primary evidential basis which provides the context for consideration by the GBHMA constituent authorities of potential approaches to making good the wider Housing Market Area shortfall. The omission of reference to the study removes the principal justification for the proposed 500 dwelling contribution within the draft plan. The proposed contribution now appears as an apparently arbitrary response to an issue which the plan recognises is significant and which needs to be addressed. Whilst we welcome the proposed contribution of 500 homes towards unmet HMA needs, South Staffordshire would support any further suitable site opportunities for proportionate dispersal identified within Cannock that would increase this contribution, should these be forthcoming at a later date.

We support the commitment within the Preferred Options Plan to providing a supply of 50 hectares of employment land during the plan period. This figure is within the range identified in the recently published Cannock Chase District EDNA 2020 study. It is considered that greater clarity would be provided by committing to a sufficient supply of identified sites rather than the present approach which suggests that part of the requirement is 'likely to become available
during the plan period'. We note your position on cross boundary employment needs set out at paragraph 4.10 of the Preferred Options document where you state:

'Discussions will continue with our Duty to Co-operate partners to ascertain potential assistance to meet unidentified need for employment land within the authorities which share our functional economic market area'

As an authority who shares a FEMA with Cannock Chase District, South Staffordshire Council fully supports this commitment and look forward to continuing our close working relationship to explore how any identified shortfall in employment land supply can be addressed.

It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process.

It is anticipated that we will continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues including the potential impact of growth and air quality on designated sites of nature conservation value.

Yours faithfully

[REDACTED]

Ed Fox

Strategic Planning Team Manager

02.12.2021 – CCDC duty to co-operate letter &

08.12.2021 – SSDC response to CCDC 02.12.2021 letter

Date: 2nd December 2021
Reference: DtC/Dec 21
Contact Officer: Sushil Birdi

2nd December, 2021

Dear colleague,

Cannock Chase Local Plan Review – Duty to Co-operate

As one of our Duty to Cooperate partners I am seeking to clarify the latest position between our authorities on duty to cooperate strategic matters.

I acknowledge that matters may change but at present seek to establish the latest position on strategic matters to support the preparation of the Publication version of the Cannock Chase Local Plan which is proposed for consultation in winter 2021. By identifying areas of agreement/ disagreement this will provide a means to plan for future meetings as the Local Plan advances.

Set out below is the current position of Cannock Chase and attached to this letter is a form which I would be obliged if you could complete and return to HeidiHollins@cannockchasedc.gov.uk

Information/ evidence

We have published extensive evidence on our website which has supported the review and preparation of our Local Plan so far. This includes SHLAA, ELAA, Local Housing Needs Assessment, Economic Development Needs Assessment and it's update in 2020. Are you currently aware of any concerns regarding the evidence

published?

Greater Birmingham and Black Country Housing Market Area housing shortfall

Our approach to this has been that Cannock Chase Council participate in the GBSLEP HMA Technical Officers Group and are actively seeking to address this strategic matter through the effective and on-going joint working of the group.

Cannock Chase Local Need

The NPPF advises that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic planning authority should be able to demonstrate that it has examined fully all other

reasonable options for meeting its identified need for development. (Para 141) One element of this is whether the strategy has been informed by discussion with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

Cannock Chase Local Housing Need

Our latest monitoring has shown that we will be unable to meet our local housing need without utillising land which is currently within the Green Belt. Our shortfall up to 2038 is approximately 1,500 dwellings. Within your administrative boundary are you able to accommodate all or some of this shortfall using land which is not in the Green Belt?

At the time of preparing the Preferred Options consultation document our neighbouring authorities were unable to assist in meeting the housing shortfall identified to 2038 by Cannock Chase Council. The Preferred Options consultation version of the Local Plan therefore proposed to meet the shortfall within our administrative boundary, a strategy which necessitates the removal of land from the Green Belt within our area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of its Pre-submission version Local Plan?

Cannock Chase Local Gypsy, Traveler and Travelling Show people Accommodation Need

Our latest monitoring has shown that we will be unable to meet our locally identified need for gypsies, travelers or travelling show persons without removing

sites from the Green Belt. Our shortfall to 2038 is approximately 16 pitches and 10 plots.

Within your administrative boundary are you able to assist us in meeting this shortfall using land which is not in the Green Belt?

Cannock Chase Local Employment Land Need

Our latest monitoring has shown that we will be unable to meet the locally identified need for employment land without removing sites from the Green Belt. Within your administrative boundary are you able to assist us in meeting some of our employment land need using land which is not in the Green Belt?

The Preferred Options consultation version of the Cannock Chase Local Plan proposed to meet the local need for employment land within Cannock Chase's administrative boundary, a strategy which necessitates the removal of land from the Green Belt within Cannock Chase District's administrative area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of Pre-submission version Local Plan?

Cannock Chase Special Area of Conservation

Cannock Chase Council participates in the Cannock Chase SAC Partnership and are actively seeking to address this strategic matter through this Partnership approach.

Other strategic matters

The NPPF states at paragraph 24 that local planning authorities and county councils (in two tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Are there any other cross boundary strategic matters which you wish to discuss with Cannock Chase District Council?

If you would like to discuss the completion of the above questions further please don't hesitate to contact either Sushil Birdi or Heidi Hollins at:

Sushil Birdi – SushilBirdi@cannockchasedc.gov.uk

Heidi Hollins – HeidiHollins@cannockchasedc.gov.uk 07747 250631.

I look forward to hearing from you, preferably by 17th December 2021.

Yours sincerely,

[REDACTED]

Dean Piper
Head of Economic Prosperity

Cannock Chase Local Plan Review – Duty to Co-operate Latest position on Strategic Matters December 2021

Information/ evidence

Are you currently aware of any concerns regarding the evidence published?

	Yes, further discussions sought.
X	No, no further discussions necessary at this time.

Greater Birmingham and Black Country Housing Market Area housing shortfall

Cannock Chase Council participate in the GBSLEP HMA Technical Officers Group and are actively seeking to address this strategic matter through the effective and on- going joint working of the group.

X	Request further discussions with Cannock Chase Council individually on this issue.
	No further discussions with Cannock Chase Council individually on this issue considered necessary at this time.

Cannock Chase Local Need Cannock Chase Local Housing Need

Our shortfall up to 2038 is approximately 1,500 dwellings.
Within your administrative boundary are you able to accommodate all or some of this shortfall using land which is not in the Green Belt?

	No.

	Yes, utilizing sites which already have planning permission and/or are allocated in an adopted development plan.
	Yes, potentially there may be capacity/ sites in an emerging development plan.
X	Further discussions sought. Assuming that it is unlikely that there will be sufficient non-Green Belt land to meet your need (and cross boundary shortfalls), confirmation is sought to confirm that if this is the case, you will proceed to building your exception circumstances case for Green Belt release, rather than declaring an unmet need?

The Preferred Options consultation version of the Local Plan therefore proposed to meet the shortfall within our administrative boundary, a strategy which necessitates the removal of land from the Green Belt within our area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of its Pre-submission version Local Plan?

	Further discussions sought.
X	No, no further discussions considered necessary at this time.

Cannock Chase Local Gypsy, Traveler and Travelling Show people Accommodation Need

Our shortfall to 2038 is approximately 16 pitches and 10 plots
Within your administrative boundary are you able to assist us in meeting this shortfall using land which is not in the Green Belt?

X	No.
	Yes, utilizing sites which already have planning permission and/or are allocated in an adopted development plan.
	Yes, potentially there may be capacity/ sites in an emerging development plan.
X	Further discussions sought.

Cannock Chase Local Employment Land Need

Within your administrative boundary are you able to assist us in meeting some of our

employment land need using land which is not in the Green Belt?

	No.
	Yes, utilizing sites which already have planning permission and/or are allocated in an adopted development plan.
X	Yes, potentially there may be capacity/ sites in an emerging development plan.
X	Further discussions sought.

The Preferred Options consultation version of the Cannock Chase Local Plan proposed to meet the local need for employment land within Cannock Chase's administrative boundary, a strategy which necessitates the removal of land from the Green Belt within Cannock Chase District's administrative area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of its Pre-submission version Local Plan?

X	Further discussions sought.
	No, no further discussions considered necessary at this time.

Cannock Chase Special Area of Conservation

Cannock Chase Council participates in the Cannock Chase SAC Partnership and are actively seeking to address this strategic matter through this Partnership approach.

	Request further discussions with Cannock Chase Council individually on this issue.
X	No further discussions with Cannock Chase Council individually on this issue considered necessary at this time.

Other strategic matters

Are there any other cross boundary strategic matters which you wish to discuss with Cannock Chase District Council?

	Yes, further discussions sought
X	No, no further discussions sought at this time.

Any other comments?

We welcome a meeting to discuss all Duty to Cooperate matters. We are particularly keen to understand how you have considered your potential role in emerging unmet employment land needs arising from the Black Country. SSDC are currently updating our EDNA due for completion in February 2022, and subject to its findings, there may be scope for some surplus employment land (arising due to West Midlands Interchange) contributing towards your supply.

We are also keen to confirm Cannock's approach to addressing unmet housing needs within the GBHMA and to discuss the emerging evidence of unmet need for Gypsy and Traveller pitches emerging within South Staffordshire. As you are aware, a meeting will take place on 15th December across the HMA where we will discuss our proposed contribution towards unmet housing needs across the HMA, including yours and others' views on the use of the Strategic Growth Study 2018

Contact (for further meetings) Ed Fox……

[REDACTED]

Signed……

Position…Strategic Planning Team Manager…… Local Authority South Staffordshire Council ……..

Dated…08/12/21……

15.12.2021 – CCDC response to SSDC Preferred Options Consultation

South Staffordshire Council – Local Plan Preferred Options November 2021 Response of Cannock Chase District Council

Question 3:

a) Have the correct vision and strategic objectives been identified? Yes/No

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

See specific comments below.

Question 4:

Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No

If no, please explain how these policies should be amended?

See response to questions 4,5 and 6 below.

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No

If no, please explain how this policy should be amended?

See response to questions 4,5 and 6 below.

Question 6:

Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No

If no, please explain how this policy should be amended?

Response to questions 4,5 and 6.

We support the approach to meeting your needs within your administrative boundary and acknowledge your long term approach to the consideration of the future needs arising from Birmingham and the Black Country authorities. We support your approach to an infrastructure-led spatial housing strategy. We acknowledge that the Greater Birmingham Housing Market Area Strategic Growth Study is a key piece of evidence and support your long term approach to consideration of your Green Belt boundaries and to the future consideration of a new settlement.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-

SA4? Yes/No

If no, please explain your reasons for this.

In general we support the your approach of an infrastructure-led spatial housing strategy which supports your local communities and allocates sites which are the most sustainable, deliverable and viable. We do not wish to comment on the individual strategic housing site allocations at this time.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-

SA4, these warrant their own policy to set the vision for the site, alongside a

requirement for a detailed masterplan and design code? Yes/No

Yes

Question 8:

Do you support the proposed housing allocations in Policy SA5? Yes/No Please

reference the site reference number (e.g site 582) for the site you are commenting on in

your response.

In general we support your approach of an infrastructure-led spatial housing strategy which supports your local communities and allocates sites which are in sustainable locations, deliverable and viable. A number of sites share infrastructure and services with residents in Cannock and whilst we do not wish to comment on individual site allocations at this time, the infrastructure and service needs of residents who reside across administrative boundaries should also be considered.

Question 9:

A) Do you support the proposed pitch allocations in Policy SA6?Yes/No Please

reference the site reference number (e.g GT01) for the site you are commenting on

in your response.

B) Is there another option for meeting our gypsy and traveller needs, including any

alternative site suggestions that could be considered? Yes/No

Please provide details, including a plan for new site suggestion

We support your approach of meeting your needs within your administrative boundary and acknowledge this will require the use of land within the Green Belt. I can advise that there is no capacity to assist in meeting your needs within Cannock Chase District. We do not wish to comment on specific site allocations.

Question 10:

Do you support the proposed allocation in Policy SA7? Yes/No

Yes, we support the proposed employment allocation of the West Midlands Interchange as an employment allocation for a Strategic Rail Freight Interchange in accordance with the existing Development Consent Order and acknowledge its removal from the Green Belt.

Question 11:

Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No

If no, then please provide details setting out what changes are needed,

Policy NB3 – Cannock Chase SAC

Support the general direction of travel. The policy includes reference to expanding the policy to include reference to the potential issue of air quality impacts upon Cannock Chase SAC and other SAC sites.

Policy NB10 – Canal Network

Support the general direction of travel. The policy supports measures to integrate the Canal network into the wider Green Infrastructure network through biodiversity net gain and maintains support for the Hatherton Branch Canal extension.

We would wish the following potential impacts and opportunities to be considered as the policy is developed further:

- **The proximity of the Cannock Extension Canal SAC and SSSI, including** any impacts upon the protected habitats from increased road traffic emissions.

- **Opportunities should be taken to improve and connect to the existing** infrastructure and the existing network of canal towpath and public footpaths/bridleways in the area and around Grove colliery, Little Wyrley.

22.02.2022 – CCDC response to SSDC 14.01.2022 letter

From: Sushil Birdi

To: Edward Fox

Cc: Heidi Hollins

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 14.01.22

Date: 22 February 2022 19:17:27

Attachments: image502740.jpg

image466718.png

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Ed,
Apologies for the delay in responding.

We published a Gypsy and Traveller Accommodation Assessment in 2019 that identified an 'Area of Search' based on existing provision and known travelling corridors . This area included the majority of existing sites and identified need. Interviews carried out showed a clear preference for sites on or near to existing sites.

The Draft Site Selection Methodology is contained with the May 2019 Local Plan Issues and Options Consultation, Section 5 from page 120.

We are progressing the next stage of the Local Plan review and more information will be available in due course but I am not able to share anything further at this time. I will be happy to revisit this in the very near future.

Kind
regards
Sushil

Sushil Birdi | Interim Planning Services Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG 01543 464326 | [R E D A C T E D] [REDACTED]@cannockchasedc.gov.uk | www.cannockchasedc.gov.uk

01.09.2022 – CCDC response to SSDC 08.08.2022 letter

From: Sushil Birdi

To: Edward Fox

Cc: Heidi Hollins

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 08.08.22

Date: 01 September 2022 14:37:41

Attachments: image913468.jpg

image014020.png

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Dear Ed,

Further to your letter of 8th August I can set out our position in relation to the 4 questions that are raised at the bottom of the letter.

1. There are no public sites within the District and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites.
2. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This is not something that we intend to explore further.
3. No engagement has taken place with site owners in respect of potential to allocate part of their site for a publicly run site. Again, there are no plans to investigate this further.
4. Publicly owned sites have been considered for potential new sites but these options were very limited when considered against our assessment criteria.

Please come back to me should you need any further

clarification. Kind regards
Sushil

Sushil Birdi | Planning Services Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG 01543 464326 | [R E D A C T E D] [REDACTED]@cannockchasedc.gov.uk | www.cannockchasedc.gov.uk

01.11.2022 – duty to co-operate meeting minutes

South Staffordshire District Council (SSDC) Cannock Chase District Council (CCDC) Duty to Cooperate meeting 01.11.2022

Attendees:
Heidi Hollins (HH) CCDC
Sushil Birdi (SB) CCDC
Ed Fox (EF) SSDC
Kelly Harris (KH) SSDC
Patrick Walker (PW) SSDC

1. **Local Plan updates**

Cannock:
HH – Reg 19 been though cabinet, background evidence being finalised, will be out to consultation this year
SB – looking towards end of November ideally, but dependent on getting certain evidence base documents finalised before consultation, going to Full Council as part of this

South Staffordshire:
KH – Going to Full Council 8th November to agree to consult and submit (subject to no main modifications), consultation hoping to start Friday 11th November. Aiming to submit end of Spring 2023. HRA air quality issues will need to be progressed prior to submission.

2. **Employment**

South Staffordshire FEMA Functional Economic Market Area (FEMA) SoCG
HH – Cannock's EDNA indicates a different South Staffordshire FEMA – SoCG needs clarifying paragraph just to clarify which South Staffordshire FEMA we mean (i.e. the one in the EDNA for South Staffordshire)
KH – SSDC now leading on FEMA SoCG drafting due to halting of Black Country plan.
HH – will provide comments on initial areas of agreement/outstanding areas of be agreed within SoCG by Wednesday

ACTION: CCDC TO PROVIDE INITIAL COMMENTS ON AREAS OF AGREEMENT AND OUTSTANDING AREAS TO BE AGREED BEFORE WEDENSDAY 2ND NOVEMBER MEETING

West Midlands Interchange (WMI)
KH – SSDC Reg 19 doesn't currently have CCDC contribution from WMI in it, will need to make amendment through main mod in examination process
HH – Can include in SoCG to rectify this and then mod it if needed, is it likely to cause an issue?
EF – Would have been helpful to discuss prior to cabinet papers being published as SSDC isn't relying on Stantec work for its WMI share
HH – What was SSDC's share in Stantec work?
EF – 5ha, simplistic approach based purely on population growth, more detailed examination of labour demand in South Staffordshire through EDNA evidenced that 18.8ha was appropriate claim. Contribution to Black Country was made up of 67ha from WMI (Stantec based) and 36.6ha oversupply on strategic sites outside of WMI.
HH – How does this effect other authorities' claim?
EF – Will depend on individual authorities' stance and whether they make a claim and on what basis

HH – EDNA says 46-66ha is employment land range; Reg 19 has come forward towards upper end of that range, which have sought to balance with housing requirement (own needs + 500 HMA dwellings with 11% plan flexibility)

3. **Gypsies and Travellers**

Response to our letter of August 2022/ Individual SSDC/CCDC SoCG
KH – Need response to four questions from letter to inform SoCG to show that we've looked for all opportunities
HH – When will GTAA be updated again?
EF – Not immediately, relatively recent (2021) evidence base for South Staffordshire. Will be expecting other HMA LPAs to go through similar steps to SSDC in terms of examining GB public sites, public land opportunities and allocated housing sites which could give land towards public sites
SB – Will build in plans to update Gypsy and Traveller evidence into the SoCG draft
KH – Please come back within next week

ACTION: CCDC TO RESPOND TO INDIVIDUAL SSDC/CCDC SOCG WITHIN THE WEEK

4. **Housing**

HMA SoCG
SB – Can turn around signing relatively quickly, have delegated approval for any SoCG
KH – Appreciate Black Country will want an addendum statement to be added to cover updates to BC plan, SSDC will want this to be signed separately to avoid slowing down the HMA SoCG
SB – Agree with need to sign it and avoid delay

5. **HRA/Air quality**

KH – Lack of solution being communicated by Natural England, written responses continue to reflect lack of solution or proposed way forward. Aiming to commission work but having difficulties with consultants to be engaged
HH- Has work with National Highways (NH) offered any indication of traffic impacts on affected roads
PW – Work with NH to date on strategic sites doesn't offer clear indication of what impact on traffic near European sites would be as its more focused on junctions near the Black Country/Strategic Road Network where capacity issues are
HH – is HRA just not meeting on air quality or mitigation as well?
KH – Recreational impacts aren't raising an issue, does include a conclusion under air quality that lack of data means they can't conclude significant effects won't happen

6. **Confirming timescales for SoCG sign off**

KH – HMA sign off timescales discussed, FEMA should be able to be signed off relatively soon, individual SoCG please provide comments on draft before its published (in draft) at end of next week

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:
Alex Yendole (AY) – Stafford Borough Council
Neville Ball (NB) – Walsall MBC
David Holloway (DH) – Dudley MBC
Ian Culley (IC) – City of Wolverhampton Council
Sushil Birdi (SB) – Cannock Chase District Council
Heidi Hollins (HH) – Cannock Chase District Council
Mark Watkins (MW) – Sandwell MBC
Kelly Harris (KH) – South Staffordshire District Council
Ed Fox (EF) – South Staffordshire District Council
Patrick Walker (PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction
AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed
AY – will add in text in table at end that FEMA is predominately Stafford's own borough area
AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?
IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans
AY – will there be conversations in advance if local authorities are affected by this?
IC – yes
KH – Black country evidence as published to date will be kept until new evidence base is available?
IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?
KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that
IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?
KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date
PW – SoCG intended to be record views understood to be agreed to date
IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19
IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't
KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging
DH – Para 4.5; repeats "must" – can we change to "should"?
KH – This is in section on SSDC's position – may not be view of all but is SSDC's view
IC – Could change it to "must continue"?
KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November
ACTIONS: Further info on signing timescales expected from all
ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

24.11.2023 – CCDC response regarding G&T assessment

At present we do not have any identified needs outside the district. Paragraph 7.23 of the GTANA states that:

"ORS have found no evidence from other local studies that have been completed recently of any households wishing to move to Cannock Chase or of any residents on existing sites stating that they were planning the move away from the area. Therefore, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions. Should any households from outside of Cannock Chase wish to develop a new site the proposal will need to be considered by a criteria-based Local Plan Policy".

There has been no identified need to and from the South Staffordshire District, or any other neighbouring authority in Cannock Chase. The GTAA has also a high response rate, with 80% of respondents responding to the survey. The figure rises to 96% when taking into consideration those respondents at Stokes Lane, who have since obtained planning permission to meet their needs. We therefore consider that the Cannock Chase GTAA has provided an accurate picture of the current needs in the district.

It is recognised that there is a need for a partial update to the GTAA before the submission of the Local Plan (to 2040) from the current period to 2038. However, discussions with ORS have confirmed that there is likely only going to be the need for one additional pitch based on household formation rates.

We note in the recent duty-to-cooperate letter (Dated 24th October 2023) that in regards to Gypsy and Traveller provision, that the SSDC has an identified need of 121 pitches and that only 37 pitches can be delivered and creating an unmet need issue which needs to be discussed with adjacent authorities.

The Duty-to-cooperate letter also sets out the history of discussions between Cannock Council, which the Council considers to be reflective of the previous duty-to-co-operate discussions.

We would note that in the duty-to-cooperate letter, it states that:

"SSDC would welcome an update to the steps taken to examine all potential pitch supply options, as SSDC has sought to do through its plan preparation".

A Gypsy, Traveller and Travelling Showpeople Topic Paper is currently being prepared which will set out how the Council has explored all potential sites which could provide pitches. This will be published alongside the Reg. 19 consultation in early 2024. The work to date has not been able to sites to accommodate the full need for pitches in Cannock Chase over the plan period and this continues to be the case, despite more intensive work to identify sites. The Topic Paper will demonstrate that the Council are unable to meet any needs outside of the needs identified in the Cannock Chase GTAA, given the tightly constrained nature of the district.

We would welcome continued dialogue with South Staffordshire Council as part of our wider duty-to-cooperate obligations."

04.12.2023 – CCDC response to SSDC 24.10.2023 letter

Date: 24th November 2023
Ref: DtC resp SS 23
Contact officer: Sushil Birdi

Cannock Chase District Council

RE: Duty to Cooperate Update Letter from South Staffordshire Council

Dear Kelly Harris,

Thank you for providing an update on the preparation of the South Staffordshire Local Plan. As a direct neighbour to Cannock Chase District, and also as part of the collective Greater Birmingham and Black Country Housing Market Area (GBBCHMA), we welcome continued engagement on cross boundary issues.

Cannock Chase is at an advanced stage of plan preparation of the Cannock Chase Local Plan. The Reg. 19 Pre-Submission document is scheduled to be considered at a meeting of Cabinet on 14th December, with a recommendation to consult on the plan in January-February 2024.

The Local Development Scheme has been revised and will also be considered at the meeting of 14th December. The revised timetable anticipates submission of the Local Plan next summer with Examination in Autumn/Winter 2024 with a view to adopt the new plan in 2025. We will soon be engaging with you separately to this response in relation to the consultation on the Cannock Chase Local Plan.

Cannock Chase Council has been preparing its own Local Plan since 2018 and in that time there has been significant shifts in plan progression of our neighbouring authorities, most notably the recent withdrawal of Lichfield's Local Plan from Examination and the departure from the joint Black Country Local Plan by the four authorities involved.

We have also experienced a delay in relation to consulting on the Reg 19. version of the Local Plan which was anticipated to take place in late 2022, following approval at Cabinet in August 2022. This is explained in the 14th December Cabinet report and is related to evidence delays beyond the Council's control.

We recognise the difficulties we all face in progressing Local Plans to adoption, particularly in the context of proposed amendments to the national plan making system and NPPF. However, as an authority we have sought to progress the Local Plan under the existing, established legal planning framework as it has been informed by the evidence we have developed, both jointly and individually and because it is important that we have an up to date plan in place as soon as possible. It is in this context that we raise some concerns over the potential change in position of South Staffordshire District Council in relation to helping to accommodate your own housing needs and the unmet need of Greater Birmingham and the Black Country.

Your letter refers to the context for consideration of Green Belt release through the Local Plan; the jointly prepared Strategic Growth Study and the Statement of Common Ground. The evidence and joint working between authorities has informed development of the Cannock Chase Local Plan, leading to the planned contribution of 500 homes towards the unmet need of the GBBCHMA. This was a recommended minimum contribution in the Strategic Growth Study, but alternatives were subject to consultation as options and tested in the Sustainability Appraisal.

Cannock Chase is highly constrained in terms of land for development, with a significant proportion of land designated as part of the Cannock Chase AONB and/or Green Belt. Aside from the permitted mixed-use development on the former Power Station site at Rugeley, there is very limited land available in urban areas and outside the Green Belt. The housing need of Cannock Chase cannot be met fully on land outside the Green Belt. Therefore, the contribution of 500 homes towards unmet need of the GBBCHMA will directly result in further release of Green Belt land through the Local Plan. Cannock Chase District Council has not changed its stance on contributing towards wider unmet needs.

In your letter dated 24th October 2023, you have asked the question:

"we would appreciate an indication of what your 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 GBBCHMA, if the proposed changes to paragraph 142 of the NPPF are enacted."

Cannock Chase have responded to the government's consultation on proposed changes to the NPPF. The Council have significant concerns that the government have not outlined how unmet need will be addressed if authorities no longer review their Green Belt boundaries through Local Plans, particularly in authorities which are predominantly Green Belt. Ultimately, if needs cannot be met on land outside the Green Belt this is likely to constrain supply, worsen affordability and will continue to exacerbate the existing housing crisis; pricing out people from where they want to live.

With regard to addressing the unmet needs of the GBBCHMA, there continues to be a significant housing shortfall identified in the emerging Birmingham Local Plan. It is unclear how the government's proposals in the NPPF consultation fit with the legal obligations under the Duty to Cooperate which will remain until the new plan-making system is introduced.

Whilst the level of contribution is a matter for the individual authority to determine, it is considered a collective responsibility to address. We would therefore like to understand if there is any new evidence or whether any new SoCG's have been formed to support the option for South Staffordshire not to contribute towards the wider unmet needs of the GBBCHMA, and to collectively discuss what the implications of this decision are, and whether there are any alternate solutions.

With regard to addressing your own housing needs, it would be helpful to understand what level of your own need cannot be met. If your authority cannot meet a substantial level of your own Districts housing need without Green Belt release, this is likely to have significant cross boundary implications. In this instance, the District Council would seek a meeting to raise our concerns regarding the potential implications of constrained supply in South Staffordshire. This could potentially increase the demand for housing in Cannock Chase District and may have

ramifications for the new Local Plan at Examination. Therefore, we would want to discuss this matter urgently.

Employment

Thank you for making us aware of your intention to update your Economic Development Needs Assessment (EDNA). Cannock Chase District Council are similarly overseeing a focused update to the EDNA and Housing Need Assessment (HNA) to reflect the increase to the plan period and to ensure the evidence is robust in light of any changes since it was first produced. This evidence will be published alongside the Reg 19. Consultation.

We are also engaging with the West Midlands Development Needs Group to assist in the preparation of the update to the West Midlands Strategic Employment Sites Study 2021. To date no potential strategic scale employment sites (under the definition in the study) have been identified in the District.

The Council would like to continue to engage with South Staffordshire on contributions to neighbouring need arising from the West Midlands Interchange development. The Reg 19. Cannock Chase Local Plan has recognised a contribution of 10ha towards Cannock's employment needs on the basis of evidence produced by Stantec on behalf of the Black Country Authorities. We would like to formalise this through a Statement of Common Ground and will be engaging on this matter in due course.

Gypsy and Travellers

We have provided a separate response to the consultants producing the update to the South Staffordshire GTAA which outlines our position in detail. I have appended the response to the email accompanying this letter.

Once again, we thank you for providing the opportunity for us to engage on these matters and would appreciate confirmation of receipt of this letter.

We will shortly be engaging with you regarding the Reg. 19 Local Plan and are open to meeting to discuss any issues raised in this letter or with regard to the Cannock Chase Local Plan.

Yours Sincerely,

Sushil Birdi

Planning Services Manager

08.01.2024 – duty to co-operate meeting minutes

Minutes

South Staffordshire Council and Cannock Chase Council Duty to Cooperate meeting.

8th January 2024, 11.30am-12.30pm

MS Teams

1) **Introductions**

South Staffordshire Council

Ed Fox – Strategic Planning Team Manager

Alex Evans – Strategic Planning Assistant Team Manager

Cannock Chase

Sushil Birdi – Planning Services Manager

Jemma March – Interim Planning Policy Team Manager

Grace Lockley – Principal Planning Officer, Planning Policy

2) **Local Plan update**

South Staffordshire

Carried out a Reg19 consultation during November / December 2022. However, the draft NPPF consultation released in December 2022 had implications for the strategy.

Therefore, South Staffordshire are aiming to hold a new Reg19 consultation in the spring this year, with the aim of submitting for examination in late 2024 / early 2025 to meet the June 2025 deadline.

Considering the latest confirmed NPPF changes, South Staffordshire are reviewing their approach to Green Belt release for the new Reg19 Plan. The new approach being considered will be more capacity led and potentially have less Green Belt sites, focusing on those at the most sustainable locations.

Evidence base documents are also being updated including GTAA, EDNA, SA and Viability.

The plan period is also being updated to 2023 – 2041.

Cannock Chase

Took their Reg 19 plan to Cabinet in December 2023, with the consultation starting in January / February (8-week consultation) and looking to submit in the plan in the summer 2024.

The plan will be examined under the September 2023 NPPF due to reaching Reg19 before the 19th March 2024 under the transitional arrangements.

3) **South Staffordshire letter dated 24th October 2023**

Cannock Chase responded with a letter dated 24th November alongside an additional note on Gypsy and Travellers. Cannock Chase emphasised that this response was written before the publication of the most recent NPPF (December 2023).

Housing

Cannock Chase – The Cannock Chase Local Plan will meet the needs of Cannock Chase District and includes a further 500 dwelling contribution towards the unmet needs of the Greater Birmingham and Black Country Housing Market Area (HMA) shortfall. This will result in some Green Belt release. Cannock Chase District Council has updated the Housing Need Assessment which will be published alongside the consultation. This has not resulted in significant amendments to the plan.

There is one proposed residential site allocation which abuts the South Staffordshire boundary at Longford Island for 45 dwellings. This site is currently part brownfield but will involve Green Belt release. The land ownership extends into S.Staffs and this site has been submitted as a cross boundary site. However S.Staffs have not allocated the part of the site within their boundary and have no intentions to at present. It was not considered that this would result in any cross-boundary issues.

South Staffordshire – are looking to meet their own need with a potential contribution towards the GBBCHMA. Some Green Belt release is being considered through different spatial strategy options.

Employment

Cannock Chase

CCDC has updated its evidence - Employment Development Needs Assessment (EDNA). This presents a range in terms of employment land requirement and CCDC has upped its target to 74 hectares (ha) to reflect the latest evidence. This will be published alongside the Reg 19. Consultation. They also engaging with the West Midlands Development Needs Group to assist in the preparation of the update to the West Midlands Strategic Employment Sites Study 2021. To date no potential strategic scale employment sites (under the definition in the study) have been identified in the District.

The Council would like to continue to engage with South Staffordshire on contributions to neighbouring need arising from the West Midlands Interchange based on evidence set out in the Stantec report produced by the Black Country and will be seeking to formalise a contribution through the SoCG. There is not considered to be any specific cross boundary issue relating to employment. The signed SoCG relating to the S.Staffs FEMA in 2022 covered key areas.

South Staffordshire

Are updating their EDNA to reflect the latest position and revised plan period. SSDC are also engaging with the West Midlands Development Needs Group to assist in the preparation of the update to the West Midlands Strategic Employment Sites Study 2021.

Gypsy and Travellers

Cannock Chase

A summary of CCDC's position on Gypsy and Travellers was provided to S.Staffs in response to the recent DtC letter. The Council are open to the potential of jointly commissioning evidence on need in the future. It is recognised the A5 which spans Lichfield and S.Staffs remains a key area where there is demand from the Gypsy and Traveller community, although much of the land is designated Green Belt.

CCDC has not updated its evidence on need produced in 2019, but has monitored supply against this target and shifted the 5 year supply to date. The original study sought 25 permanent pitches (0-4 undetermined) and 10 plots for travelling show people. Insufficient sites have been identified within the District to meet the need. A Gypsy, Traveller and Travelling Showpeople Topic Paper is currently being prepared which will set out how the Council has explored all potential sites which could provide pitches. This will be published alongside the Reg. 19 consultation.

South Staffordshire

Are currently updating the GTAA but are anticipating that there will remain a significant shortfall which will not be able to be accommodated within South Staffordshire.

Transport - no issues raised.

Infrastructure - no issues raised.

Historic Environment - no issues raise.

Natural Environment

Both authorities are involved in air quality work to understand impacts upon the Cannock Chase SAC. A methodology has been agreed with Natural England. Transport modelling is underway and a final report is expected in May / June.

4) Strategic Growth Study update

South Staffordshire – consider that carrying out a Strategic Growth Study update would be beneficial as there is still a requirement to consider unmet needs.

Both Cannock Case and South Staffordshire are broadly supportive of an update.

5) Statements of Common Ground

Both authorities will want to sign SoCG as part of their Reg19 consultations.

Action: South Staffordshire to send across the previous bilateral SoCG to Cannock Chase

6) Any other business

Cannock Chase asked about any update on the Stage 2 Climate Change Report. South Staffordshire to follow this up.

CCDC requested that the signed SoCG covering general issues produced in 2022 to support the S.Staffs Local Plan was resent for our records.

14.03.2024 – SSDC letter to FEMA authorities

From:	Alex Evans
To:	[REDACTED]@cannockchasedc.gov.uk; Jemma March; Vicki Popplewell; "([REDACTED]@sandwell.gov.uk)"; "Alex Yendole"; David Holloway; [REDACTED]@walsall.gov.uk; Alison Ives; [REDACTED]@wolverhampton.gov.uk
Cc:	Edward Fox
Subject:	FW: South Staffordshire FEMA - SoCG update
Date:	03 April 2024 12:19:00
Attachments:	South Staffs FEMA SoCG 2024.docx Appendix 2.pdf Appendix 3.pdf Appendix 1.pdf image001.png

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Dear all,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the FEMA SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans

Sent: Thursday, March 14, 2024 10:45 AM
To: [REDACTED]@cannockchasedc.gov.uk; Jemma March
; Vicki Popplewell ;([REDACTED]@sandwell.gov.uk) <; Alex Yendole
< >; David Holloway < >;[REDACTED]@walsall.gov.uk; Alison Ives < >;
[REDACTED]@wolverhampton.gov.uk
Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: South Staffordshire FEMA - SoCG update

Dear all,

Alongside the individual updates to bilateral SoCG we sent out last week to individual local authorities, we are also keen to update the previous FEMA SoCG (dated November 2022) to reflect the South Staffordshire EDNA update. Therefore, please find attached an proposed updated track change version.

Please feel free to add further changes / amendments and circulate them to all authorities in the FEMA for consideration.

I would also be happy to organise meetings on an individual or group basis if that would be helpful.

We are seeking to agree the updated SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

We would like to have the SoCG agreed and signed off at officer level by **Friday 29nd March 2024**.

Please let me know if you have any queries or questions.

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

18.03.2024 – SSDC response to CCDC Regulation 19 Consultation

Planning Policy
Cannock Chase Council Civic
Centre
Beecroft Road
Cannock WV11
1BG

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

Sent via email to: planningpolicy@cannockchasedc.gov.uk

18th March 2024

South Staffordshire Council response to the Cannock Chase Council Local Plan Pre-Submission Regulation 19 consultation

Dear Sir/Madam,

Thank you for providing South Staffordshire Council (SSC) with the opportunity to comment on the Cannock Chase Draft Local Plan Pre-Submission Regulation 19 consultation document.

Strategy

We support the proposed plan strategy of seeking to locate growth in the most sustainable locations focussed on the main existing urban areas and the priority afforded to using previously developed land to meet future development requirements.

Housing

We welcome the commitment to meeting the district's housing need requirement as determined by the standard method. It is noted that the Pre-Submission Plan is retaining a commitment to a proposed 500 dwelling contribution towards meeting the GBBCHMA housing supply shortfall. This shortfall was identified within the context of the 2018 GL Hearn Strategic Growth Study. It is the view of South Staffordshire that this study completed 6 years ago is now dated, but we are pleased to be in active discussion with partner authorities, including yourselves, on progressing an update to the evidence base on the levels of Housing Market Area unmet need. It is intended that the findings of such a review will form the basis for future plan-making decisions on the scale and broad location of areas to be tested to accommodate strategic growth.

Gypsies, Travellers and Travelling Showpeople

SSC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need for 162 pitches during the plan period.

SSC wrote to Cannock Chase District Council (and other GBBCHMA and neighbouring

authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches, and this is set against a revised 5-year requirement of 92 pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the Borough for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

SSC would welcome an indication that all such options have been explored and we look forward to continuing to engage with Cannock Chase District Council on this issue.

Employment

We support the commitment within the Pre-Submission Plan to providing a supply of 74 hectares of employment land during the plan period. This figure is at the upper end of the range identified in the recently published Cannock Chase District EDNA 2024 update. We would welcome a clearer presentation on the components of this supply. It is not evident which of the sites within the list in paragraph 6.128 have the potential to contribute towards the 17 hectares of supply quoted as being available in paragraph 6.127. It is assumed that the land supply includes a 10ha contribution from the West Midlands Interchange as identified in the 2021 Stantec report – 'West Midlands Strategic Rail Freight Interchange -whose need will the SFRI serve?', subject to agreement through a Statement of Common Ground. However, this could be made more explicit in new employment sites section of the document. SSC supports the inclusion of new specific site allocations in Policy SO4.2 but we are uncertain on the nature of site intensification as identified in Policy SO4.3. We would welcome an indication if this supply is to be delivered through comprehensive site redevelopment and intensification and/or the use of identifiable vacant areas of land within existing employment site boundaries.

We note your position on cross boundary employment needs set out at paragraph 4.15 of the Pre- Submission document where you state:

'Discussions will continue with our Duty to Co-operate partners to ascertain potential assistance to meet unidentified need for employment land within the authorities which share our functional economic market area'

As an authority who shares a FEMA with Cannock Chase District, SSC fully supports this commitment and look forward to continuing our close working relationship to explore how any identified shortfall in employment land supply can be addressed, including those originating from the Black Country.

Nature Conservation

It is anticipated that we will continue an ongoing dialogue with Cannock Chase District Council and the other constituent authorities in the SAC partnership to consider the implications of any cross- boundary issues including the potential of growth and air quality on designated sites of nature conservation value. With reference to the commitment in the plan to undertaking air quality modelling in relation to impacts on internationally designates sites we welcome the commitment to producing a partnership wide mitigation strategy.

It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process.

It is anticipated that we will continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

Appendix 5 – City of Wolverhampton Council Documents

19.12.2018 – CWC response to SSDC Issues & Options Consultation

CITY OF WOLVERHAMPTON COUNCIL

19 December 2018

Strategic Planning Team

South Staffordshire Council

Council Offices

Wolverhampton Road

Codsall

South Staffordshire

WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Issues and Options Consultation

Thank you for the opportunity to comment on the Local Plan Review Issues and Options Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 12 December 2018.

The following principles underpin our response:

1. Support for the preferred housing growth option of local housing need plus 4,000 homes of Greater Birmingham and Black Country Housing Market Area need;

2. 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 Greater Birmingham and Black Country Housing Market Area Strategic Growth Study areas of search, subject to the

findings of the joint South Staffordshire and Black Country Green Belt Review and other evidence;

3. Support for the sites submitted by CWC to South Staffordshire as part of the "Call for Sites", as approved by Cabinet Resources Panel on 2 October 2018;

4. Support for the employment growth option to allocate additional employment land to help address unmet cross boundary employment land needs for the Black Country, in locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce;

5. Request for acknowledgement that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment land and logistics provision;

6. Support for the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;

7. Request that the impact of developments on the wider transport network is assessed, and that developments minimise trip generation through all available mechanisms;

8. Request that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links;

9. Request that any development on the edge of Wolverhampton take into consideration any health, education and environmental implications.

The detailed response to specific consultation questions is attached to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

Lead Planning Manager (Sub-Regional Strategy)

Direct:[REDACTED]

Email: [REDACTED]@wolverhampton.gov.uk

Question 5:

Is the information contained in the Infrastructure Delivery Plan October 2018 the most up to date? If not please provide details. Are there any other specific infrastructure issues that the Local Plan should look to address? If no, then what further evidence is required?

The impact of any potential development allocations on the wider transport network, extending to Wolverhampton, should be fully assessed, and it should be ensured that any development allocations minimise trip generation through all available mechanisms.

Any potential development allocations should link effectively to the strategic transport network and avoid excessive pressure on sensitive transport links, including those in Wolverhampton.

Any development allocations on the edge of Wolverhampton should take into consideration any health, education and environmental implications.

Question 6:

Do you agree that Option C represents an appropriate and proportionate housing target for the Local Plan review, having regard to the Council's own needs and the needs of the wider Greater Birmingham Housing Market Area?

Yes.

The selected housing growth option should provide a balance between making an adequate contribution to meet the housing needs of the wider Housing Market Area, whilst not undermining the on-going regeneration of the Black Country urban area and delivering a sustainable increase in housing growth across South Staffordshire.

Option C, the preferred housing growth option, would satisfy these objectives by providing enough new homes to meet local housing need and also making a 4,000 home contribution towards meeting the needs of the wider Greater Birmingham and Black Country Housing Market Area (HMA) up to 2036.

It is acknowledged that Option C would represent a substantial 30% increase in housing completions compared to recent trends, and that higher growth options may not be sustainable.

Given the close proximity of the Black Country to South Staffordshire, the location of many potential growth sites on the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country, it is reasonable that all of these additional homes should be allocated towards meeting Black Country housing needs, rather than housing needs from other parts of the HMA and it is requested that this allocation is clearly referenced in the

Local Plan. It is appreciated that this is subject to the findings of the joint Black Country and South Staffordshire Green Belt Review and on-going work on the Black Country Plan.

Question 13:

Which of the above option(s) do you think should be pursued? Are there any other options to consider?

Option C, which will allocate additional employment land to meet unmet cross boundary employment needs for the Black Country, is preferred. The potential for South Staffordshire to provide additional, high quality employment land to help meet the needs of the Black Country is welcomed. In conjunction with Option C for housing growth, referred to under question 6, this Option will contribute a balanced supply of homes and jobs.

Development allocations should be made in locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce. The Council would particularly promote for consideration the site submitted by CWC to South Staffordshire for as part of the "Call for Sites" for potential employment use, which is located on the urban fringe and within a HMA Strategic Growth Study area of search and has good access links to Wolverhampton.

The Local Plan should also acknowledge that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment and logistics provision.

Question 15:

If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?

If approved, the West Midlands Interchange SRFI proposal would make a significant contribution to the overall employment land supply in the sub-region and would reduce the quantity of employment land that may need to be allocated elsewhere, such as in the Black Country. Therefore, the Local Plan should acknowledge that, if approved, the West Midlands Interchange SRFI application would contribute towards unmet Black Country need for employment and logistics provision.

Question 19:

Which of the following Spatial Distribution Policy Options do you think should be pursued? Are there any other options to consider, including any strategy which aims to provide a mixture of the policy options set out above?

In terms of the location of new housing, ABCA support a mix of spatial options which would deliver a proportionate amount of housing on the edge of the Black Country in line with the HMA Strategic Growth Study areas of search, subject to the findings of the joint Green Belt Review and other evidence.

Where housing numbers are in excess of those required to meet the local housing needs of South

Staffordshire, these additional homes, which will meet the needs of the wider HMA, should be provided in locations that have good access, by a choice of means of transport, to the Black Country urban area and the wider HMA.

The Council would particularly promote for consideration the potential housing sites submitted by CWC to South Staffordshire as part of the "Call for Sites", which are located on the urban fringe and within a HMA Strategic Growth Study area of search and have good access links to Wolverhampton.

Question 22:

Has the Council identified the key factors which should inform which of the Spatial Distribution Policy Option(s) is taken forward in the Local Plan review? If not, what other factors should inform the spatial distribution of development?

Where housing numbers are in excess of those required to meet the local housing needs of South Staffordshire, these additional homes, which will meet the needs of the wider HMA, should be provided in locations that have good access, by a choice of means of transport, to the Black Country urban area and the wider HMA.

The impact of any potential development allocations on the wider transport network, extending to Wolverhampton, should be fully assessed, and it should be ensured that any development allocations minimise trip generation through all available mechanisms.

Any potential development allocations should link effectively to the strategic transport network and avoid excessive pressure on sensitive transport links, including those in Wolverhampton.

Any development allocations on the edge of Wolverhampton should be capable of minimising impacts on health and education infrastructure in Wolverhampton to acceptable levels. Environmental implications should also be a key consideration in the selection of development allocations on the urban fringe.

Question 65:

Which of the option(s) do you think should be pursued? Are there any other options to consider?

The Council supports the existing Brinsford Strategic Park and Ride site allocation and requests that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan.

CITY OF WOLVERHAMPTON COUNCIL

28 January 2020

Strategic Planning

Team
South Staffordshire
Council Council
Offices
Wolverhampton Road
Codsall

South
Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Spatial Housing Strategy Consultation

Thank you for the opportunity to comment on the Local Plan Review Spatial Housing Strategy Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 22 January 2020.

The following principles underpin our response, with more detailed comments provided in italics:

a. Support for the preferred housing growth option of local housing need plus 4,000 homes to meet wider Black Country and Birmingham Housing Market Area need;

b. Provision of detailed evidence to support the case that the Black Country is unlikely to be able to meet its own housing need up to 2038, and that the full 4,000 homes should be specifically allocated to meet Black Country needs;

Given the close proximity of the Black Country to South Staffordshire, the location of a number of potential growth sites forming part of preferred spatial housing option G on or close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country, we feel it is reasonable that all of these additional 4,000 homes should be allocated towards meeting Black Country housing needs, rather than housing needs from other parts of the HMA. We request that this allocation is clearly referenced in the Local Plan.

c. Recognition of the approach used in the selection of the preferred spatial housing option G and the benefits of developing a draft Infrastructure Delivery Plan for this option. It is important that the spatial housing option selected:

i. makes full use of brownfield and urban site options to minimise green belt release;

ii. ensures that sites selected for development are carefully located and planned to avoid areas of greatest environmental sensitivity and green belt harm, and to minimise impacts on infrastructure;

ensures that any urban extensions are subject to an integrated health impact assessment; provide all necessary local shops, community and health facilities and primary school places on-site; provide secondary school places in appropriate locations; and address wider health service implications, to meet the needs of new residents and avoid impacts on infrastructure in neighbouring authorities;

iii. ensures that the infrastructure needs of smaller sites on the South Staffordshire boundary can be met without putting additional pressure on infrastructure in neighbouring authorities.

d. Request that the impact of developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, and that developments minimise trip generation through all available mechanisms;

e. Support for use of the very high green belt harm rating to prioritise site selection, whilst also suggesting that consideration is given to making use of landscape sensitivity ratings;

In terms of the site selection process, we support the use of the jointly prepared South Staffordshire and Black Country Green Belt and Landscape Sensitivity Studies to prioritise sites for selection. However, we suggest that the appropriate threshold should be a combination of 'very high' green belt harm and 'moderate to high' or 'high' landscape sensitivity, rather than use of 'very high' green belt harm alone. This would make full use of the findings of the two studies and facilitate a consistent cross-boundary approach.

f. Support for the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;

g. Support for the sites submitted by the Council to South Staffordshire as part of the "Call for Sites", as approved by Cabinet (Resources) Panel on 2 October 2018;

h. Acknowledgment that the Council and South Staffordshire Council have been working together constructively on planning issues of mutual interest and request that close joint working on all relevant planning issues, particularly development proposals and infrastructure and delivery, continues throughout the Plan preparation process and is strengthened through the creation of a formal liaison group to regularly consider emerging

proposals and their cross- boundary implications.

The detailed response to specific consultation questions is attached to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

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13.12.2021 – CWC response to SSDC Preferred Options Consultation

CITY OF WOLVERHAMPTON COUNCIL

13 December 2021

Strategic Planning
Team South
Staffordshire Council
Council Offices
Wolverhampton Road
Codsall

South
Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Preferred Options Consultation

Thank you for the opportunity to comment on the South Staffordshire Local Plan (SSLP) Review Spatial Preferred Options Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 8 December 2021.

The following principles underpin our response, with more detailed comments provided in italics:

Duty to Cooperate and Statements of Common Ground

a) Acknowledgment that the Black Country authorities (BCA) and South Staffordshire District Council (SSDC) have been working together constructively on planning issues of mutual interest and that this is expected to continue with a focus on the phasing of new development and to ensure that the infrastructure required to address the impacts of development proposals is provided for;

b) Expectation that, as the Black Country Plan (BCP) and SSLP both move towards Publication in summer 2022, the BCA and SSDC will aim to reach agreement on all relevant cross-boundary issues and reflect this agreement in draft Statements of Common Ground (SoCG) to support each Plan;

c) Support for the preferred housing growth option of local housing need plus 4,000 homes to

meet Greater Birmingham and Black Country Housing Market Area (HMA) need up to 2038;

d) Given detailed evidence provided by the Draft BCP that the Black Country has a very significant housing shortfall up to 2039, and the close geographical, migration and commuting links between the Black Country and South Staffordshire, request that the full 4,000 homes should be specifically allocated to meet Black Country housing needs;

It is welcome that SSDC continue to be committed to offering 4,000 homes to meet the shortfall in the wider HMA. Given the proximity of the Black Country to South Staffordshire, strong migration and commuting links, the location of a number of proposed

growth sites close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country it is reasonable to claim all of the 4,000 homes being offered by SSDC towards meeting Black Country housing needs. The Preferred Options proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. This would represent a crucial contribution towards the estimated Black Country shortfall of 28,239 homes up to 2039, which is now clearly demonstrated through the Draft BCP and supporting evidence.

We request that this allocation is clearly referenced in the Publication Plan.

e) Support the longer term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

f) Request that the South Staffordshire Housing and Employment Development Needs Assessment (HEDNA) is completed as soon as possible, with due regard to the Black Country EDNA (2021), the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study (WMSESS), and shared with the BCA as soon as possible to determine how far the SSLP will be able to contribute towards significant unmet employment land needs in the Black Country.

The SSLP has the potential to make a significant contribution towards addressing the large shortfall of 210 ha employment land evidenced by the Draft BCP and supporting 2021 EDNA. Therefore, it is of concern that no specific contribution can be offered because the employment land needs of South Staffordshire have not yet been established through the updated EDNA. This crucial piece of evidence must be completed as soon as possible, so that the figures generated can be used to inform the Publication BCP, SSLP and supporting Statements of Common Ground between the Black Country Authorities and SSDC.

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs including the

Black Country. We request that this work is progressed as quickly as possible and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below.

Site allocations and cross-boundary infrastructure

Noting the scale and location of the proposed extensions to the Wolverhampton urban area and to commit to require further work on infrastructure requirements and assurances that close joint working on all relevant planning issues will continue throughout the Plan preparation process, SPD preparation, pre-application and planning application processes *The proposed allocations adjoining Wolverhampton raise cross-boundary infrastructure issues, particularly given the location of Draft BCP housing allocation in the north east of the City which will also impact on local infrastructure. If infrastructure impacts are not fully assessed and mitigated through the contributions of developers and infrastructure providers these developments could have negative impacts on Wolverhampton infrastructure, including transport, public open space, education and health services. The developments could also have negative impacts on the environmental quality and amenity of immediately adjoining residential areas if not properly planned. Therefore, each development, including Langley Road, needs to be carefully masterplanned, based on sufficient detailed evidence, and it is vital that close joint working between SSDC and CWC continues on all relevant issues throughout the Plan preparation, SPD preparation and planning application processes.*

g) Request that a SPD and Infrastructure Delivery Strategy is also prepared for the Langley Road site;

The proposed SPDs and Infrastructure Delivery Strategies for the Linthouse Lane and Cross Green sites are supported, however it is crucial that key planning issues for the Langley Road site are subject to the same level of discussion and agreement with CWC through preparation of an SPD and Infrastructure Delivery Strategy, to ensure that the design and infrastructure requirements for this significant development on the edge of the Wolverhampton area are fully explored and formally established before submission of a planning application.

h) Request that the affordable housing secured on sites proposed in the Plan within the Wolverhampton locality are allocated through nomination rights for Wolverhampton residents, and that this requirement is set out in the Publication Plan;

The Preferred Options proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. There is therefore a strong case for Wolverhampton residents to secure nomination rights for the 30% affordable housing proposed on these sites.

i) Request that the combined impact of SSLP and BCP developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, that effective sustainable transport solutions are provided to connect essential trips to the local network, and that developments seek to minimise trip generation through all available mechanisms;

In terms of transport infrastructure implications, close engagement will need to continue with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

j) Support for the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP;

The Cross Green mixed use development will help meet the employment land needs of the Black Country in a location close to significant employment opportunities at the i54 and ROF Featherstone strategic employment sites. The development will help deliver the ROF Featherstone strategic employment site and Brinsford Strategic Park and Ride site which will increase access to the rail network, and also addresses the HMA Strategic Growth Study recommendation for a strategic housing site in this locality.

k) Support for developing a Statement of Common Ground establishing the principle of self- containment regarding primary and secondary school places for both the SSLP and the BCP, however request further detail on how secondary school places arising from Linthouse Lane and Cross Green would be accommodated;

The Draft BCP identifies where, taking into account any planned provision, it is likely that a new school will need to be provided to meet local needs, and therefore land should be set aside to accommodate this. In Wolverhampton, land in Council ownership has been set aside for a two form entry primary school in the Bushbury area to meet the potential needs arising from housing developments in the north east of the City. Wolverhampton Local Education Authority (LEA) has advised that other primary and secondary school place needs arising from the Draft BCP can be accommodated within existing school capacity or extensions to existing schools, which will be funded by developer contributions, where this is financially viable.

SSDC currently operate a developer contribution system for school places needs arising from development. The Preferred Options document and IDP set out the expectation that there will not be a reliance on Wolverhampton schools to accommodate South Staffordshire pupils arising from new development, and vice versa, and that this will be set out in a Statement of Common Ground. Although sites are proposed for new primary schools at Linthouse Lane and Cross Green, there are no specific proposals to address secondary school place needs arising from these developments. The IDP states that developments of 5000 homes may generate the need for a new secondary school.

Bhylls Acre Primary is located in Wolverhampton, adjoining the Langley Road site. Although the school is under the jurisdiction of SSDC most pupils are Wolverhampton residents.

Langley Road would also be in the catchment area for South Staffordshire secondary schools. The Langley Road development would impact on the South Staffordshire area initially due to pupil demographics and South Staffordshire operating catchment areas. If the Published Admission Number at Bhylls Acre remained at 30 per year group, the delivery and phasing of the development would likely mean that new SSDC resident pupils could displace Wolverhampton resident pupils over time. However, the Wolverhampton Wards that are closest to the border show that cohorts entering reception up to academic year 2024-25 are anticipated to decrease based on birth rates. Therefore, any push back over time from the Langley Road development, for both primary and secondary phases, is expected to be capable of being catered for in existing provision within Wolverhampton, without the need for new schools or school extensions.

In conclusion, although it is welcome that SSDC are committed to meeting primary and secondary school place needs arising from Preferred Options development within South Staffordshire, and to establishing agreement on this with CWC through a SoCG, further details are required on how the secondary school places arising from Linthouse Lane and Cross Green would be accommodated. These details should be set out in the IDP and established, as far as possible, in the SoCG.

l) Request that land is set aside at Linthouse Lane and/or Cross Green sufficient to accommodate GP consulting rooms to serve all residents, in line with the principle of self-containment for urban extensions;

m) Request that SSDC develop a developer contribution system which will secure sufficient funds from major housing development to deliver GP consulting rooms in a timely

manner, so that there are no negative impacts on Wolverhampton GP service provision;

n) Request that the SSLP makes clear that the Langley Road development will be required to make sufficient contributions to deliver an extra GP consulting room in south west Wolverhampton.

The Preferred Options document states that ensuring sufficient access to GP / health centres to accommodate residents from new developments will be a key challenge. The IDP states that access to GP provision has been identified as a local infrastructure concern.

SSLP is considering requiring developer contributions towards health infrastructure such as GP / health centres, in a similar manner to the Draft BCP, and the NHS Estates team is due to provide estimates of site specific requirements and costs by the end of 2021. However, both the Linthouse Lane and Cross Green developments would generate a large number of additional patients and it is understood that there is no potential to extend local surgeries to accommodate this increase.

The part of South Staffordshire adjoining Wolverhampton is served by the South Staffordshire Clinical Commissioning Groups (CCGs) and Wolverhampton is served by the Black Country and West Birmingham (BCWB) CCG. Therefore, any cross-boundary solutions would require coordination of service improvements between adjoining CCGs. The BCWB CCG have advised CWC that the potential impact of Draft BCP housing sites on GP provision, which are concentrated in the north east of the City, can be mitigated through planned and potential service improvements which would be part-funded through developer contributions. However, it is not certain that these improvements could also absorb additional demand arising from Linthouse Lane and Cross Green. This is particularly a concern given the lack of available sites and expansion land for surgeries in the constrained urban area of Wolverhampton. BCWB CCG currently consider that the number of new patients generated by the smaller Langley Road development could be accommodated through the addition of an extra consulting room at an existing local surgery in south west Wolverhampton.

Therefore, to avoid the potential for negative impacts on GP service provision in Wolverhampton, and in line with the principle of "self-containment" for urban extensions, it is crucial that land is set aside at the Linthouse Lane site and/or the Cross Green site sufficient to accommodate consulting rooms to serve all residents (including homes estimated for delivery post-2038). If this land is ultimately not required, due to service changes or availability of other sites for GP provision, it could be released for other uses. However, it is important that these developments are designed so that they are capable of delivering GP provision on site, if this is the only solution available at the time a planning application is submitted.

It is also essential that SSDC develop a developer contribution system which will secure sufficient funds from major housing developments to deliver consulting rooms in a timely manner which avoids impacts on Wolverhampton GP service provision. Finally, the SSLP needs to make clear that the Langley Road development will be required to make sufficient contributions to deliver an extra consulting room in south west Wolverhampton, through close consultation with BCWB CCG.

o) Request that green infrastructure proposals for developments on the edge of Wolverhampton are integrated with existing and potential networks in Wolverhampton.

As a supplement to the response provided above, detailed responses to specific consultation questions are attached as an appendix to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

Lead Planning Manager (Sub-Regional Strategy)

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City of Wolverhampton Council
Response to South Staffordshire Local Plan Review

Preferred Options Consultation Questions

Chapter 3

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

No

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs, including those arising in the Black Country. **We request that this work is progressed as quickly as possible** and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below (under Question 3).

Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

No

See answer provided to (b) below.

However, we support the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

Yes

Transport Infrastructure

In terms of transport infrastructure implications, close engagement will need to continue with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

Education Infrastructure

The Draft BCP identifies where, taking into account any planned provision, it is likely that a new school will need to be provided to meet local needs, and therefore land should be set aside to accommodate this. In Wolverhampton, land in Council ownership has been set aside for a two form entry primary school in the Bushbury area to meet the potential needs arising from housing developments in the north east of the City. Wolverhampton Local Education Authority (LEA) has advised that other primary and secondary school place needs arising from the Draft BCP can be accommodated within existing school capacity or extensions to existing schools, which will be funded by developer contributions, where this is financially viable.

SSDC currently operate a developer contribution system for school places needs arising from development. The Preferred Options document and IDP set out the expectation that there will not be a reliance on Wolverhampton schools to accommodate South Staffordshire pupils arising from new development, and vice versa, and that this will be set out in a Statement of Common Ground. Although sites are proposed for new primary schools at Linthouse Lane and

Cross Green, there are no specific proposals to address secondary school place needs arising from these developments. The IDP states that developments of 5000 homes may generate the need for a new secondary school.

Bhylls Acre Primary is located in Wolverhampton, adjoining the Langley Road site. Although the school is under the jurisdiction of SSDC most pupils are Wolverhampton residents.

Langley Road would also be in the catchment area for South Staffordshire secondary schools. The Langley Road development would impact on the South Staffordshire area initially due to pupil demographics and South Staffordshire operating catchment areas. If the Published Admission Number at Bhylls Acre remained at 30 per year group, the delivery and phasing of the development would likely mean that new SSDC resident pupils could displace Wolverhampton resident pupils over time. However, the Wolverhampton Wards that are closest to the border show that cohorts entering reception up to academic year 2024-25 are anticipated to decrease based on birth rates. Therefore, any push back over time from the Langley Road development, for both primary and secondary phases, is expected to be capable of being catered for in existing provision within Wolverhampton, without the need for new schools or school extensions.

In conclusion, although it is welcome that SSDC are committed to meeting primary and secondary school place needs arising from Preferred Options development within South Staffordshire, and to establishing agreement on this with CWC through a SoCG, further details are required on how the secondary school places arising from Linthouse Lane and Cross Green would be accommodated. These details should be set out in the IDP and established, as far as possible, in the SoCG.

Health Infrastructure

The Preferred Options document states that ensuring sufficient access to GP / health centres to accommodate residents from new developments will be a key challenge. The IDP states that access to GP provision has been identified as a local infrastructure concern.

SSLP is considering requiring developer contributions towards health infrastructure such as GP / health centres, in a similar manner to the Draft BCP, and the NHS Estates team is due to provide estimates of site specific requirements and costs by the end of 2021. However, both the Linthouse Lane and Cross Green developments would generate a large number of additional patients and it is understood that there is no potential to extend local surgeries to accommodate this increase.

The part of South Staffordshire adjoining Wolverhampton is served by the South Staffordshire Clinical Commissioning Groups (CCGs) and Wolverhampton is served by the Black Country and West Birmingham (BCWB) CCG. Therefore, any cross-boundary solutions would require coordination of service improvements between adjoining CCGs. The BCWB CCG have advised CWC that the potential impact of Draft BCP housing sites on GP provision, which are concentrated in the north east of the City, can be mitigated through planned and potential service improvements which would be part-funded through developer contributions. However, it is not certain that these improvements could also absorb additional demand arising from Linthouse Lane and Cross Green. This is particularly a concern given the lack of available sites and expansion land for surgeries in the constrained urban area of Wolverhampton. BCWB CCG currently consider that the number of new patients generated by the smaller Langley Road development could be accommodated through the addition of an extra consulting room at an

existing local surgery in south west Wolverhampton.

Therefore, to avoid the potential for negative impacts on GP service provision in Wolverhampton, and in line with the principle of "self-containment" for urban extensions, it is crucial that land is set aside at the Linthouse Lane site and/or the Cross Green site sufficient to accommodate consulting rooms to serve all residents (including homes estimated for delivery post-2038). If this land is ultimately not required, due to service changes or availability of other sites for GP provision, it could be released for other uses. However, it is important that these developments are designed so that they are capable of delivering GP provision on site, if this is the only solution available at the time a planning application is submitted.

It is also essential that SSDC develop a developer contribution system which will secure sufficient funds from major housing developments to deliver consulting rooms in a timely manner which avoids impacts on Wolverhampton GP service provision. Finally, the SSLP needs to make clear that the Langley Road development will be required to make sufficient contributions to deliver an extra consulting room in south west Wolverhampton, through close consultation with BCWB CCG.

In conclusion:

- Land should be set aside at Linthouse Lane and/or Cross Green sufficient to accommodate GP consulting rooms to serve all residents, in line with the principle of self-containment for urban extensions;

- SSDC should develop a developer contribution system which will secure sufficient funds from major housing development to deliver GP consulting rooms in a timely manner, so that there are no negative impacts on Wolverhampton GP service provision;

- The SSLP should make clear that the Langley Road development will be required to make sufficient contributions to deliver an extra GP consulting room in south west Wolverhampton.

Green Infrastructure

Green infrastructure proposals for developments on the edge of Wolverhampton should be integrated with existing and potential networks in Wolverhampton and reflect existing local open space deficiencies and improvement priorities in the relevant parts of Wolverhampton. This should be reflected in SPDs / Masterplans and Infrastructure Delivery Strategies.

Question 3: a) Have the correct vision and strategic objectives been identified?

No

We welcome the references in table 4 of the document to the need for the Plan to 'support the economies of adjoining areas and pressure to release land to meet a proportion of their unmet needs'. We also note the acknowledgement that the Black Country in particular has a significant unmet need for employment in the Local Plan period, and the need for the Plan to consider South Staffordshire's role in meeting any cross-boundary needs. This thinking is based on evidence in the form of the 2018 South Staffordshire EDNA and the 2017 Black Country EDNA, the latter subject to an update in 2021.

For consistency, **we request that the opportunity for the Plan to make a contribution towards wider unmet employment land needs is reflected in the Economic Vibrancy section of the Strategic Objectives of the Plan**. This would ensure consistency with the approach taken in Strategic Objective 2 which is related specifically to meeting unmet housing needs from the Greater Birmingham Housing Market Area.

Addressing the Black Country Employment Land Shortfall

Para 4.55 of the document confirms the Black Country Plan employment land shortfall of 210ha – the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the Plan should seek to provide for around 30% of B8 activity and 70% E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. Applying this apportionment to the delivery of the employment land supply identified in the draft Black Country Plan would suggest B8 supply of some 106ha and E(g)(ii)(iii)/B2 supply of 247ha.

Using this approach, and before taking into account any potential contributions through the Duty to Cooperate the shortfall by use class is therefore some 64-70ha B8 and 149-163ha E(g)(ii)(iii)/B2.

In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/) . This suggests that a minimum of some 72ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be satisfied by this site should the South Staffordshire EDNA update confirm a surplus of employment land against local needs. We therefore request that this work is fully considered as part of the EDNA Update referred to above.

In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, and we are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford.

We also draw your attention to the West Midlands Strategic Employment Sites Study (WMSESS) (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/) published in 2021. The

Report was produced by Avison Young and Arcadis consultants and commissioned by three of the West Midlands Local Enterprise Partnerships (the Black Country, Greater Birmingham and Solihull and Coventry Warwickshire) and Staffordshire County Council. The Study updates the 2015 West Midlands Strategic Employment Sites Study which identified a demand for strategic employment sites in the West Midlands, but a lack of suitable sites.

The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.
The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. In spite of the recognition of the need for further work, the Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.

There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. We therefore **request that the Council engage with the Black Country and other relevant West Midlands local authorities in the follow-up work recommended in the WMSESS** and that this is reflected in the EDNA update.

In summary, we welcome the commitment in principle for the Local Plan to assist with meeting unmet employment land needs arising in the Black Country. The EDNA update will provide critical and timely evidence on the extent of any surplus from the existing supply, and whether additional opportunities would need to be considered both within the District and / or in adjacent areas having regard to the recommendations of the WMSESS.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

Yes

We support the longer term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

Chapter 5

Question 7:

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

Yes

However, the Langley Road site should also be subject to this approach, given the significant cross-boundary infrastructure and design implications of this development.

01.03.2022 – Black Country authorities' response to SSDC 14.01.2022 letter

CITY OF WOLVERHAMPTON COUNCIL

Dear Ms Harris,

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter of 14 January 2022 concerning the above. This letter represents the response of the four Black Country authorities to that letter.

The 2016 Gypsy and Traveller Accommodation Assessment set out a level of need for new pitches in the Black Country in excess of current supply on identified sites. This Assessment is currently being updated and early indications are that this situation will not change.

No additional sites have been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work.

Therefore, the Black Country authorities are unlikely to be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. This position will be confirmed as the work outlined above progresses.

Notwithstanding the above, we remain committed to cooperation on issues of mutual / cross-boundary interest. We welcome the opportunity to continue to work with South Staffordshire District Council in a positive and constructive manner through the preparation of the Local Plan Review. This will include involvement in the preparation of Statements of Common Grounds to support both the South Staffordshire Local Plan and the Black Country Plan, at an appropriate stage.

We trust you find these comments helpful and look forward to further discussions with you.

If you would like to discuss our response please get in touch.

Yours sincerely

Michele Ross
Lead Planning Manager (Sub-Regional Strategy)
City Planning
City of Wolverhampton Council
Email: [REDACTED]@wolverhampton.gov.uk
Tel: [REDACTED]

25.07.2022 – duty to co-operate meeting minutes

South Staffordshire/Black Country Duty to Cooperate meeting (25.07.2022)

Attendees:
Kelly Harris (KH)
Ed Fox (EF)
Patrick Walker (PW)
Ian Culley (IC)
Michelle Ross (MR)

Black Country Update

IC – September/October for Council/cabinet decisions to submit plan, aim to make sure Reg 19 consultation happens this year. Limited Reg 18 consultation on Walsall sites on 3 sites in Green Belt.

KH – Is WMCA urban capacity study part of the emerging BC plan?

MR – produced in conjunction with the WMCA and BC plans, recognised there's potentially more capacity in centres, could re-allocate employment land for housing but that would create employment shortfall

KH – will study recommendations be in Reg 19?

IC – yes, but duplicated work already underway to understand capacity in centres, employment site additions are limited. Helped to clarify methods for centre capacity delivery recommendations. Some delivery focused recommendations too.

South Staffordshire update

KH – currently nailing down evidence base, pinch points on key documents delaying progress slightly. Still aiming for double decision around mid-October, aim to submit before May next year. Member engagement beginning soon in preparation for this. Clarification received from DLUHC that we should be proceeding and not expecting the alignment test to change need for cross-boundary.

EF – EDNA available now and on website

IC – Extra work on slightly updating EDNA, also doing some update work to align growth targets with LEP and WMCA agendas for post covid recovery

EF – SHMA being updated?

MR – not yet, likely to be at submission. Also likely to get consultants to update EDNA to align jobs and housing.

Bromsgrove

IC – suggesting potential for a new strategic employment site of 25ha which could contribute to shortfalls

PW – SSDC indicating Bromsgrove should make a contribution based on the Strategic Growth Study, not supportive of the approach advocated in their HEDNA which appears to imply deferring contributions until after adoption of BC plan.

Housing/GBHMA work

IC – intention is for South Staffs to circulate SoCG once draft finalised amongst officers, to ensure its publicly available around the time of Reg 19 consultations.

IC – Concerns raised during Shropshire EiP due to lack of evidence on 1,500 dwellings, inspector did raise need for evidence to inform shortfalls.

Employment

KH – need an update on SoCG for employment

IC – currently on to-do list, Warwick work to update BC position will also be received imminently and reflected. Middle of August for draft.

EF – area of coverage of the SoCG?

IC – mainly with South Staffs and Shropshire, then with strong and moderate economic relationships identified in the EDNA

Gypsy and travellers

EF – SSDC still have a shortfall. GTAA identifies a massive need (121 pitches). Did a pitch deliverability study to look for options to meet need, focusing on at least trying to meet 5 year need, Preferred Options can only deliver 42 pitches. Engaged all of the housing site promoters to see if land is available for public site, no landowners willing to gift land for this purposes. All SSDC land also explored. Trying to identify how specific family needs can be met, so essentially need public sites or sites owned by families. Will be engaging DtC bodies again to set out approach taken, and request that others look for similar approach. Need to show we've made every effort to meet it.

IC – how far off 5 year need is South Staffordshire?

EF – 5 year requirement is approx. 30 pitches short

MR – would expect BC to write to site promoters in a similar manner? 5 year need is barely being met in BC so surplus supply is unlikely to contribute to South Staffs. Would public sites need to be examined?

EF – appreciate public sites are difficult to deliver but we need to ask to show we're thoroughly examining export options to other authorities. Letter with further request likely to come in the next few weeks.

Masterplanning of South Staffordshire Strategic Sites

MR – why has no GP surgery been provided on Linthouse Lane?

KH – currently correspondence to date from Black Country CCG hasn't requested it and has suggested primary care facilities in surrounding Black Country could be expanded

MR – Black Country CCG has given Wolverhampton conflicting advice on this

MR – Update on STA work?

KH – Difficulties with Highways England's stance on modelling – late requests being made for microsim modelling. Currently cumulative assessment been provided by developers which SSDC thinks is proportionate

MR – Affordable housing – meeting being set up with housing team to discuss affordable housing allocations. Assuming there's room for discussion?

KH – Yes, briefing cabinet on this and willing to discuss shared solution.

MR – Assuming this could include Cross Green and Langley Road sites?

KH – Suspect so, need to go through cabinet process to confirm.

MR – what will the status of masterplans be and timescales for?

KH – Not going to be preparing SPDs

EF – Concept plans will be in Local Plan, to guide future masterplans that will be provided alongside the planning application stage

MR – Can draft concept plans be shared in advance of Reg 19?

EF – Yes in principle, but limited chance to change due to timescales

Playing Pitch Strategy

EF – Sport England advised that mostly on-site provision for 4 strategic SSDC sites will work, but there may be some instances (e.g. near Bilbrook) where cross-boundary contribution to BC needs would help.

MR – Playing Pitch Strategy about to be finalised, can organise a meeting as soon as South Staffordshire want to discuss.

Key actions arising

- SSDC to formally write to Black Country again regarding Gypsy and Traveller unmet needs
- Black Country to provide initial draft SoCG for employment by mid-August
- SSDC and BC to arrange meeting to discuss split of affordable housing on cross-boundary sites
- Follow up meeting to be arranged to discuss Playing Pitch Strategy
- SSDC to provide draft concept plans to Black Country prior to Reg 19 consultation

06.10.2022 – Dudley MBC press release

Dudley will "go it alone" on housing and employment plan | Dudley Council News

Dudley will "go it alone" on housing and employment plan

Council bosses in Dudley have pulled out of a regional plan to identify housing and employment land in a bid to "listen to local people" on the use of green belt.

Dudley Council leader, Councillor Patrick Harley, says the council will draw up its own plan after cutting ties with the Black Country Plan.

Earlier this year, almost 20,800 people across the Black Country responded to consultation on the plan in the form of individuals, organisations and group responses and a further 18,000 people signed petitions. The vast majority were from Dudley.

Following the enormous feedback Dudley leaders have since said they would pull two sites from the plan – land south of Holbeach Lane, Kingswinford, and land in Swindon Road, Wall Heath.

But after the Black Country authorities failed to come to agreement on how the plan would progress, Councillor Patrick Harley said he could not allow the "overwhelming" feedback from the public to be ignored and therefore would be recommending to Dudley Council's cabinet that the authority should withdraw and draw up its own plan.

Councillor Patrick Harley, leader of Dudley Council, said:

At every stage of this plan we have made it clear that it must be led by the people who live here. I simply cannot stand by and allow decisions to be made which are contrary to the overwhelming feedback we have already received. This is clearly a very emotive subject and people feel very strongly about it. I must reflect that in the decisions I make for the people of this borough. We will therefore look to go it alone and look at what is needed to support a Dudley specific plan and setting out the timescales for that. A lot of the work we have carried out to date is still very relevant so it is not a matter of starting from scratch. There's a huge amount of feedback already from residents in Dudley borough and it is important we use that moving forward. But rest assured we will listen to local people and put them first at every stage of this plan.

19.10.2022 – Black Country Plan joint statement

Black Country Plan | Black Country Plan

The Black Country Plan 2039

Published Wednesday, 19th October 2022

A joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton.

“The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan.

“Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans."

If you require any further information regarding the local plans for each of the individual local authorities, please email them directly using the contact details below.

31.10.2022 – G&T duty to co-operate meeting minutes

South Staffs Council, Black Country Local Authorities, Birmingham City Council

DTC Meeting 31.10.2022

Attendees:

Kelly Harris (KH) - South Staffordshire District Council

(SSDC) Ed Fox (EF) - SSDC

Patricia McCullagh (PM) – Sandwell Metropolitan Borough Council

(SMBC) Michelle Ross (MR) – City of Wolverhampton Council (CWC)

Vicki Popplewell (VP) – Dudley Metropolitan Borough Council (DMBC)

Maria Dunn (MD) – Birmingham City Council (BCC)

Uyen-Phan Han (UPH) - BCC

Liz Forster (LF) – Walsall Metropolitan Borough Council (WMBC)

Neville Ball (NB) – WMBC

Gypsy and Traveller unmet needs:

EF – BCC has responded but Black Country authorities haven't to date

KH – Are there plots on public sites? Site options for **new** public sites, including in Green Belt? Engaged with site promoters to see if there's opportunity for new public sites? Considered publicly owned land? This is what South Staffs have done, need to understand what others have.

VP – have recently re-examined site options; can come back in writing

KH – need to understand the process others have gone through

NB – one Council public site is full, just opened a temporary transit site with 6 pitches, haven't considered options for new sites other than a existing SAD non-GB allocation; goes towards existing needs, haven't discussed public sites with GB housing sites but have with non-GB housing sites, non-GB sites indicated it would affect viability to do so.

MR – latest G&T assessment isn't published yet, likely to be published in January. 1) No, 2) No, 3) No - could do that during consultation on Issues and Options, 4) Yes - could do further work at January consultation to examine this. Will examine but can't respond with any substance before January.

PM – Will be examining these four areas through Issues and Options on Sandwell plan. 1) No, 2) No, 3) No but will examine through Issues and Options and 4) have looked at some for transit sites but not any further.

Apportionment of housing contributions:

IC – have discussed this with Bham previously but see a need to separate out housing contributions between 4 BC LPAs and BCC. May be significant for justifying Green Belt exceptional circumstances. From Shropshire examination the earlier this is sorted out the better. Most progressed offer is Shropshire (signed SoCG) and some are expressed to BC specifically (e.g. Lichfield). Others aren't attributed to any individual LPAs.

IC- Have proposed an approach in circulated note based on net migration flows between importing and exporting authorities. Based on authorities mainly to north and west of conurbation as this is where majority of local plan activity is at this point. Based on a migration based method, % figures in Table 2 of the circulated note could be used as basis for separating out offers between four BC authorities and BCC. Would like to see this reflected in the SSDC SoCGs to provide certainty.

IC – Might be argued that if LPA area doesn't have a shortfall then it shouldn't be receiving offers from neighbouring LPAs. CWC want to use this approach as soon as possible to allow local plans to progress.

MD – Want to understand how lack of BC plan impacts shortfalls and want to see how contributions would be distributed across LPAs where a contribution would be given to LPA without a shortfall (e.g. if Walsall's needs are met, where does Lichfield's contribution go). What happens to individual LPAs within the Black Country which can meet their own need, but which could have a role in assisting with Bham's shortfall?

IC – If moving to four individual local plans it pushes preparation back a year, may not be the case that some LPAs which were meeting own needs still can

NB – May not reflect people moving from Sandwell to other BC authorities, which in turn then have residents moving to shires

MD – If we can't treat as collective HMA shortfall (Bham preference) then the % are a sensible way to go about it but does appear to make life difficult for Sandwell which has a large shortfall but no direct relationships.

IC – Sandwell's strongest relationships are with Dudley, Wyre Forest, Bham. If Wyre Forest was more progressed then this approach would give Sandwell a stronger argument for asking them.

MD – Should we be looking across the whole HMA then?

KH – Probably for **next** iteration of HMA SoCG if we're going down that route. Also need to be mindful that Wyre Forest isn't in HMA. Need to be mindful of what we can agree **now** for SoCG.

IC – Would seek agreement on approach to apportionment if not number at this stage.

KH – Over the next couple of months could Bham and Black Country work together on this?

MD – Would need the next couple of months to work this out.

IC – Could SoCG commit to doing apportionment based on evidence of functional relationships between LPAs?

MD – would need to check with senior management given that approach to date has been to push for singular HMA shortfall

IC – Would like to have agreement to work together on how to apportion in areas of agreement

MD – Agree it would be better to show we have a way forward on this

KH – If BCC can get wording to us by end of this week that would enable us to put in

AGREED – BCC to provide wording by the end of this week to put into each SoCG on way forward for apportionment

Timescales for plan-making

KH – Any update from BC LPAs on this in light of individual plans being pursued?

MR – CWC LDS indicates consult in Spring 2023, Reg 19 Summer/Autumn 2023, examination 2024, adopt 2025

NB – WMBC LDS going to cabinet this week, going back to Reg 18, Issues and Options after elections next Summer, submit March 2026

VP – DMBC looking to incorporate Brierly Hill AAP into plan, Reg 18 plan after elections in June/July 2023, not agreed submission/adoption timescales at this stage.

MD – Submission 2025, adoption 2026 for BCC, can't sit still and wait for new system

IC – Apportionment will be important if plans are all operating to different timescales

PM – LDS in December 2022, looking to do one Local Plan with Issues and Options February/March 2023, adoption early 2026

Signing statements of SoCG

KH – HMA SoCG; signed copy from Bham, SSDC's likely to be signed subject to scrutiny, going to be chasing today. Individual SoCGs need to be agreed at officer level this week (prior to consultation) but any idea of timescales for formal sign off?

IC – End of November for CWC

MR – should education be included at this stage?

PW – could reflect current position on school places; that each CWC and SSDC working with education authority confirm that each area can accommodate its own growth in school places

MD – Can likely do BCC's under delegated sign off

MR – Would sign off be delayed until submission next year?

KH – Need sign off as soon as possible to support Regulation 19. Will happily participate in updated SoCG with CWC and others at submission stage but that needs to be in addition to Regulation 19 stage SoCG, not instead of.

AGREED – Officer comments back by end of the week with aim to sign individual SSDC SoCG after this.

AGREED – Dudley, Sandwell and Walsall to confirm individual decision making processes in light of ABCA no longer being decision making signatory

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:
Alex Yendole (AY) – Stafford Borough Council
Neville Ball (NB) – Walsall MBC
David Holloway (DH) – Dudley MBC
Ian Culley (IC) – City of Wolverhampton Council
Sushil Birdi (SB) – Cannock Chase District Council
Heidi Hollins (HH) – Cannock Chase District Council
Mark Watkins (MW) – Sandwell MBC
Kelly Harris (KH) – South Staffordshire District Council
Ed Fox (EF) – South Staffordshire District Council
Patrick Walker (PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction
AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed
AY – will add in text in table at end that FEMA is predominately Stafford's own borough area
AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?
IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans
AY – will there be conversations in advance if local authorities are affected by this?
IC – yes
KH – Black country evidence as published to date will be kept until new evidence base is available?
IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?
KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that
IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?
KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date
PW – SoCG intended to be record views understood to be agreed to date
IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19
IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't
KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging
DH – Para 4.5; repeats "must" – can we change to "should"?
KH – This is in section on SSDC's position – may not be view of all but is SSDC's view
IC – Could change it to "must continue"?
KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November
ACTIONS: Further info on signing timescales expected from all
ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

23.01.2024 – CWC response to SSDC 24.10.2023 letter

CITY OF WOLVERHAMPTON COUNCIL

Sent via email to:

e.fox@sstaffs.gov.uk

Planning Policy Team

South Staffordshire District Council

23 January 2024

Dear Planning Policy Team,

South Staffordshire District Council – Duty to Cooperate Update

This letter contains the response of the City of Wolverhampton Council to the Duty to Cooperate Update letter sent on 24 October 2023. This response was approved by Wolverhampton Council Cabinet on 17 January 2024.

Thank-you for your letter of 24 October 2023, which seeks to understand the position of neighbouring authorities should the South Staffordshire Local Plan (SSLP) no longer review green belt boundaries to accommodate the needs of both South Staffordshire or the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA), including Wolverhampton. We understand that you are also undertaking an update to the South Staffordshire gypsy and traveller accommodation evidence and are requesting neighbouring authorities to indicate their position on cross-boundary issues relating to gypsy and traveller pitch need and supply.

Regarding the question on the City Council's likely views on the status of the proposed green belt allocations, it is considered premature to comment at this stage. The Council's position would need to be informed by the progress of the Wolverhampton Local Plan (WLP) which is programmed for consultation in early 2024. It is also premature to provide a City Council position on cross-boundary issues relating to gypsy and traveller pitch need and supply, as this would need to be informed by progress on the WLP which will consider gypsy and traveller pitch need and supply in Wolverhampton.

For your information, the current Wolverhampton position on housing and employment land need and supply is set out in the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) 2022, the Black Country Economic Development Needs Assessment (BC EDNA) 2023 and the Draft BCP (2021).

On the basis of the December 2022 consultation version of the National Planning Policy Framework (NPPF), the Leader of the Council committed to excluding any green belt land from development allocations in the emerging Wolverhampton Local Plan (WLP). Taking into account potential capacity on non-green belt land in the Draft BCP, and an extended Plan period to 2042, the WLP is likely to generate a shortfall of around 11,500 homes and 50 ha of employment development land.

In terms of employment development land, the BC EDNA concludes that the BC FEMA as a whole has a shortfall of 152ha, however contributions secured through current Statements of Common Ground between the BC FEMA authorities and Shropshire and South Staffordshire Councils have potential to provide 133.6 ha towards BC FEMA needs, which would reduce that shortfall to 18.4 ha.

I hope that this information is useful.

Yours sincerely,

Michele Ross

Planning Policy Manager

Tel: [redacted]

Email: [redacted]@wolverhampton.gov.uk

14.03.2024 – SSDC letter to FEMA authorities

From:	Alex Evans
To:	[REDACTED]@cannockchasedc.gov.uk; Jemma March; Vicki Popplewell; "[REDACTED]@sandwell.gov.uk)"; "Alex Yendole"; David Holloway; [REDACTED]@walsall.gov.uk; Alison Ives; [REDACTED]@wolverhampton.gov.uk
Cc:	Edward Fox
Subject:	FW: South Staffordshire FEMA - SoCG update
Date:	03 April 2024 12:19:00
Attachments:	South Staffs FEMA SoCG 2024.docx Appendix 2.pdf Appendix 3.pdf Appendix 1.pdf image001.png

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Dear all,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the FEMA SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans

Sent: Thursday, March 14, 2024 10:45 AM
To: [REDACTED]@cannockchasedc.gov.uk; Jemma March <[REDACTED]@cannockchasedc.gov.uk>; Vicki Popplewell <[REDACTED]@dudley.gov.uk>; ([REDACTED]@sandwell.gov.uk) >; Alex Yendole

<[REDACTED]@staffordbc.gov.uk>; David Holloway <[REDACTED]@walsall.gov.uk>; [REDACTED]@walsall.gov.uk; Alison Ives <[REDACTED]@walsall.gov.uk>; [REDACTED]@wolverhampton.gov.uk

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: South Staffordshire FEMA - SoCG update

Dear all,

Alongside the individual updates to bilateral SoCG we sent out last week to individual local authorities, we are also keen to update the previous FEMA SoCG (dated November 2022) to reflect the South Staffordshire EDNA update. Therefore, please find attached an proposed updated track change version.

Please feel free to add further changes / amendments and circulate them to all authorities in the FEMA for consideration.

I would also be happy to organise meetings on an individual or group basis if that would be helpful.

We are seeking to agree the updated SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

We would like to have the SoCG agreed and signed off at officer level by **Friday 29nd March 2024**.

Please let me know if you have any queries or questions.

Kind regards

Alex
Alex Evans

Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

09.04.2024 – SSDC response to CWC Regulation 18 Consultation

Sent via email to:
local plan@wolverhampton.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

9th April 2024

South Staffordshire Council response to Wolverhampton City Council Regulation 18 consultation

Dear Sir/Madam,

South Staffordshire Council (SSC) welcomes the opportunity to comment on the Draft Wolverhampton Local Plan (WLP) Regulation 18 Issues and Preferred Options consultation document. It is noted that the production of the new joint Black Country Plan (BCP) officially ceased in October 2022 and that City of Wolverhampton Council (CWC) are now producing an individual Local Plan for its administrative area.

We understand that this draft Local Plan is focussed on addressing strategic issues and is proposing to retain the majority of the relevant policies which were developed and evidenced as part of the now terminated joint Black Country Plan (BCP). Where policies have been amended this has been to take account of changes to national policy, the altered plan geography and any valid issues raised during the 2021 consultation on the draft BCP.

In providing the following response SSC has focussed our comments on those specific elements of the plan which raise cross-boundary issues.

Strategy

The preferred spatial strategy is aiming to provide 'Balanced and Sustainable Growth' and focusses development in the central, north and eastern parts of Wolverhampton to support regeneration and utilise existing infrastructure provision. A Growth Network comprising the city centre and the core regeneration areas at Bilston, Wednesfield and Stafford Road are to act as the principal focus for future growth, with housing density increases in accessible locations to maximise the effective use of land in accordance with national policy priorities.

It is understood that a housing, employment land and Gypsy and Traveller provision shortfall has been identified which the Draft Plan is seeking to export through Duty to Cooperate agreements with neighbouring authorities. The Plan has not sought to consider amendments to existing Green Belt boundaries within the authority area. This approach reflects the recent changes to the National Planning Policy Framework (NPPF) which now states that there is no requirement for Green Belt boundary alterations when plans are being updated or reviewed though authorities may choose to make such boundary amendments where exceptional circumstances are fully evidenced and justified.

Housing Provision

The standard method currently calculates a total future housing requirement figure for the city of 21,720 dwellings across the plan period (2022-2042). This figure includes the 35% uplift applied by national policy to the 20 largest towns and cities. A total potential supply of 10,307 dwellings has been identified leaving a shortfall of 11,413 dwellings. South Staffordshire has concerns that the CWC has 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, including through opportunities identified through PropTech software. It is the stated intention of CWC to seek to export this shortfall through Duty to Co-operate arrangements. Given that Wolverhampton is situated within a Housing Market Area (HMA) geography primarily composed of net exporting metropolitan authorities and rural shire authorities comprising significant amounts of Green Belt it is unclear how readily this surplus requirement will be absorbed through duty to cooperate arrangements within the HMA. South Staffordshire considers that CWC should seek to maximise delivery within its own administrative boundaries before seeking to export unmet needs. It would be unreasonable to ask other Green Belt authorities to release Green Belt to meet Wolverhampton housing needs, when CWC are not willing to consider releasing its own Green Belt in areas closest to where the needs are generated. As the plan making process proceeds forwards, continued efforts to increase capacity through site regeneration, housing renewal schemes, increased densification and the release of city centre sites should be ongoing with the aim of reducing the net requirement to be exported to other authorities.

SSC paused Local Plan production following completion of a Regulation 19 Publication Plan consultation in December 2022 in light of proposed Government changes to national planning policy. South Staffordshire Council has now recommenced work on plan production and is proceeding to undertake an updated Publication Plan (Regulation 19) consultation in April 2024. It should be noted that SSCs preferred strategy in its April 2024 Regulation 19 consultation is to meet the housing needs of our communities by focus growth primarily on the districts most sustainable Tier 1 settlements including some Green Belt release at these settlements on sites assessed as suitable through our site assessment process. This does result in a potential 640 home surplus based on our current standard method requirement that potentially could be attributed to unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which includes Wolverhampton. SSC remain of the view that the GBBCHMA authorities will need to work together collectively to consider housing shortfalls across the HMA and SSC is supportive of taking part in updated HMA-wide evidence to consider this.

Gypsies, Travellers and Travelling Showpeople

SSC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need for 162 pitches during the plan period.

SSC wrote to CWC (and other GBBCHMA and neighbouring authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches this is set against a revised 5-year requirement of 92 pitches, and

therefore confirming we had a significant unmet need for pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the city for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

It is noted that Wolverhampton have identified a likely shortfall in provision of suitable pitches following the 'call for sites' process, though it is not clear that all the options identified above have been explored to determine if additional capacity could be available. SSC would welcome an indication that all such options have been explored and we look forward to continuing to engage with CWC on this issue.

Employment Land Need

The latest evidence on employment needs covering the Black Country (Black Country EDNA 2023 update) has identified a need for 68.6ha of employment land in Wolverhampton. Four potential new sites in the urban area have been identified which has reduced the identified shortfall to 53.3 ha.

SCCs previous version of the Regulation 19 Plan was supported by a draft Statement of Common Ground (SoCG) across the SSC FEMA (South Staffordshire, Cannock, Dudley, Stafford, Walsall and Wolverhampton), and also Sandwell, owing to its close economic relationship with the three other Black Country authorities. At that time, South Staffordshire through a SoCG indicated its position, as set out in our November 2022 Publication Plan, that we have a 36ha (excluding WMI) surplus of employment land that we can make available to unmet needs of the Black Country FEMA. A partial update to the EDNA was produced in 2024 to inform the latest South Staffordshire Local Plan Regulation 19 consultation. This study concluded that SCC had sufficient pipeline of employment to contribute to unmet needs of the wider FEMA and when factoring in the proposal to allocate a new strategic site at M6 Junction 13 Dunston (17.6 ha.) would provide a surplus supply of 45.2 hectares of employment land, which could be attributed to meeting cross boundary unmet needs in the Black Country FEMA.

West Midlands Interchange

A Strategic Rail Freight Interchange (West Midlands Interchange (WMI)) is situated within South Staffordshire though this serves a wider market area (including Wolverhampton).

Through our 2022 EDNA & 2024 update SSC identified a requirement of 18.8 ha of the WMI land to meet our labour demand requirements up to 2041. SSC has acknowledged that there is surplus employment land at WMI that is currently 'unclaimed' and that could be utilised to meet the unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 67ha of the site towards the Black Country, with a further breakdown suggesting that 16ha of the site could be apportioned to Wolverhampton.

Nature Conservation

We support the inclusion of the Cannock Chase SAC 15km Zone of Influence on the Local Plan Policies Map. It is anticipated that we will continue an ongoing dialogue with CWC and the other constituent authorities in the SAC partnership to consider the implications of any cross-boundary issues including the potential of growth and air quality on designated sites of nature conservation value. With reference to the commitment in the plan to undertaking air quality modelling. It is suggested that reference should be included within the plan to the necessity of undertaking in-combination modelling as well as examining the specific impacts that arise from development proposed within the WLP.

I hope you find our response helpful as you progress your Local Plan and look forward to continuing to engage constructively with CWC through preparation of our respective plans.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

08.01.2025 – SSDC response to CWC Regulation 19 Consultation

Sent via email to:
localplan@wolverhampton.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

8th January 2025

South Staffordshire Council response to City of Wolverhampton Council Local Plan Regulation 19 consultation

Dear Sir/Madam,

South Staffordshire District Council (SSDC) welcomes the opportunity to comment on the Draft City of Wolverhampton Local Plan (WLP) Regulation 19 Publication consultation document.

SSDC would wish to submit the following comments which relate to those specific elements of the Plan which raise cross boundary issues of mutual interest.

The comments submitted below have been framed in anticipation that the Plan will be submitted during the three month transitional arrangement period permitted by the recently revised National Planning Policy Framework (NPPF 2024). This would mean than the Plan will be assessed in relation to the previous NPPF 2023. Should the plan be submitted outside this transitional three month period it will be subject to assessment in the context of the revised NPPF 2024. The potential implications of such an approach have been addressed in a section on transitional arrangements below.

Delivering Sustainable Housing Growth – Policy HOU1

The draft plan identifies a minimum housing supply of 9,330 dwellings during the plan period 2024- 2042. The previous Standard Method calculation identified a need of 19,728 homes (1096/annum), the revised method results in a marginal reduction in requirement and identifies a need of 19,548 dwellings (1086/annum). This leaves an unmet need of 10,398/10,218 dwellings depending on which calculation is employed. The City of Wolverhampton Council (CWC) is seeking to export this surplus requirement through Duty to Cooperate arrangements with neighbouring authorities including South Staffordshire District Council (SSDC). SSDC will continue to work closely with CWC alongside the other relevant partners through relevant working groups and duty to cooperate arrangements to consider how the unmet needs across the housing market area can be addressed.

SSDC has recently submitted a draft Plan to the Inspectorate for examination. The submitted plan is proposing to meet the housing needs of our communities by focusing

growth primarily on the district's most sustainable Tier 1 settlements, including some Green Belt release at these settlements on sites assessed as suitable through our site assessment process. This does result in a potential 640 home surplus based on our prior standard method housing requirement that could be attributed to unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

We would support a commitment to continued attempts at increasing the supply of dwellings identified within the City. Specifically, attention should focus on examining the scope for increased densities particularly in the larger urban centres, reallocation of sites from other uses were this doesn't conflict with other plan objectives, housing area renewal proposals and exploring the potential release of Green Belt sites including those sites identified in the now abandoned draft Black Country Plan. Such contributions will reduce the overspill requirement arising within Wolverhampton and potentially make a contribution towards addressing housing market shortfalls in the wider Greater Birmingham and Black Country Housing Market Area.

Accommodation for Gypsies, Travellers and Travelling Showpeople – Policy HOU5

SSDC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need within the district for 162 pitches during the plan period.

SSDC wrote to CWC (and other GBBCHMA and neighbouring authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches against a revised 5-year requirement of 92 pitches, and therefore confirming we had a significant unmet need for pitches.

SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore requested that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the city for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

It is noted that the Gypsy and Traveller Accommodation Assessment (GTAA) 2022 identified a need for an additional 75 pitches in CWC up to 2032 and a further requirement for 19 pitches between 2032-2042. The plan has identified a supply of 56 pitches up to 2032. There is therefore a shortfall of 19 pitches up to 2032 which the City Council indicate will be delivered within the 'broad location' of the urban area through the planning application process. SSDC would welcome an indication that all options identified above have been explored including the potential to deliver a new public site/sites in the Green Belt.

Economic Growth and Job Creation – Policy EMP1

CWC has identified a shortfall of 83.5 hectares in the supply of employment land to meet the needs of the City during the plan period. SSDC has identified a potential surplus of 45.2ha. of employment land, which includes a new proposed allocation at Junction 13 of the M6. This land has been identified as being available to contribute towards addressing the employment land shortfall within South Staffordshire Functional Economic Market Area (FEMA) which includes CWC. As stated in our signed Statement of Common Ground (SOCG) with CWC, the role this surplus land will play in helping to address employment land shortfalls is subject to a separate SOCG covering the entire South Staffordshire FEMA and also the Black Country FEMA.

SSDC is also proposing to allocate the consented strategic rail freight interchange, West Midlands Interchange (WMI). Though situated in South Staffordshire, WMI serves a wider market area (including the City of Wolverhampton). Through our 2022 EDNA & 2024 update SSDC identified a requirement of 18.8ha of the WMI land to meet our labour demand requirements up to 2041. SSDC has acknowledged that there is surplus employment land at WMI that is currently 'unclaimed' and that could be utilised to meet the unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI (18.8ha) through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for

determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 16ha of the site towards the B8 employment land needs of Wolverhampton, and it is noted that this figure has been recognised as a contribution in the Plan towards addressing the WLP employment land supply shortfall.

Transitional Arrangements

The revised NPPF was published in December 2024, which has coincided with the consultation period for the CWC Local Plan Reg 19 consultation. The NPPF 2024 includes provision for a three month transition period for the submission of plans which have reached Regulation 19 stage from the date of NPPF publication. Should the Plan be submitted after NPPF publication date (+ three months) it is likely that the Plan would need to be considered in relation to the revised framework, as it doesn't appear that any of points in paragraph 234 of the NPPF 2024 would apply. This would require CWC to re-examine the current plan strategy particularly in light of the distinction in the revised NPPF between Green Belt and Grey Belt land, and the role which Green Belt can play in increasing the supply of land for residential development and Gypsy and Traveller provision. Therefore, whilst the plan is currently considered sound against the December 2023 NPPF, should the plan be submitted beyond the three month transitional period and given that it appears CWC will not meet any of points in paragraph 234, then the Publication Plan would not be sound and would need to be revisited.

SSDC do not consider it necessary to take part in the hearing sessions for the examination, however equally would be happy to attend these sessions on request of the inspector.

I trust you will find our response helpful, and we will continue to engage with CWC to address matters of mutual interest.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

Appendix 6 – Dudley Metropolitan Borough Council Documents

01.03.2022 – Black Country authorities' response to SSDC 14.01.2022 letter

CITY OF WOLVERHAMPTON COUNCIL

Dear Ms Harris,

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter of 14 January 2022 concerning the above. This letter represents the response of the four Black Country authorities to that letter.

The 2016 Gypsy and Traveller Accommodation Assessment set out a level of need for new pitches in the Black Country in excess of current supply on identified sites. This Assessment is currently being updated and early indications are that this situation will not change.

No additional sites have been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work.

Therefore, the Black Country authorities are unlikely to be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. This position will be confirmed as the work outlined above progresses.

Notwithstanding the above, we remain committed to cooperation on issues of mutual / cross-boundary interest. We welcome the opportunity to continue to work with South Staffordshire District Council in a positive and constructive manner through the preparation of the Local Plan Review. This will include involvement in the preparation of Statements of Common Grounds to support both the South Staffordshire Local Plan and the Black Country Plan, at an appropriate stage.

We trust you find these comments helpful and look forward to further discussions with you.

If you would like to discuss our response please get in touch.

Yours sincerely

Michele Ross
Lead Planning Manager (Sub-Regional Strategy)
City Planning
City of Wolverhampton Council
Email: [REDACTED]@wolverhampton.gov.uk
Tel: 01902 [REDACTED]

06.10.2022 – Dudley MBC press release

Dudley will "go it alone" on housing and employment plan | Dudley Council News

Dudley will "go it alone" on housing and employment plan

Council bosses in Dudley have pulled out of a regional plan to identify housing and employment land in a bid to "listen to local people" on the use of green belt.

Dudley Council leader, Councillor Patrick Harley, says the council will draw up its own plan after cutting ties with the Black Country Plan.

Earlier this year, almost 20,800 people across the Black Country responded to consultation on the plan in the form of individuals, organisations and group responses and a further 18,000 people signed petitions. The vast majority were from Dudley.

Following the enormous feedback Dudley leaders have since said they would pull two sites from the plan – land south of Holbeach Lane, Kingswinford, and land in Swindon Road, Wall Heath.

But after the Black Country authorities failed to come to agreement on how the plan would progress, Councillor Patrick Harley said he could not allow the "overwhelming" feedback from the public to be ignored and therefore would be recommending to Dudley Council's cabinet that the authority should withdraw and draw up its own plan.

Councillor Patrick Harley, leader of Dudley Council, said:

At every stage of this plan we have made it clear that it must be led by the people who live here. I simply cannot stand by and allow decisions to be made which are contrary to the overwhelming feedback we have already received. This is clearly a very emotive subject and people feel very strongly about it. I must reflect that in the decisions I make for the people of this borough. We will therefore look to go it alone and look at what is needed to support a Dudley specific plan and setting out the timescales for that. A lot of the work we have carried out to date is still very relevant so it is not a matter of starting from scratch. There's a huge amount of feedback already from residents in Dudley borough and it is important we use that moving forward. But rest assured we will listen to local people and put them first at every stage of this plan.

19.10.2022 – Black Country Plan joint statement

Black Country Plan | Black Country Plan

The Black Country Plan 2039

Published Wednesday, 19th October 2022

A joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton.

“The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan.

“Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans."

If you require any further information regarding the local plans for each of the individual local authorities, please email them directly using the contact details below.

31.10.2022 – G&T duty to co-operate meeting minutes

South Staffs Council, Black Country Local Authorities, Birmingham City Council

DTC Meeting 31.10.2022

Attendees:

Kelly Harris (KH) - South Staffordshire District Council

(SSDC) Ed Fox (EF) - SSDC

Patricia McCullagh (PM) – Sandwell Metropolitan Borough Council

(SMBC) Michelle Ross (MR) – City of Wolverhampton Council (CWC)

Vicki Popplewell (VP) – Dudley Metropolitan Borough Council (DMBC)

Maria Dunn (MD) – Birmingham City Council (BCC)

Uyen-Phan Han (UPH) - BCC

Liz Forster (LF) – Walsall Metropolitan Borough Council (WMBC)

Neville Ball (NB) – WMBC

Gypsy and Traveller unmet needs:

EF – BCC has responded but Black Country authorities haven't to date

KH – Are there plots on public sites? Site options for **new** public sites, including in Green Belt? Engaged with site promoters to see if there's opportunity for new public sites? Considered publicly owned land? This is what South Staffs have done, need to understand what others have.

VP – have recently re-examined site options; can come back in writing

KH – need to understand the process others have gone through

NB – one Council public site is full, just opened a temporary transit site with 6 pitches, haven't considered options for new sites other than a existing SAD non-GB allocation; goes towards existing needs, haven't discussed public sites with GB housing sites but have with non-GB housing sites, non-GB sites indicated it would affect viability to do so.

MR – latest G&T assessment isn't published yet, likely to be published in January. 1) No, 2) No, 3) No - could do that during consultation on Issues and Options, 4) Yes - could do further work at January consultation to examine this. Will examine but can't respond with any substance before January.

PM – Will be examining these four areas through Issues and Options on Sandwell plan. 1) No, 2) No, 3) No but will examine through Issues and Options and 4) have looked at some for transit sites but not any further.

Apportionment of housing contributions:

IC – have discussed this with Bham previously but see a need to separate out housing contributions between 4 BC LPAs and BCC. May be significant for justifying Green Belt exceptional circumstances. From Shropshire examination the earlier this is sorted out the better. Most progressed offer is Shropshire (signed SoCG) and some are expressed to BC specifically (e.g. Lichfield). Others aren't attributed to any individual LPAs.

IC- Have proposed an approach in circulated note based on net migration flows between importing and exporting authorities. Based on authorities mainly to north and west of conurbation as this is where majority of local plan activity is at this point. Based on a migration based method, % figures in Table 2 of the circulated note could be used as basis for separating out offers between four BC authorities and BCC. Would like to see this reflected in the SSDC SoCGs to provide certainty.

IC – Might be argued that if LPA area doesn't have a shortfall then it shouldn't be receiving offers from neighbouring LPAs. CWC want to use this approach as soon as possible to allow local plans to progress.

MD – Want to understand how lack of BC plan impacts shortfalls and want to see how contributions would be distributed across LPAs where a contribution would be given to LPA without a shortfall (e.g. if Walsall's needs are met, where does Lichfield's contribution go). What happens to individual LPAs within the Black Country which can meet their own need, but which could have a role in assisting with Bham's shortfall?

IC – If moving to four individual local plans it pushes preparation back a year, may not be the case that some LPAs which were meeting own needs still can

NB – May not reflect people moving from Sandwell to other BC authorities, which in turn then have residents moving to shires

MD – If we can't treat as collective HMA shortfall (Bham preference) then the % are a sensible way to go about it but does appear to make life difficult for Sandwell which has a large shortfall but no direct relationships.

IC – Sandwell's strongest relationships are with Dudley, Wyre Forest, Bham. If Wyre Forest was more progressed then this approach would give Sandwell a stronger argument for asking them.

MD – Should we be looking across the whole HMA then?

KH – Probably for **next** iteration of HMA SoCG if we're going down that route. Also need to be mindful that Wyre Forest isn't in HMA. Need to be mindful of what we can agree **now** for SoCG.

IC – Would seek agreement on approach to apportionment if not number at this stage.

KH – Over the next couple of months could Bham and Black Country work together on this?

MD – Would need the next couple of months to work this out.

IC – Could SoCG commit to doing apportionment based on evidence of functional relationships between LPAs?

MD – would need to check with senior management given that approach to date has been to push for singular HMA shortfall

IC – Would like to have agreement to work together on how to apportion in areas of agreement

MD – Agree it would be better to show we have a way forward on this

KH – If BCC can get wording to us by end of this week that would enable us to put in

AGREED – BCC to provide wording by the end of this week to put into each SoCG on way forward for apportionment

Timescales for plan-making

KH – Any update from BC LPAs on this in light of individual plans being pursued?

MR – CWC LDS indicates consult in Spring 2023, Reg 19 Summer/Autumn 2023, examination 2024, adopt 2025

NB – WMBC LDS going to cabinet this week, going back to Reg 18, Issues and Options after elections next Summer, submit March 2026

VP – DMBC looking to incorporate Brierly Hill AAP into plan, Reg 18 plan after elections in June/July 2023, not agreed submission/adoption timescales at this stage.

MD – Submission 2025, adoption 2026 for BCC, can't sit still and wait for new system

IC – Apportionment will be important if plans are all operating to different timescales

PM – LDS in December 2022, looking to do one Local Plan with Issues and Options February/March 2023, adoption early 2026

Signing statements of SoCG

KH – HMA SoCG; signed copy from Bham, SSDC's likely to be signed subject to scrutiny, going to be chasing today. Individual SoCGs need to be agreed at officer level this week (prior to consultation) but any idea of timescales for formal sign off?

IC – End of November for CWC

MR – should education be included at this stage?

PW – could reflect current position on school places; that each CWC and SSDC working with education authority confirm that each area can accommodate its own growth in school places

MD – Can likely do BCC's under delegated sign off

MR – Would sign off be delayed until submission next year?

KH – Need sign off as soon as possible to support Regulation 19. Will happily participate in updated SoCG with CWC and others at submission stage but that needs to be in addition to Regulation 19 stage SoCG, not instead of.

AGREED – Officer comments back by end of the week with aim to sign individual SSDC SoCG after this.

AGREED – Dudley, Sandwell and Walsall to confirm individual decision making processes in light of ABCA no longer being decision making signatory

02.11.2022 – DMBC response to SSDC 08.08.2022 letter

From:	Vicki Popplewell (Planning)
To:	Kelly Harris
Cc:	Edward Fox; Patrick Walker
Subject:	South Staffordshire Council G&T Pitch Provision
Date:	02 November 2022 09:35:13
Attachments:	image001.jpg

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Kelly

Further to comments at the meeting on 31st October, I will arrange for a formal response to be sent to South Staffs. In the meantime, our comments are as follows:

1) Are there any plots available on existing public sites within your area that are available for
contributing towards meeting our unmet needs?

No. We have one public/Council owned Traveller site which is fully occupied and with a waiting list.

2) Can you confirm if you have considered site options for a new publicly run site, including on site
options within the Green Belt? If no, is this something you intend to do, and if so, can you provide
indicative timescales for this?

We did not receive any call for sites submissions for G&T sites in the urban area or in the Green Belt. We have recently undertaken a review of up to 80 sites (including Council owned sites) to determine their suitability for location of a permanent transit site. We have only identified one site that would be suitably for this purpose and which is now the subject of a planning application for a permanent transit site.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if
they are willing to make part of their site available for a publicly run site? If no, is this something

you intend to do, and if so, can you provide indicative timescales for this?

Not at this stage, but it is likely that we will consider this approach as we progress with our Local Plan work in 2023.

4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales
for this?

We have recently undertaken a review of up to 80 sites (including Council owned sites) to determine their suitability for location of a permanent transit site. We have only identified one site that would be suitably for this purpose and which is now the subject of a planning applications. We will be undertaking further work as we progress with our Local Plan work in 2023

Regards,

Vicki Popplewell

Planning Policy Manager Planning -
Development Control Regeneration &
Enterprise Dudley Council
4 Ednam Road, Dudley, DY1 1HL 01384
[REDACTED]
www.dudley.gov.uk

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:
Alex Yendole (AY) – Stafford Borough Council
Neville Ball (NB) – Walsall MBC
David Holloway (DH) – Dudley MBC
Ian Culley (IC) – City of Wolverhampton Council
Sushil Birdi (SB) – Cannock Chase District Council
Heidi Hollins (HH) – Cannock Chase District Council
Mark Watkins (MW) – Sandwell MBC
Kelly Harris (KH) – South Staffordshire District Council
Ed Fox (EF) – South Staffordshire District Council
Patrick Walker (PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction
AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed
AY – will add in text in table at end that FEMA is predominately Stafford's own borough area
AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?
IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans
AY – will there be conversations in advance if local authorities are affected by this?
IC – yes
KH – Black country evidence as published to date will be kept until new evidence base is available?
IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?
KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that
IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?
KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date
PW – SoCG intended to be record views understood to be agreed to date
IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19
IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't
KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging
DH – Para 4.5; repeats "must" – can we change to "should"?
KH – This is in section on SSDC's position – may not be view of all but is SSDC's view
IC – Could change it to "must continue"?
KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November
ACTIONS: Further info on signing timescales expected from all
ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

26.07.2023 – duty to co-operate meeting minutes

South Staffordshire District Council (SSDC)/ Dudley Metropolitan Borough Council (DMBC) Duty to Cooperate meeting – 26.07.2023

Ed Fox (EF) – South Staffordshire District Council (SSDC)
Kelly Harris (KH) - SSDC
Patrick Walker (PW) - SSDC
Annette Roberts (AR) - SSDC
Kaleigh Lowe (KL) – Dudley Metropolitan Borough Council (DMBC)
Carl Mellor (CM) – DMBC
Vicki Popplewell (VP) – DMBC

1. Local Plan updates

VP – DMBC now producing Dudley Local Plan. Hybrid plan building in Issues and Options and Reg 18 Draft Plan. Building upon consultation responses to Black Country Draft Plan and will incorporate AAPs. Delayed consultation due to NPPF proposed changes. LDS just updated, aiming for mid-November to December 6 week consultation. Allowed time between Reg 18 - 19 for updating evidence base. Hoping for adoption late 2025 or early 2026.

EF – Did Reg 19 at end of last year but draft NPPF consultation led to plan being paused. Starting to 'unpause' the plan now. Intending to do another Reg 19 consultation due to government change of stance around Green Belt and need to consider plan and strategy in light of this. Looking to do another Reg 19 Spring 2024. Need to allow time for updating a number of pieces of evidence due to need to extend plan period and are responding to representations made to last Reg 19 consultation in preparing new plan. Looking to submit before June 2025 deadline for transitional arrangements.

VP – plan period for the Dudley Plan will be extending to 2041 and intending to submit prior to June 2025 also.

EF – also looking to push back plan period end date to cover need for 15 years post adoption and update needs assessments accordingly.

2. Evidence base

VP – Currently preparing a variety of documents in support of Dudley Local Plan preparation (e.g. SA, HRA and Viability work is currently being produced. Will be looking to update evidence later this year /early next year in time for Reg 19. This includes updated SHMA, Open Space Strategy, Flood Risk plus and additional work identified.)

KH – need to discuss cross-boundary pieces of work (i.e. HMA study and WMSESS)

EF – EDNA, Housing Market Assessment and GTAA needs assessments being updated, alongside SA etc. Keeping evidence limited to what needs updating.

3. Duty to Cooperate (DtC) evidence

EF – HMA study; understand that is still being progressed – critical piece of work that needs doing to support DtC position.

KH – At the July HMA Development Needs Group – officers have been tasked with going back to local authority members and come back to September meeting with a stance on undertaking

the work. SSDC won't need member sign off to do evidence but will for signing up to HMA terms of reference. Recognition that all HMA authorities want to submit prior to June 25 and meet the DtC.

VP – Clarified whether it was the August or September HMA meeting to feedback?

KH – Yes

VP – Taking briefing to leader and portfolio holder to update them on HMA progress, the draft Terms of Reference and governance procedures, DtC requirements and the proposal to update the Housing Growth Study. Dudley haven't fed back on HMA brief yet but will feed back following discussions with leader. VP to update the HMA group post briefing.

KH – Appreciate difficulties of communicating the need for study to members, but need to address DtC position under current system.

EF – also WMSESS is being progress; SSDC have fed back comments on update presentations, last progress we're aware of?

VP –To date the consultants have produced two presentations (slide decks) with the outcomes of the work. VP has requested copies of briefing papers that have been produced to inform the study outcomes so far. Currently, feel unable to provide detailed feedback without reference to briefing notes which sit underneath presentations (these haven't yet been presented).

EF – Agreed, have concerns about the extent to which market demand has led study's modelling and haven't seen briefing notes. Have flagged a number of concerns, requesting position from consultants on what their position is and why they've made certain assumptions.

KH – Concerned that WMSESS runs at odds to national guidance on EDNAs.

EF – Very bespoke approach taken to identifying need that doesn't seem to reflect approach taken at local level.

EF – SSDC likely to be sending further correspondence on DtC position once discussed with members. Likely to reiterate unmet need on G&T pitches. Looked at various sources of supply (including public and County landholdings) but can only accommodate 42 pitches at the moment.

VP – recognise the role of concealed households in generating this need. Will also be sending out formal correspondence. Previously responded on G&T pitch needs but are currently looking at sites again now – appears likely that DMBC will have a shortfall as well. Plan consultation will include an updated urban capacity study.

4. AOB

EF – date for next meeting and frequency?

VP – Suggest mid-September as DMBC will be more progressed at this stage.

KH – Suggest it's after September HMA meeting (19th September) to reflect position emerging from that.

EF – Air quality evidence base also worth noting – tender exercise completed but not yet appointed as working out contract issues. Will update once consultants appointed.

Date of next meeting: Monday 25th Sept 10am

25.09.2023 – duty to co-operate meeting minutes

South Staffordshire District Council (SSDC)/ Dudley Metropolitan Borough Council (DMBC) Duty to Cooperate meeting – 25.09.2023

Attendance

Ed Fox (EF) – South Staffordshire District Council (SSDC)
Kaleigh Lowe (KL) – Dudley Metropolitan Borough Council (DMBC)
Vicki Popplewell (VP) – DMBC
Elizabeth Vesty (EV) – DMBC

1. Local Plan updates

VP –. Provisional dates for consultation 10th November – 22nd December 2023. Plan will go to Cabinet 25th October 2023. Dudley will issue DtC letters to stakeholders providing details of Dudley's position and confirmation of its shortfalls, along with the supporting evidence.

EF –SSDC updating evidence and working towards a revised Reg 19 Plan and consultation in April 2024. Intend to submit the Plan by January 2025 and prepare the Plan under the current system. Currently working with Members on levels of growth/options and awaiting outcomes of NPPF.

EF- SSDC will be sending updated DtC letters to stakeholders setting out its position on Plan preparation and unmet needs.

EV: Queried if the approach by SSDC could be dealt with as a Reg 19 Plan. EF advised that the review could be dealt with via Reg 19 as a large element of the Plan would not be changed and any changes to sites/strategy/options could be addressed via the SA work.

2. Evidence base

VP – Currently preparing a variety of documents in support of Dudley Local Plan preparation (e.g. SA, HRA and Viability work is currently being produced. Will be looking to update evidence later this year /early next year in time for Reg 19. This includes updated SHMA, Open Space Strategy, Flood Risk plus and additional work identified.). Will be producing an Urban Capacity Study for Reg 18 Plan. All other evidence will be updated for Reg 19.

VP - cross-boundary pieces of work (i.e. HMA study and WMSESS). LAs have been asked to feedback on the initial findings of the WMSESS. SSDC and DMBC will feedback any comments.

EF – Updating SHMA to 2041 and GTAA needs assessments being updated, alongside SA etc. Keeping evidence limited to what needs updating. Updating EDNA and hope WMSESS will be finalised to feed into this work. EDNA will update position for extended Plan period and take into account completions from previous years. Following this, SSDC will have a clear position of its employment supply and any potential contributions towards neighbouring LAs.

EF – updated on the AQ SAC work.

3. Duty to Cooperate (DtC) evidence

EF – WMSESS discussed above.

VP: - HMA work – position to be determined by HMA Development Needs Group

4. AOB

Date of next meeting: Monday 4th December 10.30 am

31.10.2023 & 30.11.2023 – correspondence with ORS

From:	Hanna Lloyd < >
Sent on:	Monday, December 4, 2023 5:20:07 PM
To:	Alex Evans >
Subject:	FW: [EXTERNAL EMAIL] FW: South Staffordshire Council Gypsy and Traveller Accommodation Assessment 2023
Follow up:	Follow up
Follow up status:	Completed
Completed on:	Tuesday, December 5, 2023 10:45:00 AM

Hi Alex,

We are conducting stakeholder engagement with your neighbouring authorities. I am passing this email to you from Elizabeth Vesty at Dudley as it may have some cross-border issues for yourselves to be made aware of.

Many thanks,

Hanna

Hanna Lloyd BSc (Hons)

Assistant Researcher | Needs Assessment Team | Opinion Research Services (ORS)

Opinion Research Services | The Strand | Swansea | SA1 1AF

Tel: 01792 535328 | Email: | Website: www.ors.org.uk

From: Elizabeth Vesty (Planning) <>
Sent: Thursday, November 30, 2023 12:10 PM
To: Hanna Lloyd >
Cc: Vicki Popplewell (Planning) <>
Subject: RE: [EXTERNAL EMAIL] FW: South Staffordshire Council Gypsy and Traveller Accommodation Assessment 2023

Hi Hanna,

Sorry for the delayed response to your emails, we've been busy with our Dudley Local Plan consultation which finishes on 22nd December.

In terms of Gypsy, Traveller and/or Travelling Showperson related planning issues that cross administrative boundaries between Dudley and South Staffordshire, the main issue really is Dudley's unmet need for Gypsy, Traveller and Travelling Showpeople provision to 2041. Therefore, working with neighbouring authorities through Duty to Cooperate to assist in meeting the unmet need will be an important issue for the DLP process.

The details of the need and identified provision in the Dudley Borough are in the Draft Dudley Local Plan (DLP) under Policy DLP15 (part one) and the associated allocations are shown in part two, table 7.1. This is supported by the GTAA evidence base to 2041, available to view on the link below.

The draft DLP and evidence are available from: https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents/

Regarding infrastructure, there may possibly be some cross boundary matters regarding education provision if any of the South Staffordshire proposed sites are close to Dudley's boundary, therefore we would be keen to be involved in the process, if there are any sites near the Dudley boundary please.

Hope this assists with the assessment and should you have any queries, please contact me.

Regards,

Elizabeth Vesty
Principal Planning Officer

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 817213
www.dudley.gov.uk

From: Hanna Lloyd < >
Sent: 24 November 2023 15:13
To: Development Control <Development.Control@dudley.gov.uk>
Subject: [EXTERNAL EMAIL] FW: South Staffordshire Council Gypsy and Traveller Accommodation Assessment 2023

Good afternoon,

Just an email regarding an update on the information we requested from you (Dudley Council) on 31/10/23.

If you have any questions or queries, please get in touch!

Many thanks,

Hanna

Hanna Lloyd BSc (Hons)

Assistant Researcher | Needs Assessment Team | Opinion Research Services (ORS)

Opinion Research Services | The Strand | Swansea | SA1 1AF

Tel: 01792 535328 | Email: | Website: www.ors.org.uk

From: Hanna Lloyd
Sent: Tuesday, November 14, 2023 10:44 AM
To: 'development.control@dudley.gov.uk' <development.control@dudley.gov.uk>
Subject: FW: South Staffordshire Council Gypsy and Traveller Accommodation Assessment 2023

Good morning,

Just an email regarding an update on the information we requested from you (Dudley Council) on 31/10/23.

If you have any questions or queries, please get in touch!

Many thanks,

Hanna

Hanna Lloyd BSc (Hons)

Assistant Researcher | Needs Assessment Team | Opinion Research Services (ORS)

Opinion Research Services | The Strand | Swansea | SA1 1AF

Tel: 01792 535328 | Email: | Website: www.ors.org.uk

From: Hanna Lloyd
Sent: Tuesday, October 31, 2023 1:14 PM
To: 'development.control@dudley.gov.uk' <development.control@dudley.gov.uk>
Subject: South Staffordshire Council Gypsy and Traveller Accommodation Assessment 2023

Afternoon,

We are Opinion Research Services (ORS). We are independent organisation that has been commissioned by South Staffordshire Council to undertake their new Gypsy and Traveller Accommodation Assessment (GTAA), and we would like to speak with you as part of the assessment.

Planning Policy Guidance (PPG) 2019 indicates that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. Therefore, we would like to ask the following question:

Are you aware of any Gypsy, Traveller and/or Travelling Showperson related planning issues that cross administrative boundaries between Dudley and South Staffordshire?

If there are issues that you feel South Staffordshire Council should be aware of, such as issues with unauthorised encampments or in-migration, can you please let us know. If there are no known issues, we would also appreciate you informing us so we can better inform the Council. If you feel these issues need to be discussed via a teams meeting, we can arrange a date/time suitable.

Your cooperation on this matter as a representative of your Local Planning Authority is appreciated and it will help to ensure the study is as robust as possible.

This assessment is important to South Staffordshire Council, and we would therefore like to hear from you. The deadline for the assessment is fast approaching and we would ideally like you to respond before the end of November.

If you wish to speak to the Local Authority lead for this project please contact: Edward Fox (Assistant Team Manager) at South Staffordshire Council, by telephone: 01902696544 or by email: E.Fox@sstaffs.gov.uk

Many thanks,

Hanna

Hanna Lloyd BSc (Hons)

Assistant Researcher | Needs Assessment Team | Opinion Research Services (ORS)

Opinion Research Services | The Strand | Swansea | SA1 1AF

Tel: 01792 535328 Ext: 328 | Email: | Website: www.ors.org.uk

21.12.2023 – SSDC response to DMBC Regulation 18 Consultation

Sent via email to:
planning.policy@dudley.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

21st December 2023

South Staffordshire Council response to Dudley MBC Regulation 18 consultation

Dear Sir/Madam,

South Staffordshire Council welcomes the opportunity to comment on the Draft Dudley Local Plan (DLP) Regulation 18 Consultation document. It is noted that the production of the new joint Black Country Plan (BCP) officially ceased in October 2022 and that Dudley is now undertaking an individual Local Plan for its administrative area.

We understand that Dudley Metropolitan Borough Council (DMBC) are proposing to produce a 'hybrid local plan' which will incorporate policies previously included in the draft Black Country Plan and provide a response to issues of relevance raised by the public and others during the public consultation on the draft BCP (held during October – November 2021).

The DMBC Draft Local Plan is a comprehensive document providing a spatial strategy alongside policies to meet identified development and infrastructure requirements and more detailed non- strategic policies for managing development. South Staffordshire has focussed the following comments on those specific elements of the plan which raise cross-boundary issues.

Strategy

The strategy identifies a Growth Network comprising urban centres and corridors as the principal focus for future growth, maximising the effective reuse of land in accordance with national policy priorities. Though a housing shortfall has been identified the Draft Plan has not sought to consider amendments to existing Green Belt boundaries. This approach reflects the recent changes to the National Planning Policy Framework (NPPF) which now states that there is no requirement for Green Belt boundary alterations when plans are being updated or reviewed though authorities may choose to make such boundary amendments.

Housing Provision

The standard method currently calculates a total future housing requirement figure of 11,954 dwellings across the plan period (2023-2041). Dudley currently anticipates being able to deliver 10,876 dwellings across the plan period, leaving a shortfall of 1,078 dwellings. It is the stated intention of DMBC to export this shortfall through Duty to Co-

operate arrangements. Given that Dudley is situated within a Housing Market Area (HMA) geography primarily composed of net exporting metropolitan authorities and rural shire authorities comprising significant amounts of green belt it is unclear how readily this surplus requirement will be absorbed through duty to cooperate arrangements within the HMA. South Staffordshire considers that Dudley should seek to maximise delivery within its own administrative boundaries. As the plan making process proceeds forwards, continued efforts to increase capacity through site regeneration, housing renewal schemes, increased densification and the release of town centre sites should be ongoing with the aim of reducing the net requirement to be exported to other authorities.

Gypsies, Travellers and Travelling Showpeople

South Staffordshire Council (SSDC) published an updated Gypsy and Traveller Accommodation Assessment in 2022 which identified a need for 121 pitches during the plan period to 2039. SSDC are now updating the GTAA to align with our revised plan period up to 2041. We have not yet received the findings of the updated GTAA but expect our needs for pitches may have increased.

South Staffordshire Council wrote to DMBC (and other GBBCHMA and neighbouring authorities) in August 2022, and subsequently in October 2023, where we set out that we had only identified a supply of 37 pitches to allocate against a 5-year requirement of 72 pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the Borough for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

It is noted that Dudley have identified a likely shortfall in provision of suitable pitches following the ‘call for sites’ process, though it is not clear that all the options identified above have been explored to determine if additional capacity could be available. South Staffordshire Council would welcome an indication that all such options have been explored and we look forward to continuing to engage with DMBC on this issue.

Employment Land Need

The latest evidence on employment needs covering the Black Country (Black Country EDNA 2023 update) has identified a need for 72ha of employment land in Dudley. This figure increases to 98 ha. once replacement for operational employment land sites identified for reallocation to residential development is included.

South Staffordshire Council paused local plan production following completion of a Regulation 19 Publication Plan consultation in December 2022 in light of proposed Government changes to national planning policy. South Staffordshire Council has now recommenced work on plan production but is awaiting the final adoption of changes to national policy before proceeding to an updated Publication Plan (Regulation 19) consultation in Spring 2024. The Regulation 19 Plan was supported by a draft Statement of Common Ground (SoCG) across the South Staffordshire FEMA (consisting of South Staffordshire, Cannock, Dudley, Stafford, Walsall and Wolverhampton), plus Sandwell, as a result of its close economic relationship with the three other Black Country authorities that fall within the South Staffordshire FEMA. At this time, South Staffordshire through this SoCG indicated its position, as set out in our November 2022 Publication Plan, that we have a 36ha (excluding WMI) surplus of employment land that we can make available to unmet needs of the Black Country FEMA. Following the decision by national government to amend national planning policy with respect to Green Belt land releases South Staffordshire Council is currently reassessing the scale of future commitments with a view to producing a revised draft local plan in Spring 2024. To accompany the revised plan SSDC is undertaking an update to the evidence base which will include revisiting the EDNA prior to our next stage of public consultation and this will inform the council's decisions with respect to future employment land commitments. This will inform an update to the SoCG across the FEMA and our position in relation to contributing to unmet employment needs.

West Midlands Interchange

A Strategic Rail Freight Interchange (West Midlands Interchange (WMI)) is situated within South Staffordshire though this serves a wider market area (including Dudley). Through our 2022 EDNA South Staffordshire Council identified a requirement of 18.8 ha. of the WMI land to meet our labour demand requirements up to 2040. This will be subject to further analysis as part of the update to the EDNA in 2024. South Staffordshire Council has acknowledged that there is surplus employment land at WMI that the council does not require and that could be utilised to meet the unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 67ha of the site towards the Black Country, with a further breakdown suggesting that 14ha of the site could be apportioned to Dudley.

I hope you find our response helpful as you progress your Local Plan and look forward to continuing to engage constructively with DMBC through preparation of our respective plans.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

09.01.2024 – duty to co-operate meeting agenda

AGENDA

South Staffordshire Council and Dudley MBC Duty to Cooperate meeting.

9th January 2024, 11.00am-12.00pm

MS Teams

1) Local Plan update
2) South Staffordshire letter dated 24th October 2023
3) Statements of Common Ground
4) Strategic Growth Study update
5) Any other business

14.03.2024 – SSDC letter to FEMA authorities

From:	Alex Evans
To:	[REDACTED]@cannockchasedc.gov.uk; Jemma March; Vicki Popplewell; "[REDACTED]@sandwell.gov.uk)"; "Alex Yendole"; David Holloway; [REDACTED]@walsall.gov.uk; Alison Ives; [REDACTED]@wolverhampton.gov.uk
Cc:	Edward Fox
Subject:	FW: South Staffordshire FEMA - SoCG update
Date:	03 April 2024 12:19:00
Attachments:	South Staffs FEMA SoCG 2024.docx Appendix 2.pdf Appendix 3.pdf Appendix 1.pdf image001.png

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Dear all,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the FEMA SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans

Sent: Thursday, March 14, 2024 10:45 AM
To: [REDACTED]@cannockchasedc.gov.uk; Jemma March <[REDACTED]@cannockchasedc.gov.uk>; Vicki Popplewell <[REDACTED]@dudley.gov.uk>; [REDACTED]@sandwell.gov.uk) [REDACTED]@sandwell.gov.uk>; Alex Yendole<[REDACTED]@staffordbc.gov.uk>; David Holloway <[REDACTED]@walsall.gov.uk>; [REDACTED]@walsall.gov.uk; Alison Ives [REDACTED]@walsall.gov.uk>; [REDACTED]@wolverhampton.gov.uk

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: South Staffordshire FEMA - SoCG update

Dear all,

Alongside the individual updates to bilateral SoCG we sent out last week to individual local authorities, we are also keen to update the previous FEMA SoCG (dated November 2022) to reflect the South Staffordshire EDNA update. Therefore, please find attached an proposed updated track change version.

Please feel free to add further changes / amendments and circulate them to all authorities in the FEMA for consideration.

I would also be happy to organise meetings on an individual or group basis if that would be helpful.

We are seeking to agree the updated SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

We would like to have the SoCG agreed and signed off at officer level by **Friday 29nd March 2024**.

Please let me know if you have any queries or questions.

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

24.06.2024 – duty to co-operate meeting agenda

AGENDA

South Staffordshire Council and Dudley MBC Duty to Cooperate meeting.

24th June 2024, 10.00am-11.00pm

MS Teams

1) Local Plan update
2) Statements of Common Ground
3) Strategic Growth Study update
4) Any other business

04.09.2024 - duty to co-operate meeting minutes

Minutes

South Staffordshire Council and Dudley MBC Duty to Cooperate meeting.

4th September 2024, 11.30am-12.30pm

MS Teams

Vicki Popplewell – Dudley MBC
Kaliegh Lowe – Dudley MBC
Ed Fox – South Staffordshire DC

1) Local Plan update

South Staffs

Progressing with Regulation 19 Plan and seeking to submit the Plan to the PINS at the end of the year. LDS will need to be amended as this currently states the submission timetable as January 2025.

Evidence base it up to date with the exception of the Viability evidence which will need updating.

Dudley MBC

Regulation 19 Plan will be taken to Cabinet on 25th September to agree to consult. The consultation will start in October for six weeks. Submission to be determined given the recent revised NPPF consultation.

Majority of the evidence base for the Plan has been completed – including updated HMA, WCS, SFRA, SA and HRA and Delivery and Viability work.

Wider joint evidence work is been undertaken with is being updated, the majority of which is nearing completion including Centres Update, Transport modelling. EDNA update is ongoing to accommodate an additional Plan period year for Wolverhampton's Plan.

Both Dudley and South Staffordshire Councils were awaiting the final outcome of the Air Quality modelling work to determine the impact upon their HRAs and to establish if any mitigation measures might be required.

2) Statements of Common Ground

An update to the HMA wide SoCG will be progressed to reflect an update to the previous Strategic Housing Growth Study and the housing land contributions that have been made to the HMA (either Birmingham, Black Country or both) and a consensus on how these contributions will be apportioned.

South Staffordshire FEMA has been finalized and a consensus agreed by all relevant local authorities who are party to this SoCG. Dudley confirmed that they will report the SoCG to their Cabinet in October for approval.

Dudley MBC/South Staffordshire DC Bilateral SoCG. Dudley will review the amended comments suggested by South Staffordshire before this SoCG agreed. Subject to this be finalized, Dudley intends to report the SoCG to their Cabinet in October for approval.

3) Strategic Growth Study update

Study has been finalized and will be published on 9th September by Nuneaton & Bedworth as part of the EiP Library. Each LA is then advised to publish on their evidence base websites. WMCA will take a report to their Board in November.

4) NPPF Consultation

Both LAs confirmed that they would be submitting a response to the consultation by 24th September.

5) Any other business

Next DtC meeting booked in for 9th December 11:00 – 12:00

29.11.2024 – SSDC response to DMBC Regulation 19 Consultation

Sent via email to:
planning.policy@dudley.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

29th November 2024

South Staffordshire Council response to Dudley Metropolitan Borough Council Local Plan Regulation 19 consultation

Dear Sir/Madam,

South Staffordshire Council (SSC) welcomes the opportunity to comment on the Draft Dudley Local Plan (DLP) Regulation 19 Publication consultation document.

SSC would wish to submit the following comments which relate to those specific elements of the Plan which raise cross boundary issues of mutual interest.

The comments submitted below were framed in relation to the existing National Planning Policy Framework (NPPF), we have however referred to potential implications of the proposed NPPF changes in a section on the transitional arrangements.

Delivering Sustainable Housing Growth – Policy DLP10

The draft plan identifies a supply of 10,470 dwellings against a calculated requirement of 11,169 homes leaving a marginal unmet need of 699 dwellings. SSC will continue to work closely with Dudley Metropolitan Borough Council (DMBC) alongside the other relevant partners consider unmet needs across the housing market area through the relevant working groups and duty to cooperate arrangements.

SSC has recently completed a consultation on an updated Publication Plan (Regulation 19). It should be noted that SSCs preferred strategy in its April 2024 Regulation 19 consultation is to meet the housing needs of our communities by focusing growth primarily on the district's most sustainable Tier 1 settlements, including some Green Belt release at these settlements on sites assessed as suitable through our site assessment process. This does result in a potential 640 home surplus based on our current standard method requirement that could be attributed to unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

We would support a commitment to continued attempts at increasing the supply of dwellings identified within the borough. Specifically, attention should focus on examining

the scope for increased densities particularly in the larger urban centres, reallocation of sites from other uses were this doesn't conflict with other plan objectives, housing area renewal proposals and exploring the potential release of Green Belt sites including those sites identified in the now abandoned draft Black Country Plan. Such contributions will reduce the overspill requirement arising within Dudley and potentially make a contribution towards addressing housing market shortfalls in the wider Greater Birmingham and Black Country Housing Market Area.

Accommodation for Gypsies, Travellers and Travelling Showpeople – Policy DLP15

SSC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need within the district for 162 pitches during the plan period.

SSC wrote to DMBC (and other GBBCHMA and neighbouring authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches this is set against a revised 5-year requirement of 92 pitches, and therefore confirming we had a significant unmet need for pitches.

SSC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSCs unmet needs for pitches. We therefore requested that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the city for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

It is noted that the Gypsy and Traveller Accommodation Assessment (GTAA) 2022 identified a need for an additional 46 pitches in Dudley Metropolitan Borough for families meeting the planning definition. The plan has identified an additional capacity of 13 pitches and there is therefore a shortfall of 33 pitches to be identified which the Borough Council indicate will be delivered within the existing urban area through the planning application process. SSC would welcome an indication that all options identified above have been explored and in particular we would wish to reiterate that DMBC explore the potential for a public site in the Green Belt, a request which we have previously made in a letter dated in December 2023.

Economic Growth and Job Creation – Policy DLP18

DMBC has identified a shortfall of 50 hectares in the supply of employment land to meet the needs of the Borough during the plan period. SSC has identified a potential surplus of 45.2 Ha. of employment land, which includes a new proposed allocation at Junction 13 of the M6. This land has been identified as being available to contribute towards addressing the employment land shortfall within South Staffordshire Functional Economic Market Area (FEMA) which includes DMBC. As stated in our signed Statement of Common Ground (SOCG) with DMBC, the role this surplus land will play in helping to address employment land shortfalls will be the subject of two separate SOCG covering the entire South

Staffordshire FEMA and also the Black Country FEMA.

SSC will also allocate the consented strategic rail freight interchange (WMI). Though situated in South Staffordshire the WMI serves a wider market area (including Dudley). Through our 2022 EDNA & 2024 update SSDC identified a requirement of 18.8 ha of the WMI land to meet our labour demand requirements up to 2041. SSDC has acknowledged that there is surplus employment land at WMI that is currently 'unclaimed' and that could be utilised to meet the unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI (18.8ha) through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 14ha of the site towards the B8 employment land needs of Dudley, and it is noted that this figure has been identified as a commitment in the Plan towards the employment land supply.

Transitional Arrangements

The proposed changes to the NPPF have recently been the subject of consultation and it is the

Government's intention to publish a finalised NPPF by the end of the year. Based on the transitional arrangement contained in the consultation NPPF it is our understanding that the Plan would need to be submitted on or before the publication of the revised NPPF (+ one month) if it is to be assessed against the current December 2023 NPPF. Should the Plan be submitted after NPPF publication date (+ one month) it would appear that the Plan would be considered in relation to the revised framework, as it doesn't appear that any of point a-c in paragraph 226 of the draft NPPF would apply to DMBC. This would require DMBC to re-examine the current plan strategy particularly in light of the proposed introduction of a distinction between Green Belt and Grey Belt land, and the role which Green Belt can play in increasing the supply of land for residential development and Gypsy and Traveller provision. Therefore, whilst the plan is currently considered sound against the December 2023 NPPF, should the transitional arrangements in paragraph 226 of the consultation NPPF remain in the final version, and should DMBC be unable to meet any of points a-c in this paragraph, then the Publication Plan would not be sound and would need to be revisited.

SSC do not consider it necessary to take part in the hearing sessions for the examination, however equally would be happy to attend these sessions on request of the inspector.

I trust you will find our response helpful, and we will continue to engage with DMBC to address matters of mutual interest.

Yours sincerely

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

09.12.2024 – duty to co-operate meeting minutes

Dudley and South Staffs D2C Meeting

9th December 2024

11am

MS Teams

Attendance

Vicki Popplewell

Kaliegh Lowe

Ed Fox

Alex Evans

1) **Local Plan update**

South Staffs

Preparing for submission around mid-December 2024. Following the Reg19 consultation a list of minor modifications have been prepared which have been assessed through an SA update.

The capacity has changed for a couple of sites following Reg19 representations.

An Advisory Visit is scheduled prior to submission.

Dudley

Reg19 consultation closed on Friday 29 November 2024. Currently processing representation and preparing for submission.

2) **Statements of Common Ground**

HMA SoCG update is being progressed (led on by Dudley). Waiting on comments from a couple of authorities. The SoCG includes details of how contributions towards unmet housing will be apportioned.

Air Quality SoCG – in the process of being signed by all parties.

3) Air quality study

The Air quality study has been completed and report published.

4) Any other business

The Combined Authority – strategic planning survey is currently out.

Next meeting - 20th January 2025

20.01.2025 - duty to co-operate meeting minutes

Dudley and South Staffs DTC Meeting

20th January 2025 - 11am

MS Teams

Attendance

Vicki Popplewell

Kaliegh Lowe

Ed Fox

Alex Evans

5) Note of last Meeting – 9th December 2024

Circulated 17th Jan.

6) Local Plan(s) update

South Staffs

Submitted on 11th December 2024.Have been notified of a change of Inspectors. There has been no significant contact yet. For example, setting of MIQs.

Starting to scope the work of the next Local Plan but have not formally started the process. This is largely internal work.

The South Staffs LDS is up to date so there is no need to update it. It is hard to update for the next plan based on a new system we haven't got details yet.

Dudley

Looking to submit in February 2025. Currently looking to appoint a Programme Officer. They are currently creating responds to reps, listing Minor Mods, progressing SoCG and writing the Compliance Statements and topic papers.

7) Statements of Common Ground

Housing Market Area SoCG is progressing – Vicki is resending out to Local Authorities with further comments which were received.

8) Air quality study/SoCG

South Staffs have published the draft SoCG but are still waiting on 2 signatures.

Ed to send the air quality SoCG to Vicki

9) Evidence Base Updates

Both South Staffs and Dudley have submitted the Green Belt – expression of interest. Both need the study urgently to help identify Grey Belt for speculative applications. Both will consider joint working on the study depending on future arrangements and timescales.

10) Any other business

Date of next meeting: Monday 10th March 2025 10:30am

10.03.2025 - duty to co-operate meeting minutes

Dudley/South Staffs DTC Meeting

10th March 2025 - 10:30am

MS Teams

Attendance

Vicki Popplewell – Dudley MBC

Kaliegh Lowe - Dudley MBC

Alex Evans - South Staffordshire DC

Apologies

Ed Fox- South Staffordshire DC

1) Note of last Meeting

South Staffs confirmed they are happy with DMBC's amendments sent 22/01/2025

2) Local Plan(s) update

South Staffs

Submitted the Local Plan for the examination on the 11th December. No hearing dates made public yet. Some additional documents have been prepared for the inspector relating to representations and housing land supply. Expecting the inspectors to produce their MIQs shortly. Additional highways work is currently being undertaken.

Dudley

Dudley submitted the Local Plan on 14 February 2025. They are having some initial correspondence with the Inspector via the Programme Officer.

The LDS is up to date.

3) Statements of Common Ground

HMA SoCG – has been signed off by a number of authorities. Chasing a few remaining authorities for signatures. Dudley have published a draft as part of their local plan evidence base.

Wolverhampton are leading on the Black Country FEMA SoCG.

4) Air quality study/SoCG

The Air Quality Study and SoCG have been signed off.

5) Evidence Base Updates

Update to the Strategic Growth Study is underway. South Staffs have provided comments on the draft data collection form. We are expecting this form to be issued imminently.

Both Dudley and South Staffs have received £70k to undertake a Green Belt Assessment. South Staffs are looking to commission a study with southern Staffordshire authorities and Dudley are potentially considering a joint commission with some of the other Black Country Authorities to obtain VfM procurement costs and as there are likely to be capacity issues amongst consultancies to undertake the work. However, Dudley and South Staffs will keep in contact in relation to the assessment of parcels along the South Staffs / Dudley boundaries.

6) Any other business

Date of next meeting – 12th May 2025 – 10:30am.

Appendix 7 – Lichfield District Council Documents

24.05.2018 – SSDC response to LDC Issues & Options

From:	Fox, Edward
To:	"developmentplans@lichfielddc.gov.uk"
Cc:	Harris, Kelly; "[redacted]@lichfielddc.gov.uk"
Subject:	SSDC response to LDC Issues and Options
Date:	24 May 2018 09:05:37

Dear Sir/Madam,

South Staffordshire Council's interim response to the Lichfield Local Plan Review: Scope Issues and Options consultation

South Staffordshire Council welcomes the opportunity to comment on Lichfield District Council's Local Plan Review: Scope, Issues and Options consultation. As this response relates to a Duty to Cooperate matter, our response will need be an individual Decision of our Cabinet Member for Planning and Business Enterprise Cllr Bob McCardle, and therefore please accept the paragraph below as the Council's interim response pending completion of the Council's constitutional process to agree the comments. Once the response has been agreed with Members, I will write to you again to confirm the Council's formal response.

We welcome the publication of the Scope, Issues and Options consultation document as the first stage in the process of updating the Local Plan. In particular we support the approach being adopted towards identifying potential development scenarios to contribute towards meeting the level of future housing requirements emerging from the wider Housing Market Area. It is considered that this document represents a sound starting point to begin the process of testing a range of potential development options and we would welcome the opportunity for continuing engagement as these options are refined in the future to produce a future development strategy and associated site allocation proposals.

Kind regards

Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire Council

Tel: 01902696418

Have you visited our website? https://www.sstaffs.gov.uk

“Like us on Facebook. Follow us on Twitter”

22.11.2018 – LDC response to SSDC Issues & Options Consultation

Your ref
Our ref South Staffs Issues and Options Response
Ask for Maxine Turley
Email [REDACTED]@lichfielddc.gov.uk



District Council House, Frog Lane Lichfield, Staffordshire WS13 6YX

Local Plans Team
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Direct Line 01543
Customer Services 01543 308000

15 November 2018

Dear Sir / Madam,

LDC Representations to South Staffordshire Local Plan Review Issues and Options Consultation

Thank you for consulting Lichfield District Council on South Staffordshire Council Issues and Options Local Plan Review.

Lichfield District Council supports the approach undertaken within the Issues and Options Local Plan Review in relation to local objectively assessed need and the consideration of wider unmet housing needs, particular the inclusion of the strategic recommendations of the GBHMA Strategic Growth options. We welcome the preferred level of future growth (Option C, Table 4: Housing level of growth policy options) identified within the plan. Further, we welcome the inclusion of strategic development locations identified within the GBHMA growth study within the Locations for Growth section of the plan.

We note the plans position in relation to Cannock Chase SAC and the review work of the SAC Partnership which Lichfield District is a member.

Lichfield District Council welcomes continuing positive dialogue with South Staffordshire Council through the Duty to Cooperate process as Local Plan Review progresses.

Yours faithfully

Maxine Turley
Spatial Policy and Delivery Officer

15.03.2019 – SSDC response to LDC Preferred Options Consultation

From:	Fox, Edward
To:	"developmentplans@lichfielddc.gov.uk"
Cc:	Harris, Kelly; "[REDACTED]@lichfielddc.gov.uk"
Subject:	South Staffordshire Council's response to the LDC Local Plan Review Preferred Options and Policy Directions Consultation
Date:	15 March 2019 10:21:41

Dear Sir/Madam,

South Staffordshire Council's interim response to the Lichfield District Council Local Plan Review 2020-2036, Preferred Options and Policy Directions Consultation

Thank you for providing South Staffordshire Council with the opportunity to comment on the Lichfield District Council Preferred Options and Policy Directions Consultation.

South Staffordshire Council welcomes the approach adopted by Lichfield District which is based on a clear understanding of the issues facing the authority and the pressures arising from the shortfall identified within the wider Housing Market Area within which both Lichfield and South Staffordshire are situated. The principle of making a clearly defined contribution towards meeting the HMA shortfall is supported. Given the scale of the shortfall identified within the wider HMA, we look forward to continuing our partnership working to test your contribution of up to 4,500 dwellings as your preferred policy direction, to ensure that it can be demonstrated as a robust and justifiable figure.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.

Kind regards

Ed

Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire Council

Tel: 01902696418

Have you visited our website? https://www.sstaffs.gov.uk

“Like us on Facebook. Follow us on Twitter”

16.01.2020 – SSDC response to LDC Preferred Options Consultation

From: Edward Fox

To: developmentplans@lichfielddc.gov.uk

Cc: Kelly Harris

Subject: South Staffordshire Council interim response to Lichfield District Council"s Preferred Options consultation

Date: 16 January 2020 15:17:00

Dear Sir/Madam,

South Staffordshire Council's interim response to the Lichfield District Council Local Plan Review 2018-2040 Preferred Options Consultation

South Staffordshire Council welcomes the opportunity to comment on Lichfield District Council's Local Plan Review Preferred Options consultation document. As this response relates to a Duty to Cooperate matter, our response will need be an individual Decision of our Deputy Leader and Cabinet Member for Planning and Regulatory Services Cllr Roger Lees, and therefore please accept the response below as the Council's interim response pending completion of the Council's constitutional process to agree the comments. Once the response has been agreed with Members, I will write to you again to confirm the Council's formal response.

Thank you for providing South Staffordshire Council with the opportunity to comment on the Lichfield District Council Preferred Options Consultation (November 2019).

South Staffordshire Council welcomes and supports the approach adopted by Lichfield District in making a contribution of 4,500 dwellings towards addressing the shortfall in housing provision arising within the Greater Birmingham Housing Market Area. It is considered that this is a reasonable and proportionate response to housing shortfalls and is based on the same evidence base as that being used by South Staffordshire Council in our emerging Local Plan. We look forward to continuing our partnership working to test your contribution of up to 4,500 dwellings as your preferred policy direction, to ensure that it can be demonstrated as a robust and justifiable figure.

We support the approach identified within the consultation document towards protecting the integrity of the Cannock Chase Special Area of Conservation (SAC). It is suggested however that consideration be given to amending the reference in the policy to a 'zone of influence' instead of a 15 km radius from the SAC.

Kind regards
Ed
Edward Fox

Assistant Team Manager (Local Plans)
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

20.11.2020 – LDC letter regarding duty to co-operate

Ask for: Philip Stephenson

Email: developmentplans@lichfielddc.gov.uk

Lichfield district council
www.lichfielddc.gov.uk

District Council House,

Frog Lane Lichfield,

Staffordshire WS13 6YX

Direct Line 0781

Customer Services 01543 308000

20th November 2020

Dear Sir / Madam

Lichfield Local Plan Review – Duty to Cooperate: Review of Green Belt

As you may be aware, Lichfield District Council is currently preparing the Regulation 19 Publication version of its Local Plan. The timetable for the emerging plan can be found at: https://www.lichfielddc.gov.uk/downloads/file/1625/local-development-scheme-2020

We are keen to continue to work with neighbouring authorities, including yours, on strategic matters in line with the duty to cooperate (DtC) and having regard to good practice.

In the latest position statement for the Greater Birmingham & Black Country Housing Market Area published in September 2020, Lichfield District Council set out that it intends to deliver approximately 11,800 dwellings to 2040 in its Local Plan. This figure includes both the identified Local Housing Need as calculated by the current standard methodology and also provides for a contribution towards meeting unmet need from other local authorities in the GBBCHMA. The figure is considered to deliver a growth strategy whilst ensuring that its provision is realistically deliverable for the Plan period up to 2040. This approach is consistent with the preferred options version of the Local Plan which was consulted upon from November 2019 to January 2020.

Strategic Housing Need

Our most recent housing evidence can be found at: https://www.lichfielddc.gov.uk/evidence-base?categoryId=20063

Whilst it is acknowledged the level of local housing need (LHN) may change following the anticipated Government review of the Standard Methodology for identifying LHN, it is considered any change is unlikely to alter the overall delivery figure currently identified of 13,300 in the emerging plan. This figure takes into account all housing

projected to be delivered through existing commitments, new allocations in the plan and completions since 2018.
Given our work on site identification to date, we are certain that in order to deliver this strategy we will not be able to accommodate all of our identified housing on sustainable sites which meet our spatial strategy; **outside of the Green Belt**. The current emerging local plan strategy reflects this approach.

In order to ensure the plan remains consistent with the National Planning Policy Framework (NPPF) and in particular paragraph 137, we are writing to all neighbouring authorities to ask if there are any **sustainable non-green belt sites or areas, in neighbouring authorities which meet your spatial strategy and which can be brought forward to meet Lichfield District Council's housing needs?** These should be clearly identified first, before releasing land from the green belt. Accordingly, please can you confirm your authority's position on this matter?

Green Belt Review

Lichfield District Council undertook a Green Belt review in 2019 which can be found here: https://www.lichfielddc.gov.uk/downloads/download/142/green-belt-review

Whilst further work continues to ensure this review remains up to date and robust as part of the preparation of the Publication version (regulation 19 version) of the Local Plan, assessment has indicated that the land identified as Green Belt in the Lichfield District makes an important contribution to the purposes of the Green Belt and therefore the scope for development within the Green Belt is limited.

Accordingly, we would request that your authority confirms if its existing or emerging Local Plan is seeking to deliver levels of housing in excess of local development needs on land currently designated as green belt that could reasonably be attributed towards meeting our housing need.

Duty to Cooperate – Statement of Common Ground
We are keen to involve as many relevant authorities as possible in developing a Statement of Common Ground (SoCG) with regard to meeting Strategic Housing Need which can be relied upon at our Examinations in Public and form the basis for partnership working in the years following the adoption of our Plans. We would therefore like to invite your authority to take part in developing a single Statement of Common Ground (SoCG) covering the strategic issue of housing.

Timetable for responses
In order for Lichfield to be able to meet its Local Development Scheme timetable, we would appreciate a response to this letter by Monday 4th December 2020.

Yours sincerely

[REDACTED]

Philip Stephenson

Temporary Spatial Policy & Delivery Manager

29.07.2021 – duty to co-operate meeting minutes

SSDC and LDC Reg 19 Duty to Cooperate Meeting

29/07/2021

10am-11am

MS Teams

Meeting called by: LDC

Attendees:

Stephen Stray-LDC Spatial Policy & Delivery Manager

Patrick Jervis-Principal Planner for Spatial Policy & Deliver

Sarah Matilde-Spatial Policy & Delivery Planning Officer

Ed Fox-Strategic Planning Manager

Patrick Walker- Strategic Planning Senior Officer

Bethany Firkins- Strategic Planning Assistant

Minutes

Discussion:

EF: SSDC under pressure from PAS and Members to push neighbouring authorities to deliver more housing where justified.

Conscious of recent inspectors' decision on DtC failures in Kent.

LDC housing contribution to GBBCHMA has dropped from 4500 to 2665 – 2000 contribution specifically for BC

Unsure where the 665 is being reserved for?

SSDC proposing 4000 contribution – in this context we will be raising plan soundness issues in LDC Reg 19 consultation

SS: 665 homes to cover unmet need from elsewhere – Birmingham plan is less progressed than LDC had hoped and

therefore, no figure has been provided of shortfall.

PJ: Strategic sites from previous LDC plan have all come forward at the same time – seeing short burst of delivery.

NE of Lichfield won't come forward until later in the plan period.

4500 homes originally proposed not deliverable in plan period as new strategic sites won't come forward until 2027

Issues of Dudley not delivering enough homes.

EF: SSDC also pushing back on Dudley.

Have LDC explored options of Strategic Growth Study (SGS)?

PJ: Explored all shortlisted options and those options discounted in the SGS through plan-making process including several rounds of consultation.

NE Lichfield option identified within SGS – this is proposed within Lichfield Local Plan as a suitable site.

Policy Directions & preferred Options and Preferred Options documents produced by LDC considered all options from SGS along with other alternative options. Options not considered to be suitable or deliverable scoped out through the plan-making process for reasons set out within the documents.

EF: SSDC have tried to deliver SGS recommendations as far as possible.

SSDC will still have to push back on LDC approach given reduction in contribution and SGS recommendations.

PJ: Preferred Options explores 8 or 9 options for housing which could potentially deliver 30,000 – 50,0000 homes. Anyone would agree this is not realistic, compared to historic housing delivery achieved by LDC.

EF: SSDC plan a large step change compared to previous plan in delivery as the need of the area justifies this. We are being asked to push back where authorities are doing enough to contribute to the GBHMA by our members, such as with Solihull.

SS: With the exception of the last couple of years or so when delivery has been high as the adopted allocations now get going, we have historically delivered lower figures. It will be some years before the new allocations get going, but we think the new target is achievable. Compared to Solihull and LDC approaches, the LDC previous 2015 plan already made a contribution to GBBCHMA of 1000 dwellings and now is set to contribute more, so isn't directly comparable.

EF: What is the justification for keeping the 665 aside when the BC need is so high?

SS: We know Birmingham plan shortfall will need to be addressed – but figure unknown so we are reserving this amount.

EF: When will LDC plan be submitted

SS: Autumn 2021 – need to do modelling work on NE Lichfield and other strategic sites – Highways England to do

survey to ensure there are no showstoppers. This was held up due to the pandemic.

EF: SSDC looking to submit 2022

PW: What is the rationale for the high plan flexibility?

PJ: Larger than normal due to North Lichfield site.

Developer confident than they will deliver all 3,300 homes in period however LDC taking a cautious approach and they see it stretching beyond that period.

30% overall buffer – 10% of this for North East Lichfield

PW: What does the 20% buffer represent?

PJ: Currently expressing this as flexibility to account for sites not coming forward/densities dropping. This is an approach consistent with the adopted Lichfield Local Plan.

Actions

- SSDC to send over meeting minutes to LDC

Lichfield District Council
20 Frog Lane
Lichfield
WS13 6HS

Please ask for: Ed Fox
Direct Dial: (01902) 696418
Email: e.fox@sstaffs.gov.uk

30 September 2021

Dear Sir/Madam,

South Staffordshire Council final response to Lichfield District Council Local Plan Draft Plan (Regulation 19) consultation.

Thank you for providing South Staffordshire Council with the opportunity to comment on the Lichfield District Council Draft Plan Consultation (August 2021). Further to our holding response to your consultation sent by email on 24 August 2021, I can now confirm that the response has been considered through the Council's constitutional processes and that the contents of this letter represent South Staffordshire Council's formal response to your Regulation 19 consultation.

South Staffordshire Council has concerns with the approach adopted by Lichfield District in making a contribution of 2,665 dwellings towards addressing the shortfall in housing provision arising within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It is considered that this is not a sufficient contribution to meeting the needs of the HMA, and is likely to push housing delivery to other, potentially less sustainable locations in the HMA. The original proposed contribution of 4,500 dwellings is considered a more suitable contribution than the now proposed 2665 dwellings for meeting the needs of the HMA, that better reflects the scale of growth set out for Lichfield in the GBBCHMA Strategic Growth Study 2018. The fall in contribution has not been fully justified, and there is no Duty to Cooperate statement in place to substantiate the approach taken.

The plan looks to only provide a contribution to the unmet needs of the GBBCHMA from 2027. National planning policy does not suggest that earlier contribution to needs will not help to meet future needs, and therefore the approach of delaying any contribution to the GBBCHMA is not justified. The Lichfield plan sets out it's housing provision over the plan period at 13,300, providing a buffer for flexibility. This is justified as the strategic allocations set out in the plan will be delivered in the middle to late years, which implies they contribute to the needs of the GBBCHMA. However, it is considered that this buffer for flexibility is a relatively

high amount, and more of this could realistically be used to contribute towards the needs of the HMA.

Furthermore, It is noted that only 1 of the 3 recommended areas for housing contribution in the GBBCHMA Strategy Growth Study 2018 is being fully delivered. The site north of Tamworth only delivers 1083 dwellings which already appeared to be in adopted plans when the Strategic Growth Study was published. We therefore do not understand why consideration has not been given to the original 1500-7500 dwellings envisaged for this location in the Strategic Growth Study. The new settlement recommendation around Shenstone was discounted by the site assessment in the Preferred Options, and the plan states it will investigate further a new settlement option after the Local Plan is published. However the Strategic Growth Study suggests that the significant timescales for the delivery of large strategic development sites means that authorities with new settlement recommendations should be assessing locations for a new settlement or alternative options now. The plan should therefore look to offset significant loss of supply elsewhere in the district, for example through the alternative shortlisted sites the Strategic Growth Study identified, and increase delivery north of Tamworth to deliver the 4,500 homes. If the locations suggested by the Strategic Growth Study are truly not deliverable then Lichfield should demonstrate it has examined other options within the local authority area before concluding that a higher contribution to GBBCHMA unmet needs is not possible.

South Staffordshire Council also 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 that Lichfield addresses its potential role in helping meet the emerging shortfall of 210ha of employment land set out in the Black Country Draft Local Plan, as Lichfield has been listed by the Black Country as an 'area of moderate economic transaction within the Black Country'.

South Staffordshire Council does support the approach identified within the consultation document towards protecting the integrity of the Cannock Chase Special Area of Conservation (SAC). It is suggested however than consideration be given to amending the reference in the policy to a 'zone of influence' instead of a 15 km radius from the SAC.

Due to the reasons set out above, the Lichfield draft plan does not meet the soundness test set out in Paragraph 35 of the NPPF. The plan fails to demonstrate it is:

1) Positively prepared: We have concerns that the plan has not maximised opportunities to sustainably accommodate the unmet needs of neighbouring authorities, failing to contribute a proportionate amount towards GBBCHMA unmet needs based on the recommendations of the GBBCHMA Strategic Growth Study 2018.
2) Justified: We have concerns that the Plan has not provided sufficient evidence to demonstrate an appropriate strategy for addressing cross boundary needs, and has not fully maximised the locations suggested in the GBBCHMA Strategic Growth Study to meeting housing need, or justified why alternatives have not been considered. Additionally to this, the plan does not currently set out the Council's stance regarding the emerging Black Country employment shortfall.
3) Effective: Lichfield has not engaged effectively with neighbouring authorities to deal with the needs of the Black Country, which will thus defer the issue.

Yours Faithfully

[REDACTED]

Ed Fox

Strategic Planning
Team Manager
South Staffordshire
Council

13.12.2021 – LDC response to SSDC Preferred Options Consultation

Your ref
Our ref SSDCPO2021
Ask for Stephen Stray
Email [REDACTED]@lichfielddc.gov.uk



District Council House, Frog Lane Lichfield, Staffordshire WS13 6YU

Strategic Planning Team
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Direct Line 01543
Customer Services 01543 308000

10 December 2021

To whom it may concern,

LDC Representations to South Staffordshire Council Preferred Options Consultation

Thank you for consulting Lichfield District Council on the South Staffordshire Local Plan Preferred Options (Regulation 18) consultation. Lichfield District Council welcomes the opportunity to provide comments on the South Staffordshire Local Plan Preferred Options (SSLP) at this emerging stage. Lichfield District Council welcomes the continuing, positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the SSLP progresses.

Housing requirement and delivery:

Lichfield District Council notes that the proposed housing requirement figure for the plan period (2018- 2038) for the SSLP area is 8,881, this includes a contribution of 4,000 dwellings to meet the unmet needs arising from the Greater Birmingham Black Country Housing Market Area (GBBCHMA) as detailed within Table 7 of the SSLP. This is based on the standard method used to calculate Local Housing Need (LHN) for the Council, completions from development in the first three years of the plan period and the aforementioned contribution to unmet needs.

Lichfield District Council supports the commitment within the SSLP to provide homes to meet the unmet needs arising from within the GBBCHMA. As stated at paragraphs 4.8 to 4.11 of the SSLP the GBBCHMA authorities produced a Position Statement in 2021 which demonstrated that the shortfall to 2031 has fallen significantly. The Position Statement noted that emerging evidence supporting the Black Country Local Plan (BCP) suggested a significant unmet need would arise from 2027/28. Lichfield District Council agree that this demonstrates there is likely to be significant unmet need arising beyond 2031. However, it is noted that as yet the evidence underpinning the BCP has yet to be tested at examination with the BCP still at a formative stage of its progression.

Lichfield District Council has progressed in the review of its Local Plan. The Local Plan 2040 was subject to consultation in July and August 2021. The draft Local Plan 2040

proposes a contribution of 2,665 homes between 2018 and 2040 towards the GBBCHMA shortfall. Lichfield District Council considers this to be a significant and proportionate contribution to unmet needs, equating to an additional 37.7% on the District's LHN.

It is noted that the SSLP places great significance on the Strategic Growth Study 2018 which was prepared on behalf of the GBBCHMA authorities and forms part of the evidence to the SSLP and the review of the Local Plan in Lichfield District. Whilst this is an important piece of evidence for authorities, it did not seek to specify where development should be located, rather it is for each authority to consider those options relevant to them through their plan-making process.

Employment

It is noted the SSLP seeks to assist with unmet needs from within the Functional Economic Market Area (FEMA) within which South Staffordshire District it located. Lichfield District is unable to assist in meeting any unmet employment need. The emerging Local Plan seeks to meet the Districts own employment needs. The emerging Lichfield District Local Plan 2040 makes clear that evidence demonstrates that there is only sufficient employment land within the District to meet our own requirements with limited potential further options beyond those allocated. Therefore, the District Council will be unable to assist in meeting unmet need for employment land which may arise.

The District Council notes the Green Belt Review and acknowledges the methodology used. The District Council concurs with the SSLP that exceptional circumstances exist to merit the release of Green.

Lichfield District Council welcomes continuing a positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the South Staffordshire Local Plan progresses.

Yours faithfully

S W Stray

Stephen Stray
Spatial Policy and Delivery Manager

03.02.2022 – LDC response to SSDC 14.01.2022 letter

Your ref
Our ref SSCGTPP
Ask for Stephen Stray
Email [REDACTED]@lichfielddc.gov.uk



District Council House, Frog Lane Lichfield, Staffordshire WS13 6YU

Direct Line 01543
Customer Services 01543 308000

Strategic Planning Team
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

03 February 2022

Dear Kelly,

RE: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14 January 2022 regarding Gypsy and Traveller pitch provision in South Staffordshire in connection with your Local Plan and its recent Preferred Options consultation. As you are aware Lichfield District Council provided formal representation to this consultation on a range of matters including housing and employment need. Lichfield District Council welcomes the further opportunity to provide comments on the South Staffordshire Local Plan in respect of Gypsy and Traveller pitch provision. Lichfield District Council welcomes the continuing, positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the authority's respective local plans progress.

Lichfield District Council notes that South Staffordshire Council has identified a need of 121 pitches through its plan making process and associated evidence base and that to date sufficient sites to meet all of this need has not been identified. As such South Staffordshire Council have contacted authorities to ascertain if neighbouring authorities can assist in meeting this unmet need.

Lichfield District Council are also in the position that it has not been able to identify sufficient sites to meet its own Gypsy and Traveller pitch requirements within its adopted Local Plan nor in the review of its Local Plan. The adopted Local Plan identified a need for 14 residential pitches and 5 transit pitches within the district to 2029. The Council was not able to identify sufficient sites to meet this need.

In support of the review of the Lichfield Local Plan (known as the Local Plan 2040) Lichfield District Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA) published in November 2019. This identified a seven residential pitches by to 2040 with four of these to be needed by 2024. This need was expressed within Local Plan 2040 publication document which was consulted upon during summer 2021. The document acknowledges that Lichfield District Council is currently unable to identify sufficient sites to meet its own Gypsy and Traveller site requirements.

The Council also prepared a Gypsy and Traveller site paper to consider the potential supply of sites to meet gypsy and traveller needs. The study concluded that there were insufficient deliverable sites to meet identified needs at the time it was undertaken. Since the time of the study no further sites for potential gypsy and traveller accommodation have been promoted or identified through the plan-making process.

Further to this Lichfield District Council wrote to neighbouring authorities, including South Staffordshire Council in 2019 to ascertain if authorities were able to assist Lichfield District Council in meeting its unmet need in relation to accommodation for Gypsies and Travellers. South Staffordshire Council confirmed they were unable to assist in meeting this unmet need.

As such, and as is evidenced by the above chronology, Lichfield District Council is not able to assist South Staffordshire Council in meeting its unmet Gypsy and Traveller Pitch need.

Lichfield District Council welcomes continuing a positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the South Staffordshire Local Plan progresses.

Yours faithfully

S W Stray

Stephen Stray

Spatial Policy and Delivery Manager

CC Councillor Iain Eadie - Deputy Leader and Cabinet Member for Economic Development, Leisure & Local Plan

14.09.2022 – LDC response to SSDC 08.08.2022 letter

From: Stephen Stray

To: Edward Fox

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 08.08.22

Date: 14 September 2022 22:22:53

Attachments:

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Ed

I can advise that in the run up to our submission we re-contacted other authorities to establish if any of them could provide sites as we appear to have no additional a sites available to meet our current more modest need.

It may be the case looking at the initial questions from the Planning Inspectorate in response to the Local Plan submission that there may be a need to revisit site assessments done previous to see if any further capacity can be found, but it is not possible at this stage to advise on that point.

Regards
Stephen
Stray

Spatial Policy & Delivery
Manager Lichfield District
Council

District Council House, Frog Lane, Lichfield, Staffordshire WS13 6YZ

t: 01543 [REDACTED] **m:** [REDACTED]

e: [REDACTED]@lichfielddc.gov.uk

Normal working hours: Monday am, Tuesday, Wednesday, Thursday am, Friday.

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

Lichfield District Local Plan 2040

May 2022



Lichfield district council

Statement of Common Ground (SoCG) between Lichfield District Council (LDC) and South Staffordshire District Council (SSDC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Lichfield District Council (LDC) and South Staffordshire District Council (SSDC), hereafter referred to as "the parties" to inform the submission of the Lichfield Local Plan 2040.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the Lichfield Local Plan 2040 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Gypsy and traveller accommodation;
    - Employment land;
    - Transport and infrastructure matters; and
    - Natural and historic environment including designated sites.

Geography covered by Statement of Common Ground

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

4. These authorities are both within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA). The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire District Council, Redditch District Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth District Council, Walsall Metropolitan Borough Council and Wolverhampton City Council.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on- going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed further dialogue moving

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forward, not just limited to the periods of plan preparation.

Housing

7. LDC along with SSDC have been active members of the GBBCHMA Technical Officers Group since it was established and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs.

8. The GBBCHMA authorities published their latest position statement in 2020 and addendum in December 2021 in respect of housing needs. This position statement details that the need arising from the GBBCHMA and in particular Birmingham City and how this need has primarily now been met. Additionally, further emerging unmet need arising from the Black Country authorities is detailed within the position statement, this emerging need has yet to be tested at Examination.

9. LDC as part of the Local Plan 2040 are proposing to contribute 2,665 to the HMA shortfall from 2027. Of the 2,665 homes, a capped contribution of 2,000 is to be made for the Black Country authorities'. This contribution is considered by LDC to be appropriate and deliverable within the District in addition to LDC Local Housing Need (LHN) of 7,062 dwellings between 2018 and 2040. SSDC have concerns about this figure for the following reasons:

    - Concern that the approach adopted in making a contribution of 2,665 dwellings towards addressing the shortfall in housing provision arising within the Greater GBBCHMA is not a sufficient contribution to meeting the needs of the HMA in light of the recommendations for LDC in the GBBCHMA Strategic Growth Study (2018) and is that failure to deliver all of these recommendations is likely to push housing delivery to other, potentially less sustainable, locations in the HMA.
    - The 4,500 which had been proposed within the Lichfield District Local Plan Review: Preferred Options document is considered by SSDC to be a more appropriate contribution and better reflects the identification of three strategic growth locations in Lichfield District in the GBBCHMA Strategic Growth Study (2018).
    - The decrease in contribution from 4,500 dwellings in the Preferred Options document to 2,665 in the Local Plan 2040 has not been fully justified and that other options should be robustly considered if Strategic Growth Study recommendations are not being delivered.
    - The Lichfield District LP2040 demonstrates supply in excess of the housing requirement as a 'buffer' to ensure flexibility in the supply of land within the plan. SSDC consider this 'buffer' to be overly large and that any buffer for plan flexibility should be planned for in addition to any unmet housing needs contribution, rather than being used as a reason for reducing any contribution.

10. LDC considers the proposed contribution of 2,665 dwellings within the Local Plan

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2040 to be appropriate and deliverable within the plan period and supported by evidence. In respect of the outputs from the GBBCHMA Strategic Growth Study (2018) LDC has considered all options through its plan-making exercise and in particular through the 'Preferred Options and Policy Directions' and 'Preferred Options' stages of the Local Plan 2040. Where it has been considered sound these options have been progressed or discounted for the reasons set out within those documents. LDC do not agree that it has 'failed to consider' the potential growth options set out within the Strategic Growth Study and has, as is set out, considered these through its plan-making process.

11. LDC consider it appropriate to include a 'buffer' in respect of housing supply to ensure that the LP2040 is flexible and deliverable across the plan period. LDC considers that the buffer is appropriate due to the SHA1 Allocation to the North of Lichfield is not expected to be delivered in full before the end of the plan period. A footnote is to be included within the plan to note that 10% of the buffer will not be delivered in the plan period.

12. It is agreed by the parties that the areas of disagreement noted at paragraph 9 to 11 (above) amount to issues of soundness of the Local Plan 2040. SSDC agree that LDC has satisfied the legal duty to cooperate test. It is acknowledged at an officer level that authorities across the GBBCHMA are continuing to work together to potentially progress a HMA wide Statement of Common Ground and associated governance arrangements.

13. It is acknowledged that LDC published consultation material and invited comments relating to its Local Plan 2040 process at the following stages:

- Scope, Issues and Options – April to June 2018;
- Preferred Options and Policy Directions – January to March 2020;
- Preferred Options – November 2019 to January 2020; and
- Publication Version – July to August 2021.

14. At each stage SSDC have been consulted on these documented and responded as they considered appropriate.

15. The Lichfield District Local Plan 2040 proposes to release sites from the Green Belt to assist in meeting the housing requirement set out within the plan. LDC wrote to neighbouring authorities including SSDC in 2020 to ascertain if sites beyond the Green Belt in neighbouring authorities were available and able to assist LDC in meeting its housing requirements outside of the Green Belt. SSDC confirmed that no such sites were available to meet wider need and would be making a contribution toward GBBCHMA need within their Local Plan.

Other Strategic Matters / Cross boundary matters

Employment

16. The Lichfield District Local Plan 2040 proposes to deliver approximately 85 hectares of land for employment uses to meet its own employment land requirements. The Local Plan 2040 (at paragraph 9.5) notes that evidence demonstrates that beyond the land proposed for allocation there is a limited

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supply of potential further options for employment growth within Lichfield District.

17. It is agreed by the parties that Lichfield District has not approached SSDC for assistance in accommodating employment land need. It is agreed by the parties that SSDC has not approached Lichfield District Council for assistance in accommodating employment land need.
It is understood by the parties that the Lichfield District Local Plan 2040 does not seek to provide employment land for potential wider unmet needs. SSDC consider that it is for LDC to discuss this position with authorities in the area declaring employment shortfalls, specifically the Black Country. LDC have through discussions with the Black Country Authorities made clear that it will not be able to assist in meeting unmet need of employment land. LDC's view is that evidence supporting the Lichfield District Local Plan 2040 indicates that there is only sufficient land within Lichfield District to accommodate its own need within the plan period.

Transport

18. LDC and SSDC are committed to continue working together in partnership, with the aim of ensuring the necessary transport and highways improvements to support sustainable growth across the housing market area. Both parties will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

Gypsy & Traveller Provision

19. LDC will support the delivery of a minimum of seven residential pitches to meet the identified needs of gypsies and travellers to 2040 including meeting the identified need for four of these pitches by 2024. The Local Plan 2040 does not identify sufficient sites to meet these requirements.

20. LDC has previously written to neighbouring authorities including SSDC to ascertain if authorities were able to assist Lichfield District Council in meeting the unmet need in relation to accommodation for Gypsies and Travellers. SSDC confirmed they were unable to assist in meeting this unmet need.

21. SSDC has similarly written to LDC to advise that the SSDC is only able to accommodate 42 additional pitches against an emerging gypsy and traveller need of 121 pitches across the 15 year plan period, despite maximising Green Belt pitch options and exploring all SSDC-owned land for public site options. LDC have responded to this indicating that based on their existing site assessment evidence base, they do not have sufficient site options to assist with SSDC's unmet pitch needs.

22. LDC and SSDC will continue to cooperate with neighbouring authorities within the HMA area in relation to housing matters, including gypsy and traveller provision.

Infrastructure

23. LDC and SSDC are committed to continue working together in partnership, with the aim of ensuring the necessary infrastructure improvements to support sustainable growth across the housing market area. Both parties will keep each other fully informed of any changes to infrastructure matters and will continue to liaise on this

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matter where appropriate.

Natural and Historic Environment

24. LDC and SSDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

25. SSDC supports the policies and approach taken within the Lichfield Local Plan 2040 with regards to the Cannock Chase SAC.

26. Both LDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of the SAC and in relation to air quality impacts from new development and associated commuting.

27. LDC and the SSDC are committed to continue working together in respect of matters relating to the natural and historic environment where these are applicable to the authorities.

Signatures

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

Lichfield District Council

Name:

Position:

Signature:

Date:

South Staffordshire District Council

DRAFT

Name:

Position:

Signature:

Date:

11.12.2023 – LDC response to SSDC 24.10.2023 letter

Your ref	-
Our ref	SSDC-111223
Ask for	Patrick Jervis
Email	[REDACTED]@lichfielddc.gov.uk

District Council House, Frog Lane Lichfield, Staffordshire WS13 6YU

Direct Line 01543
Customer Services 01543 308000

Ed Fox
South Staffordshire Council
Council Offices
Codsall
South Staffordshire
WV8 1PX

11 December 2023

Dear Ed,

RE: South Staffordshire District Council – Duty to Cooperate update October 2023

Thank you for your letter dated 24 October 2023 regarding the Duty to Cooperate and providing an update in respect of South Staffordshire District Council's (SSDC) emerging local plan. As you reference within your letter a key matter for all planning authorities is the long-awaited publication of the revised National Planning Policy Framework (NPPF) and Lichfield District Council were seeking to respond to your letter once the NPPF had been published. However, as you will be aware the revised NPPF has yet to be published.

As you will be aware Lichfield District Council (LDC) withdrew its emerging Local Plan 2040 from examination in October 2023 following the decision of its Full Council. The decision to do so was taken, having regard to a wide range of matters including the ongoing uncertainty around the plan-making system in England. I note that the Council's agreed a Statement of Common Ground (SoCG) specifically in relation to the now withdrawn local plan 2040. LDC will continue to work with SSDC through the duty to cooperate and update/renew the SoCG when appropriate. LDC is undertaking the preparatory work in relation to progressing a new Local Plan and will continue to work with all partners as this plan progresses.

The District Council welcomes this opportunity to engage with yourselves in respect of your local plan prior to further formal consultation. With regards to your letter dated 24 October 2023 and the specific matters it raises these are as follows:

Housing

As the revised NPPF has not yet been published it is difficult to comment as to the approach to consideration of Green Belt boundaries. However, it is noted that the proposed wording states that *"Green Belt boundaries are not **required** to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period"* [our emphasis]. As such the District Council's view is it should not be automatically the case that SSDC determine to no longer consider the Green Belt boundaries, particularly given the significant scale of the unmet needs within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). There are limited areas beyond the Green Belt within the GBBCHMA and should all authorities determine not to consider their Green Belt boundaries this will significantly limit the ability of the authorities to address the shortfall.

Employment

It is noted that the previous draft of the SSDC Local Plan was proposing to contribute towards unmet employment needs arising from the Black County, a position which LDC supports. As set out within the SoCG which was agreed in relation to the Local Plan 2040, LDC was not proposing to provide employment land to meet wider unmet needs due to a lack of supply within the district. Whilst this plan has been withdrawn, at present evidence demonstrates that the potential supply of future employment sites within the district is limited. The ability for LDC to assist with unmet need will be considered through a new local plan.

Gypsies and Travellers

As your letter notes both LDC and SSDC have previously indicated that they are unable to identify sufficient sites to meet their Gypsy and Traveller accommodation needs with both authorities seeking assistance from their neighbours. LDC will through the preparation of new local plan refresh its evidence in respect of the accommodation needs of Gypsies and Travellers and undertake work to establish whether sufficient sites to meet its own needs are available.
However, at present it must be made clear that LDC is not able to identify sufficient sites to meet its own need.

Next steps

As previously noted, LDC is beginning work on a new local plan for its district and will continue to engage with you as this work progresses. LDC will continue to work proactively with SSDC on both council's plan-making activities and prepare new/updated SoCGs when appropriate.

I trust that this letter has addressed those matters to which SSDC requested response. We would be happy to meet and discuss these matters further should you require.

Yours

faithfully

Patrick

Jervis

Principal Policy Place Officer

Core Services

16.01.2024 – duty to co-operate meeting minutes

Minutes

South Staffordshire Council and Lichfield District Council Duty to Cooperate meeting.

16th January 2024, 1-2pm

MS Teams

Attendance

Lichfield District Council

Patrick Jervis

Melissa Ross

South Staffordshire Council

Edward Fox

Alex Evans

Local Plan update

South Staffs

Carried out a Reg19 consultation during November / December 2022. However, the draft NPPF consultation released in December 2022 had implications for the strategy.

Therefore, South Staffordshire are aiming to hold a new Reg19 consultation in the spring this year, with the aim of submitting for examination in late 2024 / early 2025 to meet the June 2025 deadline.

Considering the latest confirmed NPPF changes, South Staffordshire are reviewing their approach to Green Belt release for the new Reg19 Plan. The new approach being considered will be more capacity led and potentially have less Green Belt sites, focusing on those at the most sustainable locations.

Evidence base documents are also being updated including GTAA, EDNA, SA and Viability.

The plan period is also being updated to 2023 – 2041.

Litchfield

Withdrew emerging Local Plan from examination in Oct 2023. There was no government intervention.

They are now in the early stages of preparing a new plan including early evidence base work and will be launching a call for sites in January 2024. They are taking a report for Cabinet scheduled for March – providing and update on the new local plan and likely setting out timetable for the Plan (LDS).

The report will set out the different options for progressing a plan including taking into account the June 2025 cutoff date. At this time it is not considered likely that LDC would progress a new plan to submission by June 2025.

Reasons for the withdrawal of the previous plan are set out in cabinet report, including significant issues raised by the inspectors and the impact of the local elections held in May 2023.

South Staffs letter 24th October

Litchfield can only provide an officer position which is caveated on not seeing the detail – but they would be generally supportive of South Staffs taking an approach which does consider some element of Green Belt release.

South Staffordshire are still waiting on final employment figures from the updated EDNA and pitch requirements from the GTAA.

SoCG

South Staffordshire are looking to agree SoCGs as part of the upcoming Reg 19 consultation – this is anticipated to be in the form of officer level agreed drafts which will be circulated around March time.

Strategic Growth Study

Both councils are generally supportive of looking to update the study.

Air quality work

Work is underway which includes transport modelling and air quality assessments. The transport assessment should be concluding soon and the final report should be completed around May time.

11.12.2024 – SSDC response to LDC Issues & Options Consultation

South Staffordshire Council

Sent via email to:
developmentplans@lichfielddc.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

11th December 2024

South Staffordshire Council response to Lichfield District Council Issues and Options consultation

Dear Sir/Madam,

South Staffordshire District Council welcomes the opportunity to comments on the Lichfield Local Plan (LLP) – Issues and Options document. It is noted that work on the previous plan 'Local Plan 2040' has now ceased following the decision to withdraw the plan from the examination in public. Plan preparation has now effectively been reset with the current consultation restarting plan production at the Regulation 18 stage and extending the plan period to 2043.

It is also noted that Lichfield District Council are proposing to rely on some of the evidence gathered during the production of the now abandoned plan and will focus resources on those elements of the evidence base which require updating. This is the first opportunity which South Staffordshire District Council have had to make comments on the Local Plan following the decision to restart the process at Regulation 18 stage. The revised Local Plan timetable envisages plan submission in March/April 2026 with adoption scheduled for January 2027.

The Issues and Options consultation document asks a number of questions across a variety of topics. A large proportion of these questions relate to local issues within Lichfield and are not cross-boundary issues relevant to South Staffordshire. South Staffordshire has specific comment to make on the following questions: Q4– key issues and objectives, Q6 – meeting housing requirements, Q11 - meeting the needs of gypsies and travellers, and Q16 – employment needs.

Question 4 – Do you agree with the key issues and objectives we have identified?

We welcome the recognition in the issues and objectives of the need to seek to make a contribution towards meeting wider Housing Market Needs alongside meeting Lichfield's own housing requirements as identified by the standard method. It is suggested that this role in

meeting the wider needs of the Housing Market Area should be referenced in the title of Objective 1.

Lichfield and South Staffordshire are situated within the same Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and are members of the West Midlands Development Needs Group which is seeking to develop mechanisms and an agreed approach to addressing the housing shortfalls in the GBBCHMA. We support continued engagement with this group, and we would request that Lichfield District as part of the plan preparation process explore all meaningful options to increase the supply of dwellings to enable a significant contribution to be made towards meeting any future identified HMA shortfall.

Question 6 – We will not be able to meet our housing requirements with existing sites, previously development sites and other sites within our urban areas. Do you agree that we should look elsewhere in the district for sites, including potentially a new settlement, to meet our needs?

South Staffordshire Council supports the examination of all reasonable options to increase the delivery of new residential development. A new settlement could play a vital role in meeting future housing requirements however such proposals usually require a longer lead-in time and the consideration of strategy over a longer time frame than is the usual remit of local plans. It will also be essential that the new plan maintains a supply of smaller and medium scale sites which can be delivered during the transition towards the build out of a new settlement to ensure a consistent housing delivery is maintained over the near to medium term.

Question 11: Which option, or combination of options, in respect of meeting the needs of gypsy and travellers do you think is most appropriate?

South Staffordshire District Council (SSDC) has written to all adjacent and housing market area authorities including Lichfield District on multiple occasions seeking assistance with meeting an identified shortfall in meeting an identified shortfall in Gypsy and Traveller pitch needs within South Staffordshire district. In examining possible options to meet gypsy and traveller needs SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore request that through you plan preparation you explore the following options, including where these options would facilitate pitches in the Green Belt:

- Consider capacity to intensify/expand existing public sites
- Consider options for new public sites on publicly owned land within the District
- Explore if site promoters of your preferred housing allocation are willing to gift a proportion of their site to be run as a public traveller site.

South Staffordshire Council therefore look forward to continuing to engage with Lichfield District on this issue and await the outcome of the call for sites and review into publicly owned land.

Question 16 – Do you agree that we should continue to prioritise previously developed sites and sites within our existing employment areas to meet our employment needs before considering new sites?

South Staffordshire District Council has no specific comments to make with respect to the approach adopted by Lichfield District to meeting employment needs We do however request that going forward the local plan should address the role which the district could have in meeting any employment land shortfall arising within the Black Country authorities. Lichfield has been identified
by the Black Country authorities as an 'area of moderate economic transaction within the Black Country' and therefore has a potential role to play in helping to meet the employment land shortfall identified in neighbouring authorities. Equally, the plan will need to explore if sites for strategic employment land can be identified within the opportunity area (Area 4) in Lichfield district, identified in the West Midlands Strategic Employment Sites Study 2024.

I trust you will find our response helpful, and we will continue to engage with Lichfield District Council to address matters of mutual interest.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

Appendix 8 – North Warwickshire Borough Council Documents

21.11.2023 – SSDC chaser email to 24.10.2023 letter

From: External Email for Local Plans

To: [REDACTED]@northwarks.gov.uk

Cc: Edward Fox; Kelly Harris; Patrick Walker; Mike Dittman; Alex Evans

Subject: FW: South Staffordshire - Duty to Cooperate Update Letter

Date: 21 November 2023 11:25:00

Attachments: DtC letter Oct 23 SSDC to NWBC.pdf image001.png

Dear Dot,

I just wanted to send a reminder that we are after responses to the attached letter by the end of Friday this week.

If you are unable to meet this deadline, please could you indicate when we would be likely to get receive your response.

Please let us know if you have any queries.

Kind regards,

Alex

From: External Email for Local Plans
Sent: Tuesday, October 24, 2023 4:51 PM
To: [REDACTED]@northwarks.gov.uk
Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>; Patrick Walker
<P.Walker@sstaffs.gov.uk>; [REDACTED]
Subject: South Staffordshire - Duty to Cooperate Update Letter

Dear Dot,

Please find attached a Duty to Cooperate update letter from South Staffordshire Council setting out the council's latest position in relation to local plan matters. We welcome your authority's views on these matters.

Please let us have your response no later than **24th November 2023.**

We would be happy to meet with you to discuss this further, please get in touch with myself or the team using the contact details in the attached letter if it would assist.

Kind regards,
Alex Evans

Senior Strategic Planning Officer
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

Appendix 9 – Redditch Borough Council Documents

28.11.2018 – BDC & RBC response to SSDC Issues and Options Consultation

Local Plan Review Consultation Response Form

Part A: Your Details (Please Print) Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	**Agent's Details (if applicable)**
Title	Mr	
First Name	Mike	
Last Name	Dunphy	
E-mail Address	[REDACTED]@bromsgroveandredditch.gov.uk	
Job Title (if applicable)	Strategic Planning & Conservation Manager	
Organisation (if applicable)	Bromsgrove District Council & Redditch Borough Council	
Address	Town Hall Walter Stranz Square Redditch	
Post Code		
Telephone Number		

The South Staffordshire Local Plan review Issues and Options document is being consulted on for a period of 8 weeks from Monday 8 October to 5pm Friday 30 November 2018. For advice on how to respond to the consultation, and how to fill in this form please see the guidance notes on the Council's website at: www.sstaffs.gov.uk/localplanreview or call 01902 696000.

Please note:

- Comments must be received by **5pm on Friday 30 November 2018**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However your contact details will not be published.

Part B: Please complete a new Part B for each representation you wish to

make. Name: Mike Dunphy

Organisation: Bromsgrove District Council & Redditch Borough Council

1. Which part of the Local Plan review Issues and Options consultation paper does this representation relate to?

Chapter	4: Housing Level of Growth 5: Locations for Growth
Paragraph	
Table	
Question (if applicable)	Questions 6 and 7
Other document eg SA, HRA	

2. Please set out your comments below

Please note that these comments represent the views of Officers only and have not been subject to Member endorsement:

We welcome South Staffordshire's approach to identifying the WMHMA Strategic Growth Study (SGS) Areas of Search within its District and the opportunity to seek views on a number of broad spatial options.

Paragraph 4.18 of the Issues and Options consultation document states that the Council's preferred level of future growth is *Option C – to provide enough housing to meet South Staffordshire's Objectively Assessed Housing Needs, and provide enough land to accommodate a minimum of an additional 4,000 dwellings towards the wider housing shortfalls from the HMA*. It is noted that South Staffordshire Council considers that this represents a proportionate contribution towards both its own housing needs and the needs of the wider HMA. Without a similar exercise being carried out in other authorities we are unable to comment on or endorse this number as being the correct proportion.

It is important to note that further detailed work will be required to finally determine the total outstanding requirement and distribution for the WMHMA housing need as new evidence arises. Within this context we would welcome the opportunity to continue to discuss further the role that each of the LPAs can play in meeting the wider WMHMA housing needs as we work towards developing our respective preferred options.

The SGS is an independent study undertaken by GL Hearn on behalf of the WMHMA. Each of the 14 LPAs within the HMA will need to test whether the broad locations put forward within the SGS are appropriate in light of the local factors which are unique to each area.
For example, infrastructure provision, environmental constraints and local housing market delivery rates. They will also need to consider how these potential locations

would support their individual emerging spatial strategies to meet their own housing needs.

As such, it should be noted that the identification of the broad locations within the SGS are not binding on the local authority and each authority should continue through their plan review process, to consider alternative locations (some of which may arise following consultation).

08.12.2021 – RBC response to SSDC SHSID Consultation

South Staffordshire Council

8th December 2021

Dear Sir/ Madam,

South Staffordshire Local Plan Review Preferred Options Consultation

Thank you for providing Redditch Borough Council (RBC) with the opportunity to comment on the above document and to continue to engage with South Staffordshire's plan-making.

This letter represents an informal officer response only and will be taken to Members in due course and reported back to you.

Redditch Borough Council does not have any substantial comments to make on the content of the Preferred Option Document. We have identified from the Consultation document that you are proposing to continue to test the contribution of 4,000 dwellings to the unmet housing needs of the Greater Birmingham Housing Market Area. As stated in the letter we sent to you in June, Redditch BC did not consider to be in a position to raise any specific matters regarding housing distribution in the GBHMA or to comment upon the appropriateness of your level of contribution to the unmet need, this continues to remain the case.

As mentioned in our previous letter a Housing and Employment Development Needs Assessment (HEDNA) is currently being prepared for Redditch to support the review of the Borough of Redditch Local Plan No.4 which (adopted in 2017). Once this piece of evidence is finalised it is hoped that Redditch will be able to have a more specific opinion on housing matters in the GBHMA.

We will of course continue to engage with your plan process

as it continues. Kind regards

Ruth Bamford
Head of Planning, Regeneration and Leisure Services

23.02.2022 – BDC response to SSDC 14.01.2022 letter

REDDITCH BOROUGH COUNCIL

making a difference

www.redditchbc.gov.uk

Cllr Terry Mason
South Staffordshire Council
C/o Kelly Harris
Lead Planning Manager
Strategic Planning

21st February 2022

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Dear Councillor Mason,

I write in response to your letter dated 14th January 2022 regarding Gypsy and Traveller pitch provision in South Staffordshire. We have considered the request in your letter and have noted the findings of both the 2021 South Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA) and Pitch Deliverability Study. Please note that the comments set out in this letter represent Officer views only and should be regarded as non-binding on the Council.

Redditch Borough Council has recently commissioned consultants Lambert Smith Hampton to undertake a HEDNA to establish the housing needs for the Borough to inform the Local Plan review. This has also included a high-level consideration of the need for new pitch provision for Gypsies and Travellers. The draft report has established that given the very small gypsy and traveller population in Redditch, it is recommended that there is a requirement for zero permanent pitches over the assessment period and a need for 2 temporary pitches.

We note that Section 5 of the latest GTAA report commissioned by South Staffordshire Council confirms that most of the existing pitches are located in the north of the District including the area near the Cannock border and main highway infrastructure. It also states that most of the need derives from the family growth of the existing population and there are few applications from new families. Furthermore, Paragraph 5.14 suggests that South Staffordshire should prioritise creating small family sites for families local to the area.

The evidence suggests that pitch requirements within South Staffordshire are therefore very localised to the area and not driven by in migration. It also does not include any evidence on the movement patterns of travellers who reside in the area to suggest that there is a strong connection with Redditch Borough.

Paragraph 13h of the National Planning Policy on Gypsy and Traveller Pitch Provision states that pitch provision should reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Redditch Borough Council therefore considers that there is insufficient evidence to conclude that we should be enabled to assist South Staffordshire Council in meeting their unmet need for gypsy and traveller provision. This would not provide a sustainable solution to meeting the specific needs of the Gypsy and Traveller population within the South Staffordshire area, who currently have no evidenced links with Redditch Borough.

Yours sincerely,

Ruth Bamford

Head of Planning, Regeneration and Leisure Services

Bromsgrove District and Redditch Borough Councils

21.11.2023 – BDC & RBC response to SSDC 24.10.2023 letter

From: Michael Dunphy - Strategic Planning and Conservation Manager

To: Alex Evans

Cc: Edward Fox; Kelly Harris; Patrick Walker

Subject: RE: South Staffordshire - Duty to Cooperate Update Letter

Date: 21 November 2023 17:10:17

Attachments:

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e002.png
image003
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Alex

Thank you for your letters to Bromsgrove District Council and Redditch Borough Council, we note the contents. In response to the substantive issue you raise about the proposed changes to Para 142 of the NPPF, and the approach South Staffordshire DC may take in relation to the changes. I can confirm that BDC and RBC will respond fully on this issue in due course once they have had chance to review the NPPF changes and consider the implications for plan making. We expect this to form part of any response we submit at regulation 19 stage.

From a Bromsgrove perspective only, you have request an update on the steps being taken to examine all potential gypsy and traveller pitch options. I can confirm BDC continues to assess all sites submitted through the Call for Sites process and from other sources to determine their suitability for meeting the development needs of the District, including those of the traveller and travelling showperson communities.

Please be aware that at this stage this is only an officer response and doesn't represent the formal view of either Bromsgrove District Council or Redditch Borough Council

Thanks Mike

Mike Dunphy
Strategic Planning and Conservation Manager Bromsgrove
District and Redditch Borough Councils Tel: 01527 881325
Email: [REDACTED]@bromsgroveandredditch.gov.uk

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From: A.Evans@sstaffs.gov.uk
Sent: Tuesday, November 21, 2023 11:09 AM
To: Michael Dunphy - Strategic Planning and Conservation Manager

Cc: Edward Fox ; Kelly Harris ; Patrick Walker
; Alex Evans
Subject: [Possible Spoofed Email..]FW: South Staffordshire - Duty to Cooperate Update Letter

Dear Mike,

I just wanted to send a reminder that we are after responses to the attached letters by the end of Friday this week.

If you are unable to meet this deadline, please could you indicate when we would be likely to get receive your responses.

Please let us know if you have any queries.

Kind regards,

Alex

Appendix 10 – Sandwell Metropolitan Borough Council Documents

01.03.2022 – Black Country authorities' response to SSDC 14.01.2022 letter

CITY OF WOLVERHAMPTON COUNCIL

Dear Ms Harris,

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter of 14 January 2022 concerning the above. This letter represents the response of the four Black Country authorities to that letter.

The 2016 Gypsy and Traveller Accommodation Assessment set out a level of need for new pitches in the Black Country in excess of current supply on identified sites. This Assessment is currently being updated and early indications are that this situation will not change.

No additional sites have been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work.

Therefore, the Black Country authorities are unlikely to be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. This position will be confirmed as the work outlined above progresses.

Notwithstanding the above, we remain committed to cooperation on issues of mutual / cross-boundary interest. We welcome the opportunity to continue to work with South Staffordshire District Council in a positive and constructive manner through the preparation of the Local Plan Review. This will include involvement in the preparation of Statements of Common Grounds to support both the South Staffordshire Local Plan and the Black Country Plan, at an appropriate stage.

We trust you find these comments helpful and look forward to further discussions with you.

If you would like to discuss our response please get in touch.

Yours sincerely

Michele Ross
Lead Planning Manager (Sub-Regional Strategy)
City Planning
City of Wolverhampton Council
Email: [REDACTED]@wolverhampton.gov.uk
Tel: [REDACTED]

06.10.2022 – Dudley MBC press release

Dudley will "go it alone" on housing and employment plan | Dudley Council News

Dudley will "go it alone" on housing and employment plan

Council bosses in Dudley have pulled out of a regional plan to identify housing and employment land in a bid to "listen to local people" on the use of green belt.

Dudley Council leader, Councillor Patrick Harley, says the council will draw up its own plan after cutting ties with the Black Country Plan.

Earlier this year, almost 20,800 people across the Black Country responded to consultation on the plan in the form of individuals, organisations and group responses and a further 18,000 people signed petitions. The vast majority were from Dudley.

Following the enormous feedback Dudley leaders have since said they would pull two sites from the plan – land south of Holbeach Lane, Kingswinford, and land in Swindon Road, Wall Heath.

But after the Black Country authorities failed to come to agreement on how the plan would progress, Councillor Patrick Harley said he could not allow the "overwhelming" feedback from the public to be ignored and therefore would be recommending to Dudley Council's cabinet that the authority should withdraw and draw up its own plan.

Councillor Patrick Harley, leader of Dudley Council, said:

At every stage of this plan we have made it clear that it must be led by the people who live here. I simply cannot stand by and allow decisions to be made which are contrary to the overwhelming feedback we have already received. This is clearly a very emotive subject and people feel very strongly about it. I must reflect that in the decisions I make for the people of this borough. We will therefore look to go it alone and look at what is needed to support a Dudley specific plan and setting out the timescales for that. A lot of the work we have carried out to date is still very relevant so it is not a matter of starting from scratch. There's a huge amount of feedback already from residents in Dudley borough and it is important we use that moving forward. But rest assured we will listen to local people and put them first at every stage of this plan.

19.10.2022 – Black Country Plan joint statement

Black Country Plan | Black Country Plan

The Black Country Plan 2039

Published Wednesday, 19th October 2022

A joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton.

“The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan.

“Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans."

If you require any further information regarding the local plans for each of the individual local authorities, please email them directly using the contact details below.

31.10.2022 – duty to co-operate meeting minutes

South Staffs Council, Black Country Local Authorities, Birmingham City Council

DTC Meeting 31.10.2022

Attendees:

Kelly Harris (KH) - South Staffordshire District Council

(SSDC) Ed Fox (EF) - SSDC

Patricia McCullagh (PM) – Sandwell Metropolitan Borough Council

(SMBC) Michelle Ross (MR) – City of Wolverhampton Council (CWC)

Vicki Popplewell (VP) – Dudley Metropolitan Borough Council (DMBC)

Maria Dunn (MD) – Birmingham City Council (BCC)

Uyen-Phan Han (UPH) - BCC

Liz Forster (LF) – Walsall Metropolitan Borough Council (WMBC)

Neville Ball (NB) – WMBC

Gypsy and Traveller unmet needs:

EF – BCC has responded but Black Country authorities haven't to date

KH – Are there plots on public sites? Site options for **new** public sites, including in Green Belt? Engaged with site promoters to see if there's opportunity for new public sites? Considered publicly owned land? This is what South Staffs have done, need to understand what others have.

VP – have recently re-examined site options; can come back in writing

KH – need to understand the process others have gone through

NB – one Council public site is full, just opened a temporary transit site with 6 pitches, haven't considered options for new sites other than a existing SAD non-GB allocation; goes towards existing needs, haven't discussed public sites with GB housing sites but have with non-GB housing sites, non-GB sites indicated it would affect viability to do so.

MR – latest G&T assessment isn't published yet, likely to be published in January. 1) No, 2) No, 3) No - could do that during consultation on Issues and Options, 4) Yes - could do further work at January consultation to examine this. Will examine but can't respond with any substance before January.

PM – Will be examining these four areas through Issues and Options on Sandwell plan. 1) No, 2) No, 3) No but will examine through Issues and Options and 4) have looked at some for transit sites but not any further.

Apportionment of housing contributions:

IC – have discussed this with Bham previously but see a need to separate out housing contributions between 4 BC LPAs and BCC. May be significant for justifying Green Belt exceptional circumstances. From Shropshire examination the earlier this is sorted out the better. Most progressed offer is Shropshire (signed SoCG) and some are expressed to BC specifically (e.g. Lichfield). Others aren't attributed to any individual LPAs.

IC- Have proposed an approach in circulated note based on net migration flows between importing and exporting authorities. Based on authorities mainly to north and west of conurbation as this is where majority of local plan activity is at this point. Based on a migration based method, % figures in Table 2 of the circulated note could be used as basis for separating out offers between four BC authorities and BCC. Would like to see this reflected in the SSDC SoCGs to provide certainty.

IC – Might be argued that if LPA area doesn't have a shortfall then it shouldn't be receiving offers from neighbouring LPAs. CWC want to use this approach as soon as possible to allow local plans to progress.

MD – Want to understand how lack of BC plan impacts shortfalls and want to see how contributions would be distributed across LPAs where a contribution would be given to LPA without a shortfall (e.g. if Walsall's needs are met, where does Lichfield's contribution go). What happens to individual LPAs within the Black Country which can meet their own need, but which could have a role in assisting with Bham's shortfall?

IC – If moving to four individual local plans it pushes preparation back a year, may not be the case that some LPAs which were meeting own needs still can

NB – May not reflect people moving from Sandwell to other BC authorities, which in turn then have residents moving to shires

MD – If we can't treat as collective HMA shortfall (Bham preference) then the % are a sensible way to go about it but does appear to make life difficult for Sandwell which has a large shortfall but no direct relationships.

IC – Sandwell's strongest relationships are with Dudley, Wyre Forest, Bham. If Wyre Forest was more progressed then this approach would give Sandwell a stronger argument for asking them.

MD – Should we be looking across the whole HMA then?

KH – Probably for **next** iteration of HMA SoCG if we're going down that route. Also need to be mindful that Wyre Forest isn't in HMA. Need to be mindful of what we can agree **now** for SoCG.

IC – Would seek agreement on approach to apportionment if not number at this stage.

KH – Over the next couple of months could Bham and Black Country work together on this?

MD – Would need the next couple of months to work this out.

IC – Could SoCG commit to doing apportionment based on evidence of functional relationships between LPAs?

MD – would need to check with senior management given that approach to date has been to push for singular HMA shortfall

IC – Would like to have agreement to work together on how to apportion in areas of agreement

MD – Agree it would be better to show we have a way forward on this

KH – If BCC can get wording to us by end of this week that would enable us to put in

AGREED – BCC to provide wording by the end of this week to put into each SoCG on way forward for apportionment

Timescales for plan-making

KH – Any update from BC LPAs on this in light of individual plans being pursued?

MR – CWC LDS indicates consult in Spring 2023, Reg 19 Summer/Autumn 2023, examination 2024, adopt 2025

NB – WMBC LDS going to cabinet this week, going back to Reg 18, Issues and Options after elections next Summer, submit March 2026

VP – DMBC looking to incorporate Brierly Hill AAP into plan, Reg 18 plan after elections in June/July 2023, not agreed submission/adoption timescales at this stage.

MD – Submission 2025, adoption 2026 for BCC, can't sit still and wait for new system

IC – Apportionment will be important if plans are all operating to different timescales

PM – LDS in December 2022, looking to do one Local Plan with Issues and Options February/March 2023, adoption early 2026

Signing statements of SoCG

KH – HMA SoCG; signed copy from Bham, SSDC's likely to be signed subject to scrutiny, going to be chasing today. Individual SoCGs need to be agreed at officer level this week (prior to consultation) but any idea of timescales for formal sign off?

IC – End of November for CWC

MR – should education be included at this stage?

PW – could reflect current position on school places; that each CWC and SSDC working with education authority confirm that each area can accommodate its own growth in school places

MD – Can likely do BCC's under delegated sign off

MR – Would sign off be delayed until submission next year?

KH – Need sign off as soon as possible to support Regulation 19. Will happily participate in updated SoCG with CWC and others at submission stage but that needs to be in addition to Regulation 19 stage SoCG, not instead of.

AGREED – Officer comments back by end of the week with aim to sign individual SSDC SoCG after this.

AGREED – Dudley, Sandwell and Walsall to confirm individual decision making processes in light of ABCA no longer being decision making signatory

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:
Alex Yendole (AY) – Stafford Borough Council
Neville Ball (NB) – Walsall MBC
David Holloway (DH) – Dudley MBC
Ian Culley (IC) – City of Wolverhampton Council
Sushil Birdi (SB) – Cannock Chase District Council
Heidi Hollins (HH) – Cannock Chase District Council
Mark Watkins (MW) – Sandwell MBC
Kelly Harris (KH) – South Staffordshire District Council
Ed Fox (EF) – South Staffordshire District Council
Patrick Walker (PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction
AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed
AY – will add in text in table at end that FEMA is predominately Stafford's own borough area
AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?
IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans
AY – will there be conversations in advance if local authorities are affected by this?
IC – yes
KH – Black country evidence as published to date will be kept until new evidence base is available?
IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?
KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that
IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?
KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date
PW – SoCG intended to be record views understood to be agreed to date
IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19
IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't
KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging
DH – Para 4.5; repeats "must" – can we change to "should"?
KH – This is in section on SSDC's position – may not be view of all but is SSDC's view
IC – Could change it to "must continue"?
KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November
ACTIONS: Further info on signing timescales expected from all
ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

08.11.2022 – SMBC response to SSDC 08.08.2022 letter

From: Patricia Mccullagh

To: Patrick Walker; Andy Miller

Cc: Edward Fox; Kelly Harris

Subject: RE: Statements of Common Ground - SSDC and Birmingham/Black Country Authorities

Date: 08 November 2022 12:14:56

Hi Patrick

Apologies, we are happy with the wording that Birmingham proposes.

With regards to para 21 – please find below response to the questions raised in your August letter:

1. Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

No – there are no plots available on existing public sites within Sandwell which are available for contributing towards meeting South Staffordshire unmet needs.

1. Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Sandwell will examine this option through Issues and Options for the Sandwell Development Plan.

2. Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Sandwell will engage with site promoters through a' Call for Sites' to explore if they are willing to make part of their site available for a publicly run site. The timescale for this work is likely to be during 2023.

3. Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Publicly owned land has been considered for transit sites in Sandwell. Further work will take place to consider if there are any sites suitable for permanent sites, the timescale for this work is likely to be during 2023.

Therefore, please can you amend the last sentence of para 21 to : Sandwell has provided a detailed response to SSDC's subsequent August 2022 letter.
We are still trying to establish the protocol for signing off responses and the signing of SoCG's and so the above response if officer only and also means that we are unable to sign the SoCG at this current time. Regards
Trisha

From: Patrick Walker <P.Walker@sstaffs.gov.uk>
Sent: 08 November 2022 11:56

To: Andy Miller <[READCTED]@sandwell.gov.uk>; Patricia Mccullagh <[REDACTED]@sandwell.gov.uk>
Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>
Subject: FW: Statements of Common Ground - SSDC and Birmingham/Black Country Authorities

CAUTION: This email originated from outside of the Council / Children's Trust. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi both,

I'm mindful that we're going to be publishing these at the end of this week and haven't heard back from you yet. If you require any tweaks before your SoCG is published in draft (which we also intend to amend for the proposed wording from Birmingham below) then please let me know by close of play tomorrow.

Patrick Walker

Senior
Planning
Officer
Strategic
Planning

South Staffordshire Council

Tel: 07970 433618

From: Patrick Walker

Sent: 04 November 2022 13:34

To: Kelly Harris <k.harris@sstaffs.gov.uk>; [REDACTED]@wolverhampton.gov.uk; [REDACTED]@wolverhampton.gov.uk; 'Vicki Popplewell' <[REDACTED]@dudley.gov.uk>;

'Carl Mellor (Planning and Regeneration)' [REDACTED]@dudley.gov.uk>; 'Neville Ball' <[REDACTED]@walsall.gov.uk>; 'Liz Forster' <[REDACTED]@walsall.gov.uk>; 'Andy Miller' <[REDACTED]@sandwell.gov.uk>; ' <[REDACTED]@sandwell.gov.uk>; 'Maria Dunn' <[REDACTED]@birmingham.gov.uk>; 'Uyen-Phan Han' <[REDACTED]@birmingham.gov.uk>; 'Martin Dando' <[REDACTED]@birmingham.gov.uk>

Cc: Grant Mitchell <g.mitchell@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>; Annette Roberts <A.Roberts@sstaffs.gov.uk>
Subject: RE: Statements of Common Ground - SSDC and Birmingham/Black Country Authorities

Hi all,

As discussed and agreed at this week's DtC meeting Birmingham have suggested a change that should be made uniformly across all Black Country and Birmingham SoCGs with South Staffordshire to ensure that we're all working together on the apportionment issue. See below for the proposed change to paragraph 9:

*"~~**To date, there is no agreed approach between**~~ SSDC, Black Country authorities and Birmingham **will work towards an agreed approach** as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls."*

If this is acceptable to all we will make this change uniformly in all of the

individual SoCGs with Birmingham, Wolverhampton, Dudley, Walsall and

Sandwell before publishing the drafts next week. Kind regards

Patrick Walker

Senior
Planning
Officer
Strategic
Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

06.04.2023 – SSDC response to SMBC Issues & Options Consultation

Sent via email to:
Sandwell_LocalPlan@sandwell.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

15th March 2023

South Staffordshire Council response to Sandwell MBC Issues and Options consultation

Dear Sir/Madam,

South Staffordshire Council welcomes the opportunity to comments on the Sandwell Local Plan (SLP) – Issues and Options Review. It is noted the production of the new joint Black Country Plan (BCP) officially ceased in October 2022 and that Sandwell is undertaking an individual Local Plan for its administrative area.

It is also noted that Sandwell Council is proposing that a number of the draft BCP policies will be incorporated into the draft SLP when it is published for public consultation. The SLP will also rely on some of the evidence gathered for it, where this remains relevant and up-to-date, and will respond to some of the issues raised by the public and others during the public consultation on the draft BCP (held during October – November 2021).

South Staffordshire Council responded to the public consultation on the draft BCP in a letter dated 1st November 2021 which is appended to this response as it remains relevant to the SLP. It is acknowledged much of the background work and evidence which was undertaken on the BCP will be remain useful for the SLP. However, the decision to undertake an individual local plan is the start of a new Local Plan review process across a different geographical area. Therefore, although much of the previous work remains useful, Sandwell Council must ensure that their emerging Plan does not presuppose that the approaches taken in the BCP are still the best available and must fully consider other approaches / options.

The Issues and Options Review consultation document asks a large number of questions across a variety of topics. A large proportion of these questions relate to local issues within Sandwell and are not cross-boundary issues relevant to South Staffordshire. South Staffordshire has specific comment to make on the following questions: Q7 – Future Development in Sandwell, Q15 – Gypsies, Travellers and Travelling Showpeople and Q28 – Employment Land Need.

Question 7 – Future Development in Sandwell

What do you think are the main challenges we face in planning for housing and employment in Sandwell between now and 2041?

With regard to meeting future housing requirements for Sandwell, the standard method currently calculates a housing requirement figure of 1,515 dwellings per annum which equates to 30,300 dwellings across the plan period (2021 – 2041). Sandwell currently anticipates being able to deliver 9,492 homes across the plan period (which is broadly in line with the previous Draft Black Country Plan Regulation 18), leaving a significant shortfall.

South Staffordshire considers that Sandwell should maximise housing delivery within its own administrative area before seeking contributions from neighbouring authorities to help meet its shortfall. It is noted that a new call for sites is taking place as part of this consultation. A report by the West Midlands Combined Authority titled: 'The Black Country Plan: Assessment of the Potential for Additional Brownfield Land Development Capacity' published in March 2022 also highlighted possible additional capacity for housing development in Strategic Centres as well as possible mixed use regeneration of employment sites. Building at higher densities is also being considered through the SLP. These factors may result in more than a 9,492 supply being identified across the plan period.

Both South Staffordshire and Sandwell are within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which is made up of fourteen local authorities, including Birmingham and the four Black Country authorities. South Staffordshire have made an offer to contribute 4,000 dwellings through their emerging Local Plan to the GBBCHMA as a whole. South Staffordshire Council is willing to work proactively with authorities generating shortfalls within the GBBCHMA in order to apportion this contribution. However, in our view it would not be appropriate to delay submission of the South Staffordshire Local Plan in order for the apportionment to be agreed, so would welcome discussions on this issue soon.

Question 15 – Gypsies, Travellers and Travelling Showpeople

Do you agree with the proposal to adapt the draft BCP policy on the needs of travelling communities for use in Sandwell?

South Staffordshire Council (SSDC) has recently published an updated Gypsy and Traveller Assessment which has identified a need for 121 pitches during the plan period to 2039. South Staffordshire Council wrote to Sandwell Metropolitan Borough Council (and other GBBCHMA and neighbouring authorities) in August 2022 where we set out that we had only identified a supply of 37 pitches to allocate against a 5-year requirement of 72 pitches. In the letter we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

In a Statement of Common Ground agreed in January 2023 between South Staffordshire and Sandwell Metropolitan Borough Council paragraph 21 states:

'A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black

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

SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore request that through you plan preparation you explore the following options:

- Consider capacity to intensify/expand existing public sites
- Consider options for new public sites on publicly owned land within the Borough
- Explore if site promoters of your preferred housing allocation are willing to gift a proportion of their site to be run as a public traveller site.

South Staffordshire Council therefore look forward to continuing to engage with Sandwell on this issue and await the outcome of the call for sites and review into publicly owned land.

Question 28 – Employment Land Need

How do you think the shortfall in the supply of employment land should be addressed?

It is understood that the latest evidence on employment needs covering the Black Country (Black Country EDNA 2022) has identified a need for 205.4ha of employment in Sandwell up until 2040, with an estimated supply of around 69.9ha, resulting in a shortfall of 135.5ha for the Borough. The EDNA 2022 identified an overall shortfall for the Black Country of around 155ha, which clearly demonstrates that Sandwell is by far the greatest generator of unmet needs within the Black Country FEMA.

Surplus employment land in South Staffordshire.

As Sandwell MBC will be aware, South Staffordshire Council completed its Regulation 19 Publication Plan consultation in December 2022, and this was supported by a draft Statement of Common Ground (SoCG) across the South Staffordshire FEMA (consisting of South Staffordshire, Cannock, Dudley, Stafford, Walsall and Wolverhampton), plus Sandwell, as a result of its close economic relationship with the three other Black Country authorities that fall within the South Staffordshire FEMA. Through this SoCG South

Staffordshire confirmed its position, as set in our Publication Plan, that we have a 36.6ha surplus of employment land that we can make available to unmet needs of the Black Country FEMA. As evidenced through our 2022 EDNA, South Staffordshire has a lesser relationship with Sandwell than it does the other three Black Country authorities, and therefore there is an argument for surplus employment land in South Staffordshire being attributed to shortfalls from other Black Country authorities before any residual surplus is attributed to Sandwell. However, South Staffordshire Council is willing to work proactively with the four Black Country authorities to agree how the 36.6ha contribution is apportioned between the four authorities, although as the shortfall is a Black Country FEMA-wide issue and our contribution is across that geography, in our view it would not be appropriate to delay submission of the South Staffordshire Local Plan in order for the apportionment to be agreed, so would welcome discussions on this issue soon.

West Midland Interchange

In addition to the 36.6ha surplus, South Staffordshire also has a Strategic Rail Freight Interchange (West Midlands Interchange (WMI)) being delivered in South Staffordshire that serves a wider market area (including Sandwell). South Staffordshire Council, through our 2022 EDNA, has undertaken an analysis which confirms that we require 18.8ha of WMI in order to meet our labour demand requirements up to 2040. This means that there is surplus employment land at WMI that South Staffordshire does not require that can meet unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for

determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 67ha of the site towards the Black Country, with a further breakdown suggesting that 18ha of the site could be apportioned to Sandwell. However, it is clear that other Black Country authorities may not require their full share of WMI[2] to meet individual authorities needs[3] and therefore we suggest that Duty to Cooperate discussions are undertaken between Sandwell and the three other Black Country authorities in the first instance to determine if they are able to provide any of their portion of WMI towards unmet employment needs of Sandwell.

Potential contributions from other local authorities identified as having a strong or moderate economic relationship with the Black Country FEMA

Should the unmet employment needs of the Black Country FEMA (including Sandwell MBC) not be able to be met through contributions from South Staffordshire (including WMI), as well as contributions currently proposed by Shropshire Council, then Duty to Cooperate discussions with all other local authorities identified as having a strong or moderate economic relationship with the Black Country FEMA[4] and other areas with which there is an evidenced functional relationship should continue to be progressed in order to meet any remaining shortfall. This is recommended as a next step in the Black County ENDA 2022 and is a key area of agreement in the draft SoCG that has been prepared to support our emerging Local Plan.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

14.08.2023 – SSDC response to SMBC 26.07.2023 letter

Sent via email to:
[REDACTED]@sandwell.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

14th

August

2023

Dear

Tony,

RE: SANDWELL LOCAL PLAN – DUTY TO CO-OPERATE LETTER

Many thanks for your recent Duty to Cooperate letter, received on 26th July. This summarises Duty to Cooperate engagement to date on housing, employment and gypsy and traveller accommodation, whilst clarifying that no cross-boundary issues have been identified by Sandwell Metropolitan Borough Council (SMBC) with regards to transport and the natural environment. The letter then requests that South Staffordshire District Council (SSDC) offers clarification regarding the South Staffordshire Local Plan and the offers of housing and employment land set out in the Statement of Common Ground (SoCG) previously signed by both councils in January 2023.

As you will be aware, SSDC paused work on its local plan in January 2023, requesting clarity from government over its proposed reforms to national planning policy announced in December 2022. At the time these were understood to be implemented by 'Spring 2023', which unfortunately has not been the case. Recognising the need to progress the plan and the uncertainty surrounding the implementation of the NPPF changes, the Council announced in July 2023 that it would begin revisiting the evidence underpinning the plan, with the intention of undertaking an additional public consultation on the plan in early 2024. The Council did this with the intention of making sure that the evidence that underpins the plan remains relevant and that South Staffordshire has a strategy ready to get its plan in place as quickly as possible. No decisions have yet been made about what changes might be made to the previously published plan. The Council's statement on this can be found here: https://www.sstaffs.gov.uk/news/2023/local-plan-statement.

In light of this statement we unfortunately cannot confirm the next local plan consultation's approach to housing and employment land at this point or any contribution to the wider housing market area. We will however be preparing formal Duty to Cooperate correspondence in the early Autumn seeking a way forward on the Council's approach to housing, employment and gypsy and traveller needs, with the intention that this will subsequently inform cross-boundary engagement between our authorities and ultimately an

updated Statement of Common Ground. In the meantime, we would reiterate the comments made to the Sandwell Issues and Options consultation, and previous representations made to the Black Country Plan, which stressed that SMBC should be considering the following in any local plan review;

- Maximising supply in Sandwell before seeking cross-boundary contributions
- Fully incorporating the recommendations of the West Midlands Combined Authority's brownfield land review into the plan's approach by delivering further supply in urban centres and through employment site regeneration.
- Requesting Sandwell fully consider the same options for accommodating Gypsy and Traveller needs as South Staffordshire before coming to a view on its ability to accommodate unmet pitch needs
- That Sandwell and South Staffordshire lie within different FEMAs, which should be taken into account when considering the distribution of any oversupply of employment land in South Staffordshire
- The need for Duty to Cooperate discussions between Sandwell and other Black Country authorities regarding the distribution of West Midlands Interchange employment land
- The need to explore contributions towards Black Country employment shortfalls from other local authorities with strong or moderate economic relationships to the Black Country (as identified in the Black Country FEMA)

We would be happy to meet with you to discuss these points

further. Yours sincerely

[REDACTED]

Kelly Harris

Lead Planning Manager – South Staffordshire Council

23.11.2023 – SMBC response to SSDC 24.10.2023 letter

Sent via email to:

e.fox@sstaff.gov.uk

Please ask for:Patricia McCullagh

Telephone No:[REDACTED]

Email: [REDACTED]@sandwell.gov.uk

Date: 23/11/2023

Dear Ed,

Response to South Staffordshire District Council – Duty to Cooperate update

Thank you for your letter received 24th October 2023, which provides an update on your local plan preparation and seeks the views of Sandwell MBC on certain aspects. It sets out that a Statement of Common Ground (SoCG) was signed with the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and also with the individual Black Country Authorities which support the exceptional circumstances for Green Belt release to help meet the needs of the GBBCHMA.

As you will be aware, Sandwell MBC commenced consultation on its Reg 18 Draft Plan on 6th November and it will run until 18th December 2023. The Draft Sandwell Local Plan demonstrates the following:

Housing

- a need for 29,773 homes by 2041
- a supply of 11,167 homes and
- a shortfall of 18,606 homes

Employment

- a demand for 185ha of employment land by 2041
- a supply of land available and suitable for employment use is **42ha** (after completions between 2020 – 2022 are considered). This includes windfall supply, generated through intensification / recycling and includes a vacant land supply of **29ha**.
- a shortfall of 143ha of employment land

Gypsies and Travellers

- a need for 8 pitches by 2031 and 6 pitches by 2041 – total pitches required 14 pitches
- a supply of 10 pitches
- a shortfall of 4 pitches

Therefore, as the shortfall is significant and the only way forward for us is to look outside the borough into neighbouring authorities we would look to South Staffordshire District Council (SSDC) to honour its original offer to the GBBCHMA.

We understand that following the pause of work on the South Staffordshire Plan, work resumed in January 2023 with an additional public consultation intended for Spring 2024 and evidence will also need to be revisited.

Housing

Your letter states that no decisions have been made on the Plan's strategy and we understand that the Council also intends to undertake a second Regulation 19 consultation in April 2024. It is hard for Sandwell to comment on whether this is the right approach without knowing how and by how much the strategy will change. If there are significant changes we would advise caution in proceeding to a second Regulation 19 consultation and would advise that it would be better and in line with the NPPF to go back to Regulation 18 consultation stage.

Your letter also seeks Sandwell Council's position if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the District or GBBCHMA. Sandwell Council considers it is premature to respond to this question as we are still awaiting the publication of the revised NPPF.

Once this has been published and proposed amendments understood, we would then be happy to comment.

Employment

We note that you will be updating your Economic Development Needs Assessment (ENDA) and will engage with Sandwell Council at an appropriate time to inform the Regulation 19 consultation. We also note and support the fact that SSDC will continue to work through the West Midlands Developments Needs Group to assist in the preparation of the update to the West Midlands Strategic Employment Sites Study 2021.

Gypsy and Travellers

In preparation of the Sandwell Local Plan, the Council undertook a Call for Sites exercise alongside the Sandwell Issues and Options consultation in February 2023. This sought submissions for any land use including for Gypsy and Travellers and also asked whether promoters were willing to make part of their site available for use by Gypsy and Travellers. We received 18 Call for Sites submissions, none of which proposed a use for Gypsy and Travellers.

The Council also undertook a site assessment of all eligible sites, details and results can be found here: https://www.sandwell.gov.uk/downloads/download/496/draft-sandwell-local-plan-reg18-plan-preparation-documents in the Site Assessment report.

Other issues

We note that you will be re-engaging with Sandwell Council on the following matters:

- Transport
- Infrastructure
- Natural Environment

We look forward to continued discussions regarding cross boundary issues.

Yours faithfully,

Patricia McCullagh

Team Leader Planning Policy

15.12.2023 – SSDC response to SMBC Regulation 18 Consultation

Sent via email to:
Sandwell_LocalPlan@sandwell.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

15th December 2023

South Staffordshire Council response to Sandwell MBC Regulation 18 consultation

Dear Sir/Madam,

South Staffordshire Council welcomes the opportunity to comment on the Draft Sandwell Local Plan (DLP) Regulation 18 Consultation document. It is noted that the production of the new joint Black Country Plan (BCP) officially ceased in October 2022 and that Sandwell is now undertaking an individual Local Plan for its administrative area. South Staffordshire Council has previously commented on an Issues and Options consultation in a letter which was submitted on 15th March 2023.

We understand that Sandwell Metropolitan Borough Council (SMBC) are proposing to incorporate policies previously included in the draft Black Country Plan and to provide a response to issues of relevance raised by the public and others during the public consultation on the draft BCP (held during October – November 2021).

The SMBC Draft Local Plan is a comprehensive document providing a spatial strategy alongside policies to meet identified development and infrastructure requirements and more detailed non- strategic policies for managing development. South Staffordshire has focussed the following comments on those specific elements of the plan which raise cross-boundary issues.

Strategy

The Plan promotes a 'Balanced Green Growth' strategy making a contribution towards meeting the housing and employment needs in the Borough whilst delivering climate change adaptation and protecting and enhancing the historic and natural environment. There is a strong emphasis on maximising development capacity through the effective regeneration, redeployment, and intensification of sites in accordance with national policy priorities. Growth is focussed upon sustainable locations prioritising the main town centres and four broader regeneration areas which are characterised as areas of existing employment land distribution. The strategy has sought to minimise the amount of greenfield release with 97% of proposed housing sites being brownfield.

Housing Provision

The standard method currently calculates a total future housing requirement figure of 29,773 dwellings across the plan period up to 2041. Sandwell currently anticipates being able to deliver

11,167 dwellings across the plan period, leaving a shortfall of 18,606 dwellings. The Borough Council state that given the finite supply of land available for development it is unlikely that this shortfall can be met within Sandwell itself and therefore it is the intention to seek to export this shortfall through Duty to Co-operate arrangements. Given that Sandwell is situated within a Housing Market Area (HMA) geography primarily composed of net exporting metropolitan authorities and rural shire authorities comprising significant amounts of green belt it is unclear how readily this surplus requirement will be absorbed through duty to cooperate arrangements within the HMA. Whilst recognising the highly constrained nature of the land supply in the Borough, South Staffordshire considers that Sandwell should continue to seek to maximise delivery within its own administrative boundaries. As the plan making process proceeds forwards, continued efforts to increase capacity through site regeneration, housing renewal schemes, increased densification and the release of town centre sites should be ongoing with the aim of reducing the net requirement to be exported to other authorities.

Gypsies, Travellers and Travelling Showpeople

South Staffordshire Council (SSDC) published an updated Gypsy and Traveller Accommodation Assessment in 2022 which identified a need for 121 pitches during the plan period to 2039. SSDC are now updating the GTAA to align with our revised plan period up to 2041. We have not yet received the findings of the updated GTAA but expect our needs for pitches may have increased.

South Staffordshire Council wrote to SMBC (and other GBBCHMA and neighbouring authorities) in August 2022, and subsequently in October 2023, where we set out that we had only identified a supply of 37 pitches to allocate against a 5-year requirement of 72 pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the Borough for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

South Staffordshire Council would welcome an indication that all such options have been explored and we look forward to continuing to engage with SMBC on this issue.

Employment Land Need

The latest evidence on employment needs covering the Black Country (Black Country EDNA 2023 update) has identified a need for 185 ha of employment land in Sandwell. There is an identified supply of 42 hectares, leaving a shortfall of 143ha. to be exported to authorities with

a strong existing or potential functional economic relationship with Sandwell.

South Staffordshire Council paused local plan production following completion of a Regulation 19 Publication Plan consultation in December 2022 in light of proposed Government changes to national planning policy. South Staffordshire Council has now recommenced work on plan production but is awaiting the final adoption of changes to national policy before proceeding to an updated Publication Plan (Regulation 19) consultation in Spring 2024. The Regulation 19 Plan was supported by a draft Statement of Common Ground (SoCG) across the South Staffordshire FEMA (consisting of South Staffordshire, Cannock, Dudley, Stafford, Walsall and Wolverhampton), plus Sandwell, as a result of its close economic relationship with the three other Black Country authorities that fall within the South Staffordshire FEMA. At this time, South Staffordshire through this SoCG indicated its position, as set out in our November 2022 Publication Plan, that we have a 36ha (excluding WMI) surplus of employment land that we can make available to unmet needs of the Black Country FEMA. Following the decision by national government to amend national planning policy with respect to Green Belt land releases South Staffordshire Council is currently reassessing the scale of future commitments with a view to producing a revised draft local plan in Spring 2024. To accompany the revised plan SSDC is undertaking an update to the evidence base which will include revisiting the EDNA prior to our next stage of public consultation and this will inform the council's decisions with respect to future employment land commitments. This will inform an update to the SoCG across the FEMA and our position in relation to contributing to unmet employment needs.

West Midlands Interchange

A Strategic Rail Freight Interchange (West Midlands Interchange (WMI)) is situated within South Staffordshire though this serves a wider market area (including Sandwell). Through our 2022 EDNA South Staffordshire Council identified a requirement of 18.8 ha. of the WMI land to meet our labour demand requirements up to 2040. This will be subject to further analysis as part of the update to the EDNA in 2024. South Staffordshire Council has acknowledged that there is surplus employment land at WMI that the council does not require and that could be utilised to meet the unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 67ha of the site towards the Black Country, with a further breakdown suggesting that 18ha of the site could be apportioned to Sandwell.

I hope you find our response helpful as you progress your Local Plan and look forward to continuing to engage constructively with SMBC through preparation of our respective plans.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

14.03.2024 – SSDC letter to FEMA authorities

From:	Alex Evans
To:	[REDACTED]@cannockchasedc.gov.uk; Jemma March; Vicki Popplewell; "[REDACTED]@sandwell.gov.uk)"; "Alex Yendole"; David Holloway; [REDACTED]@walsall.gov.uk; Alison Ives; [REDACTED]@wolverhampton.gov.uk
Subject:	FW: South Staffordshire FEMA - SoCG update
Date:	03 April 2024 12:19:00
Attachments:	South Staffs FEMA SoCG 2024.docx Appendix 2.pdf Appendix 3.pdf Appendix 1.pdf image001.png

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Dear all,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the FEMA SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans

Sent: Thursday, March 14, 2024 10:45 AM
To: [REDACTED]@cannockchasedc.gov.uk; Jemma March <[REDACTED]@cannockchasedc.gov.uk>; Vicki Popplewell <[REDACTED]@dudley.gov.uk>; [REDACTED]@sandwell.gov.uk) [REDACTED]@sandwell.gov.uk>; Alex Yendole<[REDACTED]@staffordbc.gov.uk>; David Holloway <[REDACTED]@walsall.gov.uk>; [REDACTED]@walsall.gov.uk; Alison Ives [REDACTED]@walsall.gov.uk>; [REDACTED]@wolverhampton.gov.uk

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: South Staffordshire FEMA - SoCG update

Dear all,

Alongside the individual updates to bilateral SoCG we sent out last week to individual local authorities, we are also keen to update the previous FEMA SoCG (dated November 2022) to reflect the South Staffordshire EDNA update. Therefore, please find attached an proposed updated track change version.

Please feel free to add further changes / amendments and circulate them to all authorities in the FEMA for consideration.

I would also be happy to organise meetings on an individual or group basis if that would be helpful.

We are seeking to agree the updated SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

We would like to have the SoCG agreed and signed off at officer level by **Friday 29nd March 2024**.

Please let me know if you have any queries or questions.

Kind regards

Alex
Alex Evans

Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

20.06.2024 – SMBC duty to co-operate letter

By email:

k.harris@sstaffs.gov.uk E.Fox@sstaffs.gov.uk

From: Patricia McCullagh

Email: [REDACTED]@sandwell.gov.uk

Date: 20th June 2024

Dear Colleagues

Sandwell Local Plan – Duty to Co-operate

Sandwell Council wrote to South Staffordshire Council in 2023 setting out its intention to produce a Local Plan for Sandwell following the demise of the Black Country Plan (BCP). Sandwell Council consulted on its Draft (Regulation 18) Local Plan in November/December 2023 and since then has been working towards the Publication (Reg19) version of the Plan with a view to undertaking consultation into its soundness at the end of 2024 and submitting the Plan to the SoS in early 2025.

The strategic matters, as set out in the previous letter, included meeting unmet housing need, meeting unmet employment need and some transport issues. It is the view of Sandwell Council that these strategic matters continue to be the principal cross boundary issues affecting the preparation of the Sandwell Local Plan (SLP).

The purpose of this letter is to outline the Council's preferred approach to the Duty to Cooperate (DtC) in respect of strategic housing issues, to seek your views on this approach and to request that your Council fully engages with this work. A separate letter will be sent regarding employment issues.

Background

Housing Provision

Using the Government's standard method, Sandwell needs to identify land for 29,773 homes between 2022 and 2041. However, the supply of suitable residential land based on the most recent evidence stands at 11,167 homes meaning there is an unmet need of 18,606 homes over this period. The SLP provides for just over one third of the Council's housing need on the land that is available in Sandwell. As of June 2024, Sandwell's unmet need contributes to a larger shortfall across the Black Country of approximately 42,000 homes, made up of the following components:

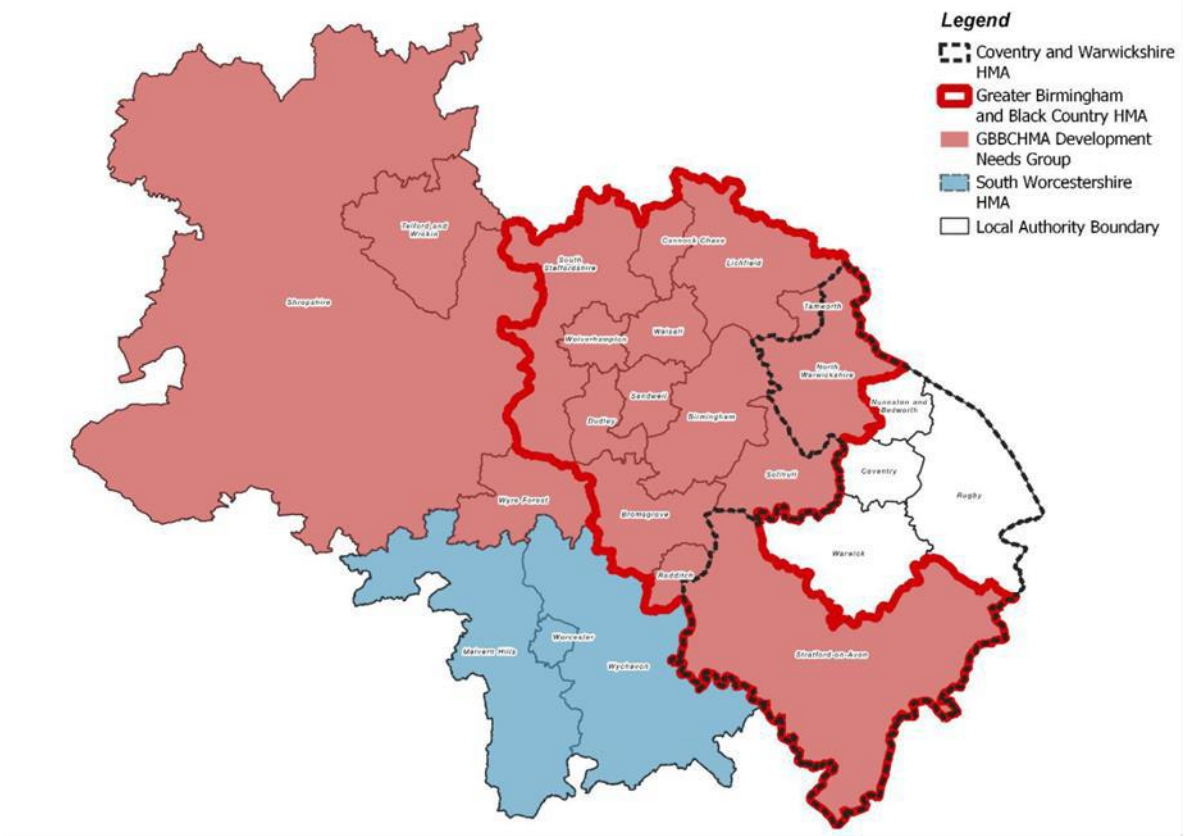
- Dudley – shortfall of 1078 homes 2022-41 as set out in the 2024 Regulation 18 Local Plan consultation https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local- plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents
- Walsall – shortfall of 11,329 homes 2022-41 based on the Walsall SHLAA 2022.

However,
Walsall's housing shortfall is unclear at the moment given the uncertainty over the deliverability of some sites.
https://go.walsall.gov.uk/sites/default/files/2022-09/Strategic Housing Land Availability Assessment 2022.pdf

- Wolverhampton – shortfall of 11,400 homes 2022-42 as set out in the February 2024 Regulation 18 Issues and Preferred Options consultation. https://www.wolverhampton.gov.uk/planning/planning-policies/Wolverhampton-local-plan

In addition, the emerging Birmingham Local Plan identifies a significant housing shortfall in the order of 46,000 homes 2022-42 as set out in the 2024 Preferred Options consultation. Together, these emerging Local Plans indicate a housing shortfall of some 88,000 across the Black Country and Birmingham Housing Market Area.

Previous discussions across the Birmingham and Black Country Housing Market Area (B&BCHMA) (as shown on the Map below) and a number of neighbouring Local Plan areas, indicated that contributions to addressing this shortfall have been made from a number of adopted and emerging Local Plans from other local authorities. However, it is anticipated that contributions secured or 'offered' to date will not make significant headway into addressing the shortfall, indicating a very substantial under-delivery of homes compared with identified needs.



Map: Birmingham and Black Country Housing Market Area (B&BCHMA) plus neighbouring Local Plan areas

Gypsy and Traveller Provision

Sandwell has identified a 14 pitch need for Gypsy and Traveller households over the plan period, including 8 pitches within the first 5-year period.[1] Through the site assessment process for the SLP, Sandwell identified provision for 10 pitches.

The Council explored all potential sites for their suitability for plots and pitches including council land and the potential to expand or new public site provision, it also engaged with site promoters through 'Call for Sites' to explore if they were willing to make part of their site available for a publicly run site, no new sites were identified.

Addressing the shortfall

As Sandwell Council and other Local Plan areas are reliant on contributions from the HMA and wider to meet identified housing needs, this letter is to determine whether South Staffordshire Council is able to make any contribution to the wider shortfall, either through current or future local plan reviews. This request is consistent with the December 2023 National Planning Policy Framework (NPPF) which confirms the need for Local Plans to consider how they can accommodate need from neighbouring areas where it is practical to do so whilst achieving sustainable development through the Duty to Cooperate.

Therefore, as part of the DtC, please could you provide the following information:

- confirm the timetable for reviewing your Council's Local Plan, and the term of this Local Plan.
- confirmation of whether your adopted and emerging Local Plan is able to meet local housing needs in full within the administrative area.
- confirm how your adopted / emerging Local Plan is responding to the requirements of the NPPF outlined above and whether your council will be able to contribute to the overall unmet need in the wider HMA area.
- confirm whether this contribution will be for the Black Country, Birmingham, or for the wider HMA.
- confirmation of whether your adopted and emerging Local Plan is able to meet Gypsy and Traveller needs in full within the administrative area.

We anticipate that the responses to these questions will confirm that emerging Local Plan work will fail to address the identified shortfall and that further collaborative work will be needed to identify additional sources of land across the whole of the HMA and almost certainly beyond it. The most recent HMA-wide evidence designed to consider this issue is the 2018 Growth Study which a number of emerging Local Plans consider to be out of date. Sandwell Council is committed to an inclusive and comprehensive review and update of this work as the most effective vehicle to respond to the shortfall and we encourage South Staffordshire Council to participate in order to shape its findings and recommendations. We note that the commissioning of this work is progressing through the HMA Development Needs Group.

Next Steps

Moving forward, we intend to use the responses to the questions set out above to prepare a

Statement of Common Ground (SoCG) that will set out:

- the housing shortfall arising in individual plan areas across the whole of the HMA and those Local Plan areas which have an evidenced strong functional relationship with it – namely Shropshire, Telford & Wrekin, Stafford and Wyre Forest
- how individually and collectively individual plans are responding to the shortfall,
- confirm the position of individual Local Plan areas to participating in a review and update of the 2018 Growth Study
- agree the method by which current and potential contributions to addressing the shortfall are apportioned to those Local Plan areas with an evidenced shortfall. We suggest that this approach is discussed at forthcoming meetings of the HMA Development Needs Group.

We would be grateful if you could confirm that your Council would be willing to be party to this SoCG.

The Council would be grateful if you could respond to the issues raised in this letter by Friday 5th July 2024. This will enable the Council to make progress with DtC issues prior to the Publication of the Sandwell Local Plan later this year.

Yours faithfully

[REDACTED]

Tammy Stokes

Assistant Director: Spatial Planning and Growth

11.07.2024 – SSDC response to SMBC 20.06.2024 letter

Sent via email to: [REDACTED]@sandwell.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

11 July 2024

RE: Sandwell Local Plan – Duty to Co-operate

Dear Tammy,

Thank you for your letter dated 20 June 2024 setting out your intended approach in relation to the Duty to Cooperate in respect to strategic housing issues affecting the preparation of the Sandwell Local Plan (SLP). In your letter you request South Staffordshire Council (SSC) to confirm its position in relation to a number of Duty to Cooperate matters. Our response on these reflect the position in our emerging Regulation 19 Local Plan (April 2024) and in the draft bilateral Statement of Common Ground (SoCG) between our authorities to support the submission of our Local Plan.

As confirmed in the SoCG, SSC is currently reviewing our Local Plan with the April 2024 Regulation 19 Local Plan consultation our most recent. Here we set out our plan target of 4,726 homes planned between 2023-41. This meets SSC's current housing need based on Government's standard method, and delivers an additional 640 homes that could be attributed to unmet needs of the Great Birmingham and Black Country Housing Market Area (GBBCHMA). This plan target was the output of the capacity of suitable housing sites determined through our site assessment process and delivers a preferred strategy based on 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.** This ensures that the plan takes a balanced approach of maximising non-Green Belt site options whilst

releasing some Green Belt but around the district's most sustainable settlements in line with NPPF requirement to give first consideration to land which has been previously-developed and/or is well- served by public transport.

Our Regulation 19 Local Plan (2024) expresses the 640 homes contribution as towards the unmet need of the GBBCHMA, reflecting that this has been evidenced as the most appropriate geography for considering this strategic issue. SSC 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. SSC would be willing to enter into a further SoCG to confirm our position. As set out in our 2024 Regulation 19 Local Plan, SSC is committed to participating in updating the 2018 Strategic Growth Study and considering its findings through future plan-making. In our view this is a key study for all authorities in our housing market area and it is critical that it is updated given that the previous study is now

out of date.

In terms of Gypsies and Travellers, SSC have identified through our Gypsy and Traveller Accommodation Assessment (2024) potential need for 162 pitches, however we have only been able to identify 37 suitable pitches for allocation through our Local Plan. The plan sets out how we will respond positively to windfall proposals for new pitches and will continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites. SSC has written to neighbouring and GBBCHMA authorities on several occasions on this issue, most recently in March 2024 (See Appendix A), requesting assistance with our unmet need for pitches and seeking confirmation that other authorities have taken the same steps to explore supply options as SSC. To date, no authority has indicated that they are able to assist with these unmet needs, with a number of authorities indicating a shortfall themselves. Given this, I can confirm that SSC are unable to assist with any unmet needs for gypsy and traveller pitches emerging from Sandwell MBC.

I trust that this clarifies SSC's position on the matters as requested and we look forward to continuing

to engage constructively with Sandwell MBC on cross boundary strategic

issues. Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

01.11.2024 – SSDC response to SMBC Regulation 19 Consultation

Sent via email to:
Sandwell_LocalPlan@sandwell.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

1st November 2024

South Staffordshire Council response to Sandwell Metropolitan Borough Council Local Plan Regulation 19 consultation

Dear Sir/Madam,

South Staffordshire Council (SSC) welcomes the opportunity to comment on the Draft Sandwell Local Plan (SLP) Regulation 19 Publication consultation document.

SSC would wish to submit the following comments which relate to those specific elements of the Plan which raise cross boundary issues of mutual interest.

The comments submitted below were framed in relation to the existing National Planning Policy Framework (NPPF), we have however referred to potential implications of the proposed NPPF changes in a section on the transitional arrangements.

Housing – Policy SHO1

The overspill requirement of 15,916 dwellings identified in the draft plan is a significant contribution to the total Greater Birmingham and Black Country Housing Market Area shortfall. SSC will continue to work closely with Sandwell Metropolitan Borough Council (SMBC) alongside the other relevant partners to address this overspill requirement through the relevant working groups and duty to cooperate arrangements.

SSC has recently completed a consultation on an updated Publication Plan (Regulation 19). It should be noted that SSCs preferred strategy in its April 2024 Regulation 19 consultation is to meet the housing needs of our communities by focus growth primarily on the districts most sustainable Tier 1 settlements including some Green Belt release at these settlements on sites assessed as suitable through our site assessment process. This does result in a potential 640 home surplus based on our current standard method requirement that potentially could be attributed to unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

Whilst we appreciate the land use constraints within which the Sandwell Plan is operating, we would support a commitment to continued attempts at increasing the supply of dwellings identified within the borough. Specifically, attention should focus on examining the scope for increased densities particularly in the larger urban centres,

reallocation of sites from other uses were this doesn't conflict with other plan objectives, housing area renewal proposals and exploring the potential release of Green Belt sites. Such contributions will assist in reducing the total overspill requirement to be addressed by neighbouring authorities and therefore contribute to directly addressing the total housing market shortfall.

Gypsies, Travellers and Travelling Showpeople – Policy SH09

SSC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need within the district for 162 pitches during the plan period.

SSC wrote to SMBC (and other GBBCHMA and neighbouring authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches this is set against a revised 5-year requirement of 92 pitches, and therefore confirming we had a significant unmet need for pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSCs unmet needs for pitches. We therefore request that through your plan preparation you continue to explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the city for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

It is noted that the Gypsy and Traveller Accommodation Assessment (GTAA) 2022 identified a need for an additional 8 permanent pitches in Sandwell over the period up to 2031 with a further six pitches required from 2031-2041. The plan has identified sufficient supply to meet the requirement to 2031 and envisages that small windfall sites will meet the remaining need over the Plan period. It is not clear that in addressing Gypsy and Traveller needs that all the options identified above have been explored to determine if additional capacity could be available. SSC would welcome an indication that all such options have been explored and we look forward to continuing to engage with SMBC on this issue.

Employment – Policy SEC1

SMBC has identified a significant shortfall of 169 hectares in the supply of employment land to meet the needs of the Borough during the plan period. SSC has identified a potential surplus of 45.2 Ha. of employment land, which includes a new proposed

allocation at Junction 13 of the M6. This land has been identified as being available to contribute towards addressing the employment land shortfall within South Staffordshire Functional Economic Market Area. Given the close association of Sandwell with the other Black Country authorities this offer has been extended to include SMBC even though the authority lies outside the South Staffordshire FEMA. As stated in our signed Statement of Common Ground (SOCG) with SMBC, the role this surplus land will play in helping to address employment land shortfalls will be the subject of two separate SOCG covering the entire South Staffordshire FEMA and also the Black Country FEMA.

SSC will also allocate the consented strategic rail freight interchange (WMI). Though situated in South Staffordshire the WMI serves a wider market area (including Sandwell). Through our 2022 EDNA & 2024 update SSDC identified a requirement of 18.8 ha of the WMI land to meet our labour demand requirements up to 2041. SSDC has acknowledged that there is surplus employment land at WMI that is currently 'unclaimed' and that could be utilised to meet the unmet needs of the wider market area. Whilst we have taken a more in-depth approach to calculating our share of WMI (18.8ha) through our local evidence, we still consider that the 2021 Stantec report[1], that considered potential apportionment across the sites market areas based upon population change within each LPA area, is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand. The Stantec report apportions 18ha of the site towards the B8 employment land needs of Sandwell, and it is noted that this figure has been identified as a commitment in the Plan towards the employment land supply.

Transitional Arrangements

The proposed changes to the NPPF have recently been the subject of consultation and it is the

Government's intention to publish a finalised NPPF by the end of the year. Based on the transitional arrangement contained in the consultation NPPF it is our understanding that the Plan would need to be submitted on or before the publication of the revised NPPF (+ one month) if it is to be assessed against the current December 2023 NPPF. Should the Plan be submitted after NPPF publication date (+ one month) it would appear that the Plan would be considered in relation to the revised framework, as it doesn't appear that any of point a-c in paragraph 226 of the draft NPPF would apply to SMBC. This would require SMBC to re-examine the current plan strategy particularly in light of the proposed introduction of a distinction between Green Belt and Grey Belt land and the role which the latter will play in increasing the supply of land for residential development. Therefore, whilst the plan is currently considered sound against the December 2023 NPPF, should the transitional arrangements in paragraph 226 of the consultation NPPF remain in the final version, and should SMBC be unable to meet any of points a-c in this paragraph, then the Publication Plan would not be sound and would need to be revisited.

SSC do not consider it necessary to take part in the hearing sessions for the examination, however equally would be happy to attend these sessions on request of the inspector.

I trust you will find our response helpful, and we will continue to engage with SMBC to address matters of mutual interest.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

South Staffordshire Council

Please ask for: Mrs K Harris
Direct Dial: (01902) 696317
Email: k.harris@sstaffs.gov.uk

Date: 15 March 2019

Mr A Cooper
Planning Policy
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Dear Mr Cooper

South Staffordshire Council's interim response to the Shropshire Council Preferred Sites Consultation

You will recall that I wrote to you on 28th January with an officer response to the above consultation. I can now confirm that this has been through the formal Council scrutiny process, and following this our comments remain unchanged. Therefore please accept the comments below as the Council's final comments to the consultation.

South Staffordshire Council supports the broad approach within the Shropshire Council Local Review and welcomes the opportunity to comment as part of our ongoing Duty to Cooperate discussions. 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. It is considered that the preferred site options are clearly aligned to the objectives and spatial framework identified in the 2017 Preferred Development Strategy to meet Shropshire's growth needs, and we welcome the opportunity for continued engagement in the plan preparation process.

Yours sincerely

Kelly Harris

Kelly Harris

Strategic Planning Team Manager

15.08.2019 – SSDC response to Shropshire Strategic Sites Consultation

From: Fox, Edward

Sent: 15 August 2019 16:34

To: Planning Policy

Cc: Harris, Kelly ; Adrian Cooper

Subject: South Staffordshire Council response to Shropshire Council Local Plan Review Strategic Sites consultation

Dear Sir/Madam,

Proposed South Staffordshire Council response to the Shropshire Local Plan Review consultation on Strategic Sites

Thank you for providing South Staffordshire Council with the opportunity to comment on the Shropshire Local Plan review consultation on strategic sites. As this response relates to a Duty to Cooperate matter, our response will need be an individual Decision of our Cabinet Member for Planning and Business Enterprise Cllr Brian Cox, and therefore please accept the paragraphs below as the Council's interim response pending completion of the Council's constitutional process to agree the comments. Once the response has been agreed with Members, I will write to you again to confirm the Council's formal response.

South Staffordshire Council reiterates our comments previously extended to the Shropshire Council Local Plan Review and considers that the three preferred strategic sites represent a positive response to the challenge identified in your Economic Growth Strategy of promoting a 'step change' in economic activity and seeking to balance increased levels of housing growth and economic development.

With regard to the potential strategic site at Junction 3 of the M54, as this is not currently a preferred strategic site, South Staffordshire Council has not formed a view on the proposal. However, should you decide to identify the site as an allocation in your next consultation document then we would expect to see robust evidence produced to support

your decision in order for us to make an informed view. This should include consideration of the environmental impacts and the capacity of the infrastructure in the surrounding area, including in South Staffordshire. If the Council decides to allocate this site then details of the exceptional circumstances case to justify this allocation should also be clearly set out as part of the consultation.

It understood from your Local Development Scheme – June 2019 that the next round of public consultation is intended to be on the pre submission draft in March 2020. If Shropshire Council resolves to identify the site at Junction 3 for allocation at the next stage of formal consultation, then the Council would welcome a further Regulation 18 consultation to allow proper consideration of the proposal, rather than a Regulation 19 consultation whereby representations relate specifically to the soundness of the plan.

Thank you again for consulting South Staffordshire Council on your strategic sites consultation; we look forward to ongoing dialogue on such cross boundary strategic matters throughout preparation of our respective Local Plans.

Yours faithfully,

Edward Fox

Assistant Team Manager (Local Plans) Strategic Planning

South Staffordshire Council

27.02.2020 – Shropshire Council letter regarding duty to co-operate matters

Kelly Harris
Team Leader Local Plans,
Planning Policy,
South Staffordshire Council
Wolverhampton Road, Codsall
South Staffordshire
WV8 1PX

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

Date: 27th February 2020

Dear Ms Harris,

Shropshire Local Plan Review - Duty to Co-operate meeting development need

As you are aware from ongoing duty to cooperate liaison and previous consultations which began in early 2017, Shropshire Council are reviewing their adopted Local Plan. There are a number of drivers for this review, including changes to national policy and guidance; the need to regularly review Local Plans; the opportunity to capitalise on potential economic opportunities; and a commitment made during examination of the SAMDev Plan (which forms part of the current Local Plan) to undertake an early review of the Local Plan, including a detailed review of the Green Belt boundary.

The intention is that following the completion of the ongoing review, the current Local Plan documents will be replaced by a single Local Plan document (supported by any formal Neighbourhood Plans) which will include all strategic and detailed policies, together with all site allocations for a Plan period which it is proposed will now extend to 2038.

Green Belt

The Shropshire Green Belt is part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry. Within Shropshire, the Green Belt is located south of the A5 and east of the River Severn.

Whilst only part of Shropshire is covered by Green Belt designation, it does impact on the ability to achieve sustainable patterns of development and constrains the ability to meet local needs and the growth potential of settlements in east Shropshire, including Bridgnorth, Albrighton, Shifnal and Alveley, as well as large developed sites such as RAF Cosford.

Furthermore, as already noted the need for a Green Belt review was specifically identified in the SAMDev Plan Inspector's report. As such, to inform the review of the Local Plan and assist the further evaluation of strategic options for sustainable development in Shropshire, a Green Belt Assessment and Review have been undertaken and published on our website.

Local Plan Review

The first stage of consultation to inform the Local Plan Review focused on Issues and Strategic Options (January 2017 – March 2017). In particular, this consultation considered the scale and distribution of housing and employment development across Shropshire.

The second stage of consultation to inform the Local Plan Review represented the first of a

series of Preferred Options consultations (October 2017 – December 2017). It identified the preferred scale and distribution of development, specifically indicating a preference for an urban focused strategy to deliver 28,750 dwellings with balanced employment growth of 300 ha of employment development (levels of growth were based on a plan period to 2036, this has now been extended to 2038).

The third and fourth stages of consultation to inform the Local Plan Review represented further stages of Preferred Options and focused on Preferred Sites (November 2018 – February 2019) and Strategic Sites (July 2019 – September 2019). These consultations sought to test preferred development proposals associated with existing established settlements and potential strategic sites not associated with existing settlements, respectively.

In summary, the Preferred Options consultations proposed that most of the additional housing and employment development required would be distributed to locations outside the Green Belt. However, it was recognised that there remained a need to ensure:

- Sustainable patterns of development;
- The long-term sustainability and delivery of the development needs of specific settlements; and
- Recognition of the strategic economic importance of the east of the county, particularly the M54 corridor.

Reflecting these important factors, growth was also proposed within settlements inset and on the edge of the Green Belt. Specifically growth was proposed in the settlements of Bridgnorth, Albrighton, Shifnal and Alveley. We also consulted on growth proposals at two strategic sites within the Green Belt.

Bridgnorth, as Shropshire's third largest town, is identified as a Principal Centre which will contribute towards the strategic growth objectives in the east of the County. There are specific planning and structural issues in Bridgnorth including: significant environmental and topographical constraints which together with Green Belt (to the town's eastern side) have significantly impacted on opportunities to deliver development, including employment land and local employer/affordable housing. Proximity to the West Midlands conurbation also results in significant influence from this direction and Bridgnorth has relatively high house prices and an imbalance between housing and local employment, with relatively high levels of in and out commuting in a context of limited public transport, resulting from its location off the rail and main motorway network.

Recent issues with the delivery of the allocated housing site in Bridgnorth have further undermined new housing provision.

We therefore identified a particular need to address these issues through the provision of appropriate high-quality housing and employment. Specifically, the Preferred Options consultations identified guidelines for the provision of 1,500 dwellings and 16ha of employment land.

Following the consideration and exhaustion of other identified growth options, we consulted on proposals to accommodate much of this growth within a 'garden' style sustainable development on land currently within the Green Belt to the east of the town and bordered to the east by an employment site which is currently inset within the Green Belt. We also consulted on proposals to remove land from the Green Belt for safeguarding to meet the longer-term development needs beyond the current Plan period.

The smaller settlements of Albrighton and Shifnal which are accessible to the M54 and are located on the Shrewsbury-Birmingham railway line are identified as Key Centres with a proportionate role in delivering strategic growth objectives in the east of the County. These settlements together with the village of Alveley (identified as a Community Hub), are wholly within Green Belt and there are no significant brownfield or infill opportunities available for these settlements.

In Albrighton, we proposed to accommodate growth needs (of around 500 dwellings and 5ha of employment land) through existing commitments and on previously safeguarded land. However, as this would exhaust all remaining safeguarded land, we also consulted on proposals to remove further land from the Green Belt and safeguard it to meet longer- term development needs beyond the current Plan period.

Previously safeguarded land and allocated employment land within Shifnal has been depleted. Furthermore, within Shifnal there is considered to be a particular need for additional employment to balance previous high levels of housing development. As such we consulted on proposals to accommodate growth needs (of around 1,500 dwellings and 40ha of employment land) on existing commitments and through release land from the Green Belt to meet development needs within and beyond the current Plan period.

We also consulted on proposals in Alveley which were considered in scale with the settlement (for around 130 dwellings). These proposals involve the removal of relatively small areas of land from the Green Belt to meet development needs within and beyond the current Plan period.

RAF Cosford is an operational military base and airfield with associated uses including a museum and areas utilised by the West Midlands Air Ambulance and West Midlands Police. The site is identified within the current adopted Plan as an existing major developed area within the Green Belt. The strategic sites consultation recognised emerging proposals for the site in relation to the development of military, museum, training and other activities. To facilitate the proposed growth and development of this site, we consulted on proposals to remove some or all of the site from the Green Belt.

Additionally, as you are no doubt aware, a further potential strategic site within Green Belt, to help meet development needs beyond Shropshire, has been identified and consulted upon at Land to the north of Junction 3 of the M54. The final decision on whether this land will be included in Shropshire Council's Local Plan will be made by the Council in May.

Further information on these proposals within each of these stages of consultation and the evidence base which has informed it is available on the Shropshire Council website at: https://shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/

Duty to Cooperate

The consultation proposals for growth within settlements within and on the edge of the Green Belt were identified as local options to meet specific sustainable development needs. Therefore, through previous stages of consultation to inform the review of the Local Plan, we have identified and tested options for meeting growth within Shropshire.

However, clearly Shropshire Council will need to demonstrate exceptional circumstances for the release of any Green Belt and as you are aware a pre-condition of NPPF (paragraph 137) is that before concluding that exceptional circumstances exist, we need to demonstrate that

all other reasonable options have been explored.

Therefore, in order to formalise previous discussions undertaken as part of the Duty to Cooperate, we are formally seeking the views from neighbouring authorities about whether they could accommodate some of the identified needs for development. In due course we are intending to record these conversations through a Statement of Common Ground.

Given the nature of Shropshire, in particular the extent of land beyond the Green Belt, we would like to gain an understanding of whether your authority is able to assist us in meeting the specifically identified development needs for:

- Bridgnorth;
- Albrighton;
- Shifnal;
- Alveley; and
- RAF Cosford.

For the purpose of this exercise, it would be helpful for you to consider the following:

- The preferred option development requirements for each location as set out above;
- Whether there is available and deliverable land within your local authority area which would be able to functionally serve the geographical location(s) and strategic purposes identified;
- If your authority is able to assist, the mechanism through which this would be forthcoming, in particular integration with your plan making, noting that Shropshire is intending to carry out Regulation 19 consultation in June/July 2020;
- How much/which of the 'preferred option' development requirements you are able to accommodate within your plan area;
- Details of suitable sites in your plan area to meet our specific identified Green Belt needs, including whether the proposed sites are 'deliverable' within 5 years or 'developable' between years 6 and 15 of our plan period; and
- How you consider the proposed site(s) satisfy the 'sustainable development' criteria.

If at all possible, we would like to encourage responses by 20th March 2020. Given the detailed background and nature of this enquiry I would be very happy to provide additional information and if you feel it would be helpful organise a specific Duty to Cooperate meeting which we could host at our offices. I would hope to be able to do this at the earliest opportunity. In any case please do not hesitate to contact me for further discussion about the content of this letter.

Yours Sincerely
Eddie West
Interim Planning Policy
and Strategy Manager
Shropshire Council

12.03.2020 – SSDC officer response to 27.02.2020 letter

From: Edward Fox

To: Edward West

Cc: Anna Jones; Dan Corden; Kelly Harris

Subject: RE: Shropshire Local Plan Review - Duty to Co-operate

Date: 12 March 2020 16:51:27

Attachments:

Hi Eddie,

Regarding your attached letter to Kelly Harris dated 27th February, unfortunately as officers we do not have delegated authority to respond on such Duty to Cooperate matters, specifically as the letter is seeking the views of neighbours about whether they could accommodate growth you have identified for Green Belt locations. Due to this, South Staffordshire Council's response will need to be an Individual Decision by our Cabinet Member, and as a result we will be unable to respond by your deadline of 20th March.

On an informal officer basis, I can however confirm that, due to extent of Green Belt coverage in South Staffordshire and our requirement to meet our own needs and make a contribution to unmet needs of the GBHMA, we will not be in a position to meet any of Shropshire's identified need.

We will get our formal response to you as soon as possible, but realistically it's is going to be several weeks before we are able to take this Decision through our constitutional processes, but I will keep you updated as our timescales become clearer.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager Strategic Planning

South Staffordshire Council

15.05.2020 – SSDC response to Shropshire Council 27.02.2020 letter

South Staffordshire Council

Our Ref: SC/DTC

15th May 2020

Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

Eddie West
Interim Planning Policy and Strategy Manager
Shropshire Council
The Shirehall
Abbey Forgate
Shrewsbury
SY2 6ND

RE: Shropshire Local Plan Review - Duty to Co-operate meeting development need

Dear Eddie,

Thank you for your letter dated 27th February 2020.

South Staffordshire Council recognises the National Planning Policy requirement placed upon strategic planning authorities to discuss the potential for accommodating development needs in adjoining authorities when determining if exceptional circumstances exist to justify Green Belt land release.

South Staffordshire is a largely rural district on the edge of the West Midland conurbation with a collection of diverse settlements ranging from small hamlets to large villages. South Staffordshire is 80% Green Belt with the remaining 20% of the district made up of villages and 'open countryside'.
The Council is currently undertaking a Local Plan Review and has recently consulted on a Spatial Housing Strategy and Infrastructure Delivery Plan (October 2019). This consultation confirmed the Council's intention to meet our own housing needs alongside making up to a 4000 home contribution to unmet housing needs arising within the Great Birmingham Housing Market Area. The consultation identified seven potential development options including an option which maximised housing development in the area of open countryside beyond the Green Belt in the north of the district. It was concluded that this option would not provide sufficient suitable sites to meet our housing requirements; would not represent a sustainable option and would face significant delivery issues. It is therefore clear that it is likely that we will need to demonstrate exceptional circumstances ourselves in order to deliver our plan target.

Given that there is insufficient supply to meet future housing requirements in the open

countryside it would not be possible therefore to make a contribution towards meeting the requirements in neighbouring authorities such as Shropshire Council without making further significant incursions into designated areas of Green Belt within the South Staffordshire plan area. I can confirm that due to the extent of Green Belt coverage in South Staffordshire and our requirement to meet our own needs and make a contribution to the unmet needs arising in the Greater Birmingham Housing Market Area we will not be in a position to meet any of Shropshire's identified need.

We also note reference in your letter to a May 2020 decision on including the proposed development at Junction 3 of the M54 in your Local Plan. We would welcome an update on this, and maintain that the contents of our representation to your last formal Local Plan consultation in September 2019 are still relevant when making your decision.

We look forward to hearing from you on this matter and welcome the opportunity to maintain dialogue with you throughout the preparation of both of our plans.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager

22.06.2020 – duty to cooperate meeting agenda

From:	Gemma Davies
To:	Edward West; Hayley Owen; Ian.Culley k.harr ; E.Fox
Cc:	Paula Ryan
Subject:	RE: Shrewsbury/Telford/Wolverhampton Corridor
Date:	21 June 2020 18:04:22
Attachments:	ShrewsburyTelfordWolverhamptonCorriorDRAFTPr sition-v1_200420

All
Hope everyone is doing ok.
Suggested agenda for meeting tomorrow;

1. Economic impact assessment study, Lichfields - Hayley
2. Any project/site updates - All
3. Local Plan updates - All
4. Discuss draft proposition – views on any next steps or pause – All
5. Future group ?

Please feel free to add anything to this and please be ready to share your updates and any views on future steps.
Thanks Gemma
Gemma Davies
Assistant Director Economic Growth Shropshire
Council
Shirehall
Shrewsbury SY2
6ND

29.09.2020 – SSDC response to Shropshire Pre-Submission Draft Consultation

South Staffordshire Council

Our Ref:

SC/DTC 29th

September

2020

Planning Policy

Shropshire Council

The Shirehall

Abbey Foregate

Shrewsbury

SY2 6ND

South Staffordshire Council response to the Shropshire Local Plan Review – consultation on the Pre Submission draft

Dear Sir/Madam,

Thank you for providing South Staffordshire Council with the opportunity to comment on the Shropshire Local Plan review consultation on the Pre-Submission draft of the Shropshire Local Plan 2016 to 2038.

South Staffordshire Council reiterates our previous comments that the plans proposals constitute an appropriate strategic approach to deliver housing and employment needs within Shropshire. The strategic approach represents a positive response to the challenge identified in the Shropshire Economic Growth Strategy of promoting a 'step change' in economic activity and seeking to balance increased levels of housing growth and economic development.

South Staffordshire Council recognises that the potential strategic site at Junction 3 of the M54, as discussed in the previous strategic site consultation, has not been allocated in the Pre-submission Draft. However, should this site be identified for allocation in the future, the Council would expect to see robust evidence produced to support this decision. This should include

consideration of the environmental impacts and the capacity of the infrastructure in the surrounding area, including in South Staffordshire. If the Council decides to allocate the site in the future, then details of the exceptional circumstances case to justify this allocation would need to be clearly stated and evidenced.

Thank you again for consulting South Staffordshire Council on your Pre-Submission Draft consultation; we look forward to ongoing dialogue on such cross boundary strategic matters throughout preparation of our respective Local Plans.

Yours Faithfully
Ed Fox

Strategic Planning Team Manager

12.01.2021 – Shropshire Council response to SSDC 08.01.2021 letter

Kelly Harris

South Staffordshire Council

Council Offices

Codsall

South Staffordshire

WV8 1PX

Shropshire Council

Shirehall

Abbey Foregate

Shrewsbury

Shropshire

SY2 6ND

Date: 12/01/2021

Dear Kelly,

I write in response to your correspondence dated 8th January 2021 regarding the South Staffordshire Council Local Plan Review – Review of Green Belt. Specifically, within this correspondence you raise a series of questions, which I will respond to in turn:

Whether or not your authority is able to assist with the unmet housing needs of the GBHMA, in particular those arising from the Black Country

I can advise that Shropshire Council is proposing to contribute towards meeting the unmet housing needs arising in the Black Country. Specifically, we are proposing to contribute around 1,500 dwellings towards meeting this unmet need, over the period to 2038. Furthermore, Shropshire Council is also proposing to contribute around 30ha of employment land towards unmet employment land needs arising in the Black Country.

However, given our current understanding of the level of this unmet need arising in the Black Country, we do not consider we are able to provide sufficient additional housing supply or employment land supply to address the entirety of this unmet need.

Whether or not your authority is able to provide sufficient additional housing supply to enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target

Whilst Shropshire Council is proposing to contribute towards meeting unmet housing and employment land needs arising in the Black Country, given our current understanding of the level of this unmet need, we do not consider we are able to provide sufficient additional housing supply or employment land supply to:

1. Address the entirety of this unmet need.
2. Enable South Staffordshire District Council to reduce its own proposed contribution towards meeting these unmet needs and as a direct consequence enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target.

The extent of the contribution proposed by Shropshire Council to meet unmet housing and employment land arising in the Black Country is documented above.

What your authority would be prepared to agree with South Staffordshire District Council in a statement of common ground covering strategic housing needs in the District and GBHMA

Shropshire Council is at an advanced stage in its own Local Plan Review and as such considers this represents a timely opportunity to prepare a joint statement of common ground (SoCG) between the two Local Planning Authorities. This SoCG could reflect the positive cross-boundary discussions undertaken to date under the duty to cooperate.

Specifically, with regard to the unmet housing and employment land needs arising in the Black Country, this SoCG could:

- Identify the relative contributions being proposed to assist in meeting this unmet need – this is of course subject to agreement in a SoCG with the Association of Black Country Authorities;
- Agree that neither Local Planning Authority is in isolation able to achieve the entirety of this unmet housing and employment land need, based on our current understanding of the level of these unmet housing and employment land needs; and
- Outline the approach proposed by each Local Planning Authority to achieving these contributions – we consider that this would provide useful context, although we would suggest that this does not need to be specifically agreed as it is a matter for each Local Planning Authority.

To this end, we have prepared an initial draft SoCG based on the information provided within you letter dated 8th January 2021 and other known cross-boundary considerations (attached).

If it would be helpful, we would be happy to arrange a further Duty to Co-operate meeting, using MS Teams, to discuss this initial draft and move towards its completion.

Please note that this response represents officer comments.

Yours sincerely

Daniel Corden
Principal Policy Specialist
Planning Policy Team
Shropshire Council

10.03.2021 – Shropshire Council email following meeting

From:	Dan Corden
To:	Edward Fox; Kelly Harris; Patrick Walker
Cc:	Edward West
Subject:	RE: Duty to Cooperate – Shropshire and South Staffs
Date:	11 March 2021 08:33:00
Attachments:	Shropshire and South Staffs Draft SoCG Jan 2021 v DC & SC TCs

Dear All,

Thank you again for your time yesterday it was very helpful. Following our discussion, please find attached an updated version of the draft SoCG between Shropshire Council and South Staffordshire District Council. This draft shows:

- The track changes proposed by yourselves, which we are supportive of.
- Further track changes proposed by ourselves, primarily relating to the two main issues we discussed at the meeting in relation to the M54/A5 strategic corridor and the south staffs position in relation to gypsy and travellers. However, we have also proposed a few other consistency tweaks/corrections.

Please let me know if you have any comments on this updated draft and our proposed track changes. Once we are all happy, I will prepare a 'clean' version without track changes/highlights so that we can commence respective sign-off processes.

Thank you Kind

Regards

DanielCorden
Planning Policy, Shropshire Council – Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND

26.05.2021 – draft SoCG between SSDC and SC

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

Date: 26 May 2021

1. Introduction

1.1. The National Planning Policy Framework (2019) (NPPF), specifies that Local Planning Authorities are "*under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries*"[1].

1.2. The NPPF also specifies that *"in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency"*[2].

2. Purpose

2.1. This Statement of Common Ground (SoCG) has been produced to support both the Shropshire Council Local Plan Review (2016-2038) and South Staffordshire Local Plan Review (2018-2038). It sets out how Shropshire Council and South Staffordshire District Council have positively engaged in order to fulfil its Duty to Cooperate requirements.

3. Scope

3.1. The National Planning Practice Guidance (NPPG) provides details on the scope of a SoCG, which can be summarised as follows:

- The plan-making authorities responsible for joint working detailed in the statement;
- A description and map of the administrative areas covered by the statement, and a brief justification for these area(s);
- The key strategic matters being addressed by the statement;
- Governance arrangements for the cooperation process;
- If applicable, the housing requirements (if known) within the area covered by the statement;
- Distribution of needs or the process for agreeing distribution of needs (including whether there is and the distribution of unmet needs);
- A record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- Any additional strategic matters to be addressed by the statement which have not already been addressed.

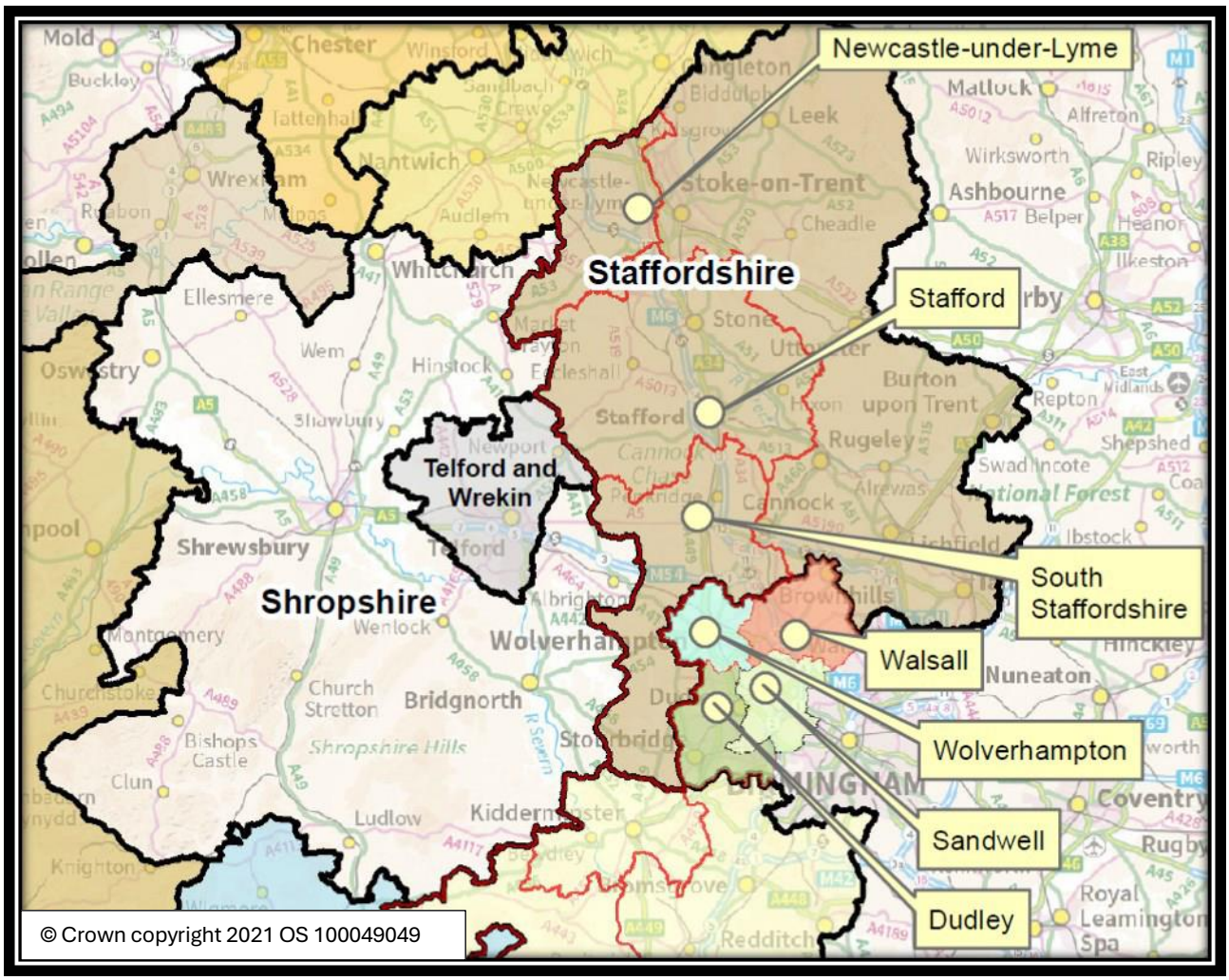
The NPPG also recognises that *"The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected*

to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites"[3].

4. Relevant Local Authorities and Geography

4.1. This SoCG has been prepared jointly by Shropshire Council and South Staffordshire District Council. As neighbouring Local Planning Authorities, it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.

4.2. The below map illustrates the location of Shropshire Council and South Staffordshire District Council:



5. Duty to Cooperate

Shropshire Council Local Plan Review

The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with adopted formal Neighbourhood Plans. On completion of the review process, the Core Strategy and SAMDev Plan documents will be replaced by the 'Shropshire Local Plan' (2016-2038)

document (with the exception of any saved policies), supported by any adopted formal Neighbourhood Plans.

5.1. The Shropshire Local Plan will include strategic and detailed policies, together with site allocations for a Plan period 2016 to 2038.

5.2. There has been ongoing and active engagement between Shropshire Council and South Staffordshire District Council throughout the Shropshire Council Local Plan Review. Specifically:

- Duty to Cooperate discussions have occurred at appropriate times during the Local Plan Review process.
- South Staffordshire District Council have been consulted during the various 'Regulation 18' Consultations undertaken to inform the Shropshire Local Plan Review. The Local Plan Review consultation periods thus far are as follows:
  - Issues and Strategic Options Consultation – 23rd January 2017 to 20th March 2017.
  - Preferred Scale and Distribution of Development Consultation – 27th October 2017 to 22nd December 2017.
  - Preferred Sites Consultation – 29th November 2018 to 8th February 2019.
  - Strategic Sites Consultation – 1st July 2019 to 9th September 2019.
  - Regulation 18: Pre-Submission Draft of the Shropshire Local Plan – 3rd August 2020 – *30th September 2020*.
- South Staffordshire District Council were also consulted as part of the 'Regulation 19' *Consultation undertaken to inform the Shropshire Local Plan Review.*
- Duty to Cooperate discussions will continue at appropriate times as the Local Plan Review progresses.

South Staffordshire District Council Local Plan Review

5.3. The South Staffordshire Local Plan currently comprises the adopted Core Strategy (2012) and Site Allocations Document (2018). On completion of the review process, the Core Strategy and Site Allocations Documents will be replaced by single 'Local Plan' (2018 – 2038) (with the exception of any saved policies), supported by any adopted formal Neighbourhood Plans.

5.4. The South Staffordshire Local Plan will include strategic and detailed policies, together with site allocations for a Plan period 2018 to 2038.

5.5. There has been ongoing and active engagement between South Staffordshire District Council and Shropshire Council throughout the South Staffordshire Local Plan Review. Specifically:

- Duty to Cooperate discussions have occurred at appropriate times during the Local Plan Review process.
- Shropshire Council have been consulted during the various 'Regulation 18' Consultations undertaken to inform the South Staffordshire Local Plan Review. The Local Plan Review consultation periods thus far are as follows:
  - Issues and Options Consultation – 8th October 2018 to 30th November 2018.

- Spatial Housing Strategy & Infrastructure Delivery – 17th October 2019 to 12th December 2019.

Duty to Cooperate discussions will continue at appropriate times as the Local Plan Review progresses. South Staffordshire Council's Local Development Scheme (LDS) sets out the timetable for plan preparation with a Regulation 18 Preferred Options earmarked for summer 2021 and a Regulation 19 Publication earmarked for summer 2022.

6. Key Strategic Matters

Housing Market Areas

6.1. The Shropshire Council area is considered to represent a self-contained housing market area (HMA).

6.2. The South Staffordshire District Council area is considered to form part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

6.3. However, it is acknowledged that the duty to cooperate is not restricted to just Local Planning Authorities within the same HMA. As such both Local Authorities continue to liaise closely in accordance with the Duty to Cooperate.

Housing Need and Requirement: Shropshire Council

6.4. Using Government's standard methodology, in 2020, Shropshire Council calculated a Local Housing Need (LHN) which applies to both the Local Planning Authority area and the Shropshire Council housing market area of some 1,177 dwellings per annum (equating to 25,894 dwellings over the 22 year plan period from 2016-2038). The assessment of need will be kept under review. Shropshire Council is proposing to meet the entirety of its LHN.

6.5. Shropshire Council currently understands that evidence prepared to inform the Local Plan Review being undertaken for the Association of Black Country Authorities (ABCA) indicates a significant unmet housing and employment land need within the Black Country, which forms part of the GBBCHMA, although the exact extent of these unmet has not yet been fully quantified through the Black Country's plan review. However, the NPPF is clear that strategic cross-boundary matters should be "dealt with rather than *deferred", so as a result of Duty to Cooperate discussions with ABCA, Shropshire Council is proposing to contribute towards meeting unmet housing and employment land needs understood to be arising in the Black Country. Specifically, Shropshire Council is proposing to contribute around 1,500 dwellings and around 30ha of employment land towards unmet needs arising in the Black Country. Rather than identifying specific sites to achieve these contributions, they will form part of the wider housing and employment land requirements for Shropshire.*

Housing Need and Requirement: South Staffordshire District Council

6.6. Using Government's standard methodology, in 2020, South Staffordshire District Council calculated a Local Housing Need (LHN) for South Staffordshire District of some 254 dwelling per annum for 2020 onwards. Taking into account completions in 2018/19 and 2019/20 this results in a LHN of some 5,068 dwellings between 2018 and 2038.

6.7. Policy SAD1 of the adopted Site Allocations Document (2018) requires South Staffordshire District Council to review housing supply options to meet both the District's own housing needs and potentially unmet cross-boundary needs from GBBCHMA, including from the Black Country. Having considered best available evidence, including evidence of unmet needs in the GBBCHMA up to 2038 and the GBBCHMA-wide evidence base provided by the GBBCHMA Strategic Growth Study 2018, and responses to consultations thus far undertaken to inform the Local Plan Review, South Staffordshire District Council is proposing a proportionate contribution of some 4,000 dwellings towards unmet housing needs arising in the GBBCHMA up to 2038. The approach and location for meeting this contribution will be identified through the emerging Local Plan Review.

Green Belt: Shropshire Council

6.8 In order to achieve a sustainable pattern of development, Shropshire Council is proposing to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work. Specifically, the Local Plan Review intends to direct the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support it. However, it also allows for appropriate levels of development within rural areas, to support the longer-term sustainability of rural communities.

6.9 The eastern part of Shropshire is located within the West Midlands Green Belt. To inform the ongoing Local Plan Review, Shropshire Council has undertaken a Green Belt review. Whilst most additional development is proposed in locations outside the Green Belt, the strategic economic importance of the eastern part of the County, particularly the M54/A5 corridor, is a significant consideration. Impacts on longer term sustainability of Green Belt settlements due to constraints on their ability to meet their local development requirements have also been identified. There is also a need to facilitate the long-term sustainability of the occupiers of the RAF Cosford site, including the Midlands Air Ambulance Charity. As such a level of Green Belt release is proposed within the ongoing Local Plan Review.

6.10 As required by the NPPF, Shropshire Council has explored with South Staffordshire District Council their ability to accommodate Green Belt development requirements, particularly those relating to the sustainable growth requirements of specific settlements. This has been formalised in a written communication sent on the 27th February 2020 which asked whether with South Staffordshire District Council could assist in meeting the identified development needs for: Bridgnorth; Albrighton; Shifnal; Alveley; and RAF Cosford.

6.11 South Staffordshire District Council have not indicated that they are able to meet these identified Green Belt development requirements.

Green Belt: South Staffordshire District Council

6.12 If South Staffordshire delivered all current housing allocations, permissions and safeguarded sites for housing land, the District's most recent Spatial Housing Strategy and Infrastructure Delivery consultation (2019) suggests that only around 3,800 dwellings

would be delivered in the District between 2018 – 2037. This is evidently well short of the level of growth the District is seeking to achieve in the Local Plan Review.

6.13 The Council will continue to review its housing land supply to inform its 2021 Preferred Options consultation. However, due to the District's rural nature and the lack of any towns or cities in South Staffordshire, it is unlikely that achievable density uplifts to existing suitable land supply will significantly alter the capacity on existing sites.

6.14 Whilst there are some areas of land beyond the Green Belt in the District, the Council's 2019 SHSID consultation and the GBBCHMA Strategic Growth Study both suggest that it is unlikely to be sustainable or deliverable to focus all new housing allocations in the District on the limited area of Open Countryside in South Staffordshire.

6.15 The District therefore considers that evidence to date suggests it is highly likely that South Staffordshire will need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBBCHMA's unmet housing needs.

6.16 As required by the NPPF, South Staffordshire District Council has explored with Shropshire Council their ability to accommodate unmet need arising within the wider GBBCHMA and reduce the need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBBCHMA's unmet housing needs. This has been formalised in a written communication sent on the 8th January 2021.

6.17 Shropshire Council have advised that whilst they are proposing to contribute towards meeting unmet housing and employment land needs arising in the Black Country, given their current understanding of the level of this unmet need, they do not consider they are able to provide sufficient additional housing supply or employment land supply to address the entirety of this unmet need or enable South Staffordshire District Council to reduce its own proposed contribution towards meeting these unmet needs, and as a direct consequence enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target.

7. Other Strategic Matters

The M54/A5 Strategic Corridor

7.1. Both Shropshire Council and South Staffordshire District Council recognise the strategic significance and support the principle of attracting investment into the existing and proposed Strategic Employment Sites at i54, Hilton Cross, ROF Featherstone, Four Ashes, Shrewsbury (including the new proposed strategic employment site at Shrewsbury SHR166), and the proposed strategic employment site at Shifnal - SHF018b and SHF018d, on the M54/A5 strategic corridor. RAF Cosford is also recognised as a strategic site on this strategic corridor, although this site is specifically for military and non-profit making uses, it complements and facilitates wider investment on this strategic corridor.

These locations:

- Provide strategic links between the Shropshire Council and South Staffordshire District Council.
- Provide strategic links from both Shropshire and South Staffordshire into

the conurbation; the M6; and the national motorway network.
- Offers investment opportunities.

Gypsies and Travellers: Shropshire Council

7.2. Shropshire Council has finalised an updated Gypsy and Traveller accommodation assessment (GTAA 2019). The updated GTAA refines the previously published GTAA (2017) by updating site information and considering public site management data to better understand and evidence site capacity and pitch turnover. Unauthorised encampment activity is also considered.

7.3. The evidence concludes that there is no current strategic requirement for allocation. However, the need to provide a permanent plot for Travelling Showpeople resident on a temporary site in Shropshire and potentially for public transit capacity to support private provision are identified. These requirements are proposed to be directly addressed by the Council, with a planning application for a travelling show persons site currently under consideration. In addition to the intended direct provision, policies within the ongoing Local Plan Review will facilitate the ongoing delivery of sites to meet arising needs. Shropshire thus intends on addressing its own needs for gypsy and traveller provision.

Gypsies and Travellers: South Staffordshire District Council

7.4 Based on current evidence there is no strategic cross-boundary matter in relation to gypsy and traveller needs arising in the South Staffordshire District Council area. Updated evidence on Gypsy and Traveller needs in currently in progress and the need for Gypsy and Traveller accommodation will then be considered within a forthcoming Preferred Options Document which will be subject to consultation in 2021. Dependent what the emerging evidence concludes, it may be necessary to explore if neighbouring authorities have available site capacity to meet the unmet Gypsy and Traveller needs of South Staffordshire. In the case of Shropshire Council, given the advanced stage of the current Local Plan Review, this would form part of duty to cooperate discussions for a future Local Plan Review.

Minerals and Waste

7.5 Shropshire Council is engaging separately with Staffordshire County Council as the Mineral and Waste Authority for Staffordshire.

Neighbourhood Planning

7.6 No significant cross boundary issues identified.

8 Matters of Agreement

8.1 Shropshire Council and South Staffordshire District Council intend to meet their identified LHN within their Local Authority area.

8.2 Shropshire Council currently understands that evidence prepared to inform the Local Plan Review being undertaken for the ABCA indicates a significant unmet housing and employment land need within the Black Country, which forms part of the GBBCHMA, although the exact extent of these unmet has not yet been fully quantified through the Black Country's plan review. However, the NPPF is clear that strategic cross-boundary

matters should be “dealt with rather than deferred”, so as a result of Duty to Cooperate discussions with ABCA, Shropshire Council is proposing to contribute towards meeting unmet housing and employment land needs understood to be arising in the Black Country. Specifically, Shropshire Council is proposing to contribute around 1,500 dwellings and around 30ha of employment land towards unmet needs arising in the Black Country. Rather than identifying specific sites to achieve these contributions, they will form part of the wider housing and employment land requirements for Shropshire.

8.3 Having considered best available evidence, including evidence of unmet needs in the GBBCHMA up to 2038 and the GBBCHMA-wide evidence base provided by the GBBCHMA Strategic Growth Study 2018, South Staffordshire District Council is testing a proportionate contribution of some 4,000 dwellings towards unmet housing needs arising in the GBBCHMA up to 2038, subject to confirmation of the extent of the unmet needs arising from the Black Country and the wider GBBCHMA. The approach and location for meeting this contribution will be identified through the Local Plan Review.

8.4 Shropshire Council has explored with South Staffordshire District Council their ability to sustainably accommodate the development requirements associated with specific settlements/sites within the Green Belt in Shropshire. Following these discussions which were formalised in a written communication sent 27th February 2020, South Staffordshire District Council have not indicated that they are able to meet these identified Green Belt development requirements.

8.5 South Staffordshire District Council has explored with Shropshire Council their ability to sustainably accommodate sufficient additional housing supply to enable South Staffordshire District Council to reduce its contribution to unmet housing needs arising within the wider HMA and as a direct consequence reduce its proposed Local Plan Review housing target. Shropshire Council have advised that whilst they are proposing to contribute towards meeting unmet housing and employment land needs arising in the Black Country, given their current understanding of the level of this unmet need, they do not consider they are able to provide sufficient additional housing supply or employment land supply to reduce its contribution to unmet housing needs arising within the wider HMA, and as a direct consequence reduce its proposed Local Plan Review housing target.

8.6 All other strategic matters are agreed.

9 Matters of Disagreement

9.1 There are no matters that Shropshire Council and South Staffordshire District Council disagree on.

10 Governance Arrangements

10.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

10.2 Updating of this SoCG will be linked to key milestones within the Local Plan process for the Local Planning Authorities involved.

11 Conclusions

11.1 The parties agree that:

i) Shropshire Council has fulfilled its Duty to Cooperate with South Staffordshire District Council.
ii) South Staffordshire District Council has fulfilled its Duty to Cooperate with Shropshire Council.
iii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

12 Signatories

12.1 This SoCG has been agreed and signed by the following:

Shropshire Council	**South Staffordshire District Council**
Name: Edward West Position: Planning Policy and Strategy Manager Date agreed: 26/05/21 Signature: [REDACTED]	Name: Councillor Roger Lees Position: Deputy Leader and Cabinet Member for Planning Date agreed:26/05/21 Signature: [REDACTED]

03.03.2022 – SC response to SSDC 14.01.2022 letter

FAO Ed Fox
Strategic Planning Team Manager
South Staffordshire Council

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury Shropshire
SY2 6ND

3 March 2022

Dear Ed,

South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your Duty to Cooperate communication of 14th January 2022 which highlights that your Gypsy and Traveller Accommodation Assessment 2021 evidence and supporting work has identified likely insufficient capacity to meet Gypsy and traveller pitch needs within South Staffordshire District over your proposed Local Plan period. I apologise for the delay in response. For clarity, this response has been agreed by Shropshire Council's Deputy Leader and Portfolio Holder for Economic Growth, Regeneration & Planningr, Councillor Ed Potter.

We note that you are formally exploring the scope for Shropshire Council, as an adjoining local authority, to help in addressing the forecast unmet Gypsy and travellers pitch need which has been identified by your evidence. You ask specifically whether Shropshire could, 'accommodate some or all of these unmet needs on existing public sites within your area, or whether new public sites could be created on available land in your area to address this cross-boundary issue**'.**

As you are aware the review of the Local Plan in Shropshire is at an advanced stage of preparation with the Draft Shropshire Local Plan 2016- 2038 having been submitted for examination on the 3 September 2021. Planning Inspectors have been appointed and we are currently waiting for confirmation of hearing dates.

As part of this process Shropshire Council and South Staffordshire District Council have engaged constructively via the Duty to Cooperate, captured within an agreed Statement of Common Ground (SoCG) between the authorities dated 26th May 2021.

The SoCG between Shropshire Council and South Staffordshire District Council sets out Shropshire Council's position regarding Gypsy and Traveller matters, summarising the outcome of the Gypsy and Traveller Accommodation Assessment (GTAA) update 2019.

This update evidence concluded that there was no current strategic requirement for general pitch allocation, although a need to address requirements for travelling showpeople and potential for public transit capacity to support private provision was identified.

The GTAA update took into account the extended Plan period of 2016 to 2038 and was informed

by detailed site management data, supplied by the Councils Gypsy Liaison team who manage Council sites, together with a range of other information. This approach to the update of the GTAA has allowed the Council to re-examine findings within the earlier GTAA and confirm assumptions, remained appropriate. It is therefore considered to be a proportionate and robust evidence base document.

As well as evidence review, Shropshire Council had carried out a 'Call for Gypsy and Traveller sites' alongside the 'Regulation 18' Plan making consultation on 'Preferred Sites' (29 November 2018 - 08 February 2019) for potential locations that could be available to meet the potential accommodation needs of Gypsies and Travellers. There was limited response. There have also been reviews of Council land, in particular with regard to specific identified Travelling Showpeople needs and a potential transit site. Subsequently a permanent site for Travelling Showpeople in Oswestry was granted planning permission in May 2020 and therefore no allocation is proposed for this purpose in the Draft Local Plan.

Significant work has been carried out by the Council in expanding and improving its existing sites and facilities in order to deliver a better offer of accommodation for the Gypsy and Traveller community in Shropshire. This has included redevelopment of sites to make additional pitch provision as well as the aforementioned provision for Travelling Showpeople. The Council as a landowner is continuing to consider requirements for additional and enhanced pitch provision. Shropshire Council does not however manage any existing Gypsy and Traveller sites in reasonable proximity to South Staffordshire, with its sites being located in Craven Arms and near Oswestry, Shrewsbury and Whitchurch.
The Council is also mindful of the impact of Green Belt designation in considering sites for development, as well as the influence of main gypsy and traveller transit routes and the concentration of gypsy and traveller sites in northern Shropshire locations.

On the basis of the above there is a notable mismatch in both the timing of our local plan preparation cycles and the geography of Shropshire Council's gypsy and traveller provision and main areas of demand that would not facilitate provision in Shropshire to meet need identified for South Staffordshire District. Thus, with these constraints in mind, we consider that we are not in a position to offer any cross boundary assistance at this time.

I hope that the information set out above sufficiently addresses the questions raised in your correspondence but please do contact me to discuss this matter if required. We look forward to continuing constructive conversations to discuss strategic cross boundary issues as part of your continued plan making process.

Eddie West
Planning Policy and Strategy Manager
Shropshire Council

07.10.2022 – SC response to SSDC 08.08.2022 letter

FAO
Kelly Harris, Lead Planning Manager
Ed Fox, Strategic Planning Team Manager

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury Shropshire
SY2 6ND

Date: 7 October 2022
My Ref:
Your Ref

Dear Kelly

South Staffordshire Council Gypsy and Traveller pitch provision

I hope you are well. This letter is in response to the letter from Cllr Terry Mason on 8th August 2022 addressed to our Portfolio holder for Planning, and addressing the issue of Gypsy and Traveller accommodation.

Firstly, can I apologise for the delay in responding to this letter. As a result of recent changes to our Cabinet, Planning related services, including those relating to Local Plan issues, now comes under the remit of Cllr Richard Marshall. I can confirm that Cllr Marshall has agreed this response.

As indicated in your letter, Shropshire Council responded to your earlier Duty to Cooperate correspondence on this issue on 3rd March 2022. We concluded that Shropshire would not be in a position to accommodate any identified unmet Gypsy and Traveller accommodation needs from South Staffordshire, due to a notable mismatch in both timing of our Local Plan preparation cycles and having regard to the geography of Shropshire's gypsy and traveller provision and main areas of demand. It is considered these conclusions remain valid, and therefore the Council's position regarding any unmet need has not changed.

Notwithstanding, we recognise the importance of continuing to engage constructively in relevant cross boundary discussions and acknowledge your 8th August letter raises further specific questions. Our response to these is captured below:

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

Clearly the level of occupancy on plots is a fluid position. Currently, whilst there are vacant plots, these are factored into the Council's evidence as turnover based supply based upon the identified needs of Shropshire. As such we do not consider there are any available plots on public sector sites that are capable of meeting any unmet needs.

2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

In response to specific evidence contained in our Gypsy and Traveller Accommodation Assessment (GTAA), the Council is considering options for additional transit site provision, with a planning application on Council land expected to be submitted shortly. In addition, provision for a specific travelling showpersons need has been met. Neither of these sites are located in the Green Belt.

Significant work has been carried out by the Council in expanding and improving its existing sites and facilities in order to deliver a better offer of accommodation for the Gypsy and Traveller community. This has included redevelopment of sites to make additional pitch provision at the Council's sites in both Park Hall and Craven Arms (Long Lane); improvements at the sites in Craven Arms (Long Lane) and Higher Heath (Manor House Lane); as well as the aforementioned provision for Travelling Showpeople.

As such no new publicly owned run sites are being considered at this stage.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

The Council's evidence, contained in the GTAA, has not identified the need for the provision of additional gypsy and traveller accommodation, aside from specific provision for a new transit site and for the accommodation of a specific travelling showperson's need, as outlined in response to Q2. As such the Council has not engaged in specific discussions with site promoters of proposed allocations in the emerging Local Plan to explore the option along the lines described, and this is something we do not intend to do.

4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Shropshire Council issued a 'Call for sites' to identify potential locations that could be available to meet the potential accommodation needs of Gypsies and Travellers alongside the 'Regulation 18' Plan-Making Consultation on 'Preferred Sites' (29 November 2018 - 08 February 2019). However, as both the 2017 and 2019 iterations of the GTAA arrived at similar conclusions, it has been concluded there was no strategic need for additional general sites to be allocated. Thus, sites promoted through the 'call for sites' process and other avenues for bringing forward general sites for allocation were not progressed as part of the Local Plan Review process.

I hope that the information set out above sufficiently addresses the questions raised in your correspondence but please do contact me to discuss this matter if required. We look forward to continuing constructive conversations to discuss strategic cross boundary issues as part of your continued plan making process.

Yours sincerely,

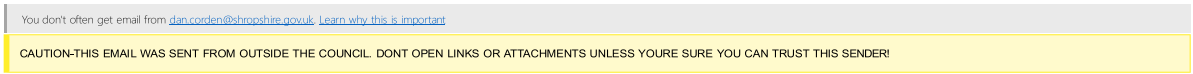
Eddie West

Planning Policy and Strategy Manager
Shropshire Council

02.09.2022 – SC email regarding duty to co-operate correspondence

From: Dan Corden <[REDACTED]@Shropshire.gov.uk>
Sent: 02 September 2022 16:06

To: External Email for Local Plans <localplans@sstaffs.gov.uk>
Subject: FW: Shropshire Local Plan Review - Duty to Cooperate
Importance: High



Dear Colleague,

I have just sent the below email to Ed Fox, and received his out of office response. In his absence I wonder if another member of the team could review our request. Please do contact me if you have any queries.

Daniel Corden

Principal Planning
Policy Officer
Planning Policy

Place Directorate

From: Dan Corden

Sent: 02 September 2022 16:01

To: *Edward Fox <E.Fox@sstaffs.gov.uk>*
Subject: *Shropshire Local Plan Review - Duty to Cooperate*
High

Hi Ed,

I hope you are well. I tried to phone you earlier but was unfortunately unable to get through, I am not sure if it was a problem at my end as it was not actually dialling. This email follows-on from previous Duty to Cooperate activity between representatives of Shropshire Council and representatives of South Staffordshire District Council regarding the draft Shropshire Local Plan.

As you are aware we submitted the draft Shropshire Local Plan for examination on the 3rd September 2021 and the examination process is currently ongoing. Following the

conclusion of the Stage 1 Hearing Sessions we have received correspondence (attached) from the Planning Inspectors, requesting further information regarding our Duty to Cooperate activity beyond that which has already been supplied, which included signed Statements of Common Ground, including with yourselves. Specifically, the Planning Inspectors have asked for evidence of the *"constructive, active and ongoing engagement on strategic matters relating to housing and employment and how this engagement maximised the effectiveness of plan preparation."*

In order to effectively respond to this request, we have and are continuing to gather information to demonstrate activity that we have undertaken with adjoining and closely related Local Planning Authorities, including yourselves.

In addition to the various consultations that we have undertaken as part of the Local Plan Review process, thus far we have identified a series of relevant meetings/discussions, exchanges of written/email correspondence, and other forms of liaison which we consider effectively demonstrate constructive, active and ongoing engagement with yourselves regarding strategic matters relating to housing and employment and consider that this effectively demonstrates how this engagement maximised the effectiveness of plan preparation. To evidence this activity we are proposing to release the attached diary entries, written/email correspondence and the signed Duty to Cooperate Protocol (subsequently superseded by the SoCG). This information would need to be published as evidence as part of our Plan Examination and therefore we need to confirm that all relevant parties are happy for it to be released.

As such, please find attached copies of the material we have thus far identified which we consider is appropriate and necessary to provide as part of the evidence to demonstrate constructive, active and ongoing engagement with yourselves regarding strategic matters relating to housing and employment. Can you please confirm that you are happy for this material to be released? We are of course intending to redact signatures, email addresses and phone numbers where they appear in this material, however please do let me know if you consider any further information needs to be redacted prior to the publication of this material.

As we are still in the process of compiling the material we are proposing to publish, we may need to come back to you with further material for approval. In particular I am aware that there were a number of discussions undertaken in the context of the M54 corridor that we are still considering. However we felt that it was important to get as much of the material that we had identified over to you as soon as possible to allow your earliest consideration.

Furthermore, if you are aware of further material which effectively demonstrates the constructive, active and ongoing engagement with yourselves regarding strategic matters relating to housing and employment that you are happy to be published, could I please ask you to provide copies for us to integrate into our wider submission.

We have also prepared the following activity log, which we feel succinctly summarises the Duty to Cooperate activity between representatives of Shropshire Council and South Staffordshire District Council. If you have any comments on this log, please do let me know.

Activity	Date	Evidence	Activity Summary
Regulation 18: Issues and Strategic Options Consultation Response	13/03/2017	Regulation 18 Consultation Response.	Regulation 18 Consultation Response.
Duty to Cooperate Meeting	26/06/2017	Diary entry. Pre-meeting email from Andrew Johnson (South Staffordshire District Council) to Adrian Cooper (Shropshire Council) on the 02/06/2017.	Duty to Cooperate Meeting seeking to identify whether any strategic or non-strategic cross boundary issues exist. Attendees: Adrian Cooper and Liam Cowden (Shropshire Council) and Kelly Harris and Andrew Johnson (South Staffordshire District Council).
West Midlands Combined Authority Housing Deal Meeting	13/03/2018	Correspondence indicates that Kelly was invited to this meeting, can she confirm if she attended?	
Duty to Cooperate Meeting	17/12/2018	Diary entry. Pre-meeting email exchange between Adrian Cooper (Shropshire Council) and Kelly Harris (South Staffordshire District Council) on the 14/12/2018. Post meeting email exchange between Liam Cowden (Shropshire Council) and Kelly Harris (South Staffordshire District Council) between the 20/12/2018 and 16/01/2019. Signed Duty to Cooperate Protocol and Checklist.	Duty to Cooperate Meeting seeking to identify whether any strategic or non-strategic cross boundary issues exist. Attendees: Adrian Cooper and Liam Cowden (Shropshire Council) and Kelly Harris and Edward Fox (South Staffordshire District Council).
Completion of a Duty to Cooperate Protocol	17/12/2018	Signed Duty to Cooperate Protocol and Checklist.	Completion of a Duty to Cooperate Protocol.
Regulation 18: Preferred Sites Consultation Response	15/03/2019	Regulation 18 Consultation Response.	Regulation 18 Consultation Response.
Regulation 18: Strategic Sites Consultation Response	15/08/2019	Regulation 18 Consultation Response.	Regulation 18 Consultation Response.
Duty to Cooperate Meeting Development Needs Correspondence	27/02/2020	Email from Anna Jones (Shropshire Council) to South Staffordshire District Council on the 27/02/2020. Duty to Cooperate Letter from Edward West (Shropshire Council) to Kelly Harris (South Staffordshire District Council) dated the 27/02/2020.	Duty to Cooperate Meeting Development Needs Correspondence.

Duty to Cooperate Meeting Development Needs Correspondence	12/03/2020	Email from Edward Fox (South Staffordshire District Council) to Edward West (Shropshire Council) on the 12/03/2020.	Duty to Cooperate Meeting Development Needs Correspondence.
Duty to Cooperate Meeting	22/06/2020	Meeting Invite/Diary Entry. Pre-meeting email including an agenda from Gemma Davies (Shropshire Council) to Ian Culley (City of Wolverhampton Council on behalf of the Black Country Authorities), Kelly Harris and Edward Fox (South Staffordshire District Council) and Gavin Ashford (Telford and Wrekin Council) on the 21/06/2020.	Shrewsbury/Telford/Wolverhampton Corridor Duty to Cooperate Meeting which includes discussion of cross-boundary matters to inform the development of Local Plans. Attendees: Gemma Davies (Shropshire Council); Ian Culley (City of Wolverhampton Council on behalf of the Black Country Authorities); Kelly Harris and Edward Fox (South Staffordshire District Council); and Gavin Ashford (Telford and Wrekin Council).
Regulation 18: Pre-Submission Consultation Response	29/09/2020	Regulation 18 Consultation Response.	Regulation 18 Consultation Response.
Duty to Cooperate Green Belt Correspondence	08/01/2021	Duty to Cooperate Letter from Kelly Harris (South Staffordshire District Council) to Shropshire Council dated the 08/01/2021.	Duty to Cooperate Green Belt Correspondence.
Duty to Cooperate Green Belt Correspondence	12/01/2021	Email from Dan Corden (Shropshire Council) to Edward Fox (South Staffordshire District Council) on the 12/01/2021. Duty to Cooperate Letter - From Dan Corden (Shropshire Council) to Kelly Harris (South Staffordshire District Council) dated the 12/01/2021.	Duty to Cooperate Green Belt Correspondence.
Duty to Cooperate Meeting	10/03/2021	Diary entry. Post meeting email from Dan Corden (Shropshire Council) to Edward Fox, Kelly Harris and Patrick Walker (South Staffordshire District Council) on the 11/03/2021.	Discussion regarding the scope and content of the draft Statement of Common Ground. Attendees: Edward West and Dan Corden (Shropshire Council) and Edward Fox, Kelly Harris and Patrick Walker (South Staffordshire District Council).
Preparation of the Submitted Statement of Common Ground	12/01/2021-26/05/2021	Email from Dan Corden (Shropshire Council) to Edward Fox (South Staffordshire District Council) on the 12/01/2021. Email from Dan Corden (Shropshire Council) to Edward Fox, Kelly Harris and Patrick Walker (South Staffordshire District Council) on the 11/03/2021. Signed statement of Common Ground (EV033).	Preparation of the Submitted Statement of Common Ground. Email exchanges and discussions to agree the scope and content of the draft Statement of Common Ground.

Agreement of the Submitted Statement of Common Ground	26/05/2021	Signed Statement of Common Ground (EV033). (Already submitted).	Agreement of the Submitted Statement of Common Ground.

Given the timescales for responding to the Planning Inspectorate, could I ask you to respond to this email by the **9th September 2022** if at all possible – we have informed the Planning Inspectorate of our intention to respond to their query in the week commencing the 12th September 2022.

Please do contact me via email or phone if

you want to discuss this issue or need any

further information. Thank you

Kind Regards

Daniel Corden

Principal Planning
Policy Officer
Planning Policy

Place Directorate

Email: [REDACTED]
Phone no:
[REDACTED]

If this is a request for information under the Freedom of Information Act, or similar legislation, please submit your request using our online form, at www.shropshire.gov.uk/access-to-information/request- general-information/

14.11.2023 – Shropshire Council duty to co-operate update

South Staffordshire District Council
Council Offices
Codsall
South Staffordshire
WV8 1PX

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury Shropshire
SY2 6ND

Date: 14th November 2023

Dear Kelly,

South Staffordshire District Council - Duty to Cooperate update

1. Introduction

1.1. Thank you for your correspondence dated the 24th October 2023, within which you provide a very helpful update on plan making in South Staffordshire District Council (SSDC).

1.2. It is noted that within this correspondence you have also requested Shropshire Council's initial position on a scenario posed – specifically if SSDC were to pursue a new approach to the housing requirement within its ongoing Local Plan Review.

1.3. As this scenario is currently hypothetical, Shropshire Council cannot provide a formal response. However, in the spirit of the Duty to Cooperate (D2C), officers have given it and the other issues raised preliminary consideration - as summarised within this correspondence. As such, this correspondence represents initial officer views only.

2. Housing

2.1. Within your correspondence you have posed the scenario of revisiting the housing strategy within the emerging Local Plan, to no longer review Green Belt boundaries to accommodate the housing needs of SSDC or your wider Housing Market Area (HMA), this being the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

2.2. Ultimately, the decision on the suitability of this scenario is a matter for SSDC, informed by consideration of its implications both for the ability to meet SSDC need and the ability to contribute to unmet needs forecast to arise within the GBBCHMA.

2.3. However, it is considered sensible that this decision is informed by proactive D2C discussions, particularly with other Local Planning Authorities within the GBBCHMA (including those where unmet housing needs are forecast to arise). We would note that Shropshire Council is of course not a part of the GBBCHMA, as it represents its

own self-contained HMA.

2.4. The most sustainable solution for households whose needs are not able to be met within one Local Planning Authority within a HMA, is within the wider HMA. This is because these areas are likely to already form part of the 'area of search' for these households. In the context of unmet housing need within the GBBCHMA, such areas would of course include SSDC. As such, we would suggest that any decision regarding the suitability of the aforementioned scenario is informed by consideration of the implications for achieving sustainable patterns of development.

2.5. We would also note that whilst the proposed changes to paragraph 142 of the NPPF mean that Green Belt boundaries are not required to be reviewed and altered if this is the only means of meeting local housing need, this process can still be undertaken, if it is considered an appropriate mechanism for meeting housing need and achieving sustainable development by the relevant Local Planning Authority.

2.6. Through the D2C process, Shropshire Council is proposing a 1,500 dwelling contribution towards the unmet housing needs forecast to arise within the Black Country Authorities (located within the GBBCHMA), as they indicated that even with the 4,000 dwelling contribution proposed by SSDC, their HMA is unlikely to be able to accommodate all their unmet housing needs.

3. Employment

3.1. We note SSDC's position with regard to employment land. Shropshire Council would of course welcome further D2C discussions on this matter at the appropriate time.

4. Gypsy & Travellers

4.1. We note SSDC's position with regard to gypsy and travellers. It is considered that the summary of Shropshire Council's position provided within your correspondence accurately reflect the agreed position on this matter, as established within the SoCG between the two Local Planning Authorities and subsequent correspondence.

5. Other Matters

5.1. We note SSDC's intention to re-engage with Shropshire Council on the matters of transport, infrastructure, and the natural environment, in due course. Shropshire Council of course welcome further D2C discussions on these matters at the appropriate time.

6. Next Steps

6.1. We note SSDC's intention to undertake a Regulation 19 consultation on the SSDC Local Plan in spring 2024.

6.2. Shropshire Council would of course welcome further D2C discussion with SSDC, either in advance or during any future consultation on the SSDC Local Plan.

Kind Regards

Edward West

Planning Policy and Strategy Manager Shropshire

Council

21.08.2024 – SSDC response to GTAA questions in Appendix 12

28.04.2025 – SC update on Examination and duty to co-operate position

Ian Culley
Lead Planning Manager (Regional Strategy) City of Wolverhampton Council

Shropshire Council Guildhall
Frankwell Quay
Shrewsbury
Shropshire SY3 8HB

Date: 28th April 2025

Dear Ian,
Shropshire Local Plan – Update on Examination and Duty to Cooperate Position

The purpose of this correspondence is to provide you with an update on the examination of the draft Shropshire Local Plan and to outline the consequences of this for the Duty to Cooperate process between our two authorities.

As you will be aware, the draft Shropshire Local Plan has been at independent examination since September 2021. As part of the Duty to Cooperate process undertaken to inform this, our authorities agreed that of the forecast unmet need arising in the four Black Country authority areas over the plan period, 1,500 dwellings and 30ha of employment land would be accommodated within Shropshire. This position was reflected within the agreed Statement of Common Ground (SoCG) in August 2021, and within the draft Shropshire Local Plan itself. Subsequently, this position has been reaffirmed at various points, most recently as part of the SoCG in November 2024 which has informed the recent submission version of the Wolverhampton Local Plan.

Whilst the examining Inspectors into the draft Shropshire Local Plan agreed in February 2023 that the legal Duty to Cooperate had been met, issues regarding the scale and delivery of these contributions have nevertheless continued to persist throughout our examination. Following the resumption of the examination process in 2024, it was hoped the Local Plan could proceed to adoption in a timely manner. Unfortunately, following Stage 2 hearing sessions in October 2024 and subsequent correspondence from the examining Inspectors in January and February 2025, it is now considered there is little choice but to seek to withdraw the draft Shropshire Local Plan from examination. If we were not to do this, the examining Inspectors have indicated their intention to prepare their final report concluding the draft Shropshire Local Plan unsound.

It is therefore our intention to formalise the withdrawal of the Local Plan from examination through a decision of Council in July 2025. If approved, statutory and interested parties will be formally notified in line with the requirements of Section 27 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

In advance of the decision of Council in July, I wanted to write to you to set out Shropshire Council officer thoughts on the status of our agreement regarding the principle of accommodating contributions to your forecast unmet need. In doing so, the important caveat included within the latest SoCG (November 2024) is recognised. This states…

"Subject to its ongoing Examination, should Shropshire's Local Plan not proceed to adoption, the agreed position will need to be reviewed. Any consideration of further contributions from

Shropshire as part of future Local Plan Reviews will need to reflect updates to Shropshire's own housing need and its ability to accommodate these needs within its administrative boundary." (SoCG, Nov 2024, para 4.18).

As a result of the withdrawal of the Local Plan, there will no longer be a mechanism to achieve the principle of delivering the unmet need in Shropshire. Therefore, it is with regret that we can see no way by which Shropshire can currently accommodate any contributions to unmet needs forecast to arise in the Black Country as envisaged as part of this plan making process.

It is clearly very frustrating the draft Shropshire Local Plan has not been able to proceed to adoption, and we equally recognise that this will be disappointing news for you as well. Unfortunately, this is an inevitable consequence of the soundness concerns raised by our examining Inspectors.

Shropshire Council fully recognises that the Duty to Cooperate process between our authorities will continue. As you may be aware, it is the intention for the Council to commence work on the next Local Plan for Shropshire under the new plan making system later in 2025. As part of this process, we would like to proactively engage with your authority as part of early and ongoing cross-boundary discussions.

Crucially, this engagement must be responsive to the significant recent changes that have arisen which have implications for plan making. Of particular note:

- The very significant uplift to Local Housing Need in Shropshire (from 1,070 dwellings per annum to 2,005 dwellings per annum – with the potential for further increases over the period of plan making) as a result of the revised national standard methodology.
- Updates to the National Planning Policy Framework (NPPF), including changes to the approach to Green Belt in circumstances where unmet need for homes, commercial or other development exists.

Regard will also need to be had to the comments of the Shropshire examining Inspectors, including their conclusions on the appropriate geography in Shropshire within which any contributions to the Black Country can sustainably be accommodated.

It is therefore clear that the context behind future Duty to Cooperate conversations has changed significantly since 2021. Nevertheless, we continue to fully recognise the importance of considering relevant strategic cross boundary issues through this process and to seek agreement wherever possible.

In the meantime, I would like to thank you for your support and contributions to the plan making process in Shropshire, and I look forward to continuing to engage with you on an ongoing and constructive basis in the future.

Kind regards

Eddie West
Planning Policy and Strategy Manager Shropshire Council

Appendix 12 – SSDC response to Shropshire GTAA

Shropshire 2024
Gypsy, Traveller and Travelling Showperson Accommodation Assessment
Stakeholder Questions

Introduction:

arc4 has been commissioned by Shropshire Council to produce a Gypsy and Traveller Accommodation Assessment (GTAA).

The overall aim of GTAA is to provide a clear, robust, and credible evidence base to inform the development of planning policies relating to Gypsies and Travellers. As part of our research, we are contacting a range of stakeholders to obtain feedback by completing as many questions as you feel able to answer.

A Stakeholder Survey Privacy Notice can be found **here**.

Thank you in anticipation for your assistance.

Name:	Alex Evans
Organisation:	South Staffordshire Council
Title:	Strategic Planning Assistant Team Manager
Contact Email:	a.evans@sstaffs.gov.uk
Contact Phone Number:	[REDACTED]

Section 1 – Residential Pitch Need: Gypsies and Travellers

Q1. Do you think there is a need for more permanent residential pitches for Gypsies and Travellers across Shropshire?

If yes, please provide reasons and your view on the number of pitches that are needed within different parts of Shropshire (a pitch is an area of land on a Gypsy Traveller site occupied by one resident family).

Response:

Yes, South Staffordshire District Council (SSDC) has identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the proposed local plan period (2023 – 20241), including 92 pitches within the first 5 year period. SSDC considers that all suitable sites within South Staffordshire (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC consider they can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same HMA.

SSDC consider that Shropshire Council (SC) should allocate all suitable Gypsies and Travellers site including within within the Green Belt to maximise the number of pitches to help meet cross boundary needs including those from South Staffordshire.

Please see the response to Q14 for details.

Q2. If permanent sites are needed, where do you think they should be located within Shropshire and why?

Response:

Q3. Do you think there are barriers to the provision of new permanent sites? If so, what are the main barriers?

Response:

Section 2 – Residential Plot Need: Travelling Showpeople

Q4. Do you think there is a need for more permanent residential plots for Travelling Showpeople across Shropshire?

If yes, please provide reasons and your view on the number of plots that are needed within Shropshire (a plot is an area of land on a Travelling Showperson yard occupied by one family)

Response:

Q5. If permanent yards are needed, where do you think they should be located within Shropshire and why?

Response:

Q6. Do you think there are barriers to the provision of new permanent yards? If so, what are the main barriers?

Response:

Section 3 – Gypsy and Traveller unauthorised encampments and the need for temporary provision.

Q7. Do you have any knowledge of unauthorised encampment activity in Shropshire? We are interested to know about the location and level of activity, challenges faced and policies for dealing with encampments.

An unauthorised encampment refers to land where persons unknown resides in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations and constitute trespass.

Response:

For households travelling through the Shropshire, there are several potential options which could be considered.

Q8. Firstly, transit sites. These are intended for short-term use whilst people are travelling and usually include hard-standing, water and electricity. Is there a need for transit sites in Shropshire?

If yes, please provide reasons and your view on the number of transit pitches that are needed and where they could be located.

Response:

Q9. Secondly, temporary stop-over places. This is land which can be used on a temporary basis if unauthorised encampments occur. They can include fields, disused land and areas of hard standing. Is there a need for temporary stop-over places in Shropshire?

If yes, please provide reasons and your view on potential locations of temporary stop-over places.

Response:

Q10. Do you think there are barriers to transit provision? If so, what are the main barriers?

Response:

Section 4 – Gypsies and Travellers in bricks and mortar/on residential caravan sites

Q11. What knowledge do you have of Gypsy and Travellers living in bricks and mortar accommodation or living on residential caravan sites (which are not Gypsy and Traveller sites)? For instance, are you aware of broad locations where households are and are you aware of any issues regarding their housing or support needs? If so please provide details.

Response:

Q12. What challenges are you aware of, such as access to facilities, services, health, education and any unmet needs, that are faced by Gypsy and Traveller or Travelling Showpeople's households who live in Shropshire?

Response:

Section 5 – Movement and cross-boundary considerations.

Q13. What regular movements of Gypsies, Travellers and Travelling Showpeople from Shropshire and to other neighbouring areas are you aware of?

Response:

Q14. What cross-boundary issues in respect of Gypsies, Travellers and Travelling Showpeople should be considered as part of this study? Please explain and provide further information.

Response:

As stated in response to Q1, SSDC has a very significant shortfall, even against the district's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same HMA.

SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the potential pitch shortfall that they consider is likely to exist, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested these authorities to examine their ability to contribute to its unmet pitch needs, specifically in the form of the potential for extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC.

SSDC then wrote again to these same authorities in August 2022, providing an update on extra efforts that they had made to identify new public sites within the District upon Staffordshire County Council land. This letter communicated that SSDC consider that a significant shortfall still remained and that SSDC consider they require assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023. This GTAA (2024) has been published and identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the proposed local plan period (2023 – 20241), including 92 pitches within the first 5 year period.

SC's response to the August 2022 correspondence confirmed their previous January 2022 position that Shropshire would not be able to accommodate any identified unmet Gypsy and Traveller needs from South Staffordshire, due to a notable mismatch in both timing of our Local Plan preparation cycles, as agreed in the SoCG agreed between the parties to inform the Shropshire Local Plan and having regard to the geography of Shropshire's gypsy and traveller provision and main areas of demand. SC confirmed it is seeking to address the needs identified within its own GTAA, but based upon this evidence are not proposing to allocate specific sites for this purpose in the emerging Shropshire Local Plan. SC confirmed that given the advanced stage of its own Plan making, that it has not investigated the potential for any new additional public sites to be created as part of wider allocations beyond that already identified within its Plan as part of its current Plan review cycle. Both parties agree that this is an issue which can be reviewed further as part of future Plan review cycles if required.

However, if SC are now reviewing their approach to Gypsy and Traveller provision as part of their Local Plan examination, SSDC reconfirm its request for support in meetings its unmet need. SSDC has taken the following approach towards

meeting its need for gypsy and traveller pitches and request that SC also take the following steps:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options (SSDC or County Council owned) in the District for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

SSDC welcome further discussion moving forwards.

Section 6

Q15. What would you want to see as the key strategic messages coming from the Gypsy and Traveller Accommodation Assessment?

Response:

Section 7 – Boat Dwellers – Residential Mooring Need

Q16. Do you think there is a need for more permanent residential moorings for boat dwellers in Shropshire?

If yes, please provide reasons and your view on the number of moorings that are needed.

Response:

Q17. If moorings are needed, where do you think they should be located and who should provide them.

Response:

This final question is only relevant to Planning Policy Officers.

Q18. We consider that this questionnaire contributes to the Duty to Cooperate process with neighbouring authorities and engagement with relevant bodies as described in the National Planning Policy Framework (NPPF) and which forms an integral part of the Local Plan making process.

Do you agree? Do you have any further views on this?

Response:

As part of the reporting for the project we often use quotes from the stakeholder survey in the narrative of the report and in related appendices. Are you happy for us to use your responses or part of your responses in the reporting? Listed below are a few options. Can you please pick one so we know how we can use your responses to the questions?

We normally provide summary responses in the main body of the reporting, but we are asking you this question so that we can provide useful qualitative quotes to back up particular views expressed. The appendices to our reports also include all responses provided by all stakeholders but these are provided anonymised so that individuals cannot be directly linked.

• ~~I am happy for anything I have said, in my responses to this survey, to be used in the reporting. Please use my name when attributing references to responses provided.~~ ***Response*** **Y/N.**
• I am happy for anything I have said on behalf of my organisation/company/Council, in my responses to this survey, to be used in the reporting. Please use the name of my organisation/company/Council when attributing references to responses provided **Y**
• ~~I do not want anything I have said, in my responses to this survey, to be attributable to me in the reporting. Please do not use my name in the reporting.~~ ***Response*** **Y/N**~~.~~
• ~~I do not want anything I have said on behalf of my organisation/company/Council, in my responses to this survey, to be used in the reporting. Please do not use the name of my organisation/company/Council in the reporting.~~ ***Response*** **Y/N.**
• ~~Other (please state)~~

THANK YOU for taking the time to complete and submit your responses to this questionnaire. Your responses are confidential and are protected under the Data Protection Act (2018) and GDPR legislation. Personal data will be processed in line with our Stakeholder Survey Privacy Notice accessed via the link at the beginning of this survey.

Appendix 13 – Solihull Metropolitan Borough Council Documents

30.11.2018 – SMBC response to SSDC Issues & Options Consultation

Dear sir/madam

Thank you for the opportunity to comment on your Council's issues and options consultation

Solihull MBC welcomes the contribution SSDC is intending to make towards the shortfall occurring across the HMA, particularly as this is likely to result in land being released from the Green Belt and SMBC recognises the difficult decisions that this will entail as our own emerging plan already proposes the release of some 530ha of land from Solihull's Green Belt. However it should be noted that SSDC's approach may not be appropriate in all other areas of the HMA since it starts from the proposition that all the GL Hearn SGS recommended options can indeed be accommodated (this is in the context that the study itself recognised there are tensions between proposals for new development and the quality of much of the Green Belt around the conurbation. The approach SSDC should follow should recognise that additional flexibility may be required if there is emerging evidence that is starting to demonstrate that some of the GL Hearn recommended options may not be suitable, achievable or deliverable.

This Council not convinced that the statement at paragraph 4.11 is entirely correct. Although the WMCA Housing Deal is expected to increase the rate of housing delivery, it is not necessarily the case that all the WMCA authorities own needs (to 2031) will be met within the area covered by the CA.

I hope the above comments are helpful.

Regards

Gary Palmer
Group Manager Policy & Engagement Solihull
MBC

30 November 2018

South Staffordshire Council

Date: 15 March 2019

Please ask for: Mrs K Harris
Direct Dial: (01902) 696317
Email:
k.harris@sstaffs.gov.uk

Mr G Palmer – Planning Policy
Manager Solihull Metropolitan
Borough Council Council House
Manor
Square
Solihull
West Midlands
B91 3QB

Dear Mr Palmer

Solihull Local Plan Review - Draft Local Plan Supplementary Consultation January 2019

Thank you for the opportunity for the Council to comment on the Draft Local Plan Review Supplementary Consultation.

Members have considered the supplementary update to the Draft Local Plan and have the following comments to make:

In responding to this present supplementary consultation, South Staffordshire Council would wish to reiterate the concerns - which we have previously expressed in our response to your Draft Plan consultation (December 2016) - on the level of contribution that Solihull MBC propose to make towards the evidenced housing shortfall of the Greater Birmingham Housing Market Area (GBHMA). Currently, the Draft Plan proposes a 2000 dwelling contribution to this shortfall, however the close relationship between Solihull and Birmingham - which is the primary source of the identified shortfall – suggests a considerably higher contribution would be justified.

It is considered that this consultation offered the opportunity to consider the findings of the GL Hearn Strategic Growth Study (SGS) and test the potential options for growth identified within Solihull Borough in the study, and the role these could play in making a contribution to the

wider housing shortfall. The decision to defer the Borough's response to the SGS findings until the publication of the Draft Submission Stage reduces the scope for meaningful engagement and consideration of the appropriate scale and potential location of additional strategic growth options. There is a concern that continuing with the current contribution towards the GBHMA shortfall could introduce the risk that the plan fails in its statutory requirements.

These comments have been uploaded to your online consultation system and this letter is confirmation of the Council's views on the consultation.

Yours sincerely

Kelly Harris

Strategic Planning Team Manager

02.10.2020 – draft SoCG to support SMBC Local Plan

From: Edward Fox

To: Andrews, Mark (Economy and Infrastructure Directorate, SMBC)

Cc: Palmer, Gary (Places Directorate - Solihull MBC); Kelly Harris

Bcc: Patrick Walker

Subject: RE: SMBC and SSDC draft SOCG

Date: 23 October 2020 16:06:00

Attachments: image001.jpg

Hi Mark,

Kelly has asked me to provide you with an update in relation to your email below.

To confirm, South Staffordshire Council are considering your draft SoCG and will be responding to you with our comments as soon as we are able. However, as our constitution requires any such Duty to Cooperate matters to be considered and comments endorsed by Members, we will need to take our response through our constitutional processes, and as such, we will be unable to get back to you on this today I'm afraid.

I trust you appreciate the situation, and we will provide you with a further update as and when we are able to.

Kind regards Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: Andrews, Mark (Economy and Infrastructure Directorate, SMBC) <[REDACTED]@solihull.gov.uk>
Sent: 02 October 2020 16:45

To: Kelly Harris <k.harris@sstaffs.gov.uk>
Cc: Palmer, Gary (Places Directorate - Solihull MBC) <[REDACTED]@solihull.gov.uk>
Subject: SMBC and SSDC draft SOCG

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Kelly,

Further to my previous email, please find attached a draft SOCG in support of the joint work our respective authorities have undertaken together over the last 5 years. This is with a view to supporting the forthcoming publication of our Local Plan and subsequent submission.

The attached is intended to be an initial draft capturing previous engagements and is presented for your consideration. As you will note we have sought to keep the majority of the SOCG factual and relevant and have looked to capture the pragmatic approach we have taken in developing our Local Plan. This includes planning positively for a meaningful contribution towards the unmet needs in the HMA to 2031.

We are happy to discuss this further with you over the coming weeks, but would like to have an agreed draft ready for the 23rd October if possible.

We then expect to update this SOCG and seek to ratify it more formally prior to the submission of our Plan. This will allow the final SOCG to reflect any representations you may wish to make to it. Subjects to the ongoing process we expect the statutory phase of representations to start in late October and are currently expecting to submit our Plan in February 2021.

Should you wish to discuss this or any other aspects of our Local Plan further please do not hesitate to contact me or Gary.
Kind regards

Mark

Mark

Andrews

MRTPI

Head of Planning, Design and Engagement Services

From: Andrews, Mark (Economy and Infrastructure Directorate, SMBC)

Sent: 14 August 2020 17:11

To: [REDACTED]

Subject: Introductory email and ongoing

cooperation

Hi all,

Whilst I know I have met and worked with many of you before as part of my time at Coventry, I just wanted to send a quick email to introduce myself within my new role at Solihull.

I also just wanted to take the opportunity to provide an update on our evolving draft Local Plan and how we are hoping to move this forward over the coming weeks and months. As many of you may already be aware we are actively working on the Reg 19 version of the Plan with a view to publishing the draft plan for representations around mid-October.

To support this, I am mindful that a substantial amount of work has been undertaken over recent years in relation to the Duty to Cooperate, most notably in relation to wider development needs and joint evidence. I am also mindful that the updated position statement is due to be issued very shortly too. In that context I am keen that we capture this work within a series of high level Statements of Common Ground that can support our Local Plan through to submission and that I believe will be of benefit to yourselves in terms of supporting evidence of ongoing cooperation and engagement with SMBC.

In the coming weeks we will look to circulate some draft documents for your consideration. To support this I am quite happy to meet with you to discuss these further and provide any further updates you may require in relation to our Local Plan.

I look forward to working with you going forward.

Kind regards

Mark

Mark Andrews MRTPI

Head of Planning, Design and Engagement
Services Economy & Infrastructure Directorate

South Staffordshire Council

Our Ref: SMBC/DTC

17 December 2020

Please ask for: Ed Fox

Direct Dial: (01902)

696418

Email:

e.fox@sstaffs.gov.uk

LPR Consultation Policy and Delivery
Solihull MBC
Solihull
B91 3QB

Dear Sir/Madam,

South Staffordshire District Council response to Solihull MBC Local Plan - Draft Submission Plan

Please accept this letter as South Staffordshire Council's formal response to Solihull Metropolitan Borough Council's Draft Submission Local Plan. I can confirm that the response below has now been considered by Members through our constitutional process and remains unchanged from our holding response sent via email on 10 December 2020.

In providing a response to this Draft Submission consultation South Staffordshire Council would wish to reiterate the concerns which we have previously expressed about the scale of the contribution being proposed by Solihull Metropolitan Borough Council towards meeting the housing shortfall identified in the GBHMA. It is considered that continuing with this approach risks the plan failing in meeting statutory requirements. Specifically, South Staffordshire considers that the post 2031 shortfall should be considered as part of this present Local Plan review rather than being deferred.

To support such an approach, we would welcome clarity on the steps taken to ensure that Solihull's approach to utilising the Green Belt review in site selection is broadly consistent with that taken by other authorities in the GBHMA. Specifically, the approach set out in the Site Selection Process Topic Paper of classifying 'moderately performing' Green Belt land as being unlikely to be allocated may not be consistent with other approaches taken elsewhere in the GBHMA. For example, the Association of Black Country Authorities advised in their response to the latest consultation stage of South Staffordshire's Local Plan Review (see Appendix A) that otherwise sustainable sites should only be automatically excluded from site selection on Green Belt/Landscape grounds if they were in both 'Very High harm' Green Belt land and 'Moderate-

High sensitivity' landscape areas. Whilst it is acknowledged there will always be slight differences in approach between local assessments, a lack of clarity on this point may risk affecting the potential of Green Belt sites to be considered for development in both South Staffordshire and the Black Country. This could risk undermining South Staffordshire's ability to commit 4,000 dwellings to the GBHMA and could exacerbate the extent of the emerging Black Country housing shortfall.

Therefore, should the examination of Solihull's approach suggest that other deliverable land is available within the Borough, we would strongly encourage this being brought forward in order to avoid the deferral of the GBHMAs post 2031 shortfall. Officers from South Staffordshire Council are happy to participate in a meeting with officers from Solihull and the Black Country to ensure that a consistent approach to utilising the Green Belt review in site selection is taken.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager

01.02.2021 – duty to co-operate email chain

From: Patrick Walker

To: Palmer, Gary (Places Directorate - Solihull MBC)

Cc: Kelly Harris; Andrews, Mark (Economy and Infrastructure Directorate, SMBC); Edward Fox

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Date: 09 March 2021 13:49:00

Attachments:

Hi Gary,

Having discussed it on our end, please see attached for a track changed version of the document that seeks to flesh out the detail of our concerns regarding the plan. Please have a look through and let us know if a meeting is needed to discuss any further changes prior to agreeing.

Many thanks
Patrick Walker

Senior Planner (Urban Design/Landscape Planning)
Strategic Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

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From: Palmer, Gary (Places Directorate - Solihull MBC) <[REDACTED]@solihull.gov.uk>

Sent: 26 February 2021 16:15

To: Patrick Walker <P.Walker@sstaffs.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Andrews, Mark (Economy and Infrastructure Directorate, SMBC) <[REDACTED]@solihull.gov.uk>

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Patrick

Apologies, meant to include a paragraph about review & triggers.

This version has that included at paragraph 28. No other changes from the version I sent through this morning.

Regards

Gary

From: Palmer, Gary (Places Directorate - Solihull MBC)

Sent: 26 February 2021 11:35 AM

To: 'Patrick Walker'

Cc: 'Kelly Harris'; Andrews, Mark (Economy and Infrastructure Directorate, SMBC)

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Hi Patrick

Further to my email on Wednesday, we've looked at the draft SCG sent last October and have made tracked changes to it to cover the publication of our Draft Submission Plan, SSDC representations upon that, and our recent discussions.

As you can imagine, we are keen to establish that the duty to cooperate has been satisfied, certainly that at the very minimum that the legal DtC has been met. We can envisage the situation whereby if an Inspector finds that an HMA authority has failed the legal DtC test, then this would have implications for other plans; whereas any failure of the soundness test is likely to be more of a matter for the individual authority.

Our view is that the legal requirement of seeking to maximise effectiveness in all our plan making activities requires us to engage constructively, actively and on an on-going basis. Whereas the soundness test, under whether the plan has been positively prepared, is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so.

It is often noted that the duty to cooperate is not a duty to agree, and if there is a difference between authorities then we believe this is about whether SMBC has demonstrated it has accommodated others needs where practical to do so.

We are still working towards submission of the plan before purdah commences on 22nd March and are keen to have a SCG we can submit alongside the plan, even if it is subject to formal member endorsement.

Perhaps once you and colleagues have had a chance to review, we would be happy to have a further discussion if that would help progress the ScG.

Look forward to hearing from you.

Regards

Gary Palmer

Group Manager – Policy & Engagement

Growth & Development

Economy & Infrastructure Directorate
Solihull MBC

Council House

Manor Square

Solihull

B91 3QB

Tel No: 0121 704 8008

Direct Dial: [REDACTED]

Email: psp@solihull.gov.uk

From: Palmer, Gary (Places Directorate - Solihull MBC)

Sent: 24 February 2021 2:46 PM

To: 'Patrick Walker'

Cc: Kelly Harris

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Hi Patrick

Thanks for the catch up just now.

As agreed, to take things forward I would set out next steps:

- SMBC to revise draft SCG circulated in Oct (attached again for convenience) to reflect SSDC comments on SMBC Draft Submission Plan. Will seek to send to SSDC by Fri 26th Feb.
- Whilst the SCG still may contain areas where we agree to disagree, a meeting to discuss the amended draft may be useful to reduce areas of disagreement, and will take a view on whether a further meeting is needed at that time.
- SSDC to use existing Member sign off to inform what can be in SCG, and will check arrangements for any further Member input should the need arise [in this context it would be useful t understand what timescales would be required for this].
- If SSDC believe that duty to cooperate not met, SMBC keen to establish that this is a soundness issue rather than SDSC believing the legal DtC test not met.
- SMBC still working towards submission of plan before local election purdah period starts on 22/03, but recognise that this may change.

Hope this covers what we talked through.

Regards

Gary

From: Patrick Walker [mailto:P.Walker@sstaffs.gov.uk]

Sent: 23 February 2021 2:11 PM

To: Palmer, Gary (Places Directorate - Solihull MBC)

Cc: Kelly Harris

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Hi Gary,

Thanks for inviting me to the meeting last week. Just to confirm, are you still seeking to meet with us regarding South Staffs' consultation response? If not, will you be seeking to agree a SoCG with us regarding what matters are agreed/not agreed regarding the Local Plan Review? Mindful that the timescales discussed for your plan submission were quite tight so please let us know if you're going to be seeking agreement on anything.

Kind regards
Patrick Walker

Senior Planner (Urban Design/Landscape Planning)
Strategic Planning

South Staffordshire Council

Tel: 07970 433618

From: Patrick Walker

Sent: 15 February 2021 11:23

To: Palmer, Gary (Places Directorate - Solihull MBC) <[REDACTED]@solihull.gov.uk>; Edward Fox

<E.Fox@sstaffs.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Hi Gary,

Thanks for letting us know re. your timescales. Ed's now on maternity leave and Kelly's on leave this week, but we have some availability on Tuesday 23rd Feb (11.30am-12.30pm) and Thursday 25th Feb (1.00pm to 2.00pm) to meet if that works on your end? Otherwise I'm afraid it would have to be the following week (W/C 1st March).

With regards to the Black Country meeting this Thursday at 9.30am I'm happy to attend from a South Staffs perspective.
Kind regards
Patrick Walker

Senior Planner (Urban Design/Landscape Planning)
Strategic Planning

South Staffordshire Council

Tel: 07970 433618

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From: Palmer, Gary (Places Directorate - Solihull MBC) <[REDACTED]@solihull.gov.uk>

Sent: 12 February 2021 15:58

To: Edward Fox <E.Fox@sstaffs.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Patrick Walker <P.Walker@sstaffs.gov.uk>
Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Hi Edward

I've been off for a few days and have only just realised that no-one has got back to you following your email reply last week.

First of all congratulations on your impending paternity leave – hope all is going well.

As we are seeking to submit the plan in March, we would like to have a catch up om either of the dates suggested, and would be happy to meet with Kelly and/or Patrick if you are on leave.

We have got a slot lined up with the Black Country authorities, and if you think that would be preferable then I wouldn't have any objections to SSDC joining that session. It's scheduled for 18th Feb at 0930.

Look forward to hearing from you.

Regards

Gary

From: Edward Fox [mailto:E.Fox@sstaffs.gov.uk]

Sent: 01 February 2021 4:23 PM

To: Palmer, Gary (Places Directorate - Solihull MBC)

Cc: Kelly Harris; Patrick Walker

Subject: RE: South Staffordshire Council - holding response to Solihull MBC draft submission consultation

Hi Gary,
We would very much welcome a meeting with you to discuss your draft submission plan and SoCG.

Although, I am likely on paternity leave for the last two weeks of February, so our preference would be to meet in March (w/c 8th March to be on the safe side). Not sure if this would work with your timescales, but if it does, I can send you some potential dates/times. Alternatively, If your timescales mean you need to meet sooner than I can arrange for Kelly Harris and Patrick Walker to meet you in February.

For efficiency purposes, and given our response highlights the need for consistency in site assessment when considering how the shortfall is addressed, we would suggest a joint meeting with yourselves and the Black Country authorities.

Please confirm your timescales and preferences for a meeting and we can get a date pencilled in.

Kind Regards
Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

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STATEMENT OF COMMON GROUND (SOCG) BETWEEN: SOLIHULL MBC (SMBC) and SOUTH STAFFORDSHIRE DC

1. Introduction

1. The content of this SOCG is to inform the submission of the SMBC local plan and ongoing works associated with the delivery of The UKC Hub development proposals in particular.
2. This SOCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the signatories to this SOCG. It covers both areas of agreement and areas that remain subject to further discussion.

Period Covered by SOCG

3. From July 2015 when SMBC commenced work on updating the current adopted development plan (the Solihull Local Plan Dec 2013) and it remains a live document to be updated as necessary.

2. Geography Covered

Housing Market Area (HMA)

1. Solihull is one of 14 authorities that make up the Birmingham & Black Country HMA, the others being:
    - Birmingham CC
    - Bromsgrove DC
    - Cannock Chase DC
    - Dudley MBC
    - Lichfield DC
    - North Warwickshire DC (also located with the Coventry & Warwickshire HMA)
    - Redditch DC
    - Sandwell MBC
    - South Staffordshire DC
    - Stratford upon Avon DC (also located with the Coventry & Warwickshire HMA)
    - Tamworth DC
    - Walsall MBC
    - Wolverhampton CC
2. Through membership of the West Midlands Combined Authority, the following authorities also have a relationship with Solihull MBC:

- Coventry CC
- Nuneaton & Bedworth DC
- Rugby DC
- Shropshire C
- Telford & Wrekin C
- Warwick DC
- Warwickshire CC

3. Areas Solihull MBC & SSDC are in Agreement

Housing Need

1. Solihull MBC Council and SSDC have been active members of the GBSLEP HMA Technical Officers Group since it was created and have contributed to all discussions relating to the delivery of unmet housing need with the HMA

2. This engagement has been ongoing and effective in so far as it has resulted in unmet housing need (to 2031) within the HMA being reduced from 37,572[1] dwellings in 2015 to 2,597[2] dwellings as at 2019.

3. The 2,597 shortfall (which includes a 2,000 contribution from Solihull) noted above represents the position using land supply as at 1st April 2019, and as such does not yet include contributions towards the shortfall from authorities that have published plans or emerging plans since then. This includes both Lichfield and South Staffordshire. These authorities have plans that are seeking to make contributions to the HMA of 4,500 (2018- 40) and up to 4,000 (2018-38) respectively[3]. Less than a third of this provision would need to be made by 2031 to see the overall HMA shortfall to 2031 having been dealt with.

4. SSDC note that the Draft Submission Plan published by SMBC in October 2020 includes a contribution to the HMA shortfall of 2,105 dwellings up to 2031. It is also noted that this contribution represents the difference between the supply SMBC believe to be sustainable and SMBC's Local Housing Need. Whilst SSDC still have concerns about this figure and how it was arrived at (see later section), this amounts to an issue about the soundness of Solihull's plan. SSDC agree that SMBC have satisfied the legal duty to cooperate test.

5. It is acknowledged that SMBC have published consultation material relating to its Local Plan review process at the following dates and stages:

    - Scope, Issues and Options – November 2015
    - Draft Local Plan – November 2016
    - Draft Local Plan Supplementary Consultation – January 2019

6. In each case SSDC have been consulted on these documents and have engaged as they felt appropriate at the time.

7. It is acknowledged that both SMBC and SSDC were active partners as part of the HMA wide commission undertaken by GL Hearn to produce the Strategic Growth Study.

8. It is noted that in December 2019 BCC published an updated Local Development

Scheme (LDS) , which concluded that an early review [of the 2017 BDP] was not required. This stated that "*the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022*." At this early stage Birmingham CC has not made any request to any LPA within the HMA to help with housing need beyond 2031, nor has it set out what any extent of shortfall beyond 2031 may be.

9. The four Black Country local authorities have indicated a shortfall arising from their urban area on multiple occasions, setting out a significant urban capacity shortfall of 21,670 dwellings up to 2036 as part of their Black Country Core Strategy Issues and Options Report in 2017. The Black Country's view that it required assistance with unmet needs was then re- iterated through a Duty to Co-operate letter circulated by the Association of Black Country Authorities in July 2018 and then was updated further in the Black Country Urban Capacity Review December 2019, which indicated the Black Country's urban shortfall had increased to around 26,918 dwellings up to 2038. This urban capacity evidence has informed more recent HMA Position Statements, but due to plan preparation timescales has not yet been considered in the examination of the Black Country Joint Plan.

10. Most recently, on the 4th August 2020 The Association of Black Country Authorities wrote to all members of the HMA regarding the challenges facing the Black Country Joint Plan review in so far as they related to matters of Housing and Employment land supply. This letter supports the ongoing duty to cooperate process in so far as it relates to the Black Country Joint Plan, but also plan preparation and review for recipient authorities (extent subject to stage of plan making). The letter updated the Black Country's plan preparation timescales, identifying that the Black Country Authorities are preparing a Draft Plan for consultation in summer 2021, with an aim to produce a Publication Plan in summer 2022 and adopt the Plan in early 2024. Despite initial work around urban capacity and potential Green Belt release within the Black Country area and potential contributions to unmet needs (including those from the Black Country) proposed by other authorities through the Duty to Co- operate, this letter indicates there remains a significant level of unmet need in the order of at least 4,500 - 6,500 homes and up to 292 ha-570ha of employment land up to 2039.

Housing Opportunities in the Urban Area or Beyond the Green Belt

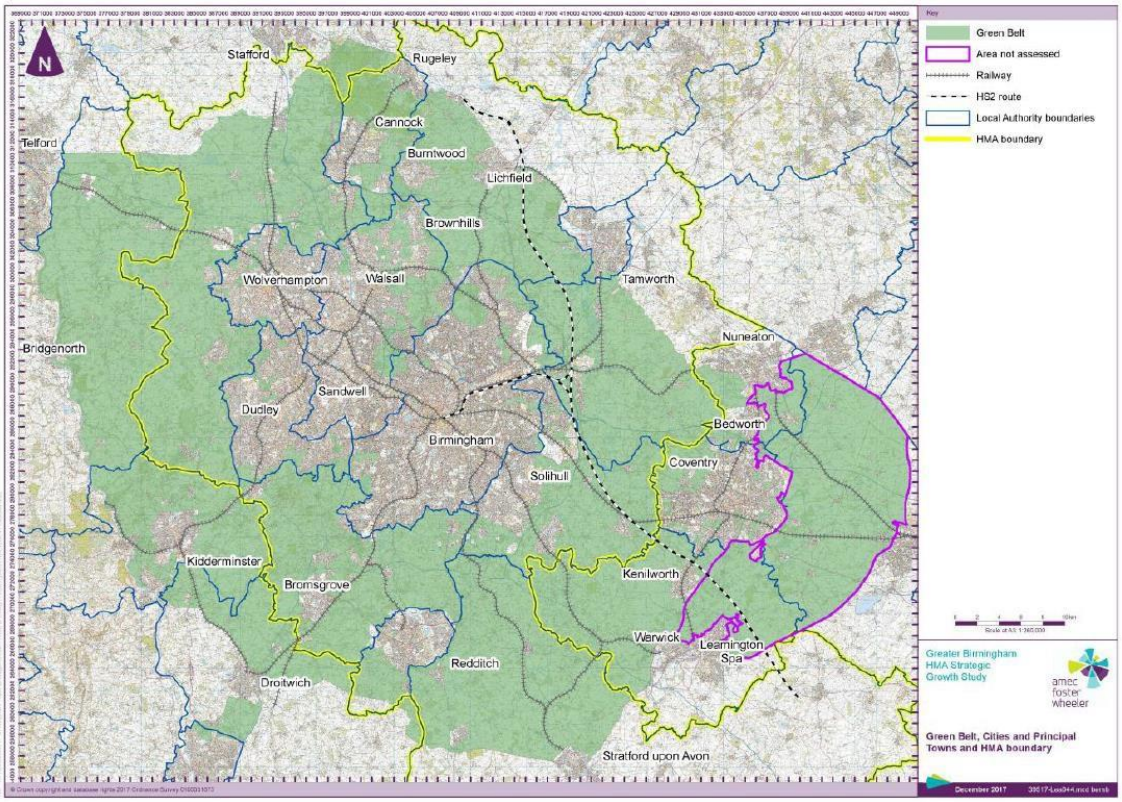
1. From the onset of the Boroughs Local Plan Review in 2015 it has been clear that significant housing pressures existed across the HMA, and beyond. Prior to the onset of the Plan review, SMBC notes that the development and examination of the BCC Local Plan which, following the publication of the Inspectors report in 2015, confirmed a significant shortfall in housing need that was required to be met within the wider HMA. In part of reaching this decision BCC were deemed to have demonstrated exceptional circumstances to justify the release of Green Belt land. In the proceeding 5 years SMBC have also noted the development and examination of other Local Plans across the HMA (for instance Bromsgrove) that exceptional circumstances were demonstrated to justify the release of Green Belt land to meet housing needs.

2. In addition, SMBC are active members of the Coventry, Solihull and Warwickshire Planning Officers Group and engaged actively with the respective authorities in relation to the development and adoption of their Local Plans and the Memorandum of Understanding that underpinned them. This is a further important

step as each authority demonstrated exceptional circumstances to justify the release of land from the Green Belt to meet the housing needs of the HMA. In the case of Stratford and North Warwickshire (where this matter remains subject to a live EIP), active proposals are also made to support the GBBC HMA.

3. Notwithstanding the above approximately 67% of the Boroughs land area is covered by Green Belt with significantly limited brownfield opportunities within the urban area or the rural settlements. As part of developing the Solihull Local Plan the Borough have been active participants in the HMA Strategic Growth Study, which included looking at options of density and brownfield land as a primary option ahead of releasing land from the Green Belt. In this respect SMBC have sought maximise the efficiency and deliverability of land within its existing urban areas.

4. Lastly, the plan below shows the extent of Green Belt coverage across the West Midlands Area. SMBC are mindful that a key part of the NPPF, and draft proposals for the future national planning system, is the principle of Sustainable Development and conversely the importance of meeting development needs as close as possible to where they arise. In SMBC's view, the above summary therefore clearly demonstrates that it would be unsustainable and inappropriate not to plan positively for meeting local housing needs within the Borough and where possible any of the unmet need within the wider HMA, especially arising from Birmingham given the geographical relationship and level of connectivity. This therefore provides part of the justification for exceptional circumstances in Solihull and demonstrates how SMBC have engaged with and supported the wider HMA in considering the most sustainable options for meeting development needs.



The West Midlands Green Belt and Greater Birmingham HMA (Figure 24 from Strategic Growth Study (GL Hearn Feb 2018)

UK Central

5. The UKC Hub area is recognised as being of strategic importance to the local, regional and national economy. It will provide for an effective and efficient use of land associated with the development of HS2 and facilitate future and long term economic growth for the area. This will also include significant connectivity improvements with other areas both to the north and south east. The development proposal is supported by the WMCA and Mayor for the West Midlands.

6. As part of the next iteration of the plan, SSDC notes SMBC intention to publishing updated evidence regarding housing and economic development needs in the form of a Housing & Economic Development Needs Assessment (HEDNA). The HEDNA includes analysis of employment forecasts including a scenario relating to potential above trend growth at the UK Central Hub. In doing so it uses commuter patterns from the 2011 census that indicate 25.3% of the workforce are Solihull residents.

Employment Land

1. SSDC has not approached SMBC to ask for assistance in accommodating employment land that cannot be accommodated within SSDC.

Minerals

2. SMBC has been an active member of the West Midlands Aggregates Working Party, which provides a forum for discussion of strategic matters relating to minerals, and for agreeing Local Aggregate Assessments.

3. SMBC was actively involved in the preparation of the West Midlands Metropolitan Area Local Aggregates Assessment 2015, which sets out the annual apportionment for sand and gravel for the sub-region. An update to the LAA 2015 is being prepared. The LAA makes clear that Solihull is the principal contributor to the sub-regional apportionment figure for sand and gravel aggregates of just under 0.5 million tonnes per annum (which amounts to over 90% of the supply from the sub-region).

4. Discussions have taken place with Warwickshire County Council in May 2019 and with WCC and Walsall MBC in February 2020. Walsall is the only other source of primary sand and gravel aggregates in the Metropolitan Area. These discussions have resulted in a draft SOCG prepared by WCC for its EIP. The draft SOCG acknowledges that there will be some sterilisation of mineral resources in Solihull due to HS2, but indicates that SMBC is not currently seeking compensation from WCC for the potential loss through any Plan requirement.

4. Areas Subject to Ongoing Discussion

1. Whilst both parties agree that engagement work through the Duty to Cooperate has been constructive, active and ongoing, in so far as the level of unmet need up to 2031 has reduced in the HMA Position Statement no.3, it is acknowledged that some HMA authorities believe that SMBC could do more to deliver additional homes in order to address shortfalls both up to and beyond 2031. Both parties agree that this does not amount to a legal deficiency in relation to the Duty to Cooperate, but could be perceived as a matter of soundness.

2. Both parties will continue to engage with a view to establishing whether SMBC's approach to site selection of sites in the Green Belt is broadly consistent with

approaches being taken elsewhere in the HMA, as it is understood that this has been used to determine SMBC's housing target.

3. SSDC note SMBC's position that no trigger mechanism has been incorporated into the plan as SMBC believe this would be a duplication of the statutory requirement to review the plan within 5 years. Both parties acknowledge that this is an issue that the Inspector may wish to explore further and if required both parties will seek to agree appropriate wording that could form the basis of a modification to the plan. Such wording would include trigger points (including for instance progress of other plans around the HMA) that may point to an earlier review of the plan. Notwithstanding this, SSDC still has fundamental concerns with the soundness of deferring post 2031 housing shortfalls to a future review of the Solihull Local Plan, which are set out in the following section.

5. Areas Subject to Disagreement

1. SSDC believe that SMBC's contribution to HMA need beyond 2031 should be addressed as part of the current plan.

2. Given the timetable at play here it is the view of SMBC that there remains a significant amount of work to be undertaken to evidence this shortfall and review the overall need in light of recent government changes to the Standard Methodology which, given the timeframes involved, will affect the continued development of the Black Country Plan. Any final shortfall will also be subject to testing through further consultation and public examination. SMBC therefore commits to continuing to work alongside the Black Country Authorities and other members of the wider HMA to review the evidence which supports the unmet need but notes that any outstanding need retains significant uncertainty and is also likely to be relevant towards the latter half of the Plan Period (post 2031 for example). Given the likelihood of a Local Plan review within SMBC prior to 2031 (having regard to the position with the BCC Local Plan and national planning system/guidance), SMBC is of the view that this issue can be more constructively and effectively managed as part of its next Local Plan review.

3. As part of this SOCG, SSDC acknowledge the position set out by SMBC but do not agree with the approach proposed. Given what SSDC views as successive indications of unmet needs arising from the Black Country urban area since 2017 and the independent strategic evidence of unmet needs up to 2036 offered in the 2018 GBHMA Strategic Growth Study, SSDC consider that deferring the strategic issue of post 2031 unmet housing needs as a significant soundness issue for Solihull's Local Plan Review. Given the time that has passed since the Black Country's 2017 Issues and Options report and the publication of the 2018 GBHMA Strategic Growth Study, SSDC view it as essential for the effectiveness of the Solihull Local Plan review that such cross boundary unmet housing needs are dealt with rather than deferred to a future review of the Local Plan. SSDC do not agree that the SMBC Local Plan review can be considered sound without effectively addressing this matter.

APPENDICES

A. Relevant Notable Events/Timeline

2014

1. November – Publication of the Strategic Housing Needs Study Stage 2 (Peter Brett & Associates (PBA)). This study considered both geographies and needs/supply across the study area and was commissioned by the Greater Birmingham and Solihull LEP[4] and the 4 Black Country authorities.

2015

2. January – Inspectors interim report into the Birmingham Development Plan confirming the appropriateness of the HMA geography.

3. August - Publication of the Strategic Housing Needs Study Stage 3 (PBA). This provided an update to the stage 2 study and noted the BDP Inspectors comments on the HMA geography. The housing need/supply balance across the HMA was noted to result in a shortfall of 37,572 dwellings[5].

4. September – HMA Housing Conference (hosted by SMBC at the NEC). The conference was attended by representatives of all 14 HMA authorities and typically included a relevant Cabinet Member, Director/Head of Service and Heads of Policy. It was agreed:

    - That the housing shortfall (37,500) is a shared problem for the HMA authorities;
    - To collaborate as part of our duty to co-operate to find a solution;
    - To share resources, expertise and provide mutual support towards a solution;
    - To establish HMA Technical officer group.

5. November – SMBC publishes Scope, Issues and Options consultation.

2016

6. January - HMA Housing Conference (hosted by SMBC at Solihull College).

7. March – Inspectors final report into the Birmingham Development Plan issued. The Inspector took into account the Strategic Housing Needs Study (both stage 2 and 3). He concluded that the city had a need for 89,000 dwellings and a supply of 51,100, leaving a shortfall of 37,900 dwellings.

8. November SMBC publishes Draft Local Plan consultation.

2017

January – Birmingham Development Plan adopted, thus quantifying (at 37,900 dwellings[6]), through an adopted plan, the extent of the Birmingham shortfall which is the principal cause of the HMA shortfall. The plan recognises that the "Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city." Furthermore policy TP48 goes onto state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham's capacity by means of a full or partial BDP review after three years.

1. March – GL Hearn commissioned by the 14 HMA authorities to produce the

Strategic Growth Study

2018

2. February – Publication of the Strategic Growth Study (GL Hearn).
3. February – HMA Position Statement No. 1 – Issued alongside the publication of the Strategic Growth Study. The statement noted:
    - That the Strategic Growth Study "*is an independently prepared, objective study and not a policy statement. It does not in any way commit the participating authorities to development of any of the geographic areas referred to (nor does it exclude the testing of alternatives), but it is a thorough evidence base to take matters forward through the local plan review process.*"
    - That there is a minimum shortfall of 28,150 to 2031 and of 60,855 up to 2036, but that higher densities might increase supply on identified sites by up to 13,000.
4. September - HMA Position Statement No. 2

2019

5. January – SMBC publishes Draft Local Plan Supplementary Consultation.

2020

6. September - HMA Position Statement No. 3
7. October - SMBC publishes Draft Submission Plan.

B. Relevant Organisations and or Groups SMBC is a Member of or

1. HMA Technical Officers Group
2. CSWPO – Coventry, Solihull and Warwickshire Planning Officers group. The group was initially established to support work on the West Midlands Regional Plans but following their abolition evolved to support the Duty to cooperate process for the area. As a neighbouring authority to Coventry, North Warks and Warwick, Solihull attend monthly meetings to gain a full understanding of emerging development pressures and policy developments across the area. The introduction of HS2 and UKC Hub has also given a strategic significance to ongoing meetings of this group given the existing and planned connectivity and growth opportunities. SMBC is also able to provide a useful link (alongside SADC and NWBC) between the Coventry and Birmingham HMA's.
3. GBSLEP
4. WMCA

C. Published Documents Referred To

1. HMA Position Statement No. 1 (February 2018) - https://www.solihull.gov.uk/Portals/0/Planning/Greater-Birmingham-HMA-Position-Statement-February-2018.pdf
2. HMA Position Statement No. 2 (September 2018) – [web link to be provided]
3. Strategic Growth Study (GL Hearn February 2018) - https://www.solihull.gov.uk/Portals/0/Planning/Greater-Birmingham-HMA-Strategic-Growth-Study-Standard.pdf
4. HMA Position Statement No. 3 (published September 20200 – [web link to be inserted here]

[REDACTED]

Solihull Metropolitan Borough Council

Signed: Mark Andrews

Position: Head of Planning, Design & Engagement

Services Date: 18/05/21

[REDACTED]

South Staffordshire District Council

Signed: Councillor Roger Lees

Position: Deputy Leader and Cabinet Member for

Planning Date: 18/05/21

13.12.2021 – SMBC response to SSDC Preferred Options Consultation

From: Palmer, Gary (Places Directorate - Solihull MBC) <[REDACTED]@solihull.gov.uk>

Sent on: Monday, December 13, 2021 4:12:15 PM

To: External Email for Local Plans <localplans@sstaffs.gov.uk>

Subject: South Staffs DC - Local Plan Consultation - Nov-Dec 2021 - Response from Solihull MBC

You don't often get email from [REDACTED]@solihull.gov.uk. Learn why this is important

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Colleagues

I would be grateful if you would treat the contents of this email as Solihull MBC's response to your consultation.

Solihull MBC welcomes the contribution SSDC is intending to make towards the shortfall occurring across the HMA, particularly as this is likely to result in land being released from the Green Belt and SMBC recognises the difficult decisions that this will entail as our own emerging plan already proposes the release of some 574ha of land from Solihull's Green Belt.

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.

SMBC notes the weight SSDC have placed on the Strategic Growth Study (GL Hearn 2018). However SMBC believe that SSDC's approach may not be appropriate in all other areas of the HMA since it starts from the proposition that all the GL Hearn SGS recommended options can indeed be accommodated (this is in the context that the study itself recognised there are tensions between proposals for new development and the quality of much of the Green Belt around the conurbation), and that there are no other strategic options. The approach SSDC should follow should recognise that additional flexibility may be required if there is emerging evidence that is starting to demonstrate that some of the GL Hearn recommended options (both within South Staffordshire and elsewhere) may not be suitable, achievable or deliverable and/or other strategic options may be available.

SMBC welcomes the opportunity to continue to constructively engage with SSDC over relevant duty to cooperate matters.

Regards

Gary Palmer

Group Manager – Policy & Engagement

Growth & Development

Economy & Infrastructure Directorate

Solihull MBC

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B91 3QB

Tel No: 0121 704 8008

Direct Dial:[REDACTED]

Email: psp@solihull.gov.uk



22.11.2023 – duty to co-operate meeting minutes

Minutes

South Staffordshire DC and Solihull MBC Duty to Cooperate meeting.

22 November 2023, 12noon-1.30pm

MS Teams

1) **Introductions**

South Staffordshire DC

Ed Fox

Kelly Harris

Patrick Walker

Alex Evans

Solihull MBC

Gary Palmer

Mark Andrews

Emma Tinsley-Evans

2) **Local Plan updates**

Update from South Staffordshire DC

Carried out a Regulation 19 consultation at the end of 2022. However, work on the plan was then paused as a result of the consultation on the revised NPPF in December 2022.

South Staffordshire have now resumed work on the Plan including looking at different spatial strategy options, revisions to the evidence base and an extension to the plan period.

The current timetable is to progress the new Reg 19 Plan through the agreement process from January with an anticipated consultation starting in April.

Update from Solihull MBC

The Local Plan has been submitted for 30 months.

Earlier this year examination was paused. This was in relation to two areas:

1. supply coming forward at the NEC
2. local issue in relation to the relocation of secondary school within a site

The inspectors have indicated that their initial view is that the Duty to Cooperate has been complied with. They have also indicated that they are satisfied with the spatial strategy and site selection process.

The revised NPPF will likely have an impact on the examination.

It is anticipated that other soundness issues may be raised by the inspectors, but these can likely be resolved through main modifications.

3) SSDC letter dated 24/10/23

Solihull MBC confirmed that they will be sending a response before the deadline (24th November).

4) Housing Market Area (HMA) SoCG and Strategic Growth Study update

Areas of discussion included:

HMA authorities under the Duty to cooperate will need to assess the shortfall across the HMA. They will also need to gain an understanding of the approach different authorities are taking towards the release of Green Belt land for housing.

The relevance and scope of the study will depend upon whether different authorities are committed to looking at their Green Belt land for housing. NPPF clarity is needed in order to review what the scope of the study would be.

5) West Midlands Strategic Employment Sites Study

No draft study has been issued yet. The study has not potentially grappled fully with Local vs Strategic needs.

6) Gypsy and Travellers

South Staffordshire have an identified shortfall which they are engaging on through the duty to cooperate. They are also updating their GTAA.

South Staffordshire have set out in the letter four steps they have taken to identify additional sites and are asking other HMA authorities to outline what steps they have taken. SSDC requested SMBC confirm which of the four steps they have taken in exploring pitch options in their response to the letter dated 24/10/23.

7) AOB

None

Appendix 14 – Stafford Borough Council Documents

30.11.2018 – SBC response to SSDC Issues & Options Consultation

Thank you for the opportunity to respond to the South Staffordshire Local Plan Issues and Options 2018 – 2037 consultation document with clear options identified through a place-based approach.

As Stafford Borough is a neighbouring authority to South Staffordshire District a number of the strategic key issues and growth options could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham Housing Market Area, nor the Greater Birmingham & Solihull LEP area.

It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the South Staffordshire District area. On this basis, in terms of the future housing provision options, Stafford Borough considers that Option B (Meet the OAN plus 1,900 new homes towards the shortfall) would be most appropriate to minimise impact on the West Midlands Green Belt constraint covering much of South Staffordshire District and the need to minimise infrastructure implications for neighbouring areas. Options C to F would lead to a significant net inflow of new residents each year, which could impact on adjacent areas concerning future housing allocations. Furthermore it is considered that Option A would be appropriate in terms of addressing the over-supply of employment land whilst focussing on the 4 main employment sites in the District.

In terms of the spatial options for delivering new housing locations, the Borough Council supports Option B with an appropriate balance across Tiers 1 to 4 based on access to services and facilities. This would ensure future sustainable development by utilising existing and new infrastructure provision due the Green Belt position. It should be noted that the Borough Council would have significant concerns arising from Options C to F because of new development being identified north of Penkridge or on the southern boundary of Stafford Borough due to the implications on Stafford Town's infrastructure, services and facilities as well as transport network pressures. Option B would avoid exceptional circumstances having to be demonstrated for Green Belt release, continue to facilitate the delivery of brownfield sites whilst facilitating a mix of urban and rural housing solutions to deliver economic growth and protecting the high quality environments across the Local Plan area. The adopted Plan for Stafford Borough 2011-2031 delivers a strategy for new development which does not make any amendments to the Green Belt within the Borough.

With regards to future provision outside of South Staffordshire District, the Borough Council can confirm it is not in a position to provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council has recently initiated a New Local Plan to set out the future development strategy beyond the adopted Plan period of 2031. Therefore if it is considered necessary to deliver

development in other areas the Borough Council would welcome an opportunity to discuss the implications of this approach in more detail, to ensure the infrastructure implications are considered in balance with achieving housing and employment needs across a wider area.

In particular the Habitats Regulation Assessment of future housing growth in South Staffordshire District will need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation (SAC) together with implications for the wider Cannock Chase Area of Outstanding Natural Beauty. The Borough Council will continue to work alongside South Staffordshire District through the Cannock Chase SAC Partnership.

The Borough Council would welcome an acknowledgement of this response and the opportunity to enter into a Duty to Co-operate Statement with South Staffordshire District Council as part of preparing the new Local Plan to support delivery of housing and employment requirements in the context of the wider area.

I look forward to hearing from you in due course.

Kind regards

Alex Yendole

Stafford Borough Council

30 November 2018

12.12.2019 – SBC response to SSDC SHSID Consultation

Stafford
BOROUGH COUNCIL

Mrs K Harris
Strategic Planning Team
Manager South Staffordshire
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OUR REF AY/766
YOUR REF
DATE 12 December 2019

By post and e-

mail

Dear Mrs

Harris

SOUTH STAFFORSHIRE SPATIAL HOUSING STRATEGY & INFRASTRUCTURE DELIVERY

Thank you for the opportunity to respond to the South Staffordshire Local Plan Spatial Housing Strategy and Infrastructure Delivery consultation.

We note that South Staffordshire District's housing need calculated, in accordance with the standard approach set out in Government planning guidance, to be 4,845 dwellings between 2018 and 2037. We also note that South Staffordshire Council proposes to plan an additional 4,000 homes as a contribution to meeting unmet housing need in the Greater Birmingham Housing Market Area.

We see that seven spatial options for the distribution of those 8,845 homes have been appraised, and option G – Infrastructure-led development with an area of search for a new settlement beyond the plan period – is identified as the preferred option.

Appendix 4 (Indicative growth tables) to the Spatial Housing Strategy paper suggests that option G could include around 186 houses south of Stafford in the A34 corridor.

Stafford Borough Council has serious concerns about any urban extension to Stafford which does not provide appropriate infrastructure in Stafford to mitigate the impact. Whilst we note that option G shows an area of search in the north of your District adjacent to the Stafford boundary, the reality is that there is only one location where a development would form an urban extension to Stafford. If South Staffordshire Council decide to allocate land at this location for housing development the appropriate policy should recognize that, as the site is

remote from any settlement or services in South Staffordshire, the occupiers of the development will look to Stafford to provide their services. Accordingly this will impact on roads, schools and leisure provision in Stafford, which should be appropriately mitigated. We therefore reserve the Council's position on the proposal, pending further details being provided to demonstrate the following:

- that highways and education impacts in Stafford Borough can be acceptably mitigated,
- that contributions to meeting Stafford's affordable housing need and providing for leisure facilities in Stafford would be secured,

- that impacts on the landscape, including the setting of the Cannock Chase Area of Outstanding Natural Beauty (AONB), would be acceptable,

- that appropriate mitigation for impacts on the Cannock Chase Special Area of Conservation (SAC) would be secured. To this end, Stafford Borough Council will continue to work alongside South Staffordshire Council through the Cannock Chase SAC Partnership.

We note that some of the rejected options included a larger urban extension south of Stafford and we strongly agree with the decision of South Staffordshire Council to reject this. As is mentioned in the consultation document, this option was not favoured in the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study.

The preferred option involves an area of search on the A449 corridor for a new settlement beyond the plan period, after 2037. One of the options in the GBHMA Strategic Growth Study was a new settlement around Dunston, although this was not one of the recommended areas of search for strategic development. Any development in this location would have significant impacts on Stafford Borough. We would therefore be grateful if you could ensure that we are kept updated on the consideration of new settlement options and would welcome the opportunity to comment further, and consider infrastructure implications.

The Strategic Growth Study identified north of Penkridge as a recommended area of search for a strategic urban extension. In our view this warrants further investigation, as an alternative to a new settlement or to new homes south of Stafford.

Finally, we note that the next consultation stage will consider options for accommodating requirements for employment land, and for gypsy, travelers and travelling show people's accommodation. South Staffordshire Council is reviewing its needs and supply evidence regarding gypsies, travellers and travelling show-people. We would reiterate that, as previously advised, Stafford Borough Council is not in a position to provide for any unmet gypsy, traveller and travelling show-people needs within Stafford Borough.

I would be grateful if you could acknowledge safe receipt of this letter. In due course we will prepare and agree a statement of common ground in relation to strategic planning matters with cross border implications.

Yours sincerely,

[redacted]

Alex Yendole
Planning Policy Manager

South Staffordshire Council

Our Ref: SBC/IO

29th April 2020

Please ask for: Ed Fox
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Alex Yendole
Planning Policy Manager
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South Staffordshire Council response to the Stafford Borough Local Plan 2020-2040 Issues and Options consultation document

Dear Alex,

Thank you for providing South Staffordshire Council with the opportunity to comment on Stafford Borough Council Issues and Options Consultation (February 2020). This letter follows the Council's interim response to the consultation sent to you on 23rd March 2020. The response has now been through the Council's constitutional process, and following consideration by Members, remains unchanged. Therefore, please accept this letter as the Council's final response to the consultation.

South Staffordshire Council supports the broad approach within the Stafford Borough Issues and Options document. Should the Borough Council decide to adopt a level of growth greater than that identified through the Objective Assessment of Needs it is suggested that this would present an opportunity for Stafford Borough Council to make a direct contribution towards meeting the shortfall of housing need identified within the Greater Birmingham Housing Market Area (GBHMA). Such an approach would be consistent with national policy

as identified within the National Planning Policy Framework paragraph 137 which promotes a sequential approach to exploring potential development opportunities prior to the release of Green Belt sites. This approach includes 'discussions with neighbouring authorities about whether they could
accommodate some of the identified need for development'. The potential scale of the housing supply requirements and shortfall within the GBHMA has been evidenced through the adoption of Birmingham Development Plan 2031 and the subsequent GBHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Stafford Borough Council to actively consider a contribution towards meeting the GBHMA shortfall as part of the current local plan review process.

We trust that the comments are useful and look forward to ongoing discussion with you on cross boundary issues throughout the preparation of our respective Local Plans.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager

24.02.2021 – SBC response to SSDC 08.01.2021 letter

Stafford BOROUGH COUNCIL

Mrs K Harris
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DATE 24 February 2021

By e-mail

Dear Mrs Harris

SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW – REVIEW OF GREEN BELT

Thank you for your letter dated 8th January 2021 concerning the review of Green Belt.

We note the current position in terms of South Staffordshire District's housing need and its contribution to unmet housing need in the Greater Birmingham Housing Market Area as well as progress on the Local Plan Review.

As you may be aware Stafford Borough Council completed a consultation period on the New Local Plan 2020-2040 Issues & Options stage in April 2020 and is currently preparing for the Preferred Options stage in the context of local evidence, the Government's national policy context and economic recovery due to implications of the Covid-19 pandemic.

At this time, with the New Local Plan in the very early stages of preparation, it is not possible to assist South Staffordshire in terms of unmet housing needs, providing additional housing supply to reduce your housing target or agree to cover any strategic housing needs. Nevertheless the Borough Council will continue to support South Staffordshire by preparing and agreeing a statement of common ground in relation to strategic planning matters with cross border implications.

I look forward to hearing from you in due course and would be grateful if you could acknowledge safe receipt of this letter.

Yours sincerely,

Alex Yendole
Planning Policy Manager

07.12.2021 – SBC response to SSDC Preferred Options Consultation

SOUTH STAFFORDSHIRE LOCAL PLAN – PREFERRED OPTION STAFFORD

BOROUGH COUNCIL RESPONSE - 6 DECEMBER 2021

Thank you for the opportunity to respond to the South Staffordshire Local Plan Preferred Option 2018 – 2037 consultation document.

As Stafford Borough is a neighbouring authority to South Staffordshire District a number of the strategic key issues and growth options could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham Housing Market Area, the same Functional Economic Market Area nor the Greater Birmingham & Solihull LEP area.

It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the South Staffordshire District area. On this basis, in terms of the future housing provision, Stafford Borough considers that the preferred option of meeting the current local housing need of 4,881 plus 4,000 new homes towards the Black Country shortfall is the most appropriate approach, noting the impact on the West Midlands Green Belt covering much of South Staffordshire District and the need to minimise infrastructure implications for neighbouring areas.

Furthermore it is considered that the preferred option is appropriate in terms of addressing the employment land provision. In general it is considered that the preferred option will facilitate a mix of urban and rural housing solutions to deliver economic growth whilst seeking to protect the high quality environments across the Local Plan area. With regards the delivery of new housing locations, the Borough Council supports the preferred option as an appropriate balance across Tiers 1 to 3 based on access to services and facilities together with a focus on maximising the use of brownfield land. This will ensure future sustainable development by utilising existing and new infrastructure provision due the Green Belt position.

Nevertheless it should be noted that the Borough Council has significant concerns in terms of Policy DS3 and Table 8 regarding an urban extension of Stafford Town arising from new development being identified on the southern boundary of Stafford Borough for a minimum of 168 houses in the A34 corridor, Weeping Cross south of Stafford as part of Locality 1, Site 036c. This would not appear to accord with Strategic Objective 2 of the New Local Plan Preferred Option as a sustainable approach to meeting the needs of the Greater Birmingham Housing Market Area. In particular it is considered that this location is less sustainable and deliverable than other sites in South Staffordshire adjacent to or in close vicinity to the Black Country authorities where housing need is originating. Therefore reference to this new development should be removed from the New Local Plan process and subsequent iterations of the Plan, including reference in Policy DS3, Table 8, Policy SA5, paragraph 4.24 and Appendix F.

Furthermore such a development does not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire, with the occupiers of the development looking to Stafford to provide their services. Accordingly this will impact on

roads, schools and leisure provision in Stafford, which have a number of capacity issues. To date further details have not been provided to demonstrate the following, with very limited information in the latest Infrastructure Delivery Plan published alongside the Local Plan preferred option:

- that highways and education impacts in Stafford Borough can be acceptably mitigated;

- that contributions to meeting Stafford's affordable housing need and providing for leisure facilities in Stafford would be secured; and

- that impacts on the landscape, including the setting of the Cannock Chase Area of Outstanding Natural Beauty (AONB), would be acceptable.

With regards to future provision outside of South Staffordshire District, the Borough Council can confirm it is not in a position to meet any of the shortfall arising from the Black Country at this stage and furthermore can not provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.

The Borough Council also notes the area of search along the A449 corridor for a new settlement beyond the plan period, after 2038 in Policy DS4 which includes the area around Dunston south of the Stafford Borough boundary. However this option, when previously assessed through the GBHMA Strategic Growth Study 2018 was not one of the recommended areas of search for strategic development. Any development in this location would have significant impacts on Stafford Borough. The Strategic Growth Study identified north of Penkridge as a recommended area of search for a strategic urban extension. In our view this warrants further investigation, as an alternative to a new settlement or to new homes south of Stafford. We would therefore be grateful if you could ensure that we are kept updated on the consideration of new settlement options and would welcome the opportunity to comment further, and consider infrastructure implications.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council has recently initiated a New Local Plan to set out the future development strategy beyond the adopted Plan period of 2031.

In particular the Habitat Regulations Assessment of future housing growth in South Staffordshire District will need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation (SAC) together with implications for the wider Cannock Chase Area of Outstanding Natural Beauty. The Borough Council will continue to work alongside South Staffordshire District through the Cannock Chase SAC Partnership.

The Borough Council would welcome an acknowledgement of this response and the opportunity to enter into a Duty to Co-operate Statement with South Staffordshire District Council as part of preparing the new Local Plan to support delivery of housing and employment requirements in the context of the wider area.

I look forward to hearing from you in due course.

Kind regards

Alex Yendole
Strategic Planning & Placemaking Manager
Stafford Borough Council

08.02.2022 – SBC response to SSDC 14.01.2022 letter

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OUR REF AY/766
YOUR REF
DATE 8 February 2022

By e-mail

Dear Councillor Mason

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14 January 2022 to my Cabinet Member, under the Duty to Co-operate, asking about the position of Stafford Borough Council concerning gypsy and travellers. I have been asked to respond on behalf of Cllr Mrs Frances Beatty.

The Plan for Stafford Borough 2011-2031 (adopted in June 2014) includes Policy C6 – Provision for Gypsies, Travellers & Travelling Show-people setting out policy criteria for considering development proposals. Subsequently a Gypsy and Traveller Accommodation Needs Assessment (GTAA) was jointly published with the City of Stoke-on-Trent, Newcastle- under-Lyme Borough and Staffordshire Moorlands, which demonstrated a need for 43 new pitches in Stafford Borough up to 2027. Whilst planning permissions have been granted for new pitches in the Borough, there remains an outstanding requirement for new pitches to meet the identified need.

The Borough Council is progressing with the New Local Plan 2020-2040 to replace the adopted Plan for Stafford Borough and the Part 2 Plan (adopted in January 2017) which will include meeting the future gypsy and traveller needs in our administrative area. This evidence base and call for sites identification process is still on-going, with further information being made available when the Preferred Options consultation is published in June & July 2022. Nevertheless at this stage I can confirm that Stafford Borough Council are not in a position to help the unmet need for new gypsy and traveller pitches in South Staffordshire District Council.

If you have any further queries, please do not hesitate to get back in contact.

Yours sincerely,

Alex Yendole
Strategic Planning & Placemaking Manager

19.08.2022 – SBC response to SSDC 08.08.2022 letter

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DATE 19 August 2022

By e-mail

Dear Councillor Mason
Re: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 8 August 2022 directed to my Cabinet Member, under the Duty to Co-operate, asking about the position of Stafford Borough Council concerning gypsy and travellers. I have been asked to respond on behalf of Cllr Mrs Frances Beatty.

The Plan for Stafford Borough 2011-2031 (adopted in June 2014) includes Policy C6 – Provision for Gypsies, Travellers & Travelling Show-people setting out policy criteria for considering development proposals. Subsequently a Gypsy and Traveller Accommodation Needs Assessment (GTAA) was jointly published with the City of Stoke-on-Trent, Newcastle- under-Lyme Borough and Staffordshire Moorlands, which demonstrated a need for 43 new pitches in Stafford Borough up to 2027. Whilst planning permissions have been granted for new pitches in the Borough, there remains an outstanding requirement for new pitches to meet the identified need.

The Borough Council is progressing with the New Local Plan 2020-2040 to replace the adopted Plan for Stafford Borough and the Part 2 Plan (adopted in January 2017) which will include meeting the future gypsy and traveller needs in our administrative area. In March 2022 the Borough Council published an updated Gypsy and Traveller Accommodation Assessment (GTAA) which demonstrated a Planning Policy for Traveller Sites (PPTS) need for 22 new pitches in Stafford Borough up to 2040. The call for sites identification process is still on-going, with relevant policy context being made available when the Preferred Options consultation takes place in October to December 2022. Nevertheless at this stage I can confirm that Stafford Borough Council are not in a position to help the unmet need for new gypsy and traveller pitches in South Staffordshire District Council.

Turning to your specific questions I can confirm that all of the plots on existing public sites are occupied and therefore are unable to support South Staffordshire's unmet need. In addition we hold a waiting list for plots for when any become available. This unfortunately is rare as we have recently had to reduce the number of pitches during a refurbishment and most of the residents on the site have lived there for long periods of time and are not considering moving.

Based on current market conditions and available resources for effective delivery within Stafford Borough all potential site delivery options, both public and private, have been considered through submissions from landowners / developers. At this stage the Borough Council are not aware of any publicly owned land which is available to deliver new gypsy sites despite reviewing Stafford Borough Council's land and working with Staffordshire County Council over a number of years in an attempt to identify new gypsy sites.

If you have any further queries, please do not hesitate to get back in contact.

Yours sincerely,

Alex Yendole
Strategic Planning & Placemaking Manager

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:
Alex Yendole (AY) – Stafford Borough Council
Neville Ball (NB) – Walsall MBC
David Holloway (DH) – Dudley MBC
Ian Culley (IC) – City of Wolverhampton Council
Sushil Birdi (SB) – Cannock Chase District Council
Heidi Hollins (HH) – Cannock Chase District Council
Mark Watkins (MW) – Sandwell MBC
Kelly Harris (KH) – South Staffordshire District Council
Ed Fox (EF) – South Staffordshire District Council
Patrick Walker (PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction
AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed
AY – will add in text in table at end that FEMA is predominately Stafford's own borough area
AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?
IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans
AY – will there be conversations in advance if local authorities are affected by this?
IC – yes
KH – Black country evidence as published to date will be kept until new evidence base is available?
IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?
KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that
IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?
KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date
PW – SoCG intended to be record views understood to be agreed to date
IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19
IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't
KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging
DH – Para 4.5; repeats "must" – can we change to "should"?
KH – This is in section on SSDC's position – may not be view of all but is SSDC's view
IC – Could change it to "must continue"?
KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November
ACTIONS: Further info on signing timescales expected from all
ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

17.11.2022 – duty to co-operate meeting minutes

Stafford BOROUGH COUNCIL	**Local Plan 2020-2040 Preferred Options** **Duty to Cooperate meeting – 17 November 2022** **South Staffordshire District Council (SSDC) & Stafford Borough Council (SBC)**

Minutes of meeting

1. Attendees

- Kelly Harris - Lead Planning Manager (SSDC)
- Edward Fox – Strategic Planning Team Manager (SSDC)
- Patrick Walker - Senior Planning Officer (SSDC)
- Alex Yendole - Strategic Planning and Placemaking Manager (SBC)
- Harriet Moseley - Planning Policy Officer (SBC)

2. Stafford Borough Council Local Plan process update

2.1 SBC are currently consulting on the Preferred Options version of the new Local Plan 2020-2040. Consultation closes at 12 noon on Monday 12th December 2022 and representations are encouraged. A short video was shown introducing the Preferred Options document. A presentation was then shown providing a brief overview of the Preferred Options proposed allocations and draft policies, including the Stafford Borough key diagram, as well as Stafford and Stone.

3. South Staffordshire District Council Local Plan process update

3.1 SSDC have a presentation which will be sent via email. The Preferred Options consultation took place in December last year. For the current Publication Plan (Regulation 19) public engagement will be conducted through six virtual meeting Q&A events by locality, as well as providing appointments for face to face meetings on request. SBC need to provide their response by 12 noon on 23 December 2022.

3.2 The SSDC Publication Plan proposes a 4,000 home contribution towards the shortfall from the Great Birmingham and Black Country Housing Market Area, in addition to meeting their own local housing needs.

SSDC and SBC have been progressing with two Duty to Co-operate Statements, one associated with the Functional Economic Market Area (FEMA) with other Councils across the South Staffordshire FEMA, and one specific to the two authorities.

4. Key issues

4.1. It was confirmed by SSDC that an email was received from SBC which included the draft Duty to Cooperate pro forma.

4.2. SSDC are currently reviewing SBC's Publication Plan and intend to provide a response in due course.

4.3. Gypsy and Traveller sites were discussed. SSDC communicated that they currently have a significant shortfall in pitches having considered site options in the Green Belt, land in Staffordshire County Council ownership, and options as part of proposed residential developments. SSDC are asking related authorities if they are able to provide public pitches to meet some of the shortfall and are asking authorities to confirm they have taken the same steps as SSDC in considering pitch options. SBC indicated that they currently do not have any additional capacity. However, it was noted that the call for sites process is still open.

4.4. SBC have made provision for at least 2,000 houses above the current Local Housing Need requirement, which would be delivered as part of the Meecebrook proposals. The surplus would be available to the wider region and SBC currently have not taken any decisions about authorities that may be assisted regarding unmet housing needs. It is also noted that there is a surplus of employment land completions and commitments above the figure of 80 hectares set out in the Stafford Borough Local Plan Preferred Options document. A decision will be made following receipt of Preferred Options representations and will be available at the next stage of the plan process.

4.5. SSDC and SBC acknowledged the continued joint working on the Cannock Chase Special Area of Conservation and meeting the Habitat Regulations Assessment requirements, including nutrient neutrality.

07.02.2023 – SSDC response to SBC Preferred Options Consultation

Sent via email to:
strategicplanning@staffordbc.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

08 December 2022

NOTE: As this response relates to a Duty to Cooperate matter, our response will need to be an individual Decision of our Cabinet Member for Planning and Business Enterprise, Councillor Terry Mason and therefore please accept this response as the Council's interim response pending
completion of the Council's constitutional process to agree the comments. Once the response has
been agreed with Members, we will write to you again to confirm the Council's formal response.

South Staffordshire Council response to the Stafford Borough Council Local Plan 2020-2040 Preferred Options Consultation

Thank you for consulting South Staffordshire District Council (SSDC) on the Stafford Borough Council (SBC) Local Plan 2020-2040 Preferred Options.

SSDC previously responded to SBC's Issues and Options Consultation with an interim response on the 23rd March 2020 which was later confirmed on the 29th April 2020.

SSDC and SBC are neighbouring authorities and therefore have a 'duty to cooperate' with each other
under section 33A of the Planning and Compulsory Purchase Act 2004.

South Staffordshire Local Plan Update

South Staffordshire are currently consulting on their Publication Local Plan (Regulation 19) between Friday 11th November and Friday 23rd December 2022.

Comments

Housing

SSDC and SBC are in separate housing market areas. SSDC acknowledge that the Stafford Borough Local Plan 2020-2040 Preferred Options is currently proposing to meet their own housing needs in full and are not seeking contributions from any other neighbouring authorities. As stated in SSDC's
response to the SBC's Issues and Options Consultation, any oversupply in housing presents an opportunity for SBC to make a direct contribution towards meeting the shortfall of housing need identified within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Such an approach would be consistent with national policy as identified within the National Planning Policy Framework paragraph 137 which promotes a sequential approach to exploring potential development opportunities prior to the release of Green Belt

sites. This approach includes 'discussions with neighbouring authorities about whether they could accommodate some of the identified need for development'. SSDC would therefore 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. South Staffordshire are also planning on meeting their full housing requirements as part of its emerging Local Plan 2018- 2039, whilst making an appropriate contribution to the unmet needs of the GBBCHMA.

Employment

SSDC's 2022 Economic Development Needs Assessment (EDNA) identified SSDC and SBC both within the South Staffordshire functional economic market area (FEMA), alongside Cannock, Dudley, Walsall and Wolverhampton. SSDC acknowledge that the Stafford Borough Local Plan 2020-2040 Preferred Options is currently proposing to meet their employment land needs in full and are not seeking contributions from any other neighbouring authorities. However, as with the issue of housing, SSDC would encourage dialogue with neighbouring authorities specifically the four Black Country authorities (whose published evidence indicates a substantial circa 210ha shortfall in employment land) to explore if there is justification for any surplus employment supply in Stafford Borough being attributed to those authorities. South Staffordshire are also planning on meeting their full employment land needs as part its emerging Plan 2018-2039 whilst making an appropriate contribution to the unmet needs of the Black Country.

Gypsy and Traveller Accommodation

Policy 30 - Gypsy and traveller accommodation seeks to allocate a site for at least 15 pitches near to Hopton and a site for at least 10 pitches near to Weston. This is to meet a need for 22 Planning Policy for Traveller Site (PPTS) Pitches. The supporting text to the policy describes how there is a need for 26 non-PPTS need which are expected to come forward through the development management process.

SSDC has identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period[1]. SSDC has allocated all suitable sites as identified through our 2021 Pitch Deliverability Study through our Regulation 19 Publication Plan, including sites in the Green Belt. Furthermore, all publicly owned land options in the District (including Green Belt options) have been explored for their potential to provide new public
site options which could address specific families' needs and thereby reduce the shortfall. These assessments are set out on the Council's evidence base page under the Gypsy and Travellers sub- heading: Local Plan Review Evidence Base South Staffordshire Council (sstaffs.gov.uk). In addition, engagement has taken place with site promoters of our proposed housing allocations to explore If they are able to provide a part of their site for a public traveller site. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on site. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the
District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment

in 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

SBC's most recent response to the August 2022 correspondence provided additional clarification in order to confirm their previous position in January 2022 that Stafford Borough would not be able to accommodate any identified unmet Gypsy and Traveller accommodation needs from South Staffordshire. SBC is currently seeking to provide sufficient sites to meet its own Gypsy and Traveller accommodation needs and is progressing with the Local Plan 2020-2040. The call for sites process remains open, and relevant policy context is available through the Preferred Options consultation currently taking place during October to December 2022. In SSDC's view it is therefore currently unclear as to what extent SBC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as the call for sites identification process is still on-going, including covering the Green Belt areas. In addition, SSDC have not received confirmation from SBC that publicly owned land, or land as part of housing allocations have been considered when exploring new public pitch options. SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach. We therefore request that through you plan preparation you explore the following options:

- Consider capacity to intensify/expand existing public sites
- Consider options for new public sites on publicly owned land within the Borough
- Explore if site promoters of your preferred housing allocation are willing to gift a proportion of their site to be run as a public traveller site.

Cannock Chase Special Area of Conservation (SAC) / air quality

SSDC and SBC work together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

Policy 48 - Cannock Chase Special Area of Conservation (SAC) sets out SBCs approach towards the protection of the SAC. SSDC will continue to work with SBC, Natural England and other partners in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC. It will also continue joint working with SBC in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities, including consideration of cumulative and in-combination effects.

Meecebrook Garden Community

SSDC acknowledge SBC's proposal of a Garden Community at Meecebrook for up to 6,000 homes (3,000 of which are anticipated to be delivered in the plan period). The proposed

location of Meecebrook for the Garden Community is some distance away from the South Staffordshire boundary. However, a new community of such a scale may well have potential impacts upon South Staffordshire, we would therefore welcome continued engagement as proposals develop.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

22.11.2023 – SBC response to SSDC 24.10.2023 letter

Stafford
BOROUGH COUNCIL

Mrs K Harris
South Staffordshire Council
Council Offices
CODSALL
South
Staffordshire WV8
1PX

CONTACT Alex Yendole
DIRECT DIAL [REDACTED]
EMAIL [R]@staffordbc.gov.uk
OUR REF
YOUR REF
DATE 22 November 2023

Dear Kelly

RE: South Staffordshire District Council - Duty to Cooperate update

Thank you for the opportunity to respond to the letter received on 24 October 2023 concerning South Staffordshire District Council - Duty to Cooperate update.

As Stafford Borough is a neighbouring authority to South Staffordshire District a number of the strategic key issues and the plan's strategy could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) so not party to the Draft Statement of Common Ground of August 2022.

It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth in the South Staffordshire District area, within the context of any revised / new National Planning Policy Framework.

On this basis, Stafford Borough understands the updated position in terms of housing, Green Belt release and proposed employment provision in the new Plan period to 2041. Nevertheless there is a concern that should South Staffordshire not meet its own local housing needs through Green Belt release this will lead to pressure for additional provision in other areas, in particular the GBBCHMA. Therefore further evidence based work would be required to demonstrate this need can be delivered elsewhere, not least on brownfield land, whilst minimizing infrastructure implications for neighbouring areas.

With regards to future provision outside of South Staffordshire District, the Borough Council can confirm it is not in a position to meet any shortfall at this stage. Any new sites provided through the on-going Call for Sites process will be considered in the context of the new Local Plan, although at this stage Stafford Borough can not provide for any unmet needs for the gypsy, traveller and travelling show-people community.

The Borough Council also notes the area of search along the A449 corridor for a new

settlement beyond the plan period, after 2039, in Policy DS6 of the South Staffordshire Local Plan Publication 2022. The Strategic Growth Study identified north of Penkridge as a recommended area of search for a strategic urban extension. In our view this warrants further investigation, as an alternative to new homes south of Stafford. We would therefore be grateful if you could ensure that we are kept updated on this matter to comment further and consider infrastructure implications.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council concluded its consultation on the Local Plan 2020-2040 Preferred Option in December 2022 setting out the future development strategy beyond the adopted Plan period of 2031. The latest position in terms of the Local Plan timetable can be viewed via the link below:

Local Development Scheme | Stafford Borough Council (staffordbc.gov.uk)

The Habitat Regulations Assessment of future housing growth in South Staffordshire District will need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation (SAC) together with other relevant SACs / Ramsar sites in the locality. The Borough Council will continue to work alongside South Staffordshire District through the Cannock Chase SAC Partnership on suitable measures.

The Borough Council would welcome an acknowledgement of this response and notes the latest information provided by South Staffordshire District Council at this stage of the plan- making process to support delivery of housing and employment requirements in the context of the wider area.

I look forward to hearing from you in due course concerning engagement on further information about matters affecting cross-boundary issues, updates to the evidence base, and the Regulation 19 consultation scheduled for Spring 2024.

Kind regards

[REDACTED]

Alex Yendole
Strategic Planning & Placemaking
Manager Stafford Borough Council

14.03.2024 – SSDC letter to FEMA authorities

From:	Alex Evans
To:	[REDACTED]@cannockchasedc.gov.uk; Jemma March; Vicki Popplewell; "[REDACTED]@sandwell.gov.uk)"; "Alex Yendole"; David Holloway; [REDACTED]@walsall.gov.uk; Alison Ives; [REDACTED]@wolverhampton.gov.uk
Cc:	Edward Fox
Subject:	FW: South Staffordshire FEMA - SoCG update
Date:	03 April 2024 12:19:00
Attachments:	South Staffs FEMA SoCG 2024.docx Appendix 2.pdf Appendix 3.pdf Appendix 1.pdf image001.png

---

Dear all,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the FEMA SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans

Sent: Thursday, March 14, 2024 10:45 AM
To: [REDACTED]@cannockchasedc.gov.uk; Jemma March <[REDACTED]@cannockchasedc.gov.uk>; Vicki Popplewell <[REDACTED]@dudley.gov.uk>; [REDACTED]@sandwell.gov.uk) [REDACTED]@sandwell.gov.uk>; Alex Yendole<[REDACTED]@staffordbc.gov.uk>; David Holloway <[REDACTED]@walsall.gov.uk>; [REDACTED]@walsall.gov.uk; Alison Ives [REDACTED]@walsall.gov.uk>; [REDACTED]@wolverhampton.gov.uk
Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: South Staffordshire FEMA - SoCG update

Dear all,

Alongside the individual updates to bilateral SoCG we sent out last week to individual local authorities, we are also keen to update the previous FEMA SoCG (dated November 2022) to reflect the South Staffordshire EDNA update. Therefore, please find attached an proposed updated track change version.

Please feel free to add further changes / amendments and circulate them to all authorities in the FEMA for consideration.

I would also be happy to organise meetings on an individual or group basis if that would be helpful.

We are seeking to agree the updated SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

We would like to have the SoCG agreed and signed off at officer level by **Friday 29nd March 2024**.

Please let me know if you have any queries or questions.

Kind regards

Alex
Alex Evans

Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

Appendix 15 – Stratford-on-Avon Documents

15.03.2019 – SSDC response to SoA Further Focused Consultation

From:	Fox, Edward
To:	"policy.consultation@stratford-dc.gov.uk"
Cc:	Harris, Kelly
Subject:	South Staffordshire Council interim response to the Stratford-on-Avon Site Allocations Plan Further Focused Consultation
Date:	15 March 2019 10:40:43

Dear Sir/Madam,

South Staffordshire Council interim response to the Stratford-on-Avon Site Allocations Plan Further Focused Consultation

Thank you for providing South Staffordshire Council with the opportunity to comment on the Stratford-on-Avon Site Allocations Plan Further Focused Consultation.

South Staffordshire Council consider that the opportunity should be taken within the Site Allocations Plan to include a commitment to an early Local Plan Review. It is suggested that 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. South Staffordshire Council was similarly required to include a Local Plan Review policy into our Site Allocation's Document by our Inspector.

Consideration should also be given to indicating within the Site Allocations Plan that the release the reserve sites identified in the SAP will be considered as making a contribution towards the GBHMA shortfall in line with the 50/50 distribution proposed in the GL Hearn study.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.

Kind regards
Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire Council

Tel: 01902696418

Have you visited our

website?

https://www.sstaffs.gov.uk

18.12.2020 – SSDC response to SoA Site Allocations Plan Preferred Options Consultation

South Staffordshire Council

Our Ref: SDC/DTC

18 December 2020

Please ask for: Ed Fox

Direct Dial: (01902) 696418 Email: e.fox@sstaffs.gov.uk

Planning Policy
Stratford-on-Avon District Council
Elizabeth House
Church Street,
Stratford-upon-
Avon CV37 6HX

Sent by email to: policy.consultation@stratford-dc.gov.uk

Dear Sir/Madam,

South Staffordshire District Council response to Stratford-On-Avon Site Allocations Plan Preferred Options Consultation

Thank you for providing South Staffordshire Council with the opportunity to comment on the Stratford-on-Avon Site Allocations Plan Preferred Options Consultation.

South Staffordshire Council recognises that the Site Allocations Plan is a Tier 2 plan, the primary function of which is to deliver sites in accordance with the framework set out in the District's adopted Core Strategy. However, to ensure that the changing strategic context is addressed we consider that the opportunity should be taken within the Site Allocations Plan to include a commitment to an early Local Plan Review. It is suggested that 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. South Staffordshire Council was similarly required to include a Local Plan Review policy into our Site Allocation's Document by our Inspector, in recognition of the limited scope of our Site Allocations Document to address unmet housing needs of the HMA.

The decision to release a number of reserve sites to contribute to meeting the identified shortfall is supported. South Staffordshire Council does however have concerns that the scale of these site releases has been based on an arbitrary pro rata basis i.e. one-ninth of the currently identified shortfall in the period up to 2031. It is important that the basis for considering the issue of the shortfall going forward is undertaken within the framework provided by the Strategic Growth Study or any subsequent agreed and evidenced HMA study. It is considered that this provides the only consistent approach for seeking to achieve a joint and

sufficient GBHMA response to the housing supply shortfall issue.

Yours Faithfully

[REDACTED]

Ed Fox

Strategic Planning Team Manager

02.03.2022 – SoA response to 14.01.2022 G&T letter

From: John Careford

To: Edward Fox

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 14.01.22

Date: 02 March 2022 22:34:23

Attachments:
image
001.jpg
image0
02.jpg

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Hi Edward,

Apologies - fell off my to-do list. Informal officer response only:

In view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SDC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding the above, as you know SDC is keen to investigate existing migration patterns across the region to better understand how needs can be accommodated moving forwards.

Regards,

John Careford *MRTPI FIPM*

Head of Place and Economy
Stratford-on-Avon and Warwick District Councils

From: Edward Fox <E.Fox@sstaffs.gov.uk>
Sent: 18 February 2022 12:46

To: [REDACTED]

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 14.01.22

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Colleagues,

Further to my email below and attached letter, thank you to those who have already responded.

For those yet to respond, just a reminder that we are requesting responses by 25th February please. Should you require an extension to this deadline then please let me know.

Regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

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From: Edward Fox

Sent: 14 January 2022 16:10

To: [REDACTED]

Subject: SSDC - Duty to Cooperate letter - Gypsies and Travellers 14.01.22

Dear Colleagues,

Please find attached a Duty to Cooperate letter from our Cabinet Member for Planning and Business Enterprise, Councillor Terry Mason, in relation to our position on unmet needs for Gypsy and Traveller pitches in our emerging Local Plan.

I would appreciate it if you could pass it on to relevant colleagues/Cabinet Member for consideration.

Please feel free to contact me if there are any aspects of the letter that you

wish to discuss. Kind regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

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14.09.2022 – SoA response to 08.08.2022 G&T letter

From: John Careford

To: Kelly Harris

Cc: Joanne Bozdoganli; Edward Fox

Subject: South Staffs G&T DtC

Date: 14 September 2022 15:58:58

Importance: High

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Dear Kelly,

I trust you are well.

I apologise for the delay in responding to the letter from Cllr Mason regarding Gypsies and Travellers dated 8th August 2022.

Planning for Gypsies and Travellers is being dealt with through the preparation of the South Warwickshire Local Plan and we have commissioned a GTAA to help inform that process. No decisions have yet been made about how needs will be met so I cannot provide a response to questions 2, 3 and 4.

In respect of question 1, I respectfully reiterate the officer response to your previous letter:

In view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SDC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding the above, as you know SDC is keen to investigate existing migration patterns across the region to better understand how needs can be accommodated moving forwards.

If you wanted to progress any regional technical work to your timescales, I would be keen to support you in that activity.

I trust that this response is helpful and I apologise again for missing your September deadline.

Regards,

John Careford *MRTPI FIPM*

Head of Development

Stratford-on-Avon District Council

21.11.2023 – SSDC follow-up email for 24.10.2023 letter

From:	External Email for Local Plans
To:	"[REDACTED]@stratford-dc.gov.uk"
Cc:	Edward Fox; Kelly Harris; Patrick Walker; Alex Evans
Subject:	FW: South Staffordshire - Duty to Cooperate Update Letter
Date:	21 November 2023 11:55:00
Attachments:	DtC Letter Oct 23 SSDC to SoADC.pdf image001.png

Dear John,

I just wanted to send a reminder that we are after responses to the attached letter by the end of Friday this week.

If you are unable to meet this deadline, please could you indicate when we would be likely to get receive your response.

Please let us know if you have any queries.

Kind regards,

Alex

From: External Email for Local Plans
Sent: Tuesday, October 24, 2023 5:04 PM
To: [REDACTED]@stratford-dc.gov.uk
Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>; Patrick Walker
<P.Walker@sstaffs.gov.uk>
Subject: South Staffordshire - Duty to Cooperate Update Letter

Dear John,

Please find attached a Duty to Cooperate update letter from South Staffordshire Council setting out the council's latest position in relation to local plan matters. We welcome your authority's views on these matters.

Please let us have your response no later than **24th November 2023.**

We would be happy to meet with you to discuss this further, please get in touch with myself

or the team using the contact details in the attached letter if it would assist.

Kind regards,
Alex Evans

Senior Strategic Planning Officer
Strategic Planning

South Staffordshire Council Tel:

01902 696421

Appendix 16 – Tamworth Borough Council Documents

27.01.2022 – TBC response to SSDC 14.01.2022 letter

Anna Miller

Assistant Director – Growth & Regeneration

Please ask for: Richard Powell

Telephone: [REDACTED]

E-mail: [REDACTED]@tamworth.gov.uk

Councillor Terry Mason C/O Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

By email only

27 January 2022

Dear Councillor Mason,

RE: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14th January 2022 concerning the above. I note that your recent Gypsy and Traveller Accommodation Assessment (GTAA) identified a significant need for pitches within both the 5 and 15 year periods and that you have been unable to identify sufficient sites to accommodate the full identified need. I also note your request for assistance in meeting your unmet need on existing public sites or potential new public sites.

Unfortunately there are currently no public sites or pitches within Tamworth Borough and so Tamworth would not be able to accommodate any unmet need through existing sites.

In 2019 the Council, jointly with Lichfield District Council and North Warwickshire Borough Council, commissioned ORS to carry out its own GTAA. The result of the assessment was that there was no identified need for pitches within Tamworth Borough. As a result of this, the Council has not currently identified any potential sites within the Borough that would be suitable for accommodating pitches.

However, Tamworth has recently seen a number of visits from Gypsy and Traveller groups and, as a result, is currently considering its approach, which may involve an assessment of the Council's own landholdings as a source of potentially suitable sites.

Therefore, whilst there may be potential opportunities in the future, at this time Tamworth Borough Council is unfortunately not in a position to be able to offer assistance.

Yours

sincerely, pp.
Councillor Stephen Doyle

Portfolio Holder for Skills, Planning, Economy & Waste

Tamworth Borough Council
Marmion House, Lichfield Street,
Tamworth B79 7BZ
Tel: 01827 709709 Fax: 01827 709590

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21.09.2022 – TBC response to SSDC 08.08.2022 letter

Anna Miller

Assistant Director – Growth & Regeneration

Please ask for: Richard
Powell

Telephone: [REDACTED]

E-mail: developmentplan@tamworth.gov.uk

Councillor Terry Mason

C/O Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

By email only

21 September 2022

Dear Councilor Mason,

RE: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 08 August 2022 concerning the above. I have provided aswers to the specific questions posed below.

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

There are no existing public sites within Tamworth, so we are currently unable to contribute any pitches from that source.

2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

As you will recall from our response to your letter of 14 January, in 2019 the Council, jointly with Lichfield District Council and North Warwickshire Borough Council, commissioned ORS to carry out its own Gypsy and Traveller Accommodation Assessment (GTAA). The result of the assessment was that there was no identified need for pitches within Tamworth Borough. As a result of this, the Council has not currently identified any potential sites within the Borough that would be suitable for accommodating pitches.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

For the reasons set out above, the Council has not engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available at this time.

4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

For the reasons set out above, the Council has not at this time considered publicly owned land for the provision of Gypsy and Traveller pitches.

The Council is currently at the beginning of the process of developing a new local plan for Tamworth, and part of this will likely involve an update to the 2019 GTAA. However, given the lack of identified need for pitches at this time, we are unfortunately still not in a position to be able to offer assistance with your unmet need.

Yours sincerely,

[REDACTED]

pp.
Councillor Stephen Doyle

Portfolio Holder for Skills, Planning, Economy & Waste

Tamworth Borough Council
Marmion House, Lichfield Street,
Tamworth B79 7BZ
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23.11.2023 – TBC response to SSDC 24.10.2023 letter

Anna Miller

Assistant Director – Growth & Regeneration

Please ask for: Richard
Powell

Telephone: [REDACTED]

E-mail: developmentplan@tamworth.gov.uk

Kelly Harris

C/O Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

By email only

23 November 2023

Dear Kelly,

RE: South Staffordshire District Council – Duty to Cooperate update

Thank you for your letter dated 24 October 2023 concerning the above. I have provided responses to the specific issues below.

Housing and the Green Belt

We have no specific comments to make to your proposal not to review Green Belt boundaries to accommodate the housing needs of the District or GBBCHMA, if the proposed changes to paragraph 142 of the NPPF are enacted.

As you will be aware, Tamworth's adopted local plan includes an unmet need of 1,825 dwellings which have, at various points, been considered as part of the overall unmet need within the wider HMA. The council has a memorandum of understanding and a statement of common ground in place with Lichfield District Council and North Warwickshire Borough Council for the delivery of that unmet need.

As a result of our adopted plan now being more than five years old, the need figure for the council's latest published 5-year supply position was calculated using the standard method as set out by Government. Using this approach resulted in a need figure that was substantially lower than that set out in the plan. This suggest that it is unliley at this time that our unmet need will increase significantly to the point that we may require further assistance.

Employment

Your comments on employment need are noted.

Gypsy and Travellers

As you have noted in your letter, in our previous correspondence we stated that our 2019 GTAA concluded that there was no identified need for pitches within Tamworth

Borough. As a result of this, we had not currently identified any potential sites within the Borough that would be suitable for accommodating pitches. The 2019 assessment remains the most up to date evidence we have available at this point, and no additional work has been carried out in relation to identifying potential sites. We are unfortunately therefore still not in a position to be able to help you with your unmet need.

Other issues

Your comments on the other issues listed are noted. We will be happy to engage with you on these issues at an appropriate time.

Yours sincerely,

[REDACTED]

Richard Powell

Planning Policy & Delivery Team Leader

Tamworth Borough Council
Marmion House, Lichfield Street,
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Appendix 17 – Telford & Wrekin Council Documents

01.12.2020 – SSDC and T&WC duty to co-operate meeting minutes

South Staffordshire Council and Telford & Wrekin Council

Duty to Cooperate - Notes from meeting

Tuesday 1 December 2020

Attendees: Ed Fox and Kelly Harris, South Staffordshire

Gavin Ashford and Ian Stevens, Telford & Wrekin Council

Telford & Wrekin Council provided a summary presentation of the Local Plan review Issues & Options consultation.

South Staffordshire provided an update on the Local Plan Review. Further evidence is being gathered to inform the Preferred Options consultation in summer 2021.

Housing and employment needs – Issues & Options consultation proposed a 4,000 dwelling contribution to Black Country unmet needs. Discussions ongoing with the Black Country on unmet needs.

The West Midlands Interchange at Four Ashes has been granted development consent by the Secretary of State.

Gypsy and Traveller accommodation – evidence has been commissioned and need identified in South Staffordshire. Options currently being considered.

Transport – Staffordshire County liaising with Highways England regarding the proposals for the M54/M6 link road. Further discussions to be had on the M54 corridor.

Opportunities for rail corridor improvements – to facilities and frequency of services.

Waste – Telford & Wrekin Council are discussing waste management issues and will provide an update to South Staffordshire.

Future schedule of meetings – next meeting in February 2021 and every two months thereafter.

Standard agenda items for future meetings:

1. Local Plan updates
2. Housing need
3. Employment need
4. Infrastructure
5. Transport
6. Minerals and Waste
7. Any other business

21.11.2023 – SSDC email reminder to 24.10.2023 letter

From: External Email for Local Plans

To: Gavin Ashford

Cc: Edward Fox; Kelly Harris; Patrick Walker; Alex Evans

Subject: FW: South Staffordshire - Duty to Cooperate Update Letter

Date: 21 November 2023 12:06:00

Attachments: DtC Letter Oct 23 SSDC to T&WC.pdf image001.png

Dear Gavin,

I just wanted to send a reminder that we are after responses to the attached letter by the end of Friday this week.

If you are unable to meet this deadline, please could you indicate when we would be likely to get receive your response.

Please let us know if you have any queries.

Kind regards,

Alex

From: External Email for Local Plans
Sent: Tuesday, October 24, 2023 5:08 PM
To: [REDACTED]@telford.gov.uk
Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>; Patrick Walker
<P.Walker@sstaffs.gov.uk>
Subject: South Staffordshire - Duty to Cooperate Update Letter

Dear Gavin,

Please find attached a Duty to Cooperate update letter from South Staffordshire Council setting out the council's latest position in relation to local plan matters. We welcome your authority's views on these matters.

Please let us have your response no later than **24th November 2023.**

We would be happy to meet with you to discuss this further, please get in touch with myself or the team using the contact details in the attached letter if it would assist.

Kind regards,
Alex Evans

Senior Strategic Planning Officer Strategic Planning

South Staffordshire Council

Tel: 01902 696421



Sent via email to:
Shapingplaces@telford.gov.uk

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

16th January 2024

South Staffordshire Council response to Telford & Wrekin Council Regulation 18 consultation

Dear Sir/Madam,

South Staffordshire Council welcomes the opportunity to comment on the Draft Telford & Wrekin Local Plan (DLP) Regulation 18 Consultation document.

The Telford & Wrekin Council (T&WC) Draft Local Plan is a comprehensive document providing a spatial strategy alongside policies to meet identified development and infrastructure requirements and more detailed non-strategic policies for managing development. South Staffordshire has focussed the following comments on those specific elements of the plan which raise cross-boundary issues.

Strategy

The Plan seeks to promote a development strategy with growth being allocated in a manner proportionate to the existing population levels of Telford, Newport and the rural area; with the majority of the growth taking the form of sustainable urban extensions in or on the edge of Telford. The strategy places a strong emphasis on protecting and enhancing the network of green spaces throughout the Borough.

Housing Provision

There is an identified housing requirement of 20,200 dwellings across the plan period 2020 - 2040. Of this requirement 11,378 dwellings have been completed or committed, leaving a balance of 8,822 new housing allocations to be identified. Telford and Wrekin Council and South Staffordshire Council are situated in separate but adjacent Housing Market Areas, though T&WC have attended meetings of the Greater Birmingham and Black Country Housing Market Area Technical Officers Group as observers. This group was seeking to identify mechanisms for meeting the housing shortfall originating from the West Midlands Metropolitan authorities. South Staffordshire Council had proposed through the Local Plan

Review to make a contribution of 4,000 dwelling to help meet this emerging overspill requirement. This planned contribution has been paused following the publication of changes to the NPPF. These changes have now been finalised and now state that there is no requirement for Green Belt boundary alterations when plans are being updated. SSDC has now resumed work on the Local Plan Review and is proposing to produce a Regulation 19 Draft Plan in the spring which will reflect the changes introduced to national policy. A likely consequence of the NPPF changes is that meeting the development pressures arising within GBBCHMA will potentially prove to be increasingly challenging. This is likely to place an increased focus for accommodating overspill development on those areas outside green belt policy constraints yet within reasonably close proximity to the West Midlands conurbation, particularly areas which benefit from strong and direct public transport links. Telford is likely to be one such area, therefore consideration of the implications for the T&WC Draft Local Plan of the changes to national Green Belt policy will need to be carefully considered as the plan progresses.

Gypsies, Travellers and Travelling Showpeople

South Staffordshire Council (SSDC) published an updated Gypsy and Traveller Accommodation Assessment in 2022 which identified a need for 121 pitches during the plan period to 2039. SSDC are now updating the GTAA to align with our revised plan period up to 2041. We have not yet received the findings of the updated GTAA but expect our needs for pitches may have increased.

South Staffordshire Council wrote to T&WC in August 2022, and subsequently in October 2023, where we set out that we had only identified a supply of 37 pitches to allocate against a 5-year requirement of 72 pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSDC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSDC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSDCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the Borough for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

South Staffordshire Council would welcome an indication that all such options have been explored and we look forward to continuing to engage with T&WC on this issue.

Employment Land Need

SSDC and T&WC are in separate functional economic market areas. South Staffordshire Council paused local plan production following completion of a Regulation 19 Publication Plan consultation in December 2022 in light of proposed Government changes to national planning policy. South Staffordshire Council has now recommenced work on plan production, and we are in the process of reassessing the scale of future

commitments with a view to producing a revised draft local plan in Spring 2024. To accompany the revised plan SSDC is undertaking an update to the evidence base which will include revisiting the EDNA prior to our next stage of public consultation and this will inform the council's decisions with respect to employment land commitments and any future collaboration on cross boundary issues with authorities including T&WC in neighbouring FEMA's.

I hope you find our response helpful as you progress your Local Plan and look forward to continuing to engage constructively with T&WC through preparation of our respective plans.

Yours sincerely

[REDACTED]

Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

Appendix 18 – Walsall Metropolitan Borough Council Documents

01.03.2022 – Black Country authorities' response to SSDC 14.01.2022 letter

CITY OF WOLVERHAMPTON COUNCIL

Dear Ms Harris,

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter of 14 January 2022 concerning the above. This letter represents the response of the four Black Country authorities to that letter.

The 2016 Gypsy and Traveller Accommodation Assessment set out a level of need for new pitches in the Black Country in excess of current supply on identified sites. This Assessment is currently being updated and early indications are that this situation will not change.

No additional sites have been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work.

Therefore, the Black Country authorities are unlikely to be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. This position will be confirmed as the work outlined above progresses.

Notwithstanding the above, we remain committed to cooperation on issues of mutual / cross-boundary interest. We welcome the opportunity to continue to work with South Staffordshire District Council in a positive and constructive manner through the preparation of the Local Plan Review. This will include involvement in the preparation of Statements of Common Grounds to support both the South Staffordshire Local Plan and the Black Country Plan, at an appropriate stage.

We trust you find these comments helpful and look forward to further discussions with you.

If you would like to discuss our response please get in touch.

Yours sincerely

Michele Ross
Lead Planning Manager (Sub-Regional Strategy)
City Planning
City of Wolverhampton Council
Email: [REDACTED]@wolverhampton.gov.uk
Tel: 01902 [REDACTED]

06.10.2022 – Dudley MBC press release

Dudley will "go it alone" on housing and employment plan | Dudley Council News

Dudley will "go it alone" on housing and employment plan

Council bosses in Dudley have pulled out of a regional plan to identify housing and employment land in a bid to "listen to local people" on the use of green belt.

Dudley Council leader, Councillor Patrick Harley, says the council will draw up its own plan after cutting ties with the Black Country Plan.

Earlier this year, almost 20,800 people across the Black Country responded to consultation on the plan in the form of individuals, organisations and group responses and a further 18,000 people signed petitions. The vast majority were from Dudley.

Following the enormous feedback Dudley leaders have since said they would pull two sites from the plan – land south of Holbeach Lane, Kingswinford, and land in Swindon Road, Wall Heath.

But after the Black Country authorities failed to come to agreement on how the plan would progress, Councillor Patrick Harley said he could not allow the "overwhelming" feedback from the public to be ignored and therefore would be recommending to Dudley Council's cabinet that the authority should withdraw and draw up its own plan.

Councillor Patrick Harley, leader of Dudley Council, said:

At every stage of this plan we have made it clear that it must be led by the people who live here. I simply cannot stand by and allow decisions to be made which are contrary to the overwhelming feedback we have already received. This is clearly a very emotive subject and people feel very strongly about it. I must reflect that in the decisions I make for the people of this borough. We will therefore look to go it alone and look at what is needed to support a Dudley specific plan and setting out the timescales for that. A lot of the work we have carried out to date is still very relevant so it is not a matter of starting from scratch. There's a huge amount of feedback already from residents in Dudley borough and it is important we use that moving forward. But rest assured we will listen to local people and put them first at every stage of this plan.

19.10.2022 – Black Country Plan joint statement

Black Country Plan | Black Country Plan

The Black Country Plan 2039

Published Wednesday, 19th October 2022

A joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton.

“The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan.

“Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans."

If you require any further information regarding the local plans for each of the individual local authorities, please email them directly using the contact details below.

31.10.2022 – duty to co-operate meeting minutes

South Staffs Council, Black Country Local Authorities, Birmingham City Council

DTC Meeting 31.10.2022

Attendees:

Kelly Harris (KH) - South Staffordshire District Council

(SSDC) Ed Fox (EF) - SSDC

Patricia McCullagh (PM) – Sandwell Metropolitan Borough Council

(SMBC) Michelle Ross (MR) – City of Wolverhampton Council (CWC)

Vicki Popplewell (VP) – Dudley Metropolitan Borough Council (DMBC)

Maria Dunn (MD) – Birmingham City Council (BCC)

Uyen-Phan Han (UPH) - BCC

Liz Forster (LF) – Walsall Metropolitan Borough Council (WMBC)

Neville Ball (NB) – WMBC

Gypsy and Traveller unmet needs:

EF – BCC has responded but Black Country authorities haven't to date

KH – Are there plots on public sites? Site options for **new** public sites, including in Green Belt? Engaged with site promoters to see if there's opportunity for new public sites? Considered publicly owned land? This is what South Staffs have done, need to understand what others have.

VP – have recently re-examined site options; can come back in writing

KH – need to understand the process others have gone through

NB – one Council public site is full, just opened a temporary transit site with 6 pitches, haven't considered options for new sites other than a existing SAD non-GB allocation; goes towards existing needs, haven't discussed public sites with GB housing sites but have with non-GB housing sites, non-GB sites indicated it would affect viability to do so.

MR – latest G&T assessment isn't published yet, likely to be published in January. 1) No, 2) No, 3) No - could do that during consultation on Issues and Options, 4) Yes - could do further work at January consultation to examine this. Will examine but can't respond with any substance before January.

PM – Will be examining these four areas through Issues and Options on Sandwell plan. 1) No, 2) No, 3) No but will examine through Issues and Options and 4) have looked at some for transit sites but not any further.

Apportionment of housing contributions:

IC – have discussed this with Bham previously but see a need to separate out housing contributions between 4 BC LPAs and BCC. May be significant for justifying Green Belt exceptional circumstances. From Shropshire examination the earlier this is sorted out the better. Most progressed offer is Shropshire (signed SoCG) and some are expressed to BC specifically (e.g. Lichfield). Others aren't attributed to any individual LPAs.

IC- Have proposed an approach in circulated note based on net migration flows between importing and exporting authorities. Based on authorities mainly to north and west of conurbation as this is where majority of local plan activity is at this point. Based on a migration based method, % figures in Table 2 of the circulated note could be used as basis for separating out offers between four BC authorities and BCC. Would like to see this reflected in the SSDC SoCGs to provide certainty.

IC – Might be argued that if LPA area doesn't have a shortfall then it shouldn't be receiving offers from neighbouring LPAs. CWC want to use this approach as soon as possible to allow local plans to progress.

MD – Want to understand how lack of BC plan impacts shortfalls and want to see how contributions would be distributed across LPAs where a contribution would be given to LPA without a shortfall (e.g. if Walsall's needs are met, where does Lichfield's contribution go). What happens to individual LPAs within the Black Country which can meet their own need, but which could have a role in assisting with Bham's shortfall?

IC – If moving to four individual local plans it pushes preparation back a year, may not be the case that some LPAs which were meeting own needs still can

NB – May not reflect people moving from Sandwell to other BC authorities, which in turn then have residents moving to shires

MD – If we can't treat as collective HMA shortfall (Bham preference) then the % are a sensible way to go about it but does appear to make life difficult for Sandwell which has a large shortfall but no direct relationships.

IC – Sandwell's strongest relationships are with Dudley, Wyre Forest, Bham. If Wyre Forest was more progressed then this approach would give Sandwell a stronger argument for asking them.

MD – Should we be looking across the whole HMA then?

KH – Probably for **next** iteration of HMA SoCG if we're going down that route. Also need to be mindful that Wyre Forest isn't in HMA. Need to be mindful of what we can agree **now** for SoCG.

IC – Would seek agreement on approach to apportionment if not number at this stage.

KH – Over the next couple of months could Bham and Black Country work together on this?

MD – Would need the next couple of months to work this out.

IC – Could SoCG commit to doing apportionment based on evidence of functional relationships between LPAs?

MD – would need to check with senior management given that approach to date has been to push for singular HMA shortfall

IC – Would like to have agreement to work together on how to apportion in areas of agreement

MD – Agree it would be better to show we have a way forward on this

KH – If BCC can get wording to us by end of this week that would enable us to put in

AGREED – BCC to provide wording by the end of this week to put into each SoCG on way forward for apportionment

Timescales for plan-making

KH – Any update from BC LPAs on this in light of individual plans being pursued?

MR – CWC LDS indicates consult in Spring 2023, Reg 19 Summer/Autumn 2023, examination 2024, adopt 2025

NB – WMBC LDS going to cabinet this week, going back to Reg 18, Issues and Options after elections next Summer, submit March 2026

VP – DMBC looking to incorporate Brierly Hill AAP into plan, Reg 18 plan after elections in June/July 2023, not agreed submission/adoption timescales at this stage.

MD – Submission 2025, adoption 2026 for BCC, can't sit still and wait for new system

IC – Apportionment will be important if plans are all operating to different timescales

PM – LDS in December 2022, looking to do one Local Plan with Issues and Options February/March 2023, adoption early 2026

Signing statements of SoCG

KH – HMA SoCG; signed copy from Bham, SSDC's likely to be signed subject to scrutiny, going to be chasing today. Individual SoCGs need to be agreed at officer level this week (prior to consultation) but any idea of timescales for formal sign off?

IC – End of November for CWC

MR – should education be included at this stage?

PW – could reflect current position on school places; that each CWC and SSDC working with education authority confirm that each area can accommodate its own growth in school places

MD – Can likely do BCC's under delegated sign off

MR – Would sign off be delayed until submission next year?

KH – Need sign off as soon as possible to support Regulation 19. Will happily participate in updated SoCG with CWC and others at submission stage but that needs to be in addition to Regulation 19 stage SoCG, not instead of.

AGREED – Officer comments back by end of the week with aim to sign individual SSDC SoCG after this.

AGREED – Dudley, Sandwell and Walsall to confirm individual decision making processes in light of ABCA no longer being decision making signatory

01.11.2022 – WMBC response to SSDC 08.08.2022 letter

From: Neville Ball

To: Edward Fox

Cc: Kelly Harris

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 08.08.22

Date: 01 November 2022 10:29:20

Attachments:
image0
01.png
image0
02.jpg

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Ed,

Further to our meeting yesterday, I can confirm Walsall's response to the four questions in your letter as follows:

1. There is currently only one permanent traveller site in Walsall, together with a transit site that has a temporary 3-year planning permission. The permanent site is full and has been for some time whilst the temporary nature of the transit site means that it cannot be considered as available for longer-term needs.
2. The adopted Walsall Site Allocation Document allocates a new permanent site that is not in the Green Belt to meet identified needs in Walsall for the period to 2026. No funding has been identified to enable its construction. No options have been considered for new publicly run sites in the Green Belt.
3. We only have a small number remaining of large general housing sites allocated in the Site Allocation Document that might be technically capable of including a traveller site. However, they are now all under construction and, given their brownfield nature, have had limited viability that has restricted their ability to contribute to existing requirements such as affordable housing. Nearly all the major new housing sites that were proposed in the Black Country Plan are in the Green Belt. We have not to date requested site promoters to consider the inclusion of a traveller site, and we have not yet scoped out the issues that might be addressed by any replacement for the BCP.
4. We explored a large number of sites when searching for a potential location for a transit site, as well as land for general housing needs. However, Walsall has very little publicly owned land that remains available for development either as a traveller site or for general housing.

Regards,

Neville Ball

Principal Planning Policy Officer

Planning & Building Control, Economy, Environment & Communities Walsall Council

Civic Centre
Darwall Street
Walsall

WS1 1DG

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:
Alex Yendole (AY) – Stafford Borough Council
Neville Ball (NB) – Walsall MBC
David Holloway (DH) – Dudley MBC
Ian Culley (IC) – City of Wolverhampton Council
Sushil Birdi (SB) – Cannock Chase District Council
Heidi Hollins (HH) – Cannock Chase District Council
Mark Watkins (MW) – Sandwell MBC
Kelly Harris (KH) – South Staffordshire District Council
Ed Fox (EF) – South Staffordshire District Council
Patrick Walker (PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction
AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed
AY – will add in text in table at end that FEMA is predominately Stafford's own borough area
AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?
IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans
AY – will there be conversations in advance if local authorities are affected by this?
IC – yes
KH – Black country evidence as published to date will be kept until new evidence base is available?
IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?
KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that
IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?
KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date
PW – SoCG intended to be record views understood to be agreed to date
IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19
IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't
KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging
DH – Para 4.5; repeats "must" – can we change to "should"?
KH – This is in section on SSDC's position – may not be view of all but is SSDC's view
IC – Could change it to "must continue"?
KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November
ACTIONS: Further info on signing timescales expected from all
ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

22.11.2023 – WMBC response to SSDC 24.10.2023 letter

Walsall Council

Economy, Environment & Communities

Date: 22 November 2023
Our Ref: DSH/NB/AI/WBLP/dtc

Telephone: [REDACTED]

Email: [REDACTED]@walsall.gov.uk

Kelly Harris

South Staffordshire Council

Council Offices

Codsall

South Staffordshire WV8 1PX

Via e-mail: e.fox@sstaffs.gov.uk

Dear Kelly,

South Staffordshire District Council – duty to cooperate update

Thank you for your letter dated 24 October 2023, in which you set out the current position with regard to your local plan: that it had been paused in January 2023 subject to the outcome of the current national planning policy reforms, to be published imminently in a revised National Planning Policy Framework [NPPF].

However, you state that you are still looking to progress your local plan under the existing plan-making regime, and in order to do this, will be likely to be required to meet a deadline for submission of your local plan by June 2025.

You state that the current position on housing need, in which you are considering moving away

from, is based on the regional evidence base prepared by the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), and as set out within your regulation 18 plan, with your contribution to the GBBCHMA stated as being around 4000 dwellings. However, you cite that, pending the outcome of the planning reforms, there is a current expectancy that under a revised NPPF Green Belt will not be required to be reviewed and altered if this would be the only means of meeting objectively assessed need for housing over the plan period.

You are consequently requesting an indication of our position in the event that you were to revise your housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the both the district and GBBCHMA, if the proposed changes to planning came through: "we would appreciate an indication of what your 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 GBBCHMA, if the proposed changes to paragraph 142 of the NPPF are enacted."

There are other planning matters which you set out in your letter, specifically on employment land and gypsy and travelling showperson' accommodation, in which you are seeking an updated Walsall Council position on under duty to cooperate.

In your covering message you have a set a deadline of 24 November 2023 for us to respond to your request.

In response, you are seeking this authority's views regarding the ramifications for neighbouring authorities on a potential change in planning strategy for your local plan. This has been interpreted as a formal approach under duty to cooperate.

In order to proceed to respond formally under Walsall's scheme of delegations we will need to first obtain authority from Planning Committee. The next available meeting at which such authority could be reasonably obtained is 15 January 2024. We are therefore unable to respond to you by your deadline.

Notwithstanding this, we look forward to further engagement with your council especially under duty to cooperate/alignment test protocols as we progress our respective local plans.

Yours sincerely
David Holloway Planning
Policy Manager

14.03.2024 – SSDC letter to FEMA authorities

From:	Alex Evans
To:	[REDACTED]@cannockchasedc.gov.uk; Jemma March; Vicki Popplewell; "([REDACTED]@sandwell.gov.uk)"; "Alex Yendole"; David Holloway; [REDACTED@walsall.gov.uk; Alison Ives; [REDACTED]@wolverhampton.gov.uk
Cc:	Edward Fox
Subject:	FW: South Staffordshire FEMA - SoCG update
Date:	03 April 2024 12:19:00
Attachments:	South Staffs FEMA SoCG 2024.docx Appendix 2.pdf Appendix 3.pdf Appendix 1.pdf image001.png

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Dear all,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the FEMA SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans

Sent: Thursday, March 14, 2024 10:45 AM
To: [REDACTED]@cannockchasedc.gov.uk; Jemma March
Vicki Popplewell([REDACTED]@sandwell.gov.uk) < >; Alex Yendole

<; David Holloway >;[REDACTED]@walsall.gov.uk; Alison Ives <;
[REDACTED]@wolverhampton.gov.uk

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: South Staffordshire FEMA - SoCG update

Dear all,

Alongside the individual updates to bilateral SoCG we sent out last week to individual local authorities, we are also keen to update the previous FEMA SoCG (dated November 2022) to reflect the South Staffordshire EDNA update. Therefore, please find attached an proposed updated track change version.

Please feel free to add further changes / amendments and circulate them to all authorities in the FEMA for consideration.

I would also be happy to organise meetings on an individual or group basis if that would be helpful.

We are seeking to agree the updated SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

We would like to have the SoCG agreed and signed off at officer level by **Friday 29nd March 2024**.

Please let me know if you have any queries or questions.

Kind regards

Alex
Alex Evans

Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

Appendix 19 – Wyre Forest District Council Documents

14.12.2018 – SSDC response to WFDC Pre-Submission Consultation

From: Fox, Edward

To: "LPR@wyreforestdc.gov.uk"

Cc: Harris, Kelly

Subject: RE: Local Plan Pre Submission Publication (October 2018) consultation

Date: 14 December 2018 09:51:12

Attachments:

Dear Sir/Madam,

South Staffordshire Council's interim response to the Wyre Forest Local Plan Pre-submission consultation

Thank you for providing South Staffordshire Council the opportunity to comment on your Local Plan Pre- submission publication.

South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.

Kind

regards

Ed

Ed Fox

Assistant Team Manager (Local Plans) Enterprise & Growth

South Staffordshire

Council Tel:

01902696418

From: LPR Consultation [mailto:LPR@wyreforestdc.gov.uk]

Sent: 01 November 2018 11:15

To: LPR Consultation

Subject: Local Plan Pre Submission Publication (October 2018) consultation

Dear Addressee

Please find attached correspondence relating to the Local Plan Pre Submission Publication (October 2018) consultation.

The consultation runs from **Thursday 1st November until 5pm on Monday 17th December 2018.**

Yours faithfully

Planning Policy

Team

LPR Consultation

Wyre Forest District
Council 01562 732928

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
LPR@wyreforestdc.gov.uk

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07.01.2019 – SSDC response to WFDC Pre-Submission Consultation

From: Fox, Edward

To: "LPR@wyreforestdc.gov.uk"

Cc: Harris, Kelly

Subject: FW: Local Plan Pre Submission Publication (October 2018) consultation

Date: 07 January 2019 14:14:36

Attachments:

Dear Sir/Madam,

You will recall that I wrote to you on 14th December 2018 to provide South Staffordshire Council's interim response to the Wyre Forest Local Plan Pre-submission consultation (see email below). I informed you that the response was subject to formal agreement through the Council's formal scrutiny process. I can now confirm that this has now concluded with no amendments proposed to the interim response.

Therefore, please accept the text below as the Council's formal response to the consultation:

South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.

Kind

regards Ed

Ed Fox

Assistant Team Manager (Local Plans)
Enterprise & Growth

South Staffordshire

Council Tel:

01902696418

Have you visited our website? https://www.sstaffs.gov.uk

"Like us on Facebook. Follow us on Twitter"

From: Fox, Edward

Sent: 14 December 2018 09:51 **To:** 'LPR@wyreforestdc.gov.uk' **Cc:** Harris, Kelly

Subject: RE: Local Plan Pre Submission Publication (October 2018) consultation

Dear Sir/Madam,

South Staffordshire Council's interim response to the Wyre Forest Local Plan Pre-submission consultation

Thank you for providing South Staffordshire Council the opportunity to comment on your Local Plan Pre- submission publication.

South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.

Kind

regards

Ed

Ed Fox

Assistant Team Manager (Local Plans) Enterprise & Growth

South Staffordshire

Council Tel:

01902696418

Have you visited our website? https://www.sstaffs.gov.uk

From: LPR Consultation [mailto:LPR@wyreforestdc.gov.uk]

Sent: 01 November 2018 11:15

To: LPR Consultation

Subject: Local Plan Pre Submission Publication (October 2018) consultation

Dear Addressee

Please find attached correspondence relating to the Local Plan Pre Submission Publication (October 2018) consultation.

The consultation runs from **Thursday 1st November until 5pm on Monday 17th December 2018.**

Yours faithfully

Planning Policy

Team

LPR Consultation

Wyre Forest District
Council 01562 732928

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
LPR@wyreforestdc.gov.uk

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09.01.2020 – WFDC response to SSDC SHSID Consultation

Wyre Forest District Council

Local Plan Team
Council Offices
Codsall
South Staffordshire
WV81PX

Dear Sir/Madam,

Re: South Staffordshire Local Plan Review Spatial Housing Strategy and Infrastructure Delivery Consultation

Please find attached the consultation response from Wyre Forest District Council to the South Staffordshire Local Plan Review Spatial Housing Strategy and Infrastructure Delivery Consultation. The response has now been signed off by our Strong Leader.

Thank you for the opportunity to respond to the consultation.

Kind regards,

Gill
Partmann
Planning
Policy Team

Economic Prosperity and Place Directorate

Wyre Forest House

Finepoint Way

Kidderminster

Wares.

DY11 7WF

Wyre Forest District Council response to South Staffordshire Council Local Plan Review - Spatial Housing Strategy and Infrastructure Delivery.

1. Thank you for the opportunity to comment on the South Staffordshire Council Local Plan review - Spatial Housing Strategy and Infrastructure Delivery Consultation Document.

2. Wyre Forest District Council welcomes the discussion of housing and employment needs within South Staffordshire and is happy to contribute to the consultation on a strategic approach to new housing development, which includes broad locations but which is not site specific as yet.

3. Having reviewed the proposed seven Spatial Housing Options, Wyre Forest District Council notes that the preferred Spatial Housing Strategy is Option G. This option would meet the preferred housing target of 8,845 dwellings between 2018 and 2037. It would include a new settlement to be delivered beyond the plan period and would be established along the A449 corridor.

4. Wyre Forest District Council considers favourably the strategy of Spatial Option G which South Staffordshire Council believe would provide a sustainable pattern of development whilst also ensuring Green Belt release is minimised wherever possible.

5. The Council notes that the local plan sets its focus on housing growth which will be closely aligned to greater levels of access to services and employment.

6. Wyre Forest District Council appreciates that the employment growth options will be discussed in greater detail in the next consultation. The Council is in agreement that employment land should be located within sustainable locations with access to strategic road networks.

7. The Council acknowledges that the needs of the Gypsy and Traveller Community will be documented at the next stage of consultation in the summer of 2020.

8. Wyre Forest strongly supports the protection of the South Staffordshire Green Belt, as part of the wider West Midlands Green Belt. The fundamental aim of Green Belt policy within the NPPF is to prevent urban sprawl by keeping land permanently open. There is a need to make as much use as possible of suitable Brownfield sites and underutilised land. We understand that Green Belt and Landscape studies have been completed and have informed the reasoning behind the options. These published reports should help to avoid housing development in areas of Green Belt where the greatest harm would be caused.

9. Wyre Forest District Council welcomes the opportunity for further discussion with South Staffordshire Council through the Duty to Co-operate process, including examining the impact of any proposals on the infrastructure and services within Wyre Forest district. Wyre Forest wishes to continue to be consulted on subsequent stages of the South Staffordshire Council Local Plan Review Spatial Housing Strategy and Infrastructure Delivery.

17.03.2020 – SoCG between SSDC and WFDC

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

1. Introduction

Under the National Planning Policy Framework (NPPF, 2019), strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the emerging Wyre Forest District Local Plan Review. It sets out how Wyre Forest District Council has engaged with South Staffordshire Council in order to fulfil its Duty to Cooperate requirements.

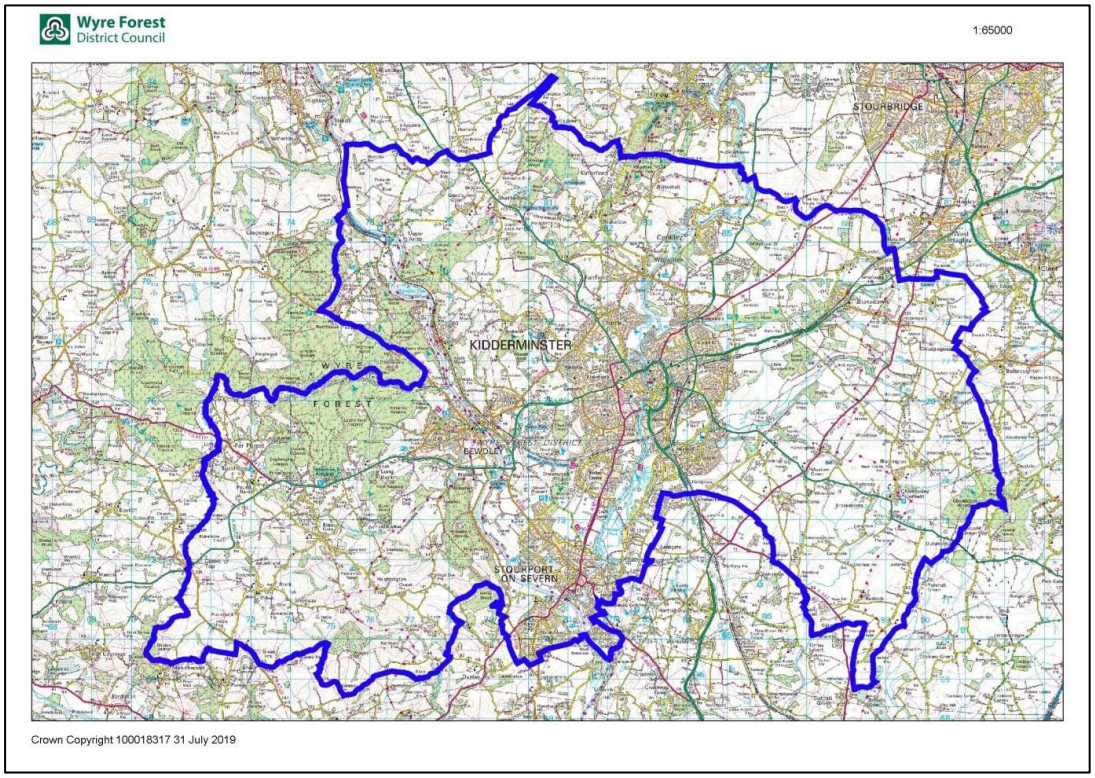
2. Parties Involved

This Statement of Common Ground (SofCG) has been prepared jointly by Wyre Forest District Council (WFDC) and South Staffordshire Council (SSC). South Staffordshire Council shares a boundary with Wyre Forest District Council to the north of the Wyre Forest District.

3. Strategic Geography

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan 2016-2036, which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

Figure 1: Map of Wyre Forest District



4. Background / Duty to Cooperate

There has been ongoing engagement between WFDC and SSC throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with SSC at every stage of plan making. The Local Plan Review consultation periods were as follows:-

- Issues and Options Consultation – September / October 2015
- Preferred Options Consultation – June / August 2017
- Pre-Submission Consultation – November / December 2018
- Pre-Submission Consultation (re-opened) – September

  /October 2019

Duty to Cooperate meetings have also taken place on the

following dates:-

- 9th February 2018
- 14th March 2019

Minutes of the above meetings can be viewed in Appendix 1.

The above meetings were jointly held with the Black Country Authorities and Birmingham City Council so that cross boundary duty to cooperate discussions could be had together to discuss strategic issues jointly. South Staffordshire Council were also invited to the following duty to cooperate meetings that WFDC held with the Black Country Authorities and Birmingham City Council. South Staffordshire Council

sent their apologies for these meetings and did not attend:-

- 18th May 2018
- 25th September 2018
- 18th July 2019

5. Strategic Matters Identified

South Staffordshire Council responded to the WFDC Local Plan Pre-Submission consultation that was undertaken in November / December 2018. Table 1 shows a summary of the responses received from SCC (the full response can be viewed in Appendix 4).

Table 1: South Staffordshire Council response to WFDC Local Plan Pre-Submission (October 2018)

	Issues
South Staffordshire Council	South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.

6. Matters that parties agree on

Table 2 below shows the matters that both parties agree on.

	Issues	**WFDC Response**
South Staffordshire Council	South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of	WFDC has made an amendments to the Local Plan in light of these comments and further discussions with South Staffordshire Council at the Duty to Co-operate meeting on 14th March

	this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.	2019. The amendments to Policy 6A(B) are as follows: "As required by the Duty to Co-operate, due consideration will be given, through a future **early** review of the WFDC Local Plan where ~~appropriate~~ **necessary and in accordance with the NPPF**, to the housing needs of neighbouring local authorities (Footnote 2) in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area. **The review will consider the need for additional growth and plan appropriate for this if the need has been clearly evidenced and justified**." Footnote 2 added as follows: **"This includes the Black Country Local Authorities who are currently preparing a joint Local Plan Review."** These amendments were consulted on the WFDC during the Pre-Submission consultation held in September / October 2019.

7. Matters that parties disagree on

Table 3 below shows the matters that both parties disagree on.

	Issues	WFDC Response
South Staffordshire Council	South Staffordshire Council does not consider the plan as proposed the be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non- specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.	Wyre Forest District does not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Therefore, the Black Country Authorities and Birmingham City Council need to produce sufficient evidence that they cannot accommodate their shortfall within their own Housing Market Area, and to justify why they need WFDC to accommodate some of their shortfall. WFDC is a Green Belt local authority and therefore exceptional circumstances are required to release land from the green belt. To date sufficient evidence has not been produced by the Black Country Authorities and/or Birmingham City Council.

8. Other Strategic Matters

As WFDC is a green belt local authority, the question of whether neighbouring local authorities can help to meet the housing need for Wyre Forest in the emerging and future local plans needs to be considered. South Staffordshire Council, who is also a Green Belt authority, has already agreed to helping the Black Country Authorities with their housing and employment shortfall (as South Staffordshire is located within the same HMA as Black Country Authorities), and therefore would not be in a position to help Wyre Forest District with their housing need.

The emerging WFDC Local Plan is intending to accommodate all of its housing need within its own district area; however this will involve some green belt release which will need to be considered at examination stage by the Planning Inspector.

9. Governance Arrangements

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

Local Authority	Method of Approval
Wyre Forest District Council	SofCG to be agreed by Council Members
South Staffordshire Council	Formal Cabinet Member agreement.

10. Timetable for agreement

The table below sets out the timetable arrangement for the Statement of Common Ground to be agreed.

Local Authority	Timetable for approval
Wyre Forest District Council	- Overview & Scrutiny – 6th February 2020 - Cabinet Meeting – 11th February 2020 - Full Council Meeting – 26th February 2020
South Staffordshire Council	- 1 month required.

11. Conclusions

The parties agree that:

i) WFDC has fulfilled its Duty to Cooperate with SSC.

ii) Whilst SSC's view is that the WFDC Local Plan Review should more proactively seek to address the GBBCHMA housing shortfall, SSC is satisfied that all matters raised in its representations to the WFDC Local Plan Review (2016-2036) have been addressed by WFDC's responses.

iii) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.

12. Signatories

This Statement of Common Ground has been agreed and signed by the following:-

South Staffordshire Council	Wyre Forest District Council
Name: Kelly Harris on behalf of Councillor Roger Lees Position: Lead Planning Manager on behalf of Cabinet Member for Planning and Regulatory Services Date agreed: 20th January 2019	Name: Mike Parker Position: Corporate Director: Economic Prosperity & Place Date agreed: 17th March 2020 Signature: [REDACTED]

Signature: [REDACTED]	

Appendices

- Appendix 1 – Duty to Cooperate Meeting Minutes between WFDC and SSC
- Appendix 2 – SSC response to the WFDC Issues and Options consultation (Sept / Oct 2015)
- Appendix 3 – SSC response to the WFDC Preferred Options consultation (June – Aug 2017)
- Appendix 4 – SSC response to the WFDC Pre-Submission Consultation (Nov/Dec 2018)

Appendix 1

Duty to Co-operate Meeting

9th February 2018 Present:

Martin Dando (Dudley)	Ian Culley (Wolverhampton)
Kelly Harris (South Staffs)	Uyen-Phan Han (BCC)
Andy Donnelly (WM Metropolitan Authorities)	Mike Parker (WFDC)
Helen Smith (WFDC)	Kate Bailey (WFDC)

		Actions

1.	**Local Plan Timetables** HS ran through the LP timetable for WFDC. Full Council in November and EiP in 2019 and adoption July 2019. Black Country – Issues and Options (Summer 2017). Preferred Options due out at end of this year. Draft plan summer / autumn 2019. Unmet need of 22k (still subject to testing) until 2036. South Staffs – site allocations examination end 2017 and now out to consultation on modifications and hope to have the plan found sound. Want to adopt by August 2018 and also started work on LP review. Have started drafting Issues & Options and aim to finish this by Summer 2018. New Local Plan aiming to be submitted by 2021. Birmingham – adopted development plan Jan 2017. The Plan is providing 51,000. Housing shortfall to be met by other LPAs in the housing market – 38k approx, against an OAHN of 89,000.	
2	**Green Belt Review** MD explained that the GB review hasn't been commissioned yet. Wanted to tie it in to the GL Hearn Housing Study so was put on hold. Now also waiting for Issues & Options consultation responses to be published before GB review can be commissioned – will publish without a response from the Council in March 2018. Approximately 1800 consultation responses were received. Combined Authority (CA) are looking at developing an overarching Investment and Spatial Delivery Framework which will not have any statutory planning making powers but will support delivery of existing plans. Therefore not involved in the GL Hearn study (HMS). CA – officers discussed the constituent and non-constituent members and mismatch in the geographies with the HMA. Spatial Investment and Delivery Framework – enables Mayor to have a discussion about priorities for the CA. Discussed timings around the household projections / standardised methodology being published and how this links to the pre-submission consultation timelines in context of WFDC timetable.	
3	**Strategic Growth Locations Study (GL Hearn & Wood plc)** Leaders meeting 20th February 2018 to consider the study and should be available publically after that.	
4	**Duty to co-operate meeting on 14th February 2018 (Black Country)** The Black Country LAs will outline the main consultation responses and timetable and discuss any DTC issues that are likely to arise. Further meetings will follow.	

5	**Ongoing engagement with DTC partners** Discussed the previous comments given at the DTC. WFDC figures aren't over-provided but meet the range identified by Amion (199 – 332) and we then selected 300 to meet the economic growth aspirations at the time. The DCLG standardised methodology was 246 so waiting on this to be finalised and 2016 population data to be available to then update to OAHN. BCC would be keen if we agreed to a MofU to take some of their numbers on the grounds that we are close to their HMA. The final WFDC OAHN number and the site technical evaluation will highlight whether there is over-provision or not and therefore what the Black Country might say at DTC. The GL Hearn study will then inform us as to whether there is a shortfall or not and as BC work continues will know whether they can meet that shortfall or not by their own GB. Unlikely that the Planning Inspector will have clarity on the BC position when they conduct the WFDC EiP in early 2019. Discussed the role of Solihull in meeting the needs of the conurbation. North Warwickshire is planning for in excess of OAHN and demographic need, with the surplus contributing to wider HMA shortfall. MP advised that it was unlikely that WFDC would be in this position. Issue raised that if a HMA planning for economic led migration above that reflected in trend based projections, then logically it needed to come from somewhere else, otherwise there was a risk of double counting e.g. Telford. Discussed the WFDC Housing Market Area and where the inward migration to the district was coming from.	WFDC will arrange a meeting again April / May 2018 to hold further DTC.

Duty to Co-operate Meeting

14th March 2019

Present:

Vicki Popplewell (Dudley)	Ian Culley (Wolverhampton)
Kelly Harris (South Staffs)	Kate Bailey (WFDC)
Helen Smith (WFDC)	
Apologies:	
Mike Parker (WFDC)	Uyen-Phan Han (BCC)
Andy Donnelly (WM Metropolitan Authorities)	

		Actions
1.	**Introductions** Vicki Popplewell from Dudley Council was welcomed to the group. Vicki has replaced Martin Dando for Duty to Cooperate meetings.	
2.	**Local Plan Timetables** HS ran through the LP timetable for WFDC. The pre-submission consultation was held last year in November/December 2018. The team has since been working through the consultation responses received and checking for any soundness issues for the plan. The EiP is expected to commence in late 2019 and adoption in 2020, based on the current LDS timetable which was approved by Cabinet on 12th June 2018. Black Country – Issues and Options (Summer 2017). The draft Black Country Plan to be published for consultation in Autumn 2019. The Publication stage will be published in 2020 and Submission in early 2021. It is hoped that adoption would be in Autumn 2021. The current housing shortfall for the Black Country LAs is 26,000. Black Country LAs have had encouraging engagement with South Staffs and also Shropshire. Telford is not willing to help with the shortfall at this stage. The Black Country LAs have done some more work on the urban capacity in terms of employment areas, open spaces, growing population, economy and the need for more land for housing and employment. South Staffs – local elections being held in May 2019. The Issues & Options document was published at end of last year. South Staffs are now preparing the preferred spatial distribution document and intend to consult on this during Summer 2019. The Preferred Options document is planned for 2020. South Staffs hope that they will submit to Planning Inspectorate by end of 2021. Black Country LAs and South Staffs will have more clarity with their plans by early 2020. GBSLEP – the housing delivery target and the housing deal was also discussed. A target of 215,000 homes to be delivered. An expectation that LAs within the LEP geography will help to meet this housing target, but this is dependent on suitable sustainable locations being found. We also discussed how the LEP geography is likely to change and it is currently unclear which LEP Wyre Forest District will fall within. Ian Culley referred us all to the West Midlands Combined Authority 'Spatial Investment and Delivery Plan' as the revised draft was published February 2019. See link to revised draft: https://governance.wmca.org.uk/documents/s2639/2019.02.13%20HLDB%20Revised%20SIDP%20appendix%20to%20covering%20paper%20-	

	%20Public%20paper%20-%20FINAL.pdf	
3.	**Black Country Green Belt Review** The Black Country LAs have appointed Land Use Consultants (LUC) to undertake the Green Belt review. The first draft of the Green Belt Review has been completed by the consultants and is currently being checked by officers. The Green Belt review is being done jointly with South Staffs.	
4.	**Consultation Responses to WFDC Pre-Submission Local Plan** The consultation responses received by WFDC from Black Country LAs and South Staffs to the WFDC Pre-Submission Local Plan were discussed. Black Country LAs - A discussion was had about the standardised methodology for calculating housing need and the use of either 2014 or 2016 figures. If Wyre Forest is looking to provide above their 2014 needs then the Black Country LAs would want WFDC to consider attributing any surplus to meeting wider needs of BC and the broader HMA. The Black Country LAs would also want commitment from Wyre Forest for an early Local Plan Review with the purpose of identifying sites to accommodate unmet housing needs arising in the Black Country. WFDC would need clear evidence that the housing/employment shortfall could not be accommodated elsewhere in the HMA. It was also pointed out that Wyre Forest is not the most sustainable location as it does not have a motorway network running through the district, unlike some of the LAs already located within the HMA. South Staffs – They are not objecting to the WFDC Local Plan but think that Wyre Forest should revise wording in draft Local Plan to commit to an early Local Plan Review in light of the Black Country LAs shortfall.	
5.	**Revised NPPF and Statement of Common Ground** We discussed the need for a Statement of Common Ground and how this could be used to iron out any issues before the Wyre Forest Local Plan examination. As South Staffs are not objecting to the WFDC Local Plan, a separate SofCG would be prepared instead of a joint one with the Black Country LAs. It was agreed that the SofCGs should be prepared ready for Submission Stage of the Wyre Forest Local Plan.	
6.	**Ongoing engagement with DTC partners** It was agreed that the next meeting should be in July 2019, after the local elections in May.	WFDC will arrange a meeting in July 2019 to hold further DTC.

7.	**AOB** The Black Country LAs have been undertaking some migration analysis. It was agreed that this information could be shared with WFDC.	Migration analysis to be sent by Vicki Popplewell to WFDC when this information is available.

Appendix 2



Date: 15 October 2015

Our Ref: AJ/JF

Your Ref: RB/HET/FP-LPRIO

Dear Ms Brown

Wyre Forest Local Plan Review - Issues & Options Consultation

South Staffordshire Council would like to respond to the Cross Boundary Issues that have been identified in the Issues & Options Paper. We agree with the list of strategic planning issues set out in the Issues and Options Paper. We are pleased to see that one of the strategic issues identified is that housing provision needs to take account of Housing Market Areas (HMAs)such as the Worcestershire HMA and the Greater Birmingham HMA.

The scale of the unmet need identified in the Main Modifications of the Birmingham Development Plan 2031, is considerable. A shortfall of 37,900 dwellings has been identified as arising from the administrative area of Birmingham alone. We request that the Council makes reference to this Identified Housing Shortfall in the neighbouring Greater Birmingham HMA and if possible, assists in accommodating an element of 'export' from this neighbouring HMA, when arriving at the future housing requirement for the plan-period of the new Wyre Forest Local Plan.

Yours sincerely

Andy Johnson

Director (Planning & Strategic Services)

Cc Mrs Kelly Harris - Team Leader (Local Plans)

Appendix 3

Sent:

To: LPR Consultation

Subject: Preferred Options Reps

Attachments: Planning Policy Wyre Forest DC re Local Plan Preferred Option.pdf

Categories: Blue Category

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

Wyre Forest Local Plan Review Preferred Option

Please find attached comments from South Staffs Council in respect of your Local Plan Review Preferred Option Consultation.

Kind
Regard
s Andy

Andrew Johnson

Chief
Planning
Officer
South
Staffordshir
e Council

Tel: 01902696457

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South Staffordshire Council

Date: 15 August 2017

Our Ref: AJ/JF

Your Ref:

Dear Sir/Madam

Wyre Forest Local Plan Preferred Option 2014

Thank you for the opportunity to comment on the above document.

As a member of the GBSLEP, Wyre Forest District Council (WFDC) participated in the initial PBA Strategic Housing Needs Study work. Stage 2 of the SHNS was published in November 2014 and confirmed that whilst WFDC did not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), it had close links with it. Based on the earlier housing market areas, work undertaken for the National Housing and Planning Advisory Unit and published by DCLG in 2010, WFDC was a best fit with the Worcester HMA along with the three South Worcestershire Authorities (Worcester, Malvern Hills and Wychavon), but as these authorities have an adopted plan, it follows that for the purpose of this round of local plan making, WFDC is a free-standing HMA.

The Preferred Options document summarises the responses to the Issues and Options consultation noting support for additional in-migration, particularly of working age people, due to the ageing population in WFDC. The Amion / Edge Analytics 2017 Objective Assessment of Need Report, verifies the ageing population and also identifies internal migration as being the principal source of population growth. Figure 2.3 and table 2.2 in this Report show that the principal source of this is conurbation authorities within the GBBCMA.

In considering economic factors, the Amion / Edge Analytics Report suggests an OAN of 300 dwellings per annum, compared to a demographically driven

figure derived from the 2014 household projections of 199 dwellings per annum. The situation in the South Worcestershire Authorities mirrors that of WFDC in that they too are seeking economic led growth, which requires more people than demographic projections suggest and is reflected in the adopted plan. It follows therefore, that the same must apply in WFDC.

It is now formally acknowledged in the adopted Birmingham Development Plan, that there is a shortfall of 37,900 dwellings in the GBBCHMA arising from the city alone and evidence emerging from the Black Country Core Strategy may lead to the overall HMA shortfall increasing further. In the light of these growth pressures in the GBBCHMA and the established migration patterns with WFDC, it is logical to conclude that increased supply in WFDC is likely to be met by additional migration from the GBBCHMA; this is reflected in 8.12 of the Amion / Edge Analytics Report. The recently published proposed modifications into the Telford and Wrekin Local Plan are relevant in this context in that the Inspector has acknowledged interactions between HMAs, PM 1 states that:

Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBC HMA.

As a consequence, we (together with our partner authorities within the GBBCHMA) would welcome the opportunity to discuss this matter with you further, with a view to signing a Duty to Cooperate Statement / Memorandum of Understanding between the relevant local authorities: •.•

Yours sincerelv

Andy Johnson

Chief Planning Officer

Appendix 4

Sent: 14 December 2018 09:51

To: LPR Consultation

Cc: Harris, Kelly

Subject: RE: Local Plan Pre Submission Publication (October 2018)

consultation

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

South Staffordshire Council's interim response to the Wyre Forest Local Plan Pre- submission consultation

Thank you for providing South Staffordshire Council the opportunity to comment on your Local Plan Pre-submission publication.

South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the 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 review process.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.

Kind regards

Ed

Ed Fox

Assistant Team Manager (Local Plans) Enterprise & Growth

17.03.2022 – WFDC response to 14.01.2022 letter

Wyre Forest
District Council

Councillor Terry Mason
Cabinet Member for Planning and Business Enterprise
South Staffordshire Council
Council
Offices
Codsall
South Staffordshire
WV81PX

Ref: HD/SFP
Date: 17 March 2022

Dear Councillor Mason,

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter dated 14 January.

Wyre Forest District Council, as a Duty to Cooperate partner, has considered your request for assistance with meeting the unmet need for gypsy pitches in South Staffordshire.
Unfortunately, we are not able to assist with this request.

There is only one public gypsy and traveller site in our District on the Sandy Lane Industrial Estate in Stourport-on-Severn. This site has already been redesigned to increase its capacity and there is no further scope for expansion.

The Council undertook its own Gypsy and Traveller accommodation assessment in 2021 and this identified a total need for 35 pitches over the period (2020/21-2035/36), with 13 of the required pitches falling within the definition set out in the Planning Policy for Traveller Sites.

The Council identified the potential to provide 4 more pitches by expansion/intensification of 3 small private existing sites together with the regularisation of an existing site for 4 pitches and one new site at Zortech Avenue, Kidderminster which is now included in the Local Plan. However, there were no other sites identified that

could meet any further need.

We received the inspector's final report on the Wyre Forest District Local Plan 2016-2036 on 11 March and it is now too late to consider further changes to it. The site proposed in the plan is in the Council's ownership on the southern edge of Kidderminster. This will entail removing land from the Green Belt. This site, along with the others mentioned above, will satisfy the plan requirement shown by our GTM 2020. The site is considered suitable for allocation as it is adjacent to the main employment area and within easy reach by foot of schools, shops, and other facilities and is close to where the majority of our Gypsy and Traveller population are located, which is important for family networks.

Much of Wyre Forest District is also within the West Midlands Green Belt and for this reason we were also constrained in our search for suitable sites to fulfil the pitch requirement.

While your letter mentioned that you had examined sites in the District Council's ownership, you did not provide any information on whether you had examined other potential sites in public ownership (such as land owned by Staffordshire County Council or the NHS) or indeed previously developed land in private ownership and so it isn't clear whether you have also pursued these options.

Yours sincerely,

[REDACTED]

Councillor H Dyke

Leader of the Council

Wyre Forest House, Finepoint Way, Kidderminster DY11 7WF

12.09.2022 – WFDC response to 08.08.2022 letter

From: Heather Stone

To: Edward Fox

Subject: RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 08.08.22

Date: 12 September 2022 12:56:51

Attachments: ~WRD0004.jpg

WFDCLogoNEW2021UPDATEDGREEN-01_653a7f6c-74d7-485e-b10e-dee6b3e1076d.png

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Hi Edward,
Thank you for consulting Wyre Forest District Council and I apologise for the delay in responding.

The Wyre Forest District Local Plan (2016-2036) was adopted on 26th April 2022. It allocates 2 new sites (one already in use) and one new site on land in District Council ownership which has been removed from the Green Belt through the Local Plan process. This requirement comes from the 2020 Wyre Forest District Gypsy and Traveller Accommodation Assessment. As set out in Policy SP.14 at table 7.0.4, an additional 4 plots have also been proposed through expansion/intensification of existing sites. The new allocated site has the potential to meet our outstanding requirement for 13 pitches as shown in Table 7.0.4.

Thus, I can confirm that:

1. There are no plots available on existing public sites within Wyre Forest District that are available for contributing towards meeting the unmet needs of South Staffordshire.
2. We have no plans for a further publicly run site within Wyre Forest District. There is currently one site managed by Worcestershire County Council.
3. The allocation of gypsy pitches on the proposed allocations was discussed through the Local Plan Inquiry and was not considered feasible
4. The site which we have allocated for pitches is in public ownership and will be able to meet the requirement for pitches in Wyre Forest. It is a tightly constrained site which will need to be carefully designed to minimise any adverse impact on the neighbouring nature reserve.

Kind regards Heather

Heather Stone MSc
MRTPI Principal Planning
Policy Officer Wyre

Forest District Council
01562 [REDACTED]

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
[REDACTED]@wyreforestdc.gov.uk

Have you seen our free online magazine for residents, WyredIn? Sign-up to receive it.

From: Edward Fox <E.Fox@sstaffs.gov.uk>
Sent: 09 September 2022 15:43

To: [REDACTED]

Subject: External Email : RE: SSDC - Duty to Cooperate letter - Gypsies and Travellers 08.08.22

This email originated from outside of the organisation STOP :
Were you expecting this email? Does it look genuine?

THINK : Before you CLICK on any links or OPEN any attachments.

Dear all,

Thank you to those who have already provided a response to the attached letter dated 8th August 2022. Responses were requested by 2nd September, however we are yet to receive replies from a number of authorities.

Please could I ask those who have not yet provided a response to do so as soon as possible and by Friday 16 September at the latest? Please get in touch if this will not be possible or if you have any further queries.

Kind

Regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 07970 643301

From: Edward Fox

Sent: 08 August 2022 16:58

To: [REDACTED]

Subject: SSDC - Duty to Cooperate letter - Gypsies and Travellers 08.08.22

Dear Colleagues,

Please find attached a Duty to Cooperate letter from our Cabinet Member for Planning and Business Enterprise, Councillor Terry Mason, in relation to an update on our position on unmet needs for Gypsy and Traveller pitches in our emerging Local Plan.

This letter follows on from a previous Duty to Cooperate letter that we sent to neighbouring authorities on

14.01.22 relating to Gypsy and Traveller needs which I also attach for information.

I would appreciate it if you could pass it on to relevant colleagues/Cabinet Member for

consideration. Please feel free to contact me if there are any aspects of the letter that

you wish to discuss.

Kind regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 07970 643301

From: Edward Fox

Sent: 14 January 2022 16:10

To: [REDACTED]

Subject: SSDC - Duty to Cooperate letter - Gypsies and Travellers 14.01.22

Dear Colleagues,

Please find attached a Duty to Cooperate letter from our Cabinet Member for Planning and Business Enterprise, Councillor Terry Mason, in relation to our position on unmet needs for Gypsy and Traveller pitches in our emerging Local Plan.

I would appreciate it if you could pass it on to relevant colleagues/Cabinet Member for consideration. Please feel free to contact me if there are any aspects of the letter that you wish to discuss.

Kind regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

17.11.2023 – WFDC response to SSDC letter

From: External Email for Local Plans

To: Alex Evans

Subject: FW: South Staffs Duty to Cooperate letter

Date: 21 November 2023 08:24:05

Attachments: WFDCLogoNEW2021UPDATEDGREEN-01_653a7f6c-74d7-485e-b10e-dee6b3e1076d.png

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FYI

From: Heather Stone <[REDACTED]@wyreforestdc.gov.uk>
Sent: Friday, November 17, 2023 2:47 PM
To: External Email for Local Plans <localplans@sstaffs.gov.uk>
Subject: South Staffs Duty to Cooperate letter

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Thank you for consulting Wyre Forest District Council about the latest position regarding the production of the South Staffordshire Local Plan.

As you will be aware, in order to meet its own housing requirement, Wyre Forest District Council released some land from the Green Belt through the Local Plan (2016-36) which was adopted in April 2022. This resulted in a small reduction of the size of the Green Belt from 11,210 Ha to 10,980 Ha – around 2%.

If South Staffordshire District Council were to revise its development strategy in the light of expected Government changes and decide to no longer remove sites from the Green Belt in order to be able to accommodate either its own housing requirement or that of the wider Housing Market Area, then that would have much wider repercussions than in just South Staffordshire. If you decide to follow this strategy, will you be increasing the density on those sites which are outside of the Green Belt or potentially looking to allocate new sites? With neighbouring authorities which were also previously looking to allocate sites in the Green Belt, now also not proposing to take land out of the Green Belt, where will the housing requirement be met? This will inevitably put more pressure on neighbouring authorities which are not constrained by Green Belt. As a neighbouring authority, albeit outside of the Housing Market Area, which is also heavily constrained by Green Belt which covers the eastern part of our District nearest to the conurbation, we would not be in a position to offer up any land to help meet any housing shortfall from neighbouring authorities.

In terms of Gypsy and Traveller requirements, WFDC undertook a Call for Sites and Gypsy

and Traveller Assessment in 2020. I can confirm that no other public land was put forward other than the site which was allocated through the Local Plan to meet our own pitch needs. Therefore, we will not be undertaking any further work on this or preparing to meet any of the need for pitches from neighbouring authorities.

Kind regards Heather

Heather Stone MSc MRTPI
Principal Planning Policy
Officer Wyre Forest District
Council [REDACTED]

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
[REDACTED]@wyreforestdc.gov.uk

No excuse for abuse.

Please treat our staff and councillors with the same respect you would expect to receive.

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29.11.2023 – SSDC response to 17.11.2023 WFDC email

From: Alex Evans

To: Heather Stone

Cc: Kelly Harris; Edward Fox; Patrick Walker

Subject: RE: South Staffs Duty to Cooperate letter

Date: 29 November 2023 17:10:00

Attachments:

Dear Heather

Many thanks for your response.

In regards to your specific questions, we are considering the different options available to accommodate our own housing requirement and any potential contribution towards Housing Market Area and we will be consulting on our preferred approach through a new Reg19 consultation during the spring next year.

This will include an update to our Site Assessment Topic Paper to reflect the preferred spatial strategy which will impact upon our site selection process. In terms of density, the Council will need to balance making effective use of the land whilst ensuring that new developments are in keeping with local character, and this is something we have already considered when setting the minimum numbers for draft allocations and in formulating our housing density policy. Therefore, there is unlikely to be any significant rise in density on preferred sites outside of the Green Belt than that proposed in the previous Reg19 consultation.

In regards to the wider HMA shortfall and neighbouring authorities approach towards taking land out of the Green Belt, this is something that will need to be addressed as part of wider Duty to Cooperate discussions.

Please let me know if you have any further queries or would like a meeting to

discuss this further.

Kind regards

Alex
Alex Evans

Senior Strategic Planning
Officer Strategic Planning

South Staffordshire Council

Tel: 01902 696421

13.06.2025 – SSDC response to GTAA survey

Wyre Forest District Council has commissioned us (RRR Consultancy) to assess the accommodation needs of Gypsies, Travellers, Travelling Showpeople and boat dwellers.

As part of the assessment, we are inviting key stakeholders to complete a short survey to share their insights and experience. Your input is vital in helping to build an accurate, evidence-based picture of the accommodation needs and service access issues faced by Gypsies, Travellers, Travelling Showpeople and boat dwellers across the area.

The survey covers topics such as accommodation need and supply, transit site/mooring provision, access to health and education services, and the effectiveness of current partnership working. It should take no more than 15– 20 minutes to complete.

This survey seeks to gather views on the accommodation needs of Gypsy, Roma and Traveller communities and boat dwellers. We recognise that respondents may have experience or knowledge of only one of these groups, and we welcome all contributions based on your area of expertise or local understanding.

We would be grateful if you could take the time to complete the survey by Friday, 13 June 2025.

Your responses will feed directly into the accommodation needs assessment and will help shape future policy and provision in the Wyre Forest local authority area.

If you have any questions about the survey or the wider GTAA process, please don't hesitate to get in touch.

📧 Email: info@rrrconsultancy.com

Your name

Alex Evans

Your organisation

South Staffordshire Council

Your role and team

Assistant Team Manager

What work do you undertake in relation to the Gypsy, Traveller, Travelling Showpeople and boat dweller communities?

GTAA

Q1. What are the main accommodation issues facing Gypsies, Travellers, Travelling Showpeople and boat dwellers in your local area?

Lack of suitable pitches.

Q2. What do you think are the main reasons why new accommodation is needed among Gypsy, Traveller and Travelling Showpeope communities and boat dwellers? (For example, this might include family formation, loss of informal stopping places or moorings, limited availability of authorised sites or permanent moorings, enforcement activity, affordability issues, or changes to travel or navigation rules.)

Family formation and inward migration

Q3. What are the main challenges or obstacles to developing new sites/moorings or extending existing sites and yards for Gypsies, Travellers and Travelling Showpeople and moorings for boat dwellers?

Available land, suitable land, Green Belt

Q4. Broadly, where do you think new site/yard and mooring provision should be located in your local authority area?

Pitches are allocated in the emerging South Staffordshire Local Plan which is currently at examination. This followed an extensive exercise to find suitable pitches are requesting assistance through the Duty to Cooperate

Q14. Is there anything else you would like to add?

South Staffordshire Council has an identified a 162 pitch need for Gypsy and Traveller households in South

Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite all efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. We therefore continue to request assistance through the Duty to Cooperate in meeting our unmet needs.

Appendix 20 – Housing Market Area Documents

08.01.2021 – SSDC letter regarding review of Green Belt

South Staffordshire Council

Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

8th January 2021

Sent via email

Dear Sir/Madam,

South Staffordshire Council Local Plan Review – Review of Green Belt

As you will be aware South Staffordshire is currently undertaking a review of its Local Plan. One of the key reasons for this is an existing Local Plan Review policy (Policy SAD1) which was adopted by the Council in its Site Allocations Document 2018. This requires the District to
review housing supply options to meet both the District's own housing needs and potentially unmet cross-boundary needs from the Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.

As a result of these pressures, the District is currently considering meeting ambitious housing targets through its emerging Local Plan Review, proposing to accommodate approximately 8,845 dwellings in the 2018 to 2037 period as set out in the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation. This level of growth includes what the District believes to be a proportionate contribution of 4,000 dwellings to the unmet needs of the GBHMA, based on the current evidence of unmet needs in the GBHMA up to 2038[1] and the GBHMA-wide evidence base provided by the GBHMA Strategic Growth Study 2018. However, even if South Staffordshire delivered all current housing allocations, permissions and safeguarded sites for housing land, the District's most recent consultation suggests that only around 3,800 dwellings would be delivered in the District between 2018 – 2037. This is evidently well short of the level of growth the District is seeking to achieve in the Local Plan Review.

The Council will continue to review its housing land supply to inform its 2020 Preferred Options consultation. However, due to the District's rural nature and the lack of any towns or cities in South Staffordshire, it is unlikely that achievable density uplifts to existing suitable

land supply will significantly alter the capacity on existing sites. Whilst there are some areas of land beyond the Green Belt in the District, the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery consultation and the GBHMA Strategic Growth Study both suggest that it is unlikely to be sustainable or deliverable to focus all new housing allocations in the District on the limited area of Open Countryside in South Staffordshire. The District therefore considers that evidence to date suggests it is highly likely that South Staffordshire will need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBHMA's unmet housing needs.

Given the above, and in order to ensure the District meets its duties under paragraph 137 of the NPPF, would welcome your Council's latest position on the following matters, acknowledging that this may be subject to change through emerging national changes to strategic housing matters (the Planning for the Future White Paper);

- Whether or not your authority is able to assist with the unmet housing needs of the GBHMA, in particular those arising from the Black Country
- Whether or not your authority is able to provide sufficient additional housing supply to enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target
- What your authority would be prepared to agree with South Staffordshire District Council in a statement of common ground covering strategic housing needs in the District and GBHMA

To ensure we can progress these discussions in a timely manner, we would welcome a response from yourselves on the above by no later than 26th February 2021. If you would like to meet the Council's officers to discuss this further before this date, then please get in touch.

We look forward to hearing from you on this matter.

Yours faithfully,

[REDACTED]

Kelly Harris

Lead Planning Manager

01.06.2021 – SSDC letter regarding LP update

South Staffordshire Council

Please ask for: Ed Fox

Direct Dial: (01902) 696418

Email: e.fox@sstaffs.gov.uk

1 June 2021

Sent via email

Dear Sir/Madam,

We wrote to you on 8th January of this year setting out South Staffordshire's progress to date in reviewing its Local Plan, recapping the District's proposed contribution towards unmet needs of the Greater Birmingham Housing Market Area (GBHMA) and rationale for this. This letter also sought views whether adjoining authorities and those in the wider housing market area could
reduce pressure on South Staffordshire's Green Belt by accommodating some of the District's proposed housing target.

Following responses received to this letter, we are now progressing towards our Preferred Options consultation later this year. Amongst other matters, this will set out proposed housing sites to meet the District's needs, whilst making a 4,000 dwelling contribution to the unmet needs of the GBHMA. As you will be aware from our previous correspondence, GBHMA officer meetings and Local Plan consultations, this contribution to the unmet needs is based on the spatial recommendations of the 2018 GBHMA Strategic Growth Study. The Council's use of this
study and proposed contribution was first set out at the 2018 Issues and Options consultation to enable GBHMA authorities, particularly those with unmet housing needs, to consider the proposed approach.
To date we have not been made aware that there is any intention from the GBHMA authorities to update the GBHMA Strategic Growth Study, or that an alternative evidence will be prepared by GBHMA authorities to sustainably distribute unmet housing needs across the region. The Council has therefore maintained its proposed 4,000 dwelling contribution to the unmet housing needs of the GBHMA to date. Given the need for the Council to progress its plan, **we are now seeking your agreement on the Council's approach to unmet housing needs and its alignment with the existing GBHMA evidence base**. Ultimately this will need to be reflected in a Statement of Common Ground, but in the shorter term a letter setting out your

authority's
initial position on this matter would be greatly appreciated.

The Council is keenly aware of the Government's requirement for all local authorities to have an up-to-date plan in place by the end of 2023 and the Council will need to continue to make progress with its Local Plan at pace to meet this deadline. I would therefore be grateful if you could respond to this letter no later than **1 July 2021**, and advise us at the earliest possible opportunity if you will be unable to meet this timescale.

Yours faithfully,

[REDACTED]

Annette Roberts

Corporate Director Planning & Infrastructure

08.11.2021 – SSDC letter

South Staffordshire Council

FAO: Officer and Cabinet Member leads for Planning Policy

Sent via email

08 November 2021

Dear Sir/Madam

South Staffordshire District Council has recently agreed to begin its Preferred Options 2021 local plan consultation. Amongst other matters, this sets out the housing sites that the District believes are required to address its own needs whilst also making a contribution to the wider unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire District Council currently believes it is taking an appropriate approach to this important cross-boundary issue and it is important we understand what others are doing and the reasons for any alternative approaches.

Recent support from the Planning Advisory Service (PAS) has reinforced the urgent need for us to agree a way forward on unmet housing needs in order to allow the South Staffordshire and Black Country local plans to progress in a timely manner. We therefore request the involvement of a senior officer and the appropriate cabinet member from your authority at a virtual meeting at **11am on 15th December** to seek agreement (as far as is possible) on the way forward in addressing these issues. Representatives for PAS will be in attendance in order to input into the meeting.

To assist this and ensure a productive meeting can you please ensure you come prepared to discuss the following matters, including potential ways forward to address these issues:

- Your authority's current position on the Birmingham and Black Country housing shortfalls, including proposed responses to these issues and the justification for this;
- Your authority's current position on the GBBCHMA Strategic Growth Study 2018 growth recommendations, including use of these locations to establish a contribution to GBBCHMA unmet housing needs;
- Any alternative approaches that your authority feels should be considered by the GBBCHMA to distribute unmet housing needs;
- The need to establish formal GBBCHMA governance arrangements to address existing and future housing shortfalls, supported by a Memorandum of

Understanding;

- The need for updated evidence, on the geographical extent of the GBBCHMA, and on the potential to apportion contributions to different GBBCHMA unmet housing needs;
- The need for an updated GBBCHMA Strategic Growth Study to address emerging housing shortfalls (particularly from the Birmingham Development Plan review

In advance of your attendance at the meeting, you are very welcome to respond to these questions by return, although this is not essential.

We will minute the key outcomes of the meeting and use these to inform a joint Statement of Common Ground to support our South Staffordshire Local Plan, setting out individual authorities' stances on the Black Country and Birmingham housing shortfalls and any areas of agreement on how these issues should be addressed through local plans. We appreciate there may not be unanimous agreement on the above points, but it is important that there is a record of areas of disagreement as well as areas of common ground. Ultimately, it is important for
everyone's plan progress that as much clarity on this matter is achieved and that solutions to these strategic issues are sought as far as possible.

Please confirm via written response to this letter who will be attending from your authority no later than 29th November and we will ensure they are invited. If you would like any clarification on the purpose or scope of the meeting in advance of attending please get in touch with Kelly Harris (k.harris@sstaffs.gov.uk) to discuss any such matters.

We look forward to hearing from you.

Yours faithfully,

Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise

15.12.2021 – duty to co-operate meeting

South Staffordshire Duty to Cooperate meeting (15 December 2021): Cross boundary unmet housing needs within GBHMA and adjoining

Attendees:
A Yendole (Stafford BC)
A Seaman (IPE)
Annette Roberts (South Staffordshire DC)
Cllr S Phipps (Dudley MBC)
Cllr M Dormer (Redditch BC)
Dean Piper (Cannock Chase DC)
Dot Barratt (North Warwickshire BC)
E Fox (South Staffordshire DC)
E Potter
E West (Shropshire Council)
F Beatty (Stafford BC)
G Mitchell (South Staffordshire DC)
G Palmer (Solihull MBC)
G Nagra (WMCA)
H Stone (Wyre Forest DC)
Cllr I Eadie (Lichfield DC)
I Culley (Wolverhampton CC)
Iqbal Padda (Sandwell MBC)
P Jervis (Lichfield DC)
J Careford (Stratford-on-Avon DC)
Cllr Pemberton (Stratford-on-Avon DC)
K Richards (South Staffordshire DC)
K Harris (South Staffordshire DC)
Maria Dunn (Birmingham CC)
M Hutchings (PAS)
Cllr K May (Bromsgrove DC)
Mike Dunphy (Bromsgrove DC)
Nev Ball (Walsall MBC)
Cllr Mike Bird (Walsall MBC)
Rebecca Brown (Redditch BC)
R Lawrence (Wolverhampton CC)
Shelly Rouse (PAS)
S Pratt (IPE)
S Stray (Lichfield DC)
Cllr Mike Sutherland (Cannock Chase DC)
Tracy Darke (Shropshire Council)
V Popplewell (Dudley MBC)

1st Topic: South Staffordshire's approach to date

Annette Roberts

- Used 2018 Strategic Growth Study since 2018 Issues and Options to inform Local Plan Review
- Based on minimum capacity figures of four growth options set out in 2018 Strategic Growth Study, supported by unmet needs in urban capacity studies
- Have allocated alternatives/additional sites where necessary (plan flexibility)
- Taken this approach to reflect the only HMA-wide document we're aware of that addresses sustainability, Green Belt, etc – we want to avoid displacing 'our' share to other less sustainable areas
- Communicated our stance to other LPAs since 2018
- Use existing comments to date as a starting point for SoCG but seeking views through this meeting

JC

- Always thought SStaffs making positive contribution, but 4,000 is a minimum; have you tested others? How does this compare to commuter flows if these are used as a benchmark?

Kelly Harris

- Alternatives tested through issues and options consultation to reflect Strategic Growth Study, no commuting-wide approach looked at across the HMA to date that we're aware of
- Concerns that commuter flows risks reinforcing unsustainable development patterns

GP

- Solihull subject to examination currently, will be guided by PINs views
- Believe they're following an appropriate strategy but others may have different approaches
- Doesn't mean there's an appropriate strategy for all
- We've used Strategic Growth Study as evidence but not policy, considered it alongside other local evidence base

MD

- Happy for the 4,000 to be used by SStaffs
- Other options out there to using the HMA Strategic Growth Study; not just HMA study going to be used

Kelly Harris

- More appropriate to discuss this under item 2, first item is seeking clarification as to whether there's concerns with South Staffs' 4,000 – alternative approaches discussed next

DB

Can't say "yes or no"; but can say it's a brilliant contribution to an issue that needs to be addressed

- If there was consistency it would make local plan processes a lot easier

TD

- Agree that collective agreement is important, but is unrealistic to seek this at this meeting

2nd Topic: Other area's approaches to addressing the Strategic Growth Study recommendations and HMA housing shortfalls and alternative approaches

Annette Roberts

- Understand there's currently many different approaches across HMA and we need to understand where there is/isn't agreement

Key questions for each area from South Staffs' point of view:

- How have you used HMA Strategic Growth Study in preparing local plans?
- What shortfalls are you planning for and why?
- If you're not using Strategic Growth Study is there an alternative evidence base across HMA to use?

Association of Black Country Authorities (ABCA)

Cllr Phipps – ever since Strategic Growth Study in 2018 the Black Country has gathered a lot of evidence including detailed site analysis to inform the Plan.

– Used growth study to inform preparation of BC plan, including revisiting assumptions on density and exploring GB in Dudley and Walsall. Housing need of 76,000 to 2039, gap of 28,000 homes after Green Belt release? Contributions from South Staffs, Lichfield, Cannock and Shropshire to 8,500 homes. Remaining shortfall of roughly 19-20,000 homes up to 2039.

– Would be useful if South Staffs clarified who they're contributing to out of Black Country and Birmingham

Birmingham

– Currently reviewing BDP; know that there will be a shortfall but not quantified yet. Issues and Options next summer with fairly clear indication of scale of shortfall. Housing need increased since last plan so likely to be at least as severe as last time round.

Bromsgrove

- Strategic Growth Study is a piece of evidence, since it was published there's been significant amount of work, most if not all of Strategic Growth Study locations are in call for sites, in a position to 'move on from it' because we have better evidence. Don't know what own housing need is yet. Not aware of alternative evidence except 'our own locally generated evidence'.

Cannock

– using Strategic Growth Study to inform local plan review process. Set out strategy in Preferred Options to meet own needs but provide a contribution to HMA shortfall of 500 dwellings

recognising proportionate dispersal option in Strategic Growth Study. Will need Green Belt release and there are infrastructure constraints. Strategic Growth Study is the only independent document providing HMA shortfall evidence so are seeking to test its recommendations within our local plan. Not aware of alternative evidence. Keen to stick to existing evidence and work with partners on that.

Lichfield

– Strategic Growth Study is a piece of evidence, helped to identify one of the key areas for growth but don't consider it would be sustainable or deliverable to deliver all areas in Lichfield's District. Providing 2,000 to BC and 665 to HMA. Existing local plan provides 1,000 to HMA needs. Not aware of alternative strategic level evidence base.

North Warkwickshire

– Used Strategic Growth Study as a piece of evidence to inform recently adopted plan. CWHMA used commuting patterns as a consistent methodology for distributing needs and used it as a basis for taking 10% of Birmingham's shortfalls. Also providing for Tamworth and CWHMA unmet needs. Relied on Strategic Growth Study market capacity evidence to support stance in local plan.

ABCA

Cllr Bird – 10% of GB is under threat in Walsall, think SStaffs offer is good. Shropshire (Junction 3 on m54) should do more and be included in HMA. Some of the brownfield sites in Bham/Black Country might require further exploration – WMCA review might identify more

Kelly Harris – Next steps addressed later on the agenda, reviewing brownfield land first would be crucial next step for any future work

Birmingham

– Undertaking map based exercise with urban intelligence to identify all urban sites available for development, giving a much more comprehensive understanding of what can be delivered.

Redditch

– At start of plan review, recently approved LDS, Reg 18 September next year, Strategic Growth Study a piece of evidence, not aware of alternative evidence other than Strategic Growth Study at this stage

Shropshire

– submitted local plan in September. PINs provided initial questions and have asked for more info on Shropshire's contribution to unmet needs and the rationale for it. Shropshire's approach largely based on migratory trends. Outside of the HMA Strategic Growth Study, agree that Shropshire is its own HMA and have engaged with ABCA constructively and have agreed SoCG to support approach towards unmet needs

Solihull

– Almost through examination hearings; waiting to see what PINs say. Support was not met with universal approach. Bham/BC/SStaffs made alternative cases. Have sought to use the Strategic

Growth Study, but there are tensions within it (principal contribution GB area identified for growth). Have looked at evidence as a whole, including SA.

Stafford

- adopted plan covering 2011-31. At early stages of 2020-2040 plan preparation. In separate HMA/FEMA

Stratford

– working with Warwick on South Warwickshire local plan, issues and options next summer running to 2050. Will have to address both Birmingham and Coventry shortfalls. Strategic Growth Study is part of plan preparation, no decisions yet made. Do think we need to agree something across HMA, such as commuting flows, to act as a benchmark for contributions?

Cllr Pemberton - need certainty – don't want to have to start again if numbers increase

Kelly Harris – need to consider commuter flows in new work but to date not aware this has been prepared consistently across the HMA – we're currently focused on **existing** evidence base across HMA. Agree it could be a starting point but need to have regard to wider factors (sustainability factors and infrastructure delivery).

Tamworth

– currently local plan forms small part of HMA unmet need and addressed through neighbouring areas. Just starting new local plan so at too early stage to address shortfalls currently

Telford

Kelly Harris – no attendees have come back to us on this, no response or engagement received despite a number of chasing emails on this matter

WMCA

– no planning powers as such, difficult to answer the questions on screen. Actively engaging with con and non-con authorities in supporting delivery. Probably not appropriate to answer questions

Annette Robert – primary focus for us is WMCA's views on evidence base question, but note that no alternatives raised

Wyre Forest

– hearing sessions just finished. Outside of HMA with no current plans to address shortfalls. Waiting on PINs report to inform stance for next local plan

South Staffs' summary of key points raised (Annette Roberts)

- Broad support for South Staffordshire's 4,000 contribution
- No universal or majority agreement on how to address HMA shortfalls or what they exactly are
- Disagreements about existing evidence base that may need to be addressed through examination

- Some authorities (e.g. Bromsgrove, Solihull) have used the Strategic Growth Study differently to South Staffs and appear to have prioritised local evidence to justify deviating from some of its recommendations
- No obvious HMA-wide evidence base currently produced to replace Strategic Growth Study
- Commuting and migration flows mentioned by some (e.g. Stratford, North Warwickshire and Shropshire) but not currently prepared as an alternative evidence base and differing views on their appropriateness
- May have to agree to disagree on use of Strategic Growth Study where a different approach to South Staffs has been used - including prioritising local evidence to justify contributions - when drawing up a SoCG in support of our emerging plan to meet 2023 deadline

3rd Topic: Future cross-boundary housing shortfalls workstreams

Annette Roberts – no HMA-wide evidence base document to address shortfalls currently. Need to progress existing plans in light of 2023 deadline

Need to update Strategic Growth Study recommendations – review delivery of existing growth recommendations, review in light of more up-to-date evidence, including WMCA brownfield land supply and sustainable transport investments. Need to understand if there's willingness to participate

JC – Keen to support; sensible way forward, recognise we need to reach agreement. Would want commuting flows work to be considered alongside this but in broad agreement with the principle.

MD – No objection in principle to further work, but don't want to end up in similar position further down the line where there's no agreement and wouldn't want it delaying local plan

GP – Strategic Growth Study was useful but didn't have enough clarity on assessing local site assessments and capacity work; future update should provide links to future methodology. Commuting and migration patterns could feed into that – CWHMA worked better because there was just one source of unmet need to be distributed; should have further work considering urban area as a whole

PJ – In principle supportive of update to the study and understanding of how it should be used would be an important part of that

IC – Important to take step back, work done through current local plans is welcomed but we're still miles away from bridging the current 28,000 gap from Black Country. Existing Strategic Growth Study needs fairly fundamental refresh; e.g. geography of HMA – still appropriate? At least need to look at it. Also need to understand what current growth study recommendations have been fully examined. Need to progress ASAP given stages of current local plan preparation. In everybody's interest to establish an agreed way forward on working together which would stand everyone in better position in local plan examinations for Duty to Cooperate purposes

DP – Concerns about jumping straight to a new study – timing is an issue for local plan – developing a new study looking at numbers again could delay emerging local plan and evidence

base. Agree with need for consistent approach and concerned that current recommendations haven't been delivered by all local authorities.

DB – will new study get all LPAs to agree numbers without governance arrangements? Otherwise risks significant resource investment with no guarantee of actual delivery. LPAs participating need to recognise that they're part of the solution.

Kelly Harris - Sympathetic to what Ian's set out in terms of next steps before jumping to next Strategic Growth Study, including independently assessing existing growth recommendations and brownfield supply. Agree with Dot that sign up needs to come first, not wait to see what it says first.

VP – agree with Ian Culley, future work needs to consider extent of the HMA. Dudley would support an update to the HMA study which also acknowledges the cross-boundary implications of housing growth.

EW – Review of HMA is a concern; at advanced stage of local plan preparation and wouldn't want to undermine this, don't disagree with the principle of reviewing evidence base but existing local plan is predicated on Shropshire functioning as separate HMA. Governance will be crucial.

Cllr Pemberton – the all-in or not point is a political decision; requires politicians to agree. If we're going to do this the 'terms of the game' need to be reset.

4th Topic: Future governance arrangements across the HMA

Annette Roberts – for reasons set out we need future governance arrangements to ensure future growth study work isn't a 'paper exercise'. We believe governance arrangements should be established to provide officer working group reporting to board of members. We've used similar structure elsewhere; Cannock Chase SAC JSB and officer working group across 8 authorities. That's one model; there may be others. Welcome views on HMA officer group preparing draft MoU to establish this structure. WMCA would be a part of this.

GN – happy to attend officer group as WMCA representative

MD – in principle no disagreement; would need to see draft MoU and would need to go through Council decision making.

IC – fully agree with proposals; no current political mandate or reporting arrangements; needs to be formalised, especially in light of the substantial work programme proposed earlier which will need strong political steer. Cannock Chase SAC referenced as example, across the country other local authorities have established similar partnership boards that PAS may be able to help with. Needs to be an advisory partnership to avoid superseding local decision-making powers.

DP – Support establishing more formal governance arrangements to deliver consistency based on shared recommendations; current approach has led to inconsistency which is a key concern.

DB - At an officer level agreed re the principle of establishing an MoU; members would be concerned if it took formal decision making away.

GP– would be useful to have an options paper to set out different approaches (carry on as existing, Option A, Option B, positives and negatives etc). Getting the geography right is

important, recognise Shropshire's concerns, also recognise that there should be some relationship with WMCA support and shortfalls (e.g. Telford).

Cllr Pemberton – There isn't anyone that's suggesting that individual LPAs should cede authority, but it's about having consistent approach. Politicians need to have sensible conversations to address these needs. Not mutually exclusive to have a sovereign plan and working with partners.

JC – Recognise that there is a legal duty to cooperate; if there are Councils who don't cooperate creates risks with Planning Inspectorate so it's in everyone's interest to participate.

GN – Importance of having up-to-date local plans as part of housing deal with govt. Key part of deal to access funding, so we need to find a way forward.

EW – Reiterate point around geography; no in-principle problem and would want to be engaged in process. Governance arrangements key. At officer level it's clear there's a big issue that needs resolving. Concerned that this may lead to authorities delaying local plans, need to be mindful of 2023 deadline. Let's move on in a cautious frame of mind.

KH – Appreciate Solihull's request for options paper but there are only two options; do nothing or do something – happy to consider alternatives to Cannock Chase SAC MoU but aren't aware of any to date. Will share draft Cannock Chase SAC MoU as example, officer group meets on a monthly basis, JSB involves cabinet members, doesn't make decisions just endorses recommendations for individual local authorities to then consider progressing. Suggest that everyone agrees that the HMA officer group should prepare a more detailed proposal around revisiting the Strategic Growth Study update and a MoU for future governance arrangements. Hope to do this in a timely fashion and then reconvene people in this meeting today. Recognise this is political, hence why we've invited cabinet members today. We also need to progress and are aware of 2023 deadline ourselves.

AY - SAC MoU is in draft form, not formally signed off yet. PAS may be able to suggest other governance arrangements. E.g. strategic alliances elsewhere?

IC – Agree with way forward suggested by Kelly. Think PAS could have important role here; suggest facilitated workshop of HMA officer working group to work out detailed programme of work to come back to cabinet members with in February with clear recommendations and propositions. May be that we need to call group something different giving different relationships individual LPAs have with urban areas (e.g. HMA and non-HMA).

14.01.2022 – SSDC letter regarding G&T pitch provision

South Staffordshire Council

Sent via email
FAO: Cabinet Members for Planning

Dear Councillor,

South Staffordshire Council Gypsy and Traveller pitch provision

I'm writing to you in connection with South Staffordshire's recent 2021 Local Plan Review Preferred Options consultation. As you may have seen in the document itself the District Council is currently unable to meet its Gypsy and Traveller pitch needs identified through our Gypsy and Traveller Accommodation Assessment (GTAA) 2021. The GTAA 2021 identifies that Gypsy and Traveller families within the District generate a need for 72 pitches within the 5 year period and 121 pitches over the 15 year period.

In tandem with our GTAA we have prepared a separate Pitch Deliverability Study (PDS) 2021. This study was also undertaken by ORS and assessed the deliverability of all site options that had been suggested to us, including an assessment on the planning constraints of the site and an analysis of sites capacity to accommodate new pitches. Following this analysis, the PDS 2021 concluded that South Staffordshire is only able to accommodate 42 additional pitches through expanded or intensified existing sites. All of these pitches are within the Green Belt and reflect the District's attempts to maximise all suitable and deliverable Green Belt sites available to meet identified family needs. Policy SA6 of the 2021 Preferred Options consultation proposes to allocate all of these pitch options, but despite this the Council will still be unable to meet the high need figures given in the GTAA 2021, either in the 5 or 15 year period.

Given what appears to be an acute unmet need for the Gypsy and Traveller pitches to meet family needs, the Council has also examined its own land holdings to see if there is potential for a new public site to be created within the District, which could then be controlled to ensure it supplied pitches to the Gypsy and Traveller families which generate the District's pitch needs. The summary results of this work are set out in the Gypsy and Traveller Public Sites Search November 2021. Despite reviewing all of the Council's own landholdings, all appear to have significant constraints that would prevent them from being delivered, such as open space or sports facilities which have not been identified as suitable for disposal, environmental designations (e.g. Local Nature Reserves) or sites which are permitted/in use as other important functions (e.g. crematoria or employment land).

Given the need to plan for our Gypsy and Traveller pitch needs, **we are therefore seeking your assistance as a Duty to Co-operate body[1] to meet these unmet pitch needs**. **Specifically, we need to understand if there are options to either accommodate some or all of these unmet needs on existing public sites within your area, or whether new public sites could be created on available land in your area to address this cross-boundary issue.** If you are unable to assist the District in meeting these unmet needs on public sites we would appreciate a justified explanation of why this is not the case and the site typologies you have explored before reaching this conclusion, so that we can be sure that a consistent approach is being taken.

Given the pressing need to address this matter prior to our next local plan consultation, **we would appreciate a response to this letter no later than 25th February 2022**. If you wish to clarify any matters relating to this letter then please contact Kelly Harris (k.harris@sstaffs.gov.uk).

Yours faithfully,

Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise

15.03.2022 – duty to co-operate meeting minutes

Immediate actions from GBBCHMA / WMCA Working Group 15/03/2022	
Item	**Action**
Matters arising	
Invite Rebecca Riley again to update on WMCA employment forecasts	AD
Local Plan Updates	
Solihull to forward Inspector's letter for circulation https://eservices.solihull.gov.uk/LocalPlan/DownloadDoc.ashx?docid=1665133	GP/AD
South Warwickshire to forward links for local plan review Cabinet Reports for circulation when available	PC/ AD
TfWM update	
Specification for employment land monitoring to include hectares field as well as square metres. Smartsheet to be amended / circulated	LE
In / out migration figures behind net totals to be provided for last five years. *Liam, if when you have found this data you can provide it back to the start of the time series, it would be incredibly useful. Thanks*	LE
GBBCHMA SoCG	
In principle view on your authority's likely position on being able to sign up to a SoCG - scope and content broadly as presented to the meeting yesterday.	ALL
Detailed comments on the document including your view of the summary of your authority's approach to the shortfall.	ALL
Please use group email contact list so all authorities are aware of each other's position	ALL
Strategic Employment Sites Study	
Your authority's likely position on taking part in the Study and potential funding contribution of up to £5k per local authority.	ALL

17.03.2022 – duty to co-operate meeting actions

From:	Kelly Harris
To:	[REDACTED]
Subject:	RE: GBBCHMA / WMCA Monitoring meeting 15 March 2022 - main Actions
Date:	17 March 2022 10:50:40

Dear all,

Thanks for sending through the actions Andy. I am happy to reply on behalf of South Staffordshire Council.

GBBCHMA SoCG

In principle view on your authority's likely position on being able to sign up to a SoCG - scope and content broadly as presented to the meeting yesterday. *ALL*

Unsurprisingly, as co-author of the SoCG that is being considered, officers are fully supportive of the principle, scope and content of the SoCG. We have also discussed the principle with our Cabinet Member and the wider Cabinet, and PAS have presented to all our Members about the need to make timely progress towards agreeing and signing a SoCG to cover the scope and content as drafted. I can say with some certainty that South Staffordshire Council is wholly supportive of the need to progress this SoCG in terms of scope and content as drafted, and do so quickly so that we can consult on our Reg 19 in the Autumn. The draft SoCG is based on PAS advice and their templates and guidance notes, having assisted authorities in the South East to get sound plans where cross boundary housing shortfalls exist. Whilst I note the comments on Tuesday about splitting the governance arrangements into a separate document, I have significant concerns about taking this approach as it would be easily perceived by an inspector, the development industry and interested parties, that authorities are delaying and deferring making difficult decisions. Which, in turn weakens all of our abilities to defend our Plans. At this stage, we all need to understand which authorities are willing to agree to this way forward, and which aren't. This can then be reflected in the SoCG so that those authorities at advanced stages of plan making can move forward to Reg 19 consultation/submission this year.

To be clear, the SoCG is not stating that the governance arrangements need to be in place on signing as we appreciate that will take time within each authority; but it does seek an agreement to work towards this being put in place. Equally, I think it's worth restating that these are explicitly **advisory** arrangements and are not seeking to replace local authorities decision making powers, but are instead seeking to provide a transparent forum for political discussion and agreeing recommendations for co-ordinated approaches (where possible) to address the shortfalls, which appears absent from the HMA currently.

Detailed comments on the document including your view of the summary of your authority's approach to the shortfall. *ALL*

As stated at the meeting, the detailed contents of the SoCG are truly a 'starter for ten' and welcome any feedback. We have no further comments to make on the wording at this time.

Strategic Employment Sites Study

Your authority's likely position on taking part in the Study and potential funding contribution of up to £5k per local authority. *ALL*

As stated at the meeting, subject to other authorities agreeing to the SESS and the cost per authority being manageable up to £5k, we would be willing to take part in the work. Given the strategic nature of the employment sites that this study will consider, and acknowledgment in the PPG that strategic logistics may need to be considered over a wider geography encompassing multiple FEMAs, we consider that the more authorities involved in this study the better and ideally this should match the original study area of the WMSESS 2021 study.

In terms of PAS, I did speak to our contacts yesterday and provided a copy of the draft SoCG. They are keen to help drive it forward and are meeting DLUHC today to discuss how they can help us as we are apparently a priority area for the government, and I will come back to you when I have further information.

Regards,

Kelly Harris

Lead Planning Manager
Planning

South Staffordshire Council

Tel: 07966255463

From: Ian Culley <[REDACTED]@wolverhampton.gov.uk>
Sent: 17 March 2022 09:04

To: [REDACTED]

Subject: RE: GBBCHMA / WMCA Monitoring meeting 15 March 2022 - main Actions

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Sensitivity: RESTRICTED

Thanks Andy and good morning all.

I wanted to reinforce the importance of this work to us all, particularly for those LAs who were unable to attend the meeting on Tuesday.

It is critical that we make the most out of our next meeting and we are hoping to arrange for PAS to attend to provide guidance and support building on best practise from elsewhere. With this in mind, as Andy has asked, could you provide your comments on the SoCG in good time, circulating to all those in the email group. I'm conscious that there are big political issues at play but I'd like to be able to move forward with an officer consensus that what we are proposing is sensible and is capable of being supported.

If anyone would like to pick up issues beforehand then I'd be happy to talk through.

Kind regards

Ian

Ian Culley

Lead Planning Manager (Regional Strategy) Tel. Office:
[REDACTED]

E-mail: [REDACTED]@wolverhampton.gov.uk
City of Wolverhampton Council

From: Andrew Donnelly <[REDACTED]@birmingham.gov.uk>
Sent: 16 March 2022 16:33

To: [REDACTED]

Subject: GBBCHMA / WMCA Monitoring meeting 15 March 2022 - main Actions

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Colleagues

Please find attached a note identifying the main actions from yesterday's meeting. The next HMA meeting is on 19/4/22 @14:00 and we really need your thoughts ahead of this meeting and by 5th April to inform the discussion with a priority on SoCG actions. Support from PAS to help facilitate this meeting.

Kind regards

08.08.2022 – SSDC letter regarding G&T pitch provision

Sent via email
FAO: Cabinet Members for Planning

Please ask for: Kelly Harris

Direct Dial: 07966 255463
Email: k.harris@sstaffs.gov.uk

08

Augus

t 2022

Dear

Counci

llor,

South Staffordshire Council Gypsy and Traveller pitch provision

Further to my previous letter dated 14 January 2022 (reattached), I'm writing to you in relation to South Staffordshire's emerging Local Plan and specifically our unmet needs for Gypsy and Traveller pitches.

As set out in my previous letter, ORS have prepared a Gypsy and Traveller Accommodation Assessment that has identified a need for 72 pitches within the 5-year period and 121 pitches over the 15-year period. Having then assessed the deliverability of site options to meet the identified family need, it was concluded that South Staffordshire is only able to accommodate 42 additional pitches through expanded or intensified existing sites. Further consideration was given to council landholdings at this time, but our assessment of these concluded that all had significant constraints that would prevent them from being delivered, such as open space or sports facilities. All 42 site options proposed through the Preferred Options consultation are in the Green Belt.

The Council received responses to my letter of 14 January from a total of 13 authorities (some within our Housing Market Area and some from other neighbouring authorities), however none of these responses indicated that pitches could be delivered on an existing public site or that a new public site could be delivered. In summary, responses included the following points:

- Authorities unable to meet their own needs due to lack of suggested sites for traveller pitches through call for sites consultations or other site identification processes
- Site identification process still ongoing so unable to help with unmet needs at this stage
- Land supply constraints including unmet needs for general housing, meaning suitable sites may be earmarked for other housing types due to the significant shortfall

- Existing public site(s) at capacity with no scope to extend
- Questioning whether exporting unmet needs to other (further away) parts of the HMA would be appropriate given the lack of need in our GTAA that is driven by in-migration
- Mismatch in local plan preparation cycles and the geography of existing provision to meet South Staffordshire's unmet needs
- Constrained by Green Belt
- Unclear if South Staffordshire have considered other public sector land (e.g Staffordshire County Council or NHS owned land) or privately owned Previously Developed Land (PDL)

Having considered these responses, we have taken further steps to explore if additional supply for gypsy and traveller pitches is available and deliverable. Firstly, we contacted all the site promoters for proposed allocations within our emerging plan to enquire if they could set aside a proportion of their site for a public gypsy and traveller site. However, none of the site promoters responded with confirmation that part of their site would be available for this use.

We are also in the process of undertaking a further assessment of Staffordshire County Council owned farms, all of which are washed over by Green Belt or designated open countryside. This assessment is currently being finalised however early indications suggest that any potentially suitable sites are limited and that a shortfall, even against our five-year requirement of 72 pitches, will remain.

In light of the further steps we have taken, we are now contacting all HMA and neighbouring authorities for an updated position on this issue and to understand if a consistent approach has been taken to explore supply options. Whilst we appreciate that some authorities may have less of a functional relationship with South Staffordshire than others, the purpose of this request is to explore if there is availability within an existing public site, or suitable site options to create a new public site to meet the needs of specific family members with an identified need. We cannot assume that they would be unwilling to relocate to a public site in other authorities if this secured them a permanent pitch, so we must explore this option to export unmet needs further.

We therefore request confirmation of the following:

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?
2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?
3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?
4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Given the pressing need to address this matter prior to our next local plan consultation, **we would appreciate a response to this letter no later than 2nd September 2022**. If you wish to clarify any matters relating to this letter, then please contact Kelly Harris (k.harris@sstaffs.gov.uk).

Yours faithfully,

Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise

18.08.2022 – SSDC letter regarding draft SoCG

18.08.2022 – draft SoCG (Appendix XX)

Sent via email to:
@birmingham.gov.uk @wolverhampton.gov.uk @wolverhampton.gov.uk
@dudley.gov.uk @dudleymbc.org.uk @sandwell.gov.uk @sandwell.gov.uk
@sandwell.gov.uk @walsall.gov.uk @walsall.gov.uk @cannockchasedc.gov.uk
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@wyreforestdc.gov.uk

18 August 2022

Greater Birmingham and Black Country Housing Market
Area Draft Statement of Common Ground August 2022

Dear Colleagues

You will recall that South Staffordshire Council hosted a Duty to Cooperate meeting for Cabinet Members and officers of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) on 15 December 2021, where it was agreed that our officers would work collaboratively to draft a Statement of Common Ground (SoCG) for our wider housing geography. I'm pleased to say that we are now in a position where each local authority can take the proposed SoCG for housing through their respective agreement processes to enable it to be considered and hopefully signed by individual local authorities. A copy of the proposed SoCG is attached to this correspondence.

As you are aware, this is the first SoCG to be prepared for our housing market area. It is very much intended to be a live document that will continually be updated to demonstrate our collective progress with these important strategic cross boundary housing matters and support our respective Local Plan making processes. I'm sure that this will be the first of a number of signed agreements, and South Staffordshire Council looks forward to continuing to work collaboratively with you to address our strategic issues, future objectives and future work streams.

I would be grateful if you could confirm by reply what your intended next steps are, and anticipated timescales for a decision to be taken by your local authority on signing the SoCG. South Staffordshire Council is aiming to carry out consultation in autumn 2022 on our Publication Plan under Regulation
19. As such, this correspondence and the proposed SoCG for housing will be made publicly available and taken through our own agreement process in coming weeks.

I trust the above is clear, but should you wish to discuss anything further then please do not hesitate to contact me or one of our planning officers.

Yours sincerely

Councillor Terry Mason

Cabinet Member for Planning and Business Enterprise – South Staffordshire Council

24.10.2023 – SSDC letter regarding duty to co-operate update

Sent via email to:

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

24th October 2023

South Staffordshire District Council – Duty to Cooperate update

Dear ,

As you will be aware, South Staffordshire District Council (SSDC) paused work on its local plan in January 2023, requesting clarity from government over its proposed reforms to national planning policy announced in December 2022. At the time these were understood to be implemented by 'Spring 2023', which unfortunately has not been the case, with our current understanding being that the revised National Planning Policy Framework will be published in Autumn 2023.

Despite these delays at the national level, we recognise the need to progress the plan to ensure that we can submit in line with the government's plan deadlines. Whilst no decisions have yet been made regarding the plan's strategy it is evident that the delay to the plan's preparation and potential changes to national planning policy will have effects on the plan's approach to accommodating development needs. Therefore, the Council announced in July 2023 that it would begin revisiting the evidence underpinning the local plan, with the intention of undertaking an additional public consultation on the plan in Spring 2024. Whilst the Council had hoped to wait for the changes to the NPPF to be finalised before progressing further work on the Local Plan it will be necessary to begin this process now, including further Duty to Cooperate engagement, if the government's June 2025 deadline is to be met. The Council's full statement on this can be found here: https://www.sstaffs.gov.uk/news/2023/local-plan-statement.

The likely Duty to Cooperate issues raised by this additional plan-preparation stage and changing national policy context for cross-boundary matters are summarised below, alongside matters where the Council would welcome your authority's views.

Housing

The Council's 2022 Publication Plan consultation proposed releasing significant Green Belt release to achieve its proposed housing target, which accommodated the Council's own housing needs and a 4,000 dwelling contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The Council's evidence base indicated that, at a strategic level, the exceptional circumstances for releasing this level of Green Belt heavily relied upon the Council's housing need and the significant unmet housing needs arising

from the wider housing market area[1], as there was no way to accommodate this contribution to unmet needs without Green Belt release.

The Council's exceptional circumstances for altering Green Belt boundaries were also supported by a regional evidence base prepared by the GBBCHMA[2] in 2018, which indicated that strategic Green Belt release would likely be required to meet the unmet housing needs of the region. Following on from this regional evidence base, a Statement of Common Ground was drafted between the GBBCHMA authorities, reflecting the position on unmet housing needs, proposed updates to the regional evidence base and measures to implement a governance structure between the authorities, based on the positions of each authority as at August 2022. This is attached in Appendix 1 of this letter and was signed by nine (but not all) of the GBBCHMA local authorities and related authorities.

Given the evident role of unmet housing needs in driving Green Belt release in South Staffordshire, it is important to note that the 2022 draft changes to the National Planning Policy Framework (NPPF) proposes changes to how Green Belt boundary changes are considered in relation to housing needs. Specifically, paragraph 142 proposes that "*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period*". 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.

Given the above context, **we would appreciate an indication of what your 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 GBBCHMA, if the proposed changes to paragraph 142 of the NPPF are enacted**. Understanding your stance on this will help us to progress any necessary changes to the plan at pace once the final changes to the NPPF are confirmed, ensuring that we can meet the June 2025 deadline set by government.

Employment

The 2022 Publication Plan proposed sufficient employment land supply would be released to deliver 99ha between 2020-2039. This provided for a potential contribution of 36.6ha towards the unmet needs of the Black Country authorities and a further additional minimum contribution of 67ha of land to the Black Country from the West Midlands Interchange development consent order, with the remainder of the surplus land supply from the site to be considered with related authorities through the Duty to Cooperate. Due to the delay in the plan's preparation, the Council will need to prepare an update of its Economic Development Needs Assessment (EDNA) to inform its Spring 2024 Regulation 19 consultation. This will update the Councils employment requirement across an updated plan period, reflecting delay to the plan's likely adoption date. We will be engaging with you on these matters at an appropriate point in time to inform the Regulation 19 consultation on SSDC's Local Plan in Spring 2024.

SSDC will also continue to work through the West Midlands Development Needs Group to assist in the preparation of the update to the West Midlands Strategic Employment Sites Study 2021 and will seek to address its findings through the update to its EDNA and employment land site assessment process.

Gypsy and Travellers

SSDC has previously indicated a 121 pitch need for Gypsy and Traveller households, including 72 pitches within the 5 year period. SSDC has commissioned an update to the Gypsy and Traveller Accommodation Assessment which will identify our needs up until 2041. It is not expected that our needs will reduce through the updated assessment. As it stands, despite undertaking the following steps, SSDC can only deliver 37 pitches within the plan period on sites which would address unmet pitch needs;

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options (SSDC or County Council owned) in the District for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs
-

Call for sites, public consultations with Gypsy and Traveller sites and pro-active conversations with public bodies were undertaken to fully establish the extent of land available to meet pitch needs. This involved full exploration of both Green Belt and non-Green Belt options, which, if suitable, are allocated for new pitch supply. Despite exploring all of these options, SSDC can only deliver 37 pitches which would address its unmet pitch needs, creating a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the housing market area.

In response to this unmet need, Birmingham City Council (BCC) indicated that it was unlikely that additional pitches could be offered to SSDC due to BCC's own pitch needs. It confirmed it had not yet explored options for a new publicly owned site, nor had it engaged with site promoters of general housing allocations to identify opportunities for additional pitch supply. SSDC would welcome an update to the steps taken to examine all potential pitch supply options, as SSDC has sought to do through its plan preparation.

Other issues

The previous statement of common ground drafted between our councils also addressed the following matters:

- Transport
- Infrastructure
- Natural Environment

Once further details of any finalised spatial strategy are understood will be re-engaging with you on these matters.

Next steps

The Council is currently preparing a Regulation 19 consultation on SSDC's Local Plan in Spring 2024 and will engage with you once further information is available on matters affecting cross-boundary issues. This will allow us to update to the statement of common ground previously

drafted to reflect each of our up-to-date positions. In the meantime we would welcome a response to the matters raised in the letter above, particularly those relating to potential changes to national planning policy regarding housing needs and Green Belt. Please let us have your response no later than **24th November 2023**.

We would be happy to meet with you to discuss this further, please get in touch with myself or the team using the contact details above if it would assist.

[REDACTED]

Lead Planning
Manager Planning
South Staffordshire Council

08.03.2024 – SSDC letter regarding SoCG

Sent via email to:

Please ask for: Ed Fox

Direct Dial: 07970 643301

Email: e.fox@sstaffs.gov.uk

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Maria

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041**.** The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In

addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

Gypsy & Traveller Provision

In August 2023 work began on an update to SSDCs Gypsy and Traveller Accommodation Assessment (GTAA) to assess need over the updated plan period to 2041. The updated assessment has identified a need of 162 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite exploring all available opportunities, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the district's 5 year pitch need. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the district. The position remains that SSDC still requires assistance in addressing its unmet pitch needs.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[REDACTED]

Lead Planning Manager
Planning
South Staffordshire Council

GBBCHMA Development Needs Group

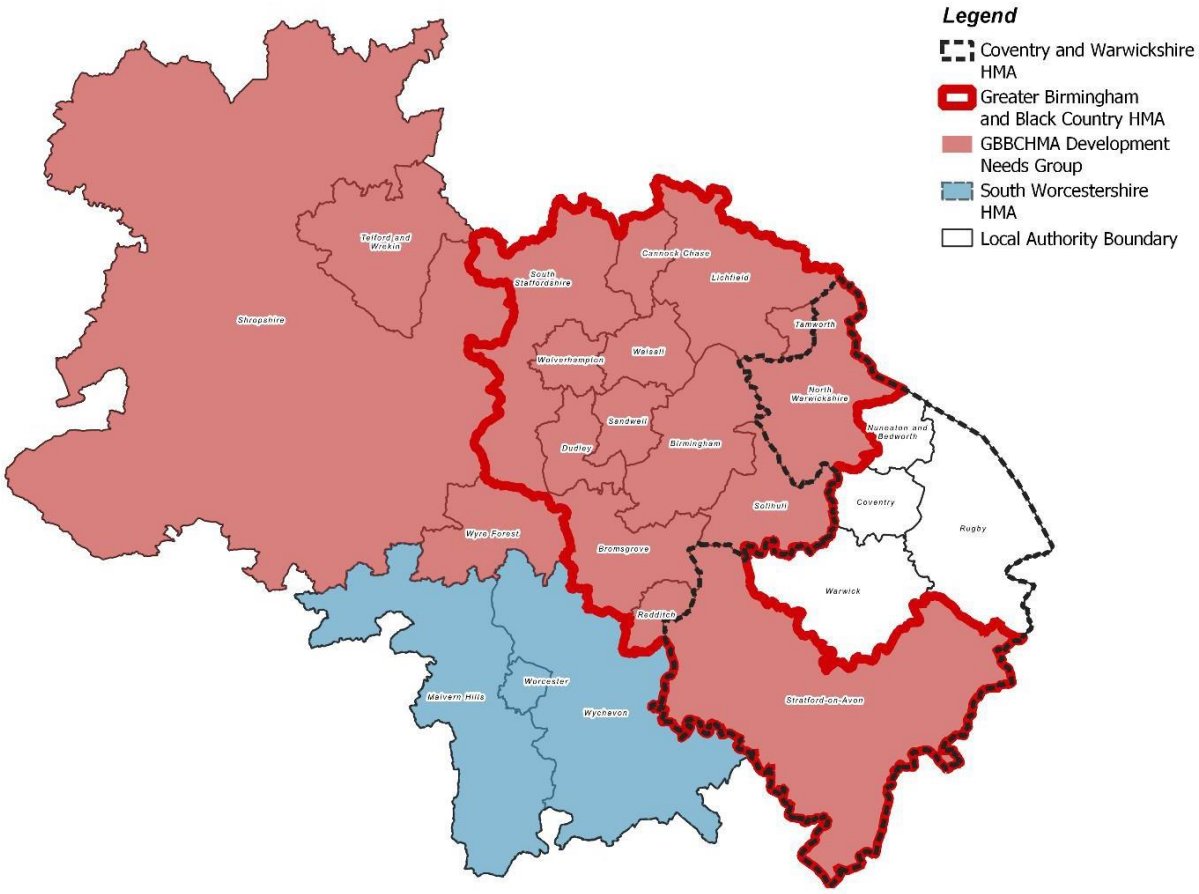
Draft Statement of Common Ground

August 2022

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

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

1.2 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises the local planning authorities set out below. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.



Local planning authorities within the GBBCHMA

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

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

Other related local planning authorities outside of the GBBCHMA

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

2. Signatories to this Statement of Common Ground:

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

3. Strategic Geography

3.1 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) comprises 14 local authorities: Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford-on-Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council.

3.2 This geography was defined through two published studies commissioned from Peter Brett Associates (now Stantec) in accordance with guidance at the time based on

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

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

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

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

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

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

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

4. Strategic Matter - Meeting Housing Need

2011 – 2031 period

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

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

<u>Birmingham Policy context</u>

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

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

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

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

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

4.4 January 2020 signalled three years since adoption of the BDP. In December 2019 Birmingham City Council published an updated Local Development Scheme (LDS)[1] which concluded that an early review was not required. This stated that:

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

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

Joint studies commissioned to address strategic housing shortfalls

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

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

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

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

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

[1] [1] https://www.birmingham.gov.uk/lds

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

Monitoring the GBBCHMA Shortfall

4.10 A monitoring framework was established based on the Strategic Growth Study and progress towards meeting this shortfall has been reflected in a series of position statements for the period 2011 – 2031. The most recent of these position statements was published in 2021 with a base date of 1 April 2020. This suggests that the shortfall to 2031 is some 10,000 homes fewer than when the Strategic Growth Study was published. This is mainly as a result of the Birmingham Development Plan identifying additional capacity over that anticipated when the plan was examined.

4.11 The summary of GBBCHMA housing supply and need below in Table 1 includes capacity identified through the Solihull and North Warwickshire local plan reviews. In the case of Solihull, a contribution of 2,104 homes has been identified as coming forward before 2031 and in North Warwickshire a contribution of 3,790 by 2033. Further contributions may come forward pre 2031 as identified in Table 2, which may close the gap further.

4.12 As North Warwickshire and Stratford-on-Avon straddle the GBBCHMA and the Coventry and Warwickshire Housing Market Area, their contribution is shared and this is set out in an agreed Memorandum of Understanding[2], consequently an adjustment is made in Tables 1 & 2.

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

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

Source: GBBCHMA Position Statement update

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

[2] Available here: http://democracy.stratford.gov.uk/documents/s35727/Appendix%201%20MoU%20CW%20HMA.pdf&TxtOnly=1

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

Table 2: Local Plan Reviews – Shortfalls and Contributions

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

Housing Need and capacity post-2031

4.15 The Black Country is the only plan area in the GBBCHMA that does not have a post NPPF local plan which has been adopted or reached examination. However, the Black Country Plan has reached Regulation 18 stage, and this is significant because it identifies a shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 over the period 2031-2039). These shortfall figures are based on up-to-date local housing need (including the 35% uplift for Wolverhampton). These figures, however, are subject to further consultation and examination. The Birmingham Development Plan review is at its formative stages and the extent of any post 2031 shortfall has yet to be established.

4.16 The 2018 Strategic Growth Study did consider unmet housing needs across the whole GBBCHMA up to 2036, concluding that there was an approximate 60,000 dwelling shortfall. In general, however, at the time of publication, plans looking beyond 2031 were not far enough advanced so capacity beyond this date would be limited by implication.

5. Timetable for review and ongoing cooperation

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

Table 3: Local plan review progress

Area	Plan Period	LHN as of 2022 (homes per annum)	Plan Requirement (homes per annum)	Shortfall / Surplus over Plan Period (total homes)	Plan Status
Birmingham	2011-2031	6,750	2,555	-37,900	Adopted (2017)
Black Country	2020 -2039	4004	2278	-28,239	Regulation 18 (2021)
Bromsgrove	2011-2030	383	368	+ 3,400[3]	Adopted (2017)
Cannock Chase	2018-2038	276	301	+ 500	Regulation 18 (2021)
Lichfield	2018 - 2040	303	422	+2655[4]	Examination (2022)
North Warwickshire	2014-2033	169	454	+ 3790[5]	Adopted (2021)
Redditch	2011-2030	165	337	-3,400[6]	Adopted (2017)
Solihull	2016-2036	807	939	+2,105	Examination (2022)
South Staffordshire	2018-2038	243	444	+4,000	Regulation 18 (2021)
Stratford-on-Avon	2011-2031	567	730		Adopted (2016)
Tamworth	2006-2031	145	177	-1825[7]	Adopted (2016)
Non-HMA					
Shropshire	2016-38	1,147	1,430	+1,500[8]	Examination (2022)
Telford and Wrekin	2011-31	491	864		Adopted (2018)
Wyre Forest	2016-36	276	276		Adopted (2022)

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

[3] 3,400 contribution specifically towards the 2011-30 Redditch shortfall
[4] 2,000 contribution specifically towards the 2020-38 Black Country shortfall
[5] 913 contribution specifically towards the 2006-31 Tamworth shortfall
[6] 3,400 met by Bromsgrove Local Plan (2017)
[7] 500 met by Lichfield Local Plan (adopted 2015) and 913 homes met by North Warwickshire Local Plan (adopted 2021)
[8] Shropshire contribution towards Black Country shortfall specifically post 2031

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

Approach taken in local plans to date

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

Birmingham

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

Black Country

5.5 The Strategic Growth Study made several recommendations of relevance to the Black Country, including examining potential additional urban supply, and identifying and allocating additional land elsewhere for developments of 1500+ homes. The Black Country Urban Capacity Review Update 2021 examines the potential to increase densities in the urban area, and Policy HOU2 of the Draft Black Country Plan proposes increased housing densities compared with those required by current policy.

5.6 The Strategic Growth Study also identified areas of search for sites beyond and within the Green Belt. These included land for an urban extension North of Walsall around Brownhills (Walsall, Lichfield, Cannock) and South of Dudley (within Dudley). The Draft Black Country Plan proposes allocations in both of these locations, although the detailed assessment carried out for the Plan has shown that the total capacity of individual sites at each location is less than 1500 homes.

Bromsgrove

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

Cannock Chase

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

North Warwickshire

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

Lichfield

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

Redditch

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

Solihull

5.12 The local plan was submitted for examination in May 2021. Hearings took place from September 2021 to February 2022. Solihull Metropolitan Borough Council's (SMBC) approach was to make a contribution to the GBBCHMA based on the shortfall created by the 2017 Birmingham Development Plan as this represented a tested and established position, which is not yet the position for the Black Country Plan. Other LPAs made the case that SMBC should be doing more now. The Inspector's [interim] report is not yet published, but they have confirmed their conclusion "*that the Council has complied with the duty to co-operate in the preparation of the Local Plan*."

5.13 As a piece of evidence, the Strategic Growth Study options were considered during the preparation of the plan and helped inform further evidence (e.g. testing a new settlement proposal through the Sustainability Appraisal for the plan). Whilst the SA did not support a new settlement in the Balsall Common area, the Local Plan has been able to treat the settlement as an appropriate location for what is effectively an urban extension. The plan includes growth at other options identified in the Strategic Growth Study e.g. land south of the airport/NEC and land south of Birmingham around Hollywood, Whitlock's End and Cheswick Green. This represents a balanced approach and reflects the tensions in the Strategic Growth Study which identified the Green Belt in these locations as making a 'principal contribution'.

South Staffordshire

5.14 South Staffordshire first established its 4,000 dwelling contribution towards GBHMA unmet needs in its Local Plan Review 2018 Issues and Options consultation. This contribution was in addition to the district's own housing needs and represented the sum of the minimum indicative capacities of the following four strategic growth locations recommended in the GBHMA Strategic Growth Study 2018:

- Urban extension (1,500 dwellings minimum) north of Penkridge
- Employment-led strategic development (1,500 dwellings minimum) in vicinity of i54/J2 of M54
- Proportionate dispersal (500 dwellings minimum) north of Codsall/Bilbrook
- Proportionate dispersal (500 dwellings minimum) on the western edge of the conurbation

5.15 The Council's position was that if all authorities in the GBBCHMA delivered the locations proposed by the Strategic Growth Study, the shortfall (including up to 2036) would be met, in line with paragraph 1.102 of the Study.

5.16 There was also a need to consider other locations in the district alongside the locations listed above, due to the district's own increasing housing needs. The Council then proposed a Spatial Strategy in 2019 which delivered both the 4,000 dwelling contribution and growth in the broad locations identified in the Strategic Growth Study. These were then translated into proposed site allocations in the 2021 Local

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

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

Stratford-on-Avon

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

Tamworth

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

Shropshire

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

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

Telford & Wrekin

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

Wyre Forest

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

6. Summary of Current Position

Summary of key issues

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

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

Summary of key areas of agreement

- Cross boundary unmet housing needs are acknowledged as a strategic matter.
- The GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs.
- The proposed Officer Working Group and Member Board offers a complementary process to other Duty to Cooperate engagement and is agreed as the preferred means to cooperating across the strategic geography as a whole in order to ensure housing delivery, and terms of reference will be established to support this.
- Joint working will be employed where circumstances warrant (e.g., BC LP etc).
- Agreement in principle to the plan making value of the existing evidence base, including the 2018 Strategic Growth Study, whilst acknowledging that this is not a policy document it is part of an evidence base to take matters forward through the local plan review process[9].
- Parties to this Statement of Common Ground will commission funding of shared evidence bases, where practicable to do so, to inform cooperation on housing delivery, including any necessary updates to the 2018 Strategic Growth Study.

Summary of key areas where agreement is still being sought

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

[9] https://www.birmingham.gov.uk/downloads/file/9405/february_2018_glhwood_position_statement

local authorities taking different positions on the Black Country's emerging post - 2031 housing shortfall for example.
- The relative weight given to the Strategic Growth Study varies, all local authorities utilising the Strategic Growth Study have tested and supplemented it with more local evidence, but the manner in which this has been done varies.

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

Objectives of the Development Needs Group

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

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

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

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

- Confirming how current contributions to meet GBBCHMA wide needs will be apportioned between the current and emerging unmet needs of the Black Country and Birmingham. This work is essential in order to show how the anticipated, but not yet tested, Black Country housing shortfall in particular is being addressed to support the next stages of the Plan.
- To confirm the scale of the housing shortfall across the whole of the GBBCHMA over a period of at least 15 years, using the standard method as the starting point for addressing housing needs, to inform the approach taken by current emerging Local Plan reviews[10]. This should attempt to take a consistent approach to identifying capacity within the study area, particularly in areas generating housing shortfalls.
- A review of whether the growth locations identified in the 2018 Strategic Growth Study remain appropriate and whether further work is needed to identify new growth areas for testing through Local Plan preparation.

[10] Where plans have reached an advanced stage then this will be addressed via the review cycle.

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

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

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

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

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

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

Delivering ongoing engagement going forward

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

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

7.7 Future Duty to Cooperate engagement through the Member Board on the scale and apportionment of housing shortfalls will be informed by the programme of work set out in 7.2-7.4 to review and (if necessary) update the Strategic Growth Study, although the final decision on how such matters will be addressed is a matter for individual local authorities' local plans. The principles which will inform the identification and distribution of housing shortfalls within the GBBCHMA will be further developed in future iterations of this Statement of Common Ground.

7.8 The final scope of the revised Strategic Growth Study work and future iterations of this Statement of Common Ground will be informed by best practice from similar statements of common ground covering other large housing market areas, whilst having regard to the differing political structures, combined authority roles and functional geographies across such areas.

8. Future governance arrangements for the GBBCHMA Development Needs Group

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

GBBCHMA Development Needs Group – Officer Working Group

Terms of Reference

8.2 The GBBCHMA Development Needs Group provides a framework for coordination between local authorities to ensure that unmet needs within the GBBCHMA can be satisfactorily addressed (where possible). These Terms of Reference set out how the Development Needs Group - Officer Working Group will work together and report to the Member Board of the GBBCHMA.

8.3 The objective of the GBBCHMA Development Needs Group – Officer Working Group (OWG) is to prepare evidence and monitoring information to inform recommendations made by the GBBCHMA Development Needs Group – Member Board.

Status

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

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

Composition

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

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

Structure and Procedures

8.6 The following structures and procedures will be observed:

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

Remit

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

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

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

GBBCHMA Development Needs Group - Member Board

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

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

8.9 In terms of its remit the Member Board will:

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

Appendix 1: Local Plan Commitments to review

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

Bromsgrove Local Plan 2011 – 2030, Adopted January 2017

Policy BDP4: Green Belt

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

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

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

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

Local Plan Strategy

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

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

Local Plan Allocations

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

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

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

Policy LPR: Local Plan Review

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

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

- A comprehensive Green Belt Review either in partnership with relevant neighbouring authorities or in close consultation with these authorities through the DtC, to inform any further Green Belt release to accommodate new development within the District.
- An evidence-based assessment of highways infrastructure needs, in partnership with the highways authorities.

Explanation

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

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

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

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

of which assists in providing a consistent evidence base for the authorities to consider and upon which future memorandums of understanding (MOU) and/or statements of common ground (SCG) apportioning unmet growth can be based.

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

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

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

Redditch Local Plan, 2011 – 30, Adopted January 2017

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

Tamworth Local Plan 2006 -31, adopted February 2016

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

Local Plan Review

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

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

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

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

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

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

Stratford-on-Avon Core Strategy, adopted July 2016

Explanation

Policy CS.17 Accommodating Housing Need Arising from outside Stratford-on-Avon District The existence of unmet housing need arising outside Stratford-on-Avon District will not render this Plan out of date. However, the Plan will be reviewed if evidence demonstrates that significant housing needs arising outside the District should be met within the District and cannot be adequately addressed without a review. To establish this, the Council will work with other local authorities in the Coventry and Warwickshire Housing Market Area to:

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

Explanation

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

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

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

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

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

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

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

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

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

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

Solihull Local Plan – Adopted December 2013

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

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

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

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

Appendix 2: Strategic Growth Study 2018 Areas of Search

Recommended strategic development areas

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

Long list of alternative strategic development areas

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

Recommended areas of proportionate dispersal

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

Signatories (Senior Officer and Councillor)

Birmingham City Council

Name:

Position:

Name:

Position:

Bromsgrove District Council

Name:

Position:

Name:

Position:

Cannock Chase District Council

Name:

Position:

Name:

Position:

Dudley Metropolitan Borough Council

Name:

Position:

Name:

Position:

Lichfield District Council

Name:

Position:

Name:

Position:

North Warwickshire Borough Council

Name:

Position:

Name:

Position:

Redditch Borough Council

Name:

Position:

Name:

Position:

Sandwell Metropolitan Borough Council

Name:

Position:

Name:

Position:

Solihull Metropolitan Borough Council

Name:

Position:

Name:

Position:

South Staffordshire District Council

Name:

Position:

Name:

Position:

Stratford-on-Avon District Council

Name:

Position:

Name:

Position:

Tamworth Borough Council

Name:

Position:

Name:

Position:

Walsall Metropolitan Borough Council

Name:

Position:

Name:

Position:

City of Wolverhampton Council

Name:

Position:

Name:

Position:

Shropshire Council

Name:

Position:

Name:

Position:

Telford and Wrekin Council

Name:

Position:

Name:

Position:

Wyre Forest District Council

Name:

Position:

Name:

Position:

Greater Birmingham and Black Country HMA

Notes of Meetings 2018

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Monday 16th April, 10:00 Room G03, One Lancaster Circus, Birmingham

AGENDA

1. **Apologies**
2. **Initial local authority responses to study**
3. **Addressing study findings through current plan reviews:**
   - North Warwickshire
   - Solihull
   - Black Country
4. **Taking forward recommendations - Policy choices / refining areas of search**
   - 2031 vs 2036 end date
   - Proportionate distribution vs dispersal
   - Green Belt vs non – Green Belt locations
   - Links with other strategies – transport, economic
5. **Scope for increasing densities – taking this forward**
6. **Implications of NPPF - esp. SoCG requirements**

[redacted]

8. **Monitoring land supply**

[redacted]

10. **Difference between PBA 2015 and GLH 2018 (table attached)**

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Monday 16 April, 2018 @10:00

Room G03, One Lancaster Circus, Birmingham City Council

In attendance: Ian MacLeod (Birmingham – Chair), Ashley Baldwin (Lichfield), Michele Ross (Wolverhampton), Mike Smith (Walsall), Patricia McCullagh (Sandwell), Kelly Harris (South Staffordshire), Andy Johnson (South Staffordshire), Uyen Phan Han (Birmingham), Rosemary Williams (Stratford upon Avon), Gary Palmer (Solihull), Mike Dunphy (Bromsgrove), Dorothy Barratt (North Warwickshire), Clare Eggington (Cannock Chase), Sushil Birdi (Tamworth), Martin Dando (Dudley), Andy Donnelly (West Midlands Metropolitan Authorities)

Apologies: Sandra Ford (Homes England), Ian Culley (Wolverhampton), Craig Jordan (Lichfield), John Careford (Stratford upon Avon), Vicki Popplewell (West Midlands Housing Officers Group)

1	**Local Plan updates / response to GL Hearn / Wood Study**	
1.1	General point that review timetables dependent on final NPPF publication	
1.2	**North Warwickshire** plan submitted for examination rolling the plan forward to 2033, the public examination is anticipated to take place in July. The Hearn / Wood broad locations are more for a subsequent review as no proposals of the suggested size have come forward. The report, however, is helpful in demonstrating market absorption and capacity to deliver. The HIF bid has been successful.	
1.3	**Lichfield:** plan review (issues and Options document) to commence shortly and roll plan forward to 2036. Queries from development industry as to how GL Hearn work will be taken on board.	
1.4	**Cannock Chase:** Council resolution not to pursue local plan part 2 but instead go straight to plan review. Evidence base updating underway with a view to consulting on an issues paper over the summer with Issues and Options following early 2019. Plan to roll forward to 2036.	
1.5	**South Staffordshire:** GL Hearn / Wood made presentation n to Members and considerable developer interest in new settlements / urban extensions as identified in GL Hearn report, although new settlements are smaller than GL Hearn report recommendations. Consequence of this is to accelerate Local Plan review with issues and Options scheduled for Summer 2018 consultation, with end date of 2037.	
1.6	**Black Country** is going straight to Regulation 19 plan from issues and Options. Joint Green Belt review (excluding Dudley) with South Staffordshire to be commissioned shortly and completed autumn / winter 2018, with submission plan in 2019 and adoption 2021.	

1.7	**Bromsgrove** Issues and Options (July 2018), to include a Green Belt review methodology to fulfil commitments made in adopted plan. Members accept that Hearn / Wood evidence that needs to be taken account of.	
1.8	**Redditch** Plan adopted in Jan 2017, fully Allocated up to 2030 although acknowledges that early review may need to happen if necessary. Currently waiting on revised NPPF to see what impacts on adopted plan. controlling members briefed on the strategic study.	
1.9	**Stratford upon Avon** has recently published Regulation 18 consultation Site Allocations Document, including reserve sites as a contribution to Birmingham shortfall, next i iteration of this October 2018. Review date for core strategy yet to be confirmed, but should be well progressed by 2021.	
1.10	**Solihull:** consideration being given to how Hearn / Wood taken on board given current position of local plan review, submission draft plan to be published for consultation summer / autumn 2018 due summer / autumn 2019. Draft NPPF guidance on SoCGs does not support deferring decisions for review, but this may be inconsistent with NPPG. Potential risk that if delay review progress to consider Hearn / Wood proposals, then there will be a delay in bringing sites forward that are currently identified. End date currently 2033, discussion as to whether this should extend to 2036 given NPPF requirement for plans of 15 years duration and to align with other plan reviews.	
1.11	**Tamworth:** Local Plan 2006-2031 was adopted in 2016. There is an early review mechanism built in that should sufficient sites and/or allocations not come forward in North Warwickshire and Lichfield to meet the balance of Tamworth's housing and employment need by the end of 2017/18 that an early review will address any outstanding issues. A potential Green Belt review is referred to in a separate policy. The current LDS references the potential early review but the LDS is being revised to reflect the new work programmes and whether an early review is carried out.	
1.12	Agreed that: • Wherever possible work towards common end date of 2036 • Consider a common start date – important if plans are to be directly comparable in terms of dealing with shortfalls • Prepare a schedule of local plan review timetables	Action AD
2	**Working towards MoU / Position Statement**	

2.1	The Hearn / Wood study and the earlier PBA work are not directly comparable due to different methods of calculating land supply. In summary, however, the GL Hearn study shows a more optimistic position than the early PBA work as some local plans have identified more land than previously.	
2.2	The Hearn / Wood study also makes some further estimates as to where higher residential densities can increase housing supply on identified sites. Birmingham has already established that it can increase supply through additional / higher density City centre development	
2.3	Also in some instances the new standardised methodology figure is lower than the adopted plan figure, potentially indicating a surplus which can be offset against the shortfall.	
2.4	Draw on findings of GL Hearn / Wood report in order to develop position statement / MoU, which in due course may evolve into a statement of common ground.	
2.5	There are two immediate reasons for this: • North Warwickshire has submitted a revised draft Local Plan to the Secretary of State for examination and an MoU will assist the Council in demonstrating that it is working collectively with its neighbours and met Duty to Cooperate requirements • Birmingham Development Plan requires the City Council to work with neighbouring HMA authorities and monitor activity to address the shortfall.	
2.6	Account will also need to be taken of potential capacity in authorities outside of the HMA, for example Telford and Shropshire, to determine whether they have any surplus capacity, which can reasonably be offset against the HMA shortfall. It is note that these two unitary authorities are contained within the Housing Deal geography.	
2.7	It is anticipated that this work will be completed over the next couple of months in time for the next formal meeting of the Working Group scheduled for 12th July @10:00.	
2.8	It was agreed that: • AD to commence drafting of statement as above • IM to contact WMCA explaining what had been agreed and inviting to next formal meeting on 12th July	 AD IM

	• Informal meeting to consider progress towards end of May to be convened. • Consideration be given to inviting Telford and Wrekin and Shropshire to subsequent meetings	
3	**Other matters**	
3.1	Agreed that Terms of Reference need to be drafted for this group.	AD
[redacted]	[redacted]	[redacted]
4	**Date of next meeting**	
4.1	Next scheduled meeting Thursday 12 July @10:00, room GO1A, One Lancaster Circus, Birmingham City Council.	
4.2	An interim meeting to be scheduled for end of May to consider position statement / emerging MoU.	

Next meeting July

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Thursday 12th July 2018, 10:00 Room 201 One Lancaster Circus, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **Terms of Reference**
4. **Latest positions:**

- **2018 SHLAAs**
- **Local Plan reviews / LDSs**

5. **Draft Position Statement**

[redacted]

7. **Any other business**
8. **Date of next meeting**

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Thursday 12 July, 2018 @10:00

Room G03, One Lancaster Circus, Birmingham City Council

In attendance: Ian MacLeod (Birmingham – Chair), Ashley Baldwin (Lichfield), Michele Ross (Wolverhampton), Mike Smith (Walsall), Patricia McCullagh (Sandwell), Kelly Harris (South Staffordshire), Andy Johnson (South Staffordshire), Uyen Phan Han (Birmingham), John Careford (Stratford on Avon), Gary Palmer (Solihull), Mike Dunphy (Bromsgrove), Dorothy Barratt (North Warwickshire), Clare Eggington (Cannock Chase), Sushil Birdi (Tamworth), Martin Dando (Dudley), Andy Donnelly (West Midlands Metropolitan Authorities), David Warburton (WMCA), Sandra Ford (Homes England), Ian Culley (Wolverhampton)

1	**Apologies**	
1.1	Gareth Bradford (WMCA), Jane Gowing (Black Country Authorities)	
2	**Notes of last meeting**	
2.1	MD to provide AD with Redditch position. Sushil Birdi represents Tamworth and not Cannock Chase.	MD
3	**Terms of Reference**	
3.1	Comments made on circulated document: • To include reference to monitoring land supply and completions • Ensure that reference to Duty to Cooperate does not imply that this is the only forum • Make reference to fact that matter other than housing will be considered in due course e.g employment Individual authorities to determine whether they require formal Member endorsement in accordance with their delegations.	
4	**Latest position on capacity (SHLAA's, completions etc.)**	
4.1	**Stratford on Avon:** Currently recalculating 5 year supply, which will inform trajectory. Likely to be some slippage on larger sites into 2031 – 36 period but possibly compensated by faster anticipated delivery elsewhere.	
4.2	**South Staffordshire:** Reduction in 5 year supply of available land but building out at a higher rate close to what anticipated by SAD allocations. Higher densities and more windfalls than anticipated in the SAD.	

4.3	**Solihull:** Unlikely to demonstrate 5 year land supply until revised local plan adopted. Land supply as of April 2018 currently at draft stage but anticipates slight increase in capacity compared to 2017.	
4.4	**Black Country:** Position established for 2017 and set out in Urban Capacity Report. SHLAAs to be updated to 2018 over summer. Over next six months an evaluation will take place of sites currently allocated for housing.	
4.5	**Bromsgrove:** No major changes in overall land supply, but two large allocations have recently gained planning permission so their status will change.	
4.6	**Redditch:** Cannot demonstrate a 5 year supply but a large site is currently progressing through committee cycle.	
4.7	**Cannock Chase:** No additional supply indicated by 2018 SHLAA.	
4.8	**Lichfield:** 2018 SHLAA to be published next week, land supply marginally lower than last year. SAD examination scheduled for September 2018.	
4.9	**North Warwickshire**: Estimate a 4.8 year supply, with a 20% buffer. Non-implementation rate is less than 1%.	
4.10	**Birmingham:** Slippage on programmed delivery on Langley site to 2031 – 36 period but additional capacity of approximately 3000 dwellings identified predominantly in the city centre. This will be reflected in 2018 SHLAA, which is currently being completed.	
5	**Density Assumptions**	
5.1	The Black Country had revisited the density assumptions in the Strategic Growth Study and established that gains via this source were overstated; this is reflected in its Urban Capacity review.	
5.2	North Warwickshire also expressed concern that the gains suggested through higher densities are not reflected in the SGS's conclusions, which state that market viability does not support higher levels of growth in the district than those proposed.	
5.3	Other issues raised included: If identified capacity now committed due to obtaining planning permission, then no longer available as a gain Have gross / net development ratios been treated consistently given the variation and particularly as some of the major gains are on the larger sites.	

5.4	It appears that the methodology used in the SCG used 60% plot development ratios unless the local authority stated otherwise.	
5.5	It was agreed that: • Smaller group to convene early August to thrash out density issue. • Wider group to meet late August	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
7	**Draft Position Statement**	
7.1	Attention drawn to fact that this is a technical document and in the first instance the structure needs to be sound but the conclusions need bringing out more and sharpening. Comments to be forwarded to AD within next couple of weeks. Consideration to be given to seeking member endorsement of this and ToR simultaneously. Consideration to be given to seeking member endorsement of this and ToR simultaneously. Target date for completion of Position statement September 2018.	ALL
7.2	Need to engage with Shropshire and Telford regarding their potential contributions. [redacted]	[redacted]
8	**Any other business**	
8.1	None	

9	**Date of next meeting** Thursday 30 August, 10:00 – 12:00	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Thursday 30th August, 10:00 Room 201 One Lancaster Circus, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **Terms of Reference**
4. **Latest positions:**

- **2018 SHLAAs**
- **Local Plan reviews / LDSs**
- **Green Belt assessments**

5. **Draft Position Statement (Inc. engagement with Telford and Wrekin / Shropshire)**

[redacted]

7. **Any other business**
8. **Date of next meeting**

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Thursday 30 August, 2018

Room 201, One Lancaster Circus, Birmingham City Council

In attendance: Martin Rich (Lichfield), Michele Ross (Wolverhampton), Mike Smith (Walsall), Andy Miller (Sandwell), Andy Johnson (South Staffordshire), Uyen Phan Han (Birmingham), John Careford (Stratford on Avon), Maurice Barlow (Solihull), Mike Dunphy (Bromsgrove), Richard Powell (Tamworth), Martin Dando (Dudley), Andy Donnelly (West Midlands Metropolitan Authorities), Ian Culley (Wolverhampton), Jacob Bonehill (WMCA)

Ian MacLeod (Birmingham) and Dorothy Barratt (North Warwickshire) via dial - in

1	**Apologies**	
1.1	Clare Eggington (Cannock Chase), Sandra Ford (Homes England), Vicki Popplewell (Sandwell)	
2	**Notes of last meeting**	
2.1	[redacted] Stratford on Avon – not upon NWBC 20% buffer not 10%	
3	**Terms of Reference**	
3.1	Penultimate paragraph to state 'where appropriate', in relation to involvement of other bodies.	
4	**Latest position on capacity (SHLAA's, completions etc.)**	
4.1	Some authorities are not going to have 2018 SHLAA figures available until later in the year. Given that position statement needs to be with NWBC Inspector early September, 2016/7 will be end date for estimated land supply.	
4.2	Reference made to earlier Green Belt Assessment common methodology, which was coordinated by Clare Eggington. Agreed to retrieve and circulate for consideration at next meeting.	AD
5	**Draft Position Statement**	
5.1	Outstanding document for NWBC hearings. Duty to Cooperate session scheduled for 25th September and needs to be with Inspector beforehand.	

5.2	All agreed with not including non-implementation discounts and stating that this was a matter for local discretion. Also agreed not to make specific density gain assumptions by district but state a matter for local plan reviews / SHLAAs.	
5.3	All agree with approach of relegating mention of new Local Housing Need method to appendix as position statement written in context of 2012 NPFF.	
5.4	Strategic Growth Study extends to 2036 but position statement only until 2031. Rationale for this is that Birmingham shortfall only to 2031 and NWBC local plan is contributing towards that.	
5.5	SGS did not refer to Bromsgrove meeting some of Redditch's needs – agreed to reference in Position Statement.	AD to make above changes
5.6	Telford do not agree that they are making a contribution towards conurbation's shortfall, whereas Shropshire is more receptive. Agreed to approach Shropshire with a view to agreeing text for inclusion.	IC
5.7	As Lichfield DC had initially brought CX together, agreed that ToR and Position Statement to be forwarded from Lichfield to other CX in HMA for noting.	AD to contact Craig Jordan
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
7	**Any other business**	
7.1	None	

8	**Date of next meeting**	
8.1	Next scheduled meetings: 11 October 09.30 – 11.30 6 December 10:00 – 12:00	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Thursday October 11th, 09:30 Room G01A, One Lancaster Circus, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **Latest positions:**
4. **2018 SHLAAs**
5. **Local Plan reviews**
6. **Green Belt assessments (inc. common methodology)**
7. **Feedback from NWBC examination hearings**
8. **2016 based sub-national household projections**
9. **Working towards a SoCG**

[redacted]

11. **Strategic Employment Sites (Phase 2)**
12. **Any other business**
13. **Date of next meeting**

Greater Birmingham and Black Country Housing Market Area Working Group **Notes of meeting Thursday 11 October, 2018 @09:30** **Room G01A, One Lancaster Circus, Birmingham City Council**		
In attendance: Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), , Patricia McCullagh (Sandwell), Andy Johnson (South Staffordshire), Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Gary Palmer (Solihull), Martin Dando (Dudley), Andy Donnelly (West Midlands Metropolitan Authorities), Jacob Bonehill (WMCA), Kelly Harris (South Staffs), Vicki Popplewell (West Midlands Housing Officers Group), Steve Maxey (North Warwickshire), Clare Eggington (Cannock Chase)		
1	**Apologies** Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Sandra Ford (Homes England), Uyen Phan Han (Birmingham), Mike Smith (Walsall)	
2	**Notes of last meeting** Agreed subject to : [redacted] • Stratford on Avon not upon	
2	**Latest Positions**	
	2018 SHLAAs	
2.1	Once 2018 SHLAA data available will be in position to update position statement to 2017/18. AD to circulate schedule.	AD
	Black Country	
2.2	Consultants commissioned to undertake Green Belt assessment in conjunction with South Staffordshire. Confirmed that Green Belt releases will need to be considered as part of the plan review. Document to be called Black Country Plan and contain a strategic framework and allocations. The main change since adoption of the Joint Core Strategy is that the manufacturing sector's land demands have not declined at the rate anticipated so insufficient land has come forward for housing.	
	South Staffordshire	
2.3	Site Allocations Document now adopted. Issues and Options document published for consultation closing 30th November, with a view to testing an additional 4-5,000 dwelling above local need based on the Strategic	

	Growth Study options. Keen to use growth to support infrastructure investment.	
2.4	Agreed to draft HMA wide response, which could hopefully be extended to other plans coming forward and help progress a SoCG. Method to be applied to other plans by means of demonstration.	AD
	Bromsgrove	
2.5	Noted that Local Plan review Issues and Options published, closing date for comments 19th November. Accompanied by Green Belt assessment methodology, site selection criteria and sustainability appraisal.	
	Lichfield	
2.6	Site Allocations examination hearings completed in mid-September. Local Plan review Preferred Option scheduled for January publication.	
	Stratford on Avon	
2.7	Site Allocations Document under preparation, with Regulation 19 document scheduled for consideration by Members in March 2019. Adopted plan requires 20% of the total housing to be identified as reserve sites to 2031, these are to address: • Five year housing land supply • GBBCHMA shortfall • Coventry and Warwickshire HMA shortfall • Implications of JLR growth It needs to be established what proportion of this reserve allowance can be attributed to GBBCHMA shortfall and the mechanism for its release.	
2.8	SoADC is also preparing a Local Industrial Strategy	
	Cannock Chase	
2.9	First stage of Local Plan review Issues and Scoping has been completed. Next stage, Issues and Options to take place early 2019.	
	Green Belt Assessments	
3.0	Previous work on broad principles for Green Belt reviews had been circulated and needs to be revisited as now local authorities are actually commencing reviews.	
3.1	Brief note giving overview to be drafted for further consideration	AD
4	**Feedback from NWBC hearings**	
4.1	First week of hearings to consider strategic matters commenced 25th September. View that housing hearings went well, with some loose ends to tie up. Issues around whether NWBC contribution towards shortfall	

	could be considered as 'aspirational' to be determined by Inspector. Stronger challenge to employment regarding whether NWBC should allocate a regional / large scale logistics site.	
4.2	Additional SA work anticipated, important messages for all regarding 'reasonable alternatives' examining scale of growth and alternative distribution patterns.	
4.3	Inspector's interim findings to be published in October, with second phase of hearings to commence thereafter.	
5	**2016 Sub National Household Projections**	
5.1	Noted that across the board these were generally lower due to lower population projections and changes to methodology, particularly household representation rates.	
5.2	MHCLG is to review the Local Housing Need Methodology, recently announced in the NPPF, by January. ONS intends publishing an alternative variant projection in December.	
5.3	Note to be prepared comparing 2014 and 2016 data, including affordability ratios.	AD
6	**Working towards and SoCG**	
6.1	Acknowledged that need to progress this. Scoping note drawing on NPPF / G required.	AD
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	

8	**Any other business**	
8.1	None	
9	**Date of next meeting**	
9.1	Thursday 6th November @10:00, One Lancaster Circus, Birmingham	
9.2	[redacted] (Shropshire CC) to be invited	

Next meeting December

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Thursday 6th December 10:00, Room 201, One Lancaster Circus, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **Local Plan updates**
    - **Shropshire Local Plan (Adrian Cooper Shropshire CC)**
    - **GBBCHMA**
    - **OTHER ex GBBCHMA**
4. **Latest SHLAA positions**
5. **Alignment of Green Belt reviews**
6. **Statement of Common Ground**

[redacted]

8. **Technical consultation on updates to national planning policy and guidance**

[redacted]

10. **Any other business**
11. **Date of next meeting**

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Thursday 6th December 2018 @10:00

Room 201, One Lancaster Circus, Birmingham City Council

In attendance: Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), Patricia McCullagh (Sandwell), Andy Johnson (South Staffordshire), Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Gary Palmer (Solihull), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Jacob Bonehill (WMCA), Kelly Harris (South Staffs), Vicki Popplewell (West Midlands Housing Officers Group), Dorothy Barratt (North Warwickshire), Clare Eggington (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Adrian Cooper (Shropshire), Michele Ross (Wolverhampton), Mike Smith (Walsall)

1	**Apologies**, Sandra Ford (Homes England),	
2	**Notes of last meeting**	
2.1	Agreed	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
4	**Local Plan reviews**	
4.1	**Shropshire** - Presentation by AC on Shropshire Local Plan review. Shropshire is planning for more than minimum housing need due to	

	additional demands from armed forces and students and to support higher levels of economic growth.	
4.2	M54 corridor study due to report in New Year. Yet to be determined whether strategic employment proposal to be pursued at J3 with a strong focus on RAF Cosford. This would possibly be accompanied by some additional housing provision, which could address shortfall in GBBCHMA albeit to back end of plan period.	
4.3	Presentation and details of latest iteration of local plan consultation to be circulated to group.	AD / AC
4.4	**Lichfield**: Local Plan review Preferred Options / Direction of Travel to be considered by Cabinet in January. This will include what level of growth to pursue. Consultation on Proposed Modifications to Allocations Document DPD ongoing.	
4.5	**Cannock Chase**: Local Plan Review Issues and Options document to be considered by Members at end of February.	
4.6	**South Staffordshire**: Consultation on Local Plan Review Issues and Options completed. SHLAA analysis suggests SSDC does not have a 5 year land supply.	
4.7	**Solihull:** Non statutory supplementary local plan review consultation to be considered by Cabinet January 2019. This would not be proposing higher growth levels but would consider alternative / additional sites.	
4.8	**Tamworth** LDS being reviewed with a view to Local Plan Review Issues and Options consultation commencing next year.	
4.9	**Bromsgrove:** Considering responses to Issues and Options consultation and Green Belt review methodology.	
4.10	**Black Country:** As previous update, Green Belt assessment ongoing and evidence base being put in place.	
4.11	**Birmingham**: SHLAA now published showing more capacity than previously estimated. Employment land review to commence.	
4.12	**North Warwickshire:** Awaiting Inspectors interim findings following initial hearings.	
4.13	**Stratford on Avon:** Revised LDS reported to Cabinet in December. Local Plan review will not commence until after local elections	
5	**latest SHLAA positions**	
5.1	Need to update position statement to reflect 2017/18. Agreed to update formally when Housing Delivery Test guidelines published by MHCLG.	
6	**Alignment of Green Belt reviews**	

6.1	Agreed that only need alignment of broad principles. Key issue is how use findings in terms of land release.	
7	**Statement of Common Ground**	
7.1	This to be substantive item of next meeting. Meeting to be confined to GBBCHMA members only. AC (Shropshire) to be invited to subsequent meetings.	
[redacted]	[redacted]	
[redacted]	[redacted]	
9	**Consultation on updates to national planning policy and guidance**	
9.1	AD briefing acknowledged	
10	**Any other business**	
10.1	None	
11	**Date of next meeting**	
11.1	To be determined	

Greater Birmingham and Black Country HMA /WMCA Housing Deal Monitoring Working Group

Notes of Meetings 2019

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Monday 4th February 14:00, Rooms 3 and 4, Council House, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **TfWM land use monitoring and demographic services**
4. **Local Plan updates**

- **Reviews**
- **Green Belt assessments (Lichfield attached)**
- **Land supply (SHLAA) updates**

[redacted]

6. **Date of next meeting**

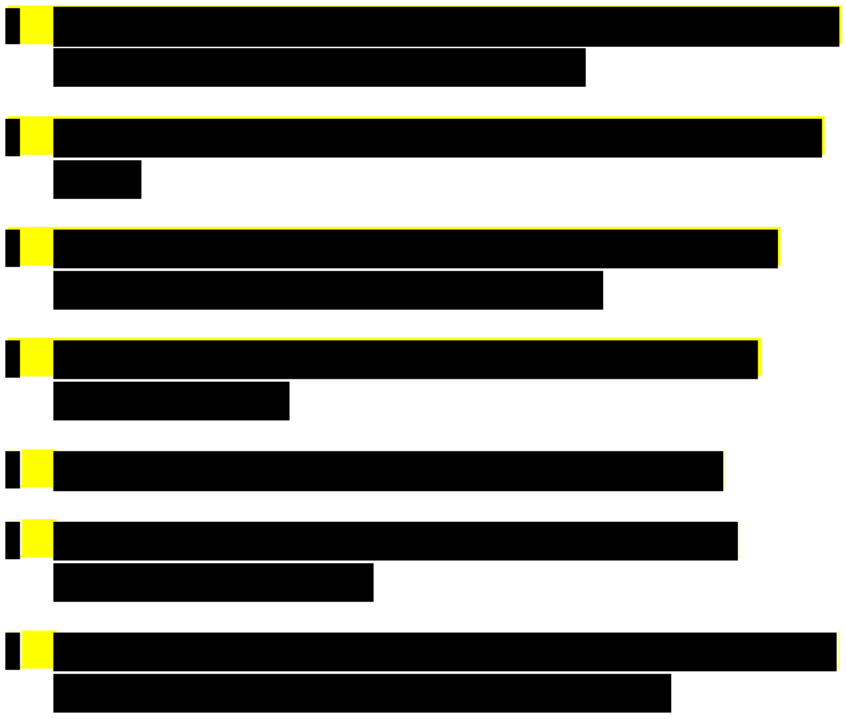
Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Monday 4th February 2019 @14:00

Rooms 3 and 4, Council House, Birmingham

In attendance: Patrick Jervis (Lichfield), Ian Culley (Wolverhampton), Andy Johnson (South Staffordshire), Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Vicki Popplewell (Dudley),), Sarah Jones (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Mike Smith (Walsall), Patrick Walker (South Staffs.)

1	**Apologies**: Gary Palmer (Solihull) Kelly Harris (South Staffs), Dorothy Barratt (North Warwickshire)	
2	**Notes of last meeting**	
2.1	Stratford on Avon correction – Revised LDS reported to Cabinet in December. Local Plan review will not commence until after local elections.	
3	**TfWM Monitoring**	
3.1	As of 1st April 2018, TfWM has taken over the land use monitoring and provision of demographic services from Mott MacDonald and receives funding from the Metropolitan Authorities accordingly.	
3.2	Widespread support for upgrade of site based disaggregated monitoring database, which authorities could update. A useful presentation had also been given to the Coventry and Warwickshire local authorities. Agreed to invite TfWM to next meeting to give presentation on work undertaken / services available.	AD
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]

	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted] 	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
5	**Local Plan reviews**	
5.1	**Cannock Chase** Local Plan review issues and options document report to Cabinet 7th February, rolling forward end date to 2036. This includes potential options for growth in accordance with the 'proportionate distribution' option set out in the Strategic Growth Study and following method used by South Staffordshire. Rugeley power station a major opportunity.	
5.2	**Lichfield**	

	Consultation on SAD proposed modifications closes Wednesday 6th February.	
5.3	Consultation on local plan review Preferred Options / Direction of Travel closes Monday 18th March. Between 3,000 and 4,500 dwellings above standard method identified as potential preferred option. Green Belt assessment methodology circulated for consultation	
5.4	**South Staffordshire** Next iteration to be published summer 2019 identifying potential spatial options	
5.5	**Stratford on Avon** Further focussed consultation on SAD document, with pre-submission scheduled for summer 2019. Consultation early 2019 on draft Development Requirements DPD and publication Gypsy and Traveller Plan later in year.	
5.6	**Tamworth** Local Plan review Issues and Options consultation scheduled for June 2019. Consultation on Design SPD also.	
5.7	**Birmingham** Consultation commenced on Development Management DPD Preferred Option.	
5.8	**Bromsgrove** In process of analysing responses to issues and Options consultation.	
5.9	**Black Country** Draft plan by end of year when have greater understanding of housing numbers – this will include testing of Green Belt options	
5.10	**Solihull** Noted that local plan review supplementary consultation published.	
5.11	**North Warwickshire** Noted that Interim Inspector findings broadly supportive but had requested further SA work based on district's direct functional relationship with Birmingham.	
5.12	Noted that the Black Country had responded in support of Shropshire's latest Plan consultation and that had queried commitment of Wyre Forest to meet any of the HMA shortfall. Other Worcestershire authorities had also made similar comments.	
6	**Green Belt assessments**	

6.1	Noted that Lichfield had circulated this and invited comment. Green Belt assessment methodologies considered at last meeting and it was agreed that… 'only need alignment of broad principles. Key issue is how use findings in terms of land release.'	
7	**Any other business**	
7.1	None	
8	**Date of next meeting**	
8.1	To be determined	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP

Thursday 11 April 14:00, Rooms 201, One Lancaster Circus, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **Purpose of meeting**
4. **TfWM land use monitoring and demographic services presentation**
5. **Local Plan updates**
6. **GBBCHMA shortfall progress**

[redacted]

8. **Next steps – Statement (s) of Common Ground**
9. **Date of next meeting**

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Thursday 11th April 2019 @14:00

Rooms 201, One Lancaster Circus, Birmingham

In attendance: Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), Kelly Harris (South Staffordshire), Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sarah Jones (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Dan Corden (Shropshire), Pat Willoughby (WMCA), Rob Haigh (Coventry), Alex Smith (TfWM)

1	**Apologies**:	
1.1	Dorothy Barratt (North Warwickshire), Vicki Popplewell (Dudley)	
2	**Notes of last meeting**	
2.1	Page 1: MDu would be representing Bromsgrove and Redditch, but Redditch only for WMCA matter.	
3	**Purpose of meeting**	
3.1	Chair explained that group had been established to monitor progress towards meeting housing shortfall in GBBCHMA. [redacted]	
[redacted]	[redacted]	
4	**TfWM Monitoring**	
4.1	Presentation on GIS representation of housing sites and their status. Key points raised included: • Currently point data but ultimately would like to move to polygons • Employment sites to be mapped • Can view transport schemes in relation to housing proposals • Geography covered WMCA constituent members, Stafford and Warwickshire • Uncertainty log required to assist transport planning • Demographic analysis to be completed • Helpful as gives expression to the headline data monitoring progress towards meeting HMA shortfall and WMCA 215,000	
4.2	Other authorities to consider whether want to provide information in appropriate format for inclusion. Agreed that:	

	• Each authority should have at least one person who could access GIS platform. AS to circulate information • MS to act on behalf of HMA group to advance the work. • AS to be invited to meeting after next to give further update.	AS/MS
4	**GBBCHMA shortfall progress**	AD
4.1	Figures presented as at 31/03/18 and summary table comparing with 2017 and Strategic Growth Study baseline circulated. This shows that the shortfall has fallen again. This is principally due to additional capacity being identified in Birmingham.	
4.2	Discussion ensued whether supply estimates should be discounted in accordance with the SGS assumptions or not as was case with 2017 update. At present a mixture although many authorities do not apply discount rates.	
4.3	Noted that these supply estimates did not include elevated plan requirements currently being considered through Lichfield and South Staffordshire plan reviews.	
4.4	General consensus that should look at non-discounted estimates in first instance both for consistency with 2017 position and on the basis that funding was forthcoming to help deliver more difficult sites. All agreed to provide information to AD as to whether estimates were discounted or not and if there are two estimates to provide both along with assumptions / rationale.	ALL
4.5	Noted that based on pro-rata plan rates of delivery there has been collective under delivery since 2011, but also was noted that plan trajectories were often back loaded. Agreed also to compare plan trajectories from 2011 with what has actually been delivered to date and up to 2031 if available. All to provide information to AD.	ALL
4.6	Agreed that position statement to be updated to reflect this new / additional information.	AD
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	

[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
6	**Local Plan reviews**	
6.1	**Black Country** Leaders' summit scheduled for June and emerging Green Belt assessment findings will be considered along with subsequent review timetable.	
6.2	**Birmingham** Langley and Peddimore SPDs prepared. Agreed to circulate.	MDa
6.3	**Cannock Chase** Local Plan review issues and options to commence 13th May 2019 – to include Infrastructure Delivery Plan.	
6.4	**Solihull** Local plan review supplementary consultation exercise completed.	
6.5	**Stratford on Avon** Regulation 19 SAD scheduled for summer publication.	
6.6	**Lichfield** SAD Inspector's report received and progressing local plan review	
6.7	**South Staffordshire** Position same as last meeting	
6.8	**Bromsgrove and Redditch** Next iteration of Bromsgrove local plan review scheduled for autumn 2019 publication. High Quality Design SPD for both districts being progressed.	

6.9	**Tamworth** Local Plan Review Issues and Options consultation scheduled for June 2019. Tamworth's unmet need has reduced as a consequence of the standard method.	
6.10	**Coventry** Focus on implementing adopted plan and SPD preparation.	
6.11	**Shropshire** Local Plan Review Preferred Strategic Sites consultation later in 2019.	
6.12	**North Warwickshire** Noted that hearings in progress and that additional SA work supported the higher level of growth proposed in local plan under examination.	
7	**Statement of Common Ground**	
7.1	All to forward any comments on circulated scoping note to AD. Further thought needed as to how to transform Position Statement into SoCG. Position Statement does not need member support but a SoCG may.	ALL
8	**Any other business**	
8.1	Concern expressed by some authorities that they were not fully engaged in LEP / Staffordshire CC commissioned Strategic Employment Sites Phase 2 study. IM to contact GBSLEP representative.	IM
[redacted]	[redacted]	
9	**Date of next meeting**	
9.1	To be determined	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA WORKING GROUP

Wednesday 5th June 2019, 14:00 – 16:00, Room G01A, One Lancaster Circus, Birmingham

AGENDA

1. **Apologies and introductions**
2. **Notes of last meeting**
3. **TfWM land use monitoring data**
4. **Housing Delivery Test**
5. **GBBCHMA shortfall progress (inc. plan trajectories)**
6. [redacted]
7. **Green Belt release**
8. **SoCG scoping note**
9. **Local Plan updates**
10. **Next steps – Statement (s) of Common Ground**
11. **Date of next meeting**

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting Wednesday 5th June 2019 @14:00

Rooms GO1A, One Lancaster Circus, Birmingham

In attendance: Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), , Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sarah Jones (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Mike Smith (Walsall), Chloe Parrish (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Ian Stevens (Telford and Wrekin, Pat Willoughby (WMCA.

		Actions
1	**Apologies**:	
1.1	Adrian Cooper (Shropshire), Vicki Popplewell (Dudley), Mark Andrews (Coventry), Kelly Harris (South Staffordshire).	
2	**Notes of last meeting**	
2.1	Para. 6.5 correction, Stratford on Avon is not looking at possibility of commissioning Coventry / Warwickshire wide GTAA.	
3	**TfWM monitoring**	
3.1	Attention drawn to the fact that there appear to be some discrepancies between housing capacity totals held on TfWM database and what provided for purpose of refreshing Position Statement. This needs rectifying as the two need to be comparable or at least discrepancies explained and understood. The TfWM records tended to show less capacity than those provided for the Position Statement, which runs the risk of transport models under estimating travel demand.	Action: All to check as to potential reasons for discrepancies.
3.2	Reiterated that all authorities need to ensure that appropriate officers can access TfWM database. AD to contact Alex Smith (TfWM) requesting that he circulates email again inviting access requests.	AD
[redacted]	**Housing Delivery Test**	
[redacted]	Schedule considered which shows GBBCHMA aggregate performance against Housing Delivery Test requirements. This illustrates that collectively CWHMA, GBBCHMA and WMCA area all meeting HDT requirements with some headroom. Noted, however that: • HDT did not include Birmingham shortfall if not absorbed into other plans. • HDT gets more strenuous in future years. Schedule noted but not considered appropriate to include in refreshed Position Statement	

	• What impact had the extraordinarily high score for Redditch had on aggregate total?	
5	**GBBCHMA shortfall (Inc. plan trajectories)**	
5.1	Latest iteration of table shows that shortfall to 2031 had fallen since last year, but this is still subject to refinement. Attention drawn to fact that Bromsgrove, Redditch, Sandwell and Dudley all had higher numbers in local plan allocations category higher than previous year and that this needs verifying and /or justifying. Black Country stated that had revisited densities on some sites which may account for some of the difference. AD to identify specifically where these discrepancies are and circulate schedule to those local authorities for consideration. AD also to contact North Warwickshire in order to obtain most up to date figures.	AD
5.2	Reiterated that all figures to be provided as 'unadjusted' for non-implementation to ensure consistency with previous years.	ALL
5.3	Noted that original plan trajectories were not a particularly useful measure due, in some instances, to their maturity and also because of different time periods. Agreed to examine latest trajectories, key reason being to extrapolate up to 2031 for those authorities whose plans expire before then. All to provide this information to AD.	ALL
5.4	Updated Position Statement to be drafted for consideration at next meeting. Agreed that it should be as faithful in format as last year's.	AD
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
7	**Green Belt release.**	
7.1	Paper prepared by Solihull MBC noted and agreed. It provides a useful summary as to what Green Belt land GBBCHMA authorities have released or are considering for release. Agreed that this paper is better as standalone document to be published alongside rather than appended to Position Statement. AD to circulate national Green Belt release summary note for information.	AD

8	**SoCG Scoping Note**	
8.1	Comments to be provided to AD on this.	ALL
9	**Local Plan Updates**	
9.1	**Lichfield** – Site Allocations Document to be adopted next month. Further consultation proposed on Regulation 18 review document in November.	
9.2	**Black Country –** No change since last meeting. Leaders' Summit to take place 19th June.	
9.3	**Stratford upon Avon** – Site Allocations Document under preparation; a proportion of the 'reserve site' capacity to contribute towards GBBCHMA shortfall. .	
	Tamworth – Issues and Options consultation scheduled for autumn – looking at partial review.	
	Telford and Wrekin – Meeting delivery targets set out in local plan. Considering possibility of a review.	
	Cannock Chase – Plan review issues and options consultation commenced in May until 8th July**.**	
	Solihull – Analysing representations on Focused Consultation exercise.	
7	**Statement of Common Ground**	
7.1	All to forward any comments on circulated scoping note to AD. Further thought needed as to how to transform Position Statement into SoCG.	ALL
8	**Any other business**	
8.1	Attention drawn to STOG paper on WMCA's Low Emissions Strategy and the potential implications for planning authorities.	
9	**Date of next meeting**	
9.1	To be determined	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Thursday 19th September 2019, 14:00 – 16:00, Room 116, 16 Summer Lane, Birmingham, B19 3SD

AGENDA

1. Apologies / introductions and purpose of meeting
2. Notes of last meeting
3. TfWM land use monitoring data
4. GBBCHMA - Refreshed Position Statement
5. [redacted]
6. SoCG scoping note
7. Local Plan updates (inc. beyond HMA area)
8. Next steps – Statement (s) of Common Ground
9. Date of next meeting

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting 19 September, 2019,

Room 116, WMCA Offices, 16 Summer Lane, Birmingham

In attendance: Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), , Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Sahar Khan (Birmingham, Mike Dittman (North Warwickshire), Andy Donnelly (West Midlands Metropolitan Authorities), Sarah Jones (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Ian Stevens (Telford and Wrekin), Pat Willoughby (WMCA), Vicki Popplewell (Dudley), Ross Parker (Coventry), Adrian Cooper (Shropshire), Kelly Harris (South Staffordshire)

		Actions
1	**Apologies**:	
1.1	Richard Powell (Tamworth), Victoria Chapman (Rugby)	
2	**Notes of last meeting**	
2.1	Agreed as an accurate record	
3	**TfWM monitoring**	
3.1	Discussions ongoing between TfWM and local authorities regarding consistency of data.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	
5	**Local Plan reviews**	AD

5.1	**Lichfield** – Preferred Options consultation scheduled for November 2019, with the plan period extending to 2040.	ALL
5.2	**South Staffordshire –** Regulation 18 Preferred Option October / November 2020.	
5.3	**Cannock Chase** – Regulation 19 Preferred Option Spring 2020	
5.4	**North Warwickshire –** Awaiting decision of HIF bid for highway infrastructure improvements, which are essential to plan's delivery. Consequently, local plan on hold.	
5.5	**Shropshire** – Strategic Sites phase of consultation now completed. Regulation 19 plan scheduled for March 2020, with submission to SoS by end of July.	
5.6	**Bromsgrove** - Bromsgrove is undertaking further issues and options consultation and a call for sites.	
5.7	**Redditch –** No review programmed	
5.8	**Birmingham** – Trigger point for considering plan review reached in early 2020. Formally writing to other LPAs regarding their positions in relation to plan reviews and contributions to shortfall.	
5.9	**Stratford on Avon** – Consultation on Regulation 19 SAD commenced in July 2019. Would be requesting that HMA authorities agree a SoCG regarding reserve sites attributed to GBBCHMA shortfall. Formal review of local plan to follow.	
5.10	**Coventry –** Plan adopted and focus on implementation, review to commence before 2021.	
5.11	**Telford and Wrekin / Solihull** – Position as at previous meeting	
6	**SoCG Scoping Note**	
6.1	Note from previous meeting circulated again, comments to be provided to AD.	ALL
7	**Any other business**	
7.1	Note circulated on the need to refresh the Metropolitan Area's Local Aggregate Assessment. Noted that past sales may not be the most accurate measure of future demand due to pursuit of higher housing number and HS2 impacts. Also impacts of Modern Methods of Construction. Agreed AD to coordinate this.	AD
8	**Date of next meeting**	
9.1	Next meeting scheduled for 11th December 2019 @ 10:00, room 116, WMCA offices. Interim meeting for early November to be scheduled (see 4.2)	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 5 November 2019, 14:00 – 16:00, Room 109, 16 Summer Lane, Birmingham, B19 3SD

AGENDA

1. Apologies / introductions
2. Notes of last meeting
3. Refreshed GBBCHMA Position Statement (Updated with new information since last meeting)

- Approach to discounting
- Approach to post-2031 period
- Arrangements for publishing statement

[redacted]

5. Local Plan review updates
6. Any other business
7. Date of next meeting

Greater Birmingham and Black Country Housing Market Area Working Group

Notes of meeting 5 November 2019,

Room 116, WMCA Offices, 16 Summer Lane, Birmingham

In attendance: Patrick Jervis (Lichfield), Ian Culley (Wolverhampton), Michele Ross (Wolverhampton) Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Mike Dittman (North Warwickshire), Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Patrick Walker (South Staffordshire), Eddie West (Shropshire), Katherine Moreton (Nuneaton and Bedworth), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley)

		Actions
1	**Apologies**:	
1.1	Ian Stevens (Telford and Wrekin), Adrian Cooper (Shropshire), Kelly Harris (South Staffordshire), Victoria Chapman (Rugby), Dorothy Barratt (North Warwickshire)	
2	**Notes of last meeting**	
2.1	Bromsgrove and Redditch in same heading, make clear that two distinct councils.	
2.2	Confirmation that next meeting is Wednesday December 12 @10:00 **not** 14:00	
3	**Local Plan reviews**	
3.1	**Black Country** – Evidence is not been published until after the General election, main documents relate to Green Belt assessment and urban capacity refresh. Regulation 18 local plan to be published for consultation Autumn 2020.	
3.2	**South Staffordshire** – Currently consulting on Spatial Housing Strategy & Infrastructure Delivery document until December 12.	
3.3	**Stratford on Avon** – Consulting on Regulation 19 Site Allocations Document, have received over 700 representations. Local Plan review to commence next year.	
3.4	**Bromsgrove** – District Plan Review Update and Call for Sites Consultation ending (11th November). Approximately further 18 months until draft plan available as will need a lot of evidence, transport assessments etc.	
3.5	**Redditch** – No review being progressed	
3.6	**Lichfield -** Preferred Option to be considered by Cabinet next week. LHN plus 4,500 contributed to HMA shortfall proposed (by 2040)	

3.7	**Cannock:** Preferred Option Summer 2020 with 2022 targeted for adoption.	
3.8	**Solihull –** In process of reviewing programme.	
3.9	**Birmingham** – Reporting to Cabinet in December, will not be proposing review of plan after 3 years as progress being made in addressing shortfall, but will need to consider whether review necessary after 5 years in accordance with Government policy.	
3.10	Consultation to commence shortly on Development Management DPD (Publication) and Parking SPD	
3.11	**Shropshire** – Timetable for Preferred Option may be delayed from published March date as awaiting results of Black Country evidence refresh. Decision on M54 J3 strategic proposal not yet reported to members for consideration.	
3.12	**North Warwickshire** – As previously reported, awaiting outcome of HIF bid. Anticipate January / February decision, but this may be deferred to spring budget.	
3.13	**Nuneaton and Bedworth –** Recently adopted plan, including meeting unmet need from Coventry. Focus now on accompanying DPDs/ SPDs.	
3.14	Audit trail report explaining how shortfall decreased previously circulated. Main reasons for shortfall decrease include: • Additional capacity identified in Birmingham, a lot of consents on non-allocated sites • Extra capacity identified in Solihull through NEC Masterplan • Dudley correcting earlier figures	
3.15	Reiterated that both Bromsgrove and Redditch Councils were monitoring against local plan targets and not LHN figures.	
3.16	In the appendix, Stratford's capacity has not decreased per se; rather revised trajectory timescales mean some sites are now expected to deliver more homes post 2031.	
3.17	Black Country refreshed capacity suggested loss of 6,500 housing units from former employment sites that it was now considered would not come forward. This increases shortfall pre 2031 to 6,800 units from 300 as presented at September meeting).	
3.18	Stated that would be discounting remaining sites through SHLAAs, which it was estimated could reduce capacity by approximately further 5,000. Clarified that this was brownfield or 'urban' capacity and any potential Green Belt release yet to be factored in.	

3.19	In previous position statement, view was taken not to apply a universal discount for non-implementation as this would be offset by not applying a universal uplift for increased densities.	
3.20	View expressed that Shire districts found it difficult to increase densities Also considered that the GL Hearn work may have taken some over generous estimates of net capacity when estimating density uplifts, e.g. included 'strategic' open space on larger sites. Any increase in densities would come forward through SHLAAs / policy reviews and negotiations on planning applications. Also noted that Housing Deal funding could be dependent on building at higher densities.	
3.21	In terms of discounting capacity identified through SHLAAs, HMA local authority summary positions as follows:	
3.22	**Birmingham**: No discount applied	
3.23	**Solihull:** Discount applied on 5-year supply calculation stage, not SHLAA inclusion.	
3.24	**Stratford on Avon:** Discount applied on 5-year supply calculation stage, not SHLAA inclusion.	
3.25	**Bromsgrove:** No discounting of SHLAA sites as high build out rates as strong market.	
3.26	**Redditch:** No discounting on sites identified in SHLAAs	
3.27	**Cannock Chase** – Applies local discounts on SHLAA sites.	
3.28	**North Warwickshire:** Does not apply discount to SHLAA derived sites ??	
3.29	**Lichfield:** Does not apply discount to SHLAA sites but proposes flexibility allowance on allocated sites through local plan review.	
3.30	Main points resulting from discussion summarised as follows:	
3.31	Black Country evidence critical in terms of other authorities having justification for going beyond LHN (South Staffordshire, Lichfield, Shropshire)	
3.32	Black Country to firm up position, urban capacity on brownfield sites and likely Green Belt release. Black Country authorities invited to share their evidence on these matters in confidence with other members of group. Noted that Coventry and Warwickshire HMA authorities had peer reviewed each other's analysis.	BC authorities
3.33	The only tested pre 2031 shortfall remains the 37,900 set out in the Birmingham plan.	
3.34	Need to consider what shortfall is pre and post 2031 as plan reviews extend up to 2040. At present Birmingham shortfall only quantified to 2031.	
3.35	Discounting issue needs resolving. Agreed that a standard request be made of all authorities seeking confirmation of approach towards	AD

	discounting of SHLAA figures and density uplifts in the light of Strategic Growth Study and revised NPPF.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
5	**Any other business**	
5.1	None	
6	**Date of Next Meeting**	
6.1	Wednesday 11 December, Room 116, WMCA offices, 16 Summer Lane @10:00	

MONITORING WORKING GROUP

Wednesday 11 December 2019, 10:00 – 12:00, Room 116, 16 Summer Lane, Birmingham, B19 3SD

AGENDA

1. Apologies / introductions
2. Notes of last meeting
3. Black Country Urban Capacity Refresh (presentation)
4. Position Statement refresh

- Implications of item 3
- Updating to 2018/19
- Agreeing discounting / buffer assumptions
- Extending beyond 2031

[redacted]

[redacted]

6. Local Plan review updates
7. Strategic Employment Sites Study (Phase Two)
8. TfWM monitoring
9. Any other business
10. Date of next meeting

GBBCHMA / WMCA Housing Deal Monitoring Group

Actions from meeting 11 December 2019 @ 10:00.

Room 116, WMCA Offices, 16 Summer Lane, Birmingham

In attendance: Patrick Jervis (Lichfield), Ian Culley (Wolverhampton), Michele Ross (Wolverhampton) Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Kelly Harris (South Staffordshire), Eddie West (Shropshire), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley), Ian Stevens (Telford and Wrekin), Mark Watkins (Sandwell), Sahar Khan (Birmingham)

Actions

1	**Apologies**:
1.1	Dorothy Barratt / Mike Dittman (North Warwickshire) Katherine Moreton (Nuneaton and Bedworth).
2	**Notes of last meeting**
2.1	Remove reference to 35dpa reference (para 3.20). Paragraph 3.29 confirmed as accurate regarding Lichfield flexibility allowances through local plan review.
3	**Black Country Urban Capacity refresh / Green Belt / Landscape Assessment**
3.1	The focus of the meeting was to receive presentations on the Black Country Urban Capacity Refresh and Green Belt / Landscape Assessment. Noted that Urban Capacity Refresh document would be in the public domain shortly. **ACTION:** Agreed to circulate Urban Capacity Refresh presentation.
4	**Position Statement Refresh**
4.1	In the light of new Black Country evidence, agreed that the date needed to be rolled forward to 2018/19-year end for completions (residual supply until 2030/31) and acknowledge that a post 2031 shortfall too. **ACTION:** AD to circulate necessary proformas, ALL to respond
4.2	Also agreed that where local planning authorities discount their SHLAA / AMR figures, then these should be reflected in revised Position Statement for consistency. Applies to Black Country, South Staffordshire and Cannock Chase.
[redacted]	[redacted]
[redacted]	[redacted]
6	**Strategic Employment Sites Study Phase Two**

6.1	Concern expressed as to status of report and that most local authorities had not had sight of it. **ACTION:** IC to convey this to LEP / Staffordshire County Council Steering Group.
7	**TfWM land use monitoring and demographic services**
7.2	Two issues, firstly discrepancy between TfWM returns and totals in Position Statement regarding completions / capacity. Secondly, availability of demographic reports in format previously supplied by Mott MacDonald. **ACTION:** PW to take up with TfWM
8	**AOB**
8.1	Responses to Stratford on Avon's Site Allocations Document SoCG outstanding. Reminder to all to action if not already done so**. ACTION:** All
9	**Date of next Meeting**
9.1	Actual date to be determined but to be arranged for end of January.

Greater Birmingham and Black Country HMA /WMCA Housing Deal Monitoring Working Group

Notes of Meetings 2020

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Wednesday 12 February 2020, 14:00 – 16:00, Room 109, 16 Summer Lane, Birmingham, B19 3SD

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. GBBCHMA Position Statement refresh
    - Checking 2018/19 data
    - Finalising discount / lapse rate assumptions and buffers
    - Target date for completion

[redacted]

5. Local Plan review updates
6. TfWM monitoring
7. Strategic Employment Sites Study (Phase Two)
8. Any other business
9. Date of next meeting

GBBCHMA / WMCA Housing Deal Monitoring Group

Agreements and Actions from meeting 12 February 2020 @ 14:00.

Room 109, WMCA Offices, 16 Summer Lane, Birmingham

In attendance: Patrick Jervis (Lichfield), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Dan Corden (Shropshire), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley), Ian Stevens (Telford and Wrekin), Uyen Phan Han (Birmingham), Ed Fox (South Staffordshire)

Actions

1	**Apologies**:
1.1	Katherine Moreton (Nuneaton and Bedworth). Ian Culley (Wolverhampton), Michele Ross (Wolverhampton), Kelly Harris (South Staffordshire), Ian MacLeod (Birmingham)
2	**Actions from last meeting**
2.1	Agreed as accurate record.
3	**GBBCHMA Position statement Refresh**
3.1	Noted that Black Country figures require slight adjustment for net demolitions so that consistent with urban capacity work: **ACTION BC authorities to provide to AD (**Dudley already provided)
3.2	Confirmation requested that North Warwickshire data is as of 1st April 2019 and whether what provided extends to 2033 (in accordance with plan review). If the latter, then last two years' estimates need removing. **ACTION MD to advise AD**
3.3	Noted that discounts of varying magnitudes only applied to Black Country, South Staffordshire and Cannock Chase's total supply figures. These are to be applied in refreshed Position Statement and set out in footnotes / text.
3.4	Once above information / confirmation provided circulate table again with suggested footnotes / annotations. **ACTION AD**
3.5	Agreed that specific discounts of sites five-year supply not to be applied and reference made to this in the document. The impact of these 5-year supply discounts is marginal.
3.6	Note that some local authorities apply a buffer to land supply over and above any five-year supply uplift (Stratford adopted plan, Lichfield propose in emerging plan). Make it clear in document / footnotes where this applies and what implications are.

3.7	Agreed that as NPPF requires plans to consider a 15-year horizon, need to include a post 2031 section setting out that large shortfall emerges again in the light of Black Country analysis. The full extent cannot be confirmed until Birmingham (and others) quantify post 2031 shortfall.
3.8	Shortfall currently estimated as 2,116 but will increase slightly in the light of the above Black Country adjustments (and potentially North Warwickshire). Position Statement refresh to explain that shortfall will continue to close as capacity comes forward through plan reviews e.g. Black Country, Lichfield, South Staffordshire, Cannock Chase. **ACTION AD**
3.9	Agreed that status of current plan reviews needs to be tabulated and appended to Position Statement refresh.
3.10	Position statement to be redrafted in the light of the above **ACTION: AD to circulate two weeks in advance of next meeting.**
3.11	Agreed to try and keep format as faithful to previous Position Statement as possible but acknowledge that there may be some divergence. **ACTION: In redrafting AD to identify where substantive changes made.**
3.12	Agreed to review text / sections of existing Statement and identify if all information still warranted. **ACTION: ALL**
4	**WMCA Housing Deal Monitoring**
[redacted]	[redacted]
[redacted]	[redacted]
5	**Local Plan review updates**
5.1	Agreed that circulated schedule to be updated before / at each meeting and extended to include other non-HMA authorities. **ACTION AD**
6	**TfWM Monitoring**
6.1	Agreed that needed a list of what secondary information required and in what format. General preference for continuation of Mott MacDonald report format. Still concern that primary land use monitoring records did not appear to be consistent with totals presented to this group. Concern about using inconsistent data in transport modelling. **ACTION: AD** to draft note and circulate. Once agreed **PW** to raise with relevant TfWM contact.

8	**Strategic Employment Sites Phase Two study**
8.1	No update available as to progress / availability. Previous concern remains as to status of report and that most local authorities had not had sight of it. **ACTION:** IC to convey this to LEP / Staffordshire County Council Steering Group.
9	Any other business
9.1	**AD** to complete and circulate Local Aggregate Assessment Scoping Note to Metropolitan Authorities.
9	**Date of next Meeting**
9.1	Tuesday 24th March ,13:00 to 15:00. Venue to be confirmed.

No meeting March, next meeting June

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 2nd June 2020, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. GBBCHMA Position Statement refresh

    - Verifying 2018/19 data
    - Revised document content and outstanding matters
    - Target date for completion / arrangements for publication
    - Shortfall evolution (audit trail)
    - Moving towards SoCGs

[redacted]

5. Local Plan review updates (exceptions from draft position statement table 3) and ex GBBCHMA LPAs)
6. Planning for economic recovery
7. Strategic Employment Sites Study (Phase Two)
8. Any other business
9. Date of next meeting

GBBCHMA / WMCA Housing Deal Monitoring Group

Agreements and Actions from meeting 2 June 2020 @ 14:00 via MS Teams

In attendance: Ian MacLeod (Birmingham – chair), Stephen Stray (Lichfield - part), John Careford (Stratford on Avon), , Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch),), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Patricia Willoughby (WMCA), Ian Stevens (Telford and Wrekin), Maria (Birmingham), Ed Fox (South Staffordshire), Mark Andrews (Coventry), Dorothy Barratt (North Warwickshire), Mike Dittman (North Warwickshire), Michele Ross (Wolverhampton), Ian Culley (Wolverhampton), Kelly Harris (South Staffordshire – part), Richard Powell (Tamworth)

Actions

1	**Apologies**: Vicki Popplewell (Dudley), Mike Smith (Walsall)
2	**Actions from last meeting**
2.1	Agreed as accurate record, matters arising included on agenda.
3	**GBBCHMA Position statement Refresh**
3.1	**General comments** • Conclusion needed which sets out that shortfall to 2031 largely been met with the remainder being addressed by emerging plans which will increase capacity pre 2031 and that a shortfall emerging post 2031 (to 2037) from the Black Country. Also, local discounts now taken account of to give more accurate position. • Whilst end monitoring date March 2019, need to explain that Covid 19 will impact on short term delivery going forward. • Now have three years' worth of data, include short narrative as to reasons for shortfall reduction. • Areas beyond HMA to be included as in earlier statement but made clear that current plans don't make provision, but reviews may. • Whilst the cut off point for land supply monitoring is 31/3/2019, information regarding plan reviews to be as up to date as possible. • Actions AD to amend document and circulate again
3.2	**Outstanding information** • Check that table 3 accurate as information changes frequently **ACTION ALL**

	• **North Warwickshire** to advise on latest plan position regarding infrastructure funding / plan status, whether any discounting / buffer to land supply, whether figures relate to 2031 or 2033; and if Tamworth 500 shortfall is addressed. • **Tamworth** to advise whether any discount or buffer to land supply • **Lichfield** to advise whether land supply to 2031 includes a buffer, or whether this is an intention for plan review
3.3	• **Next steps** • Attention drawn to attached SoCG note, but focus now on completing accurate statement • Comments to be provided to AD, including outstanding information requests **ACTION: ALL** • Final draft document to be circulated within next couple of weeks with a view to it being formally published shortly thereafter – indicative timetable to be set **ACTION: AD** • Need a standard approach to communications / queries • As it is not a policy document, it is not considered that in requires Member approval but all LPAS to be satisfied that internal delegations / protocols are met **ACTION: ALL**
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
5	**Local Plan reviews (updates to previous information / table 3 of draft position statement)**
5.1	**North Warwickshire** to advise in the light of infrastructure funding announcement and PINS delay due to Covid 19.
5.2	**Lichfield** timetable to slip due to Covid 19, cabinet report drafted

5.3	**Stratford on Avon SAD ???**
6	**Strategic employment sites and economic recovery**
6.1	All authorities agreeable in principle to a further strategic employment land study subject to funding availability / agreed brief / geographical coverage etc. **ACTION AD to scope and draft brief**
7	**Any other business**
7.1	None
8	**Date of next meeting**
8.1	To be arranged

No meeting until December

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Thursday 3rd December 2020, 10:00 – 12:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM land use monitoring returns
4. [redacted]
5. Strategic Employment Sites Study – next steps
6. GBBCHMA Position Statement – feedback and 2020 data
7. Local Plan review updates
8. Any other business
9. Date of next meeting

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Thursday 3rd December 2020, 10:00 – 12:00, via MS Teams

Notes of meeting

Item		Action
1	**Apologies and Introductions**	
	Recording failure so details unavailable.	
2	**Matters arising**	
2.1	Covered by agenda items	
3	**TfWM land use monitoring returns**	
3.1	Concern expressed that the TfWM returns were not consistent with the data included in the position Statement. There was a detailed discussion about this, and it was resolved that a separate meeting should be arranged with all interested parties to be invited. This would also address the demographic secondary data, particularly migration.	AD
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
5	**Strategic Employment Sites Study**	
5.1	It was understood that the study was reaching its final stages. Concerns were noted regarding identification of potential sites at motorway junctions that were not being actively promoted. It was agreed that a brief should be prepared for a further study taking forward relevant finings from this study and addressing any deficiencies.	AD
6	**GBBCHMA Position Statement – feedback and 2020 data**	
6.1	There had been no direct feedback to local authorities following the publication of the update in August 2020. Attention was drawn to the fact that this was based on data for year end 2018/19 and that consideration needed to be given to rolling it forward.	
7	**Local Plan review updates**	
7.1	**Solihull** – representations on the Regulation 19 Local Plan invited until 14 December 2020	

7.2	**Bromsgrove** – Continued preparation of the evidence base but no firm proposals to formally publish consultation documents	
7.3	**Lichfield** – Regulation 19 plan to be considered by cabinet in February, with possible formal consultation in the late Spring. Have sought views from other authorities whether they can assist as need to consider Green Belt boundary adjustments	
7.4	**Telford and Wrekin** - Issues and options consultation extended until 8th January 2021.	
7.5	**Birmingham** – development management DPD Hearings completed in November 2020	
7.6	**Black Country** – Barton Willmore and CPRE have commented on the Urban Capacity Review. Regulation 18 Black Country Plan scheduled for publication Summer 2021.	
7.7	**Stratford on Avon –** Site Allocations Document, comments invited until 18th December. This has implications for the GBHMA as it includes Cores Strategy reserve sites. A joint South Warwickshire Local Plan (with Warwick DC) Scoping and call for Sites document to be published April 2021.	
8	**Any other business**	
8.1	None	
9	**Date of next meeting**	
9.1	To be determined	

Greater Birmingham and Black Country HMA /WMCA Housing Deal Monitoring Working Group

Notes of Meetings 2021

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 15 June 2021, 14:00 – 16:30, via MS Teams,

AGENDA

1. Apologies / introductions

2. Actions from last meeting

3. TfWM update
   - Land use monitoring
   - Demographic data / information

4. Local Plan reviews update

5. GBBCHMA Position Statement update
   a) 2020 returns
   b) Time series data check / verification
   c) Estimate of 'need'
   d) Apportioning contributions

[redacted]

7. Strategic Employment Sites Study – Phase 2

8. Local Aggregate Assessment

9. Any other business

10. Future meeting dates

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP 15th June 2021, 14.00 – 16.00, via MS Teams Notes of meeting		
Item		Action
1	**Apologies and Introductions**	
	In attendance Uyen Phan Han, Maria Dunn (Birmingham), Ian Culley (Chair, Michelle Ross (Wolverhampton, Neville Ball (Walsall), Amanda Holland, Pat Willoughby, Alexander Smith (WMCA), Philip Hatton, Stuart Lester, Liam Edge (TfWM), David Butler, Tom Ryan (Coventry), Patrick Jervis (Lichfield), Patricia McCullagh (Sandwell), Heidi Hollins (Cannock Chase), Richard Powell (Tamworth), Andy Donnelly (WM Met. Authorities), Vicki Popplewell, Jennie Plant (Dudley), Gary Palmer (Solihull), Kelly Harris (South Staffordshire), John Careford (Stratford), Ian Stevens (Telford), Mike Dittman, Dorothy Barratt (North Warwickshire), Mike Dunphy (Bromsgrove).	
2	Actions from last meeting	
	Incomplete due to technical issues locating according, group members to advise whether they had attended	ALL
3	**TfWM land use monitoring returns**	
3.1	Presentation given on land use monitoring system (YE 2019) following liaison with local authorities, the data is principally used to support the PRISM model The focus is primarily on the seven constituent authorities, but other HMA / WMCA authorities had submitted their data. There is a desire to extend the coverage. Most returns for YE 2020 have now been received. Within the next month local authorities would receive password details permitting access to the data and can make further observations.	TfWM
3.2	Point made that Metropolitan Authorities paid the contract for data collection and there would potentially be budgetary implications if the scope of data collection increased. It was also confirmed that the data would not be in the public domain	
3.3	There was much discussion regarding the consistency of data with that collected for HMA / WMCA monitoring. As this data is a subset of local authority's internal monitoring this should not be an issue. Suggested that the district totals held were compared with the HMA / WMCA totals. Also	

	suggested 'tagging' TfWM data fields with land categories used to monitor HMA supply.	
	ONS data	
3.4	Presentation given on map-based migration flows, showing flows between all local authorities nationally as an example of what could be done with the data. The intention is to make this available via a dashboard as publicly available data and to go back to 2002 and show as in and out flows in spreadsheets and by broad age group for planning purposes. Rather than publish the data piecemeal it is intended to produce it as a batch shortly after the 2020 data is made available later this month. Attention drawn to fact that method for collecting data changed for last three years.	AS
3.6	Agreed that TfWM matters would be a standing item on future agendas	AD
4	**Local Plan updates**	
4.1	**Birmingham** Cabinet report 29/6/21 seeking consent to formally review BDP. HEDNA has been commissioned and Issues and options due to be published Summer 2020. Development management DPD still with Inspector.	
4.2	**Black Country** Local Plan review goes live via Cabinets in 10 days' time, the main issues were shared in last week's DtC event.	
4.3	**Solihull** Plan submitted for examination May 2021, two Inspectors appointed [redacted]	
4.4	**Bromsgrove – (MD representing Bromsgrove only)** Regulation 18 Preferred Option anticipated Summer 2022.	
4.5	**Redditch** HEDNA commissioned and LDS to be considered by Cabinet shortly.	
4.6	**Tamworth** LDS to be considered July 2021	
4.7	**Cannock Chase** Regulation 19 plan anticipated Winter 2021	

4.8	**Stratford on Avon** Decision taken for joint South Warwickshire plan with Warwick DC and scoping report published. Joint C&WHMA HEDNA commissioned.	
4.9	**Coventry** LDS to Cabinet in two weeks' time. Joint HEDNA commissioned via CWHMA.	
4.10	**Lichfield** Spring / Summer consultation on Regulation 19 plan.	
4.11	**North Warwickshire** Inspector has indicated that he will be responding to MM consultation and publishing report early Summer 2021.	
4.12	**Telford and Wrekin** Members have suspended local plan review until White paper clarification available.	
5	**GBBCHMA Position Statement**	
	Request made by Solihull to update document to reflect position at YE 2020. Information received thus far suggests shortfall exceeded 5,000 as Black Country capacity fallen more than Birmingham's increase. Noted as the end year is 2020, increased capacity from some local plan reviews is not yet captured. Solihull and North Warwickshire to check that returns sent.	GP/MD/DB
	Noted that all local authority data will be under scrutiny even if their plan is not. A note set out change over time by local authority and local authorities invited to comment on this	ALL
	Agreed that for the purpose of an update, key data to be included rather than a full re-write of document.	AD
	Uncertainty remains regarding post 2031 shortfall and acknowledged that demand will increase via LHN from the SGS baseline. Separate note to set out new LHN figures.	AD
	Black Country and South Staffordshire appear to have received diverging advice from PAS regarding whether shortfalls attributed to individual plan or HMA shortfall. Identify whether this had been dealt with elsewhere but noted that migration flows can be used to determine apportionment. Ultimate aim a HMA wide MoU / SoCG identifying where all shortfall to be accommodated.	AD
[redacted]	[redacted]	

	[redacted]	
	[redacted]	[redacted]
7	**Strategic Employment Sites Study**	
	Agreed that this matter to be addressed via a separate meeting	AD/IC
8	**Local Aggregate Assessment**	
	Deferred to next meeting.	
9	**Any other business**	
	None	
10	**Date of next meeting**	
	To be determined	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 19 October 2021, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions

2. Actions from last meeting

3. TfWM update:

- Land use monitoring
- Demographic data / information

4. Solihull Local Plan Examination – issues arising

5. GBBCHMA potential future work streams:

- Black Country / Birmingham apportionment
- Updating the position statement to reflect 2021 base data
- Review of HMA geography and membership
- Review Governance (MoU / SoCGs)
- Status of ex HMA contributions
- Local Plan early review commitments
- Monitor / refresh of SGS

6. Strategic Employment Sites Study - further commission

7. GBBCHMA Position Statement 2020 update

[redacted]

9. Local Aggregate Assessment

10. Any other business

11. Future meeting dates

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP 19th October 2021, 14.00 – 16.00, via MS Teams Notes of meeting		
Item		Action
1	**Apologies and Introductions**	
	In attendance Uyen Phan Han, Maria Dunn (Birmingham), Ian Culley (Chair), Michelle Ross (Wolverhampton, Neville Ball (Walsall), Amanda Holland, Gurdip Nagra (WMCA) Liam Edge (TfWM), Patrick Jervis (Lichfield), Patricia McCullagh (Sandwell), Heidi Hollins (Cannock Chase), Andy Donnelly (WM Met. Authorities), Jennie Plant (Dudley), Gary Palmer (Solihull), Kelly Harris (South Staffordshire), John Careford (Stratford / Warwick), Gavin Ashford (Telford), Mike Dittman, Dorothy Barratt (North Warwickshire), Mike Dunphy (Bromsgrove), Ruari McKee (Rugby),	
	Apologies Clare Eggington (Coventry), Richard Powell (Tamworth), Vicki Popplewell (Dudley), Ian McLeod (Birmingham), Pat Willoughby (WMCA)	
2	**Notes from last meeting**	
2.1	Agreed	ALL
3	**TfWM matters**	
3.1	2021 data returns to be requested shortly, Black Country to advise when they will be available. LE to be invited to meeting. Note change to Use Classes Order regarding employment land.	MR/LE
3.2	Invitations to use app sent out, advise LE if not working/ haven't received one.	ALL
3.3	Opportunity to review employment land monitoring specification once spreadsheet circulated.	ALL
	ONS data	
3.4	No update on migration data. LE to purse with Alex Smith outside of meeting.	LE
4	**Solihull examination hearings**	S
4.1	Noted that helpful to have an agreed Position Statement on behalf of all 14 GBBCHMA authorities, agreement needed as to when 2020 update to be	

	determined – can it be signed off officer level? Not all LPAs in a position to provide 2021 data yet. Noted that an agreed MoU benefited C&WHMA.	
4.2	Noted that there had been challenge to approach taken in Position Statement and different views as what need was. The Inspectors had approached the issue pre and post 2031.	
4.3	Issue of strategic employment sites raised, in terms of absence of additional work and whether allocations met wider than local need.	
5	**GBBCHMA potential future work streams**	
5.1	South Staffordshire has been working with PAS and LUHC to progress its local plan. It has been advised to approach Leaders / portfolio holders (and senior officers) within the HMA and intend to convene virtual meeting in December. Letters will be sent shortly and matters to consider include: LPAs current positions • Views on Strategic Growth Study (SGS) and suggested locations • Alternative approaches • Geographical extent of HMA • Scope of evidence base updating SGS • Governance – aim of MoU	
5.2	Yet to be determined whether PAS or LUHC would be in attendance or whether WMCA / Mayor to be engaged. PAS advice that WMCA / Mayor should be invited.	
5.3	This prompted a discussion about the wider need for governance as this group does not report anywhere; there was universal support for this. However, SSDC is not offering to lead on this, its aim is to adopt a sound plan, but it is acknowledged that governance arrangements may flow from this.	
5.4	Noted that Birmingham's consultants had re-considered HMA boundaries as part of its HEDNA commission, this re-affirmed existing boundaries. This has been consulted upon and there was no disagreement.	
5.6	Noted that some concern regarding overt focus on housing when employment land too had featured in local plan hearings.	
6	**Strategic Employment Sites Study**	
6.1	Schedule of response to recommendations and draft brief for further commission tabled. Noted that no detailed transport work was proposed on the grounds of cost, a need assessment based on more than past trends was required and that site selection was better done at local plan level.	
6.2	Still uncertainty regarding the geography that recommendations would be made at (e.g. would it be down to LA level), suggested that is something to	

	seek consultancy advice on. Also need for a nuanced approach taking account of planning as well as 'market led' issues.	
6.3	NWBC has been in discussions with North West Leicestershire, especially regarding pressures at M42 J11, and that they may be included in a future study. There were no objections to this.	
6.4	Confirmed that scope of study to be as Phase Two, GBSLEP, BCLEP and C&WLEP. IC to contact approach Staffordshire County to establish whether they wish to participate. Once a brief agreed, need to seek political support, and identify budget.	IC
7	**GBBCHMA Position Statement Refresh**	
7.1	Draft addendum circulated, this updates key data and shows that the shortfall has increased, mainly due to changes in Black Country urban capacity estimates.	
7.2	Reiterated that not all authorities were in a position yet to provide 2021 data. Final comments to be sent to AD by end of month.	ALL
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
9	**Local Aggregate Assessment**	
9.1	AD attended Regional Aggregate Working Party on 8th October. Others grappling with similar issues, i.e. expired Regional Guidelines and HS2 mineral requirement, although DfT had provided a total for the latter, it was not regionally apportioned.	
10	**Any other business**	
10.1	Noted that WMCA has commissioned Oxford Economics employment forecasts for the East and West Midlands. AH to investigate given potential implications for local plans	AH
10.2	Request that future meeting dates be scheduled.	

11	**Date of next meeting**	
11.1	To be determined	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 30 November 2021, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update:

- Land use monitoring
- Demographic data / information

4. Strategic Employment Sites Study Phase 3 brief
5. SSDC Local Plan Review Member event:

- Local authorities' position on shortfalls
- Local authorities' current position on the GBBCHMA Strategic Growth Study recommended locations
- Alternative approaches to the above recommendations
- Formal governance arrangements
- Updating evidence e.g. the geographical extent of the HMA, apportioning contributions
- Updating Strategic Growth Study given additional growth pressures (e.g. Birmingham Plan review

6. GBBCHMA Position Statement 2020 update

[redacted]

8. Local Plan updates
9. Any other business
10. Future meeting dates

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP 30th November 2021, 14.00 – 16.00, via MS Teams Notes of meeting		
Item		Action
1	**Apologies and Introductions**	
	In attendance Uyen Phan Han, Martin Dando (Birmingham), Ian Culley (Chair), (Wolverhampton), Neville Ball (Walsall), Amanda Holland, Gurdip Nagra (WMCA), Patrick Jervis (Lichfield), Patricia McCullagh (Sandwell), Andy Donnelly (WM Met. Authorities), Jennie Plant (Dudley), , Kelly Harris (South Staffordshire), John Careford (Stratford / Warwick), Ruari McKee, Peter Heath (Rugby), Richard Powell (Tamworth, Sushil Birdi (Cannock Chase), Rebecca Brown (Redditch), Eddie West (Shropshire), Clare Eggington (Coventry)	
	Apologies Liam Edge (TfWM) Gary Palmer, Mark Andrews (Solihull) Gavin Ashford (Telford), Dorothy Barret, Mike Dittman (North Warwickshire), Maria Dunn (Birmingham), Heidi Hollins (Cannock Chase).	
2	**Notes from last meeting / matters arising**	
2.1	Agreed to invite Rebecca Riley (WMCA) to a future meeting to present / discuss WMCA commissioned employment forecasts.	AD
2.2	Agreed to schedule monthly meetings for next year on second Tuesday of each month, subject to confirmation that this is suitable. Agreed IC to chair group for next year then a different local authority to take over.	ALL
3	**TfWM update**	
3.1	Query as to whether smartsheets had been issued and whether employment specification had been resolved.	GN
3	**Strategic Employment Sites Brief**	
3.1	SSDC to provide some further comments before Christmas break. Agreed that the outputs need to be clear and that it is a live issue as has risen at the North Warwickshire and Solihull hearings. No budget has been identified yet but need to get the brief agreed first.	SSDC
4	**South Staffordshire Local Plan member event**	

4.1	Event arranged for 15th December, SSDC has been assisted by PAS and former Planning Inspector Stephen Pratt as part of a LUHC Gateway review. Authorities thanked for confirming attendance and those yet to do so invited to respond. Clear advice been given to SSDC that they need to drive this and document where agreement and disagreement.	
4.2	Issues to consider: • How has strategic growth study been used and is there any alternatives? • Support for commissioning a further study • Governance / member engagement e.g. Cannock Chase SAC • Do other authorities agree with SDDC approach and are there alternatives?	
4.2	Responses to questions in the invitation letter welcomed in advance of meeting, the aim is to agree a SoCG across HMA if possible. Stressed that this is not SSDC taking the lead on resolving all HMA issues but is necessary for local plan to comply with Duty to Cooperate.	
5	**GBBCHMA position statement 2020 update**	
5.1	Documents circulated addressed comments made by Bromsgrove and Lichfield.	
5.2	Two issues to be resolved: • Are all local authorities happy with the content? • When is an appropriate time to publish the update, bearing in mind it may be requested by the Solihull Inspector? Agreed to publish Friday 17th December, after the SSDC event subject to agreement with Solihull MBC. Local authorities requested to check appendix showing local plan latest status.	ALL
[redacted]	[redacted]	
[redacted]	[redacted]	
7	**Local Plan updates**	
	Birmingham	
7.1	Issues and Options scheduled for publication June / July 2022.	
	Black Country	

7.2	20,000 representations received on Preferred Options from 5,000 respondents. Submission plan (Regulation 19) scheduled for Summer 2022.	
	South Staffordshire	
7.3	Consultation on Preferred Options closes on the 13 December 2021	
	Lichfield	
7.4	Submission Plan going to Cabinet next week for consideration, with a view to submitting shortly afterwards.	
	Cannock Chase	
7.5	Still working towards Winter 2022 (back end) for taking Regulation 19 plan to Cabinet. Work around site allocations ongoing.	
	Bromsgrove	
7.6	Still on track for Preferred Options Summer 2022, dependent on outcome of discussions with Redditch.	
	Tamworth	
7.7	Vision being established with a view to Issues and Options being published for consultation next year.	
	Redditch	
7.8	Revised LDS agreed by full Council in November. HEDNA commissioned and work ongoing to establish whether a full or partial review.	
	Shropshire	
7.9	Plan submitted for examination September 2021 and Inspector asked some initial questions. Anticipate hearings commencing May / June 2022.	
	Rugby	
7.10	Review to commence summer 2022.	
8	**AOB**	
8.1	None	
9	**Date of next meeting**	
9.1	To be scheduled for January, then monthly as previously discussed.	AD /IC

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 18 January 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions

2. Actions from last meeting

3. National Land Data Programme

4. TfWM update
    - Representation on Central and Local Government Information Partnership (CLIP) Planning Statistics Sub-Group
    - Land use data monitoring
    - Migration / ONS data

5. Tasks arising from SSDC meeting 15th December 2021
    - Governance
    - Need for an updated Growth Study
    - Next steps

6. Strategic Employment Sites Study Phase 3 brief

7. GBBCHMA Position Statement 2020 update

[redacted]

9. Local Plan updates

10. Any other business

11. Future meeting dates

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP 18 January 2022, 14.00 – 16.00, via MS Teams Notes of meeting		
Item		Action
1	**Apologies and Introductions**	
	In attendance Ian Culley (Chair), Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Mike Dittman, Dorothy Barratt (North Warwickshire), Heidi Hollins (Cannock Chase), Stephen Stray, Patrick Jervis (Lichfield), Dan Corden (Shropshire), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Darren Beriro, Mehul Doshi (Geospatial Commission), Louise Jones (Redditch); Butler, David Butler (Coventry), Uyen-Phan Han, Martin Dando (Birmingham), Hannah Post (Telford and Wrekin), Kelly Harris (South Staffordshire), Liam Edge (TfWM), Ruari McKee (Rugby), John Careford (Stratford on Avon / Warwick), Mike Dunphy (Bromsgrove), Richard Powell, (Tamworth), Vicki Popplewell (Dudley),	
2	**Notes from last meeting / matters arising**	
[redacted]	[redacted]	[redacted]
2.2	Meeting invitations sent out for six months, send for next six months.	AD
3	**Local Plan updates**	
	Birmingham	
3.1	Progressing review of the Birmingham Development Plan. Sustainability appraisal scoping report out to consultation and work ongoing on the HEDNA and the urban capacity study. Still expecting to start consultation on issues and options in early June in accordance with the LDS.	
	Black Country	

3.2	Regulation 18 Preferred Option consultation ended in summer - some 20,000 representations made. Regulation 19 consultation scheduled for mid-summer 2022. Continued engagement via Duty to Cooperate.	
	South Staffordshire	
3.3	Consultation on Regulation 18 Preferred Option closed 13 December. Approximately 2,500 representations mainly on specific sites. Regulation 19 Submission consultation around October 2022.	
	Lichfield	
3.4	Members deferred Regulation 19 plan being received by Cabinet. Working with members on next steps.	
	Cannock Chase	
3.5	No change from last meeting's update.	
	Bromsgrove	
3.6	Preferred Options scheduled for Summer 2022.	
	Tamworth	
3.7	No change from last meeting, Issues and Options due for consultation Summer 2022	
	Redditch	
3.8	LDS now approved by Full Council	
	Shropshire	
3.9	Plan submitted in September 2021. Working through initial sets of questions set by Inspector with a view to responding by end of the month. Hearings may commence May / June, but dependent on Inspector.	
	Rugby	
3.10	Local plan review to commence summer 2022.	
	Telford	

3.11	Plan still paused as await further guidance from Government., no formal review timetable yet.	
	Stratford on Avon / Warwick	
3.12	Updated informal timetable on website, Issues and Options Summer 2022, possible adoption 2025. Currently analysing call for sites and scoping consultation responses.	
	Solihull	
3.13	Examination ongoing, last session of hearings next week.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]

5	**TfWM update**	
5.1	Requests sent to update the 2020 smartsheets, please contact if not received. Dudley suggested may not have been received. Also issue regarding employment data needs resolving, currently collected in square metres when hectares needed too.	LE/ALL
5.2	Regarding the migration data, [redacted] responsible for this and will be leaving at the end of January. Data to be supplied within next two weeks.	
6	**Tasks arising from SSDC meeting 15th December 2021**	
6.1	Attendees thanked and positive feedback from PAS – final notes now circulated. SDDC set out its approach and rationale for using Strategic Growth Study and sought views as to how others were addressing shortfall and whether there were alternatives.	
6.2	Next steps critical and include refresh of Strategic Growth Study and suggestions included in circulated Black Country Leaders letter. With regard to Governance, Cannock Chase SAC suggested as a model (MoU circulated), currently only operate at officer level. Other issues discussed included the name of the group and the role of local authorities beyond the GBBCHMA. In summary, three main issues: • What would governance look like? • What would SoCG contain • Future workstreams Agreed a draft SoCG for discussion be brought to next meeting	AD / IC / SSDC
7	**Strategic Employment Sites Study**	
7.1	Brief circulated with papers, but minor amendment omitted, need to re-circulate. Previously agreed that once brief agreed would seek funding, possibly Midlands Engine? Budget figure of £50,000 mooted.	IC / AD
7.2	Other issues raised: • Cross boundary issues e.g. Hinckley and Bosworth • Aligning with WMCA Growth Plans	

	• Informally liaising with private sector regarding brief suitability / cost Coventry Airport Gigafactory would fit strategic sites criteria – now with planning permission but referred to SoS as a departure.	
[redacted]	[redacted]	
[redacted]	[redacted]	
9	**Any other business**	
	Gypsy and Travellers	
9.1	Inquiry made (South Warwickshire) whether there was any merit /interest in looking at a study which looks at Gypsy and Traveller movements as GTAA's largely confine themselves to individual LPA areas. Agreed that this had merits, but no firm conclusions drawn.	
10	**Dates of future Meetings** 15 February @14:00 15 March @14:00	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 15 March 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. PlaceMaker presentation (by Urban Intelligence)
4. TfWM update
5. Local Plan updates
6. [redacted]
7. First Draft GBBCHMA SoCG / MoU
8. West Midlands Strategic Employment Sites Brief and next steps
9. Position Statement 2021 refresh
10. Any other business
11. Future meeting dates

Immediate actions from GBBCHMA / WMCA Working Group 15/03/2022	
Item	**Action**
[redacted]	
[redacted]	[redacted]
Local Plan Updates	
Solihull to forward Inspector's letter for circulation https://eservices.solihull.gov.uk/LocalPlan/DownloadDoc.ashx?docid=1665133	GP/AD
South Warwickshire to forward links for local plan review Cabinet Reports for circulation when available	PC/ AD
TfWM update	
Specification for employment land monitoring to include hectares field as well as square metres. Smartsheet to be amended / circulated	LE
In / out migration figures behind net totals to be provided for last five years. [redacted] *if when you have found this data you can provide it back to the start of the time series, it would be incredibly useful. Thanks*	LE
GBBCHMA SoCG	
In principle view on your authority's likely position on being able to sign up to a SoCG - scope and content broadly as presented to the meeting yesterday.	ALL
Detailed comments on the document including your view of the summary of your authority's approach to the shortfall.	ALL
Please use group email contact list so all authorities are aware of each other's position	ALL
Strategic Employment Sites Study	
Your authority's likely position on taking part in the Study and potential funding contribution [redacted]	ALL
GBBCHMA Position Statement 2021 Update	
Allow sufficient time for data etc. to be collected if / when require updated statement for submission / hearings.	ALL

Local Plan Update March 2022

GBBCHMA / WMCA Local Plan Reviews as at March 2022	
Birmingham	Issues and Options to be published autumn 2022
Black Country	Regulation 19 consultation winter 2022
South Staffordshire	Regulation 19 autumn 2022, possibly September. Submission early 2023
Lichfield	Regulation 19 plan to PINS May / June
Bromsgrove	Regulation 18 Preferred Option summer 2022
Tamworth	Issues and Options summer 2022
Redditch	Regulation 18 Preferred Option late summer / autumn 2022
Shropshire	Plan submitted September 2021, hearings commence July 2022.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options late summer 2022, anticipated submission 2024
Rugby	Local Plan review to formally commence summer 2022 (from January notes)
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire
Cannock Chase	Should be at Regulation 19 around now, Cabinet report to consider Regulation 19 plan July 2022, LDS will be updated also.
Solihull	Examination hearings finished February 2022, have completed responding Inspectors' questions.
Coventry	Cabinet report to trigger review no later than November 2022
Telford and Wrekin	Plan review paused pending outcome of Government changes.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 19 April 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. Purpose of meeting

4a. Feedback on draft SoCG

4b. Refreshed SoCG document

4c. Outstanding matters / areas of disagreement

5. SESS update and brief
6. Next steps e.g. ratification and timeframes
7. AOB
8. Date of next meeting

GBBCHMA / WMCA Officer meeting – 19 April 2022 **Note of main points and actions**		
	In attendance: Ian Culley (Chair), Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi (Cannock Chase), Stephen Stray, Patrick Jervis (Lichfield), Eddie West (Shropshire), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Mark Andrews, (Solihull), Louise Jones (Redditch); Clare Eggington (Coventry), Maria Dunn (Birmingham), Ed Fox, Kelly Harris (South Staffordshire), John Careford (Stratford on Avon / Warwick), Mike Dunphy (Bromsgrove), Richard Powell, (Tamworth), Jennie Plant (Dudley), Neville Ball (Walsall), Philip Hatton (TfWM), Martin Hutchings, Shelley Rouse (PAS).	
	Matters arising	
[redacted]	[redacted]	[redacted]
	SoCG general	
2	Contact Wyre Forest with a view to being signatories	IC
	As many changes as possible made – LPAs to check. This excludes governance, as many of the issues raised require further discussion.	ALL
3	General point that SoCG is a live document and timing of publication needs consideration. For example, timing of South Staffordshire and Black Country Regulation 19 plans and Birmingham Issues and Options – the latter would firm up the shortfall.	
	Main changes made	
4	Reference to Black Country and emerging Birmingham shortfalls yet to be tested	
5	Issue around extent of GBBCHMA. Agreement (in meeting) that not seeking to change HMA boundaries. Birmingham CC HEDNA report now complete and includes evidence supporting current HMA geography (and linkages), to be published after local elections. Suggested quoting directly from published document.	

6	Noted that the Strategic Growth Study recommendations were tested locally and complemented by local evidence.	
7	Issue around 35% urban uplift and whether this absorbed in situ and ignored if cannot be met here or dispersed via Duty to Cooperate. General view that cannot be ignored as sums to 300,000 national target and numbers prior to urban uplift cannot be met in-situ. Noted that DLUHC had been unable to advise.	
8	Agreed than minerals and waste be included in SoCG.	
9	Noted that legacy strategic employment sites referenced rather than just need for additional ones.	
	Outstanding issues	
10	Whether contributions apportioned to Black Country or Birmingham shortfalls	
11	Whether to include further market absorption workstream. South Essex Stantec evidence noted, this concluded that HMA could not absorb the LHN requirements. Would this conflict with local plan evidence if done at GBBCHMA level?	
12	Aligning housing with economic growth. Issue is that GBBCHMA unlike other areas where there is a common employment forecast.	
13	Whether WMCA is a signatory, this is enabled by the NPPG.	
14	The Strategic Employment Sites workstream includes LPAs outside of GBBCHMA.	
	Governance	
15	Agreed (in meeting) that the approach differed from previously as governance addressed. Fundamental issue as to whether principles agreed with members before setting out the issues (currently the document attempts both) and hence whether the two elements need splitting. PAS template includes governance in overarching SoCG, but not set in stone.	
16	Following the discussion, four options were identified: 1. Details of officer and member groups as in current draft	

	2. Details of officer working arrangements and principles for members 3. Principles of both groups but details of neither 4. No details or principles for ether group	
17	The second group was agreed in principle as a way forward, but LPAs would need to take soundings from members.	ALL
18	Changes agreed today and Bromsgrove, Redditch, and Shropshire to be incorporated into revised document and circulated week ending 29th April.	AD
	Strategic Employment Sites Study	
19	Presentation given to Coventry and Warwickshire Officers and around 12 LPAs had committed to a £5,000 contribution. Commissioning body yet to be identified.	
	Any other business	
20	Local Plan latest positions schedule was tabled – changes made and circulated after meeting (attached here too)	
21	New LHN numbers published, those published by Turley and Lichfield's match GBBCHMA spreadsheet. Attention drawn to OBR report, which suggests that affordability ratios may be artificially inflated as incomes fell but transactions increased during pandemic. Link to be circulated	AD
22	Attention drawn to Turley submission (previously circulated) to BC Regulation 18 consultation critiquing the GBBCHMA Position Statement.	
	Date of next meeting	
23	Tuesday 17 May 2022 @14:00	

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 17 May 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM Update
4. Local Plan updates
5. Statement of Common Ground
    - Main outstanding issues (see below)
    - Detailed Governance Arrangements
    - Next Steps / timetable for completion
6. Strategic Employment Sites Update
7. Local Aggregate Assessment
8. AOB
9. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 17 May 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Chair), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi (Cannock Chase), Patrick Jervis (Lichfield), Eddie West (Shropshire), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn (Birmingham), Alex Evans (South Staffordshire), John Careford (Stratford on Avon / Warwick), Mike Dunphy (Bromsgrove), Richard Powell, (Tamworth), Vicki Popplewell (Dudley), Lian Edge, Sue Balu (TfWM), Martin Hutchings, Andrew Seaman (PAS), Heather Stone (Wyre Forest), Gavin Ashford (Telford), Eddie West (Shropshire), Mike Dittman, Dorothy Barratt (North Warwickshire).	
1	**Matters arising**	
1.1	[redacted]	[redacted]
2	**TfWM update**	
2.1	[redacted] has produced spreadsheets for migration flows (in / out, age) – currently being checked	
3	**Local Plan updates – see separate schedule**	
3.1	**Observations on Levelling up and Regeneration Bill** • Need for transitional arrangements • Mixed messages regarding status of 300,000 dpa target and local flexibility • Duty to Cooperate legislation to be replaced with revised policy test • 2024 before legislation enacted so continue under current arrangements • Much more detail to follow • Top down approach with new powers at very local level • Situation unlikely to change for urban areas, make maximum use of previously developed land	
4	**GBBCHMA Position statement**	
4.1	All to advise when 2021 update required bearing in mind time needed to collect and verify data	ALL

[redacted]	[redacted]	
5	**Statement of Common Ground**	
5.1	Good progress made with sharper focus on areas of agreement, disagreement, and course of action	
5.2	General view that comments have been addressed but all LPAS to check detail, particular focus on Approach taken in local plans to date and governance sections.	ALL
5.3	Agreed to edit 'clean' version from now on as tracked changes version illegible	ALL
	Outstanding Matters	
5.4	Agreed that no reference to 35% uplift being met in area specifically identified not to be referred to as it is physically not possible for this to be achieved	
5.5	Agreed that not seeking to extend HMA but identify linkages with LPAs beyond it.	
5.6	Difficult to estimate with precision the extent of pre and post 2031 contributions from current data as plan reviews overlap. Note that at Solihull EIP a pro-rata approach was suggested. Matter will be further clarified once Birmingham Issues and Options published	
5.7	Details for Officer Group mentioned in document and principles for Members. Existing ToR for officer group need amending	AD
5.8	**Apportioning contributions to Birmingham or Black Country** – Lichfield has apportioned Solihull has not. May be a case for contributions from beyond HMA e.g. Shropshire. Birmingham and Black Country to share work on this with wider group	BCC / BC
5.9	**Strategic Employment Sites –** Include text to acknowledge that this group does not have ownership if this as it draws on a wider geography. At present, the only commitment is to commission a study, a further SoCG may be needed when dealing with recommendations.	AD

5.10	**WMCA as a signatory –** Starting point to consider legislation, especially S33A and Regulation 4. Noted that WMCA geography does not cover all LPAs directly and that WMCA authorities are already party to SoCG.	AD/PW
5.11	**Common employment forecast –** Common forecast impractical due to progress on local plans to date. Future workstreams to consider housing / workforce alignment with strategic employment sites which may draw labour from beyond immediate area e.g. UKC and WMI**.**	AD
5.12	**Market Absorption –** Agreed this should be a future workstream, South Essex cited as an example	AD
5.13	Extent to which HMA to consider all options before seeking assistance from elsewhere to be included as a workstream	AD
5.14	PAS confirmed funding secured to support the SoCG work but specific details as to what this entails to be established. Support, in principle, to give a third-party overview of next draft of document.	PAS /IC
6	**Strategic Employment Sites Study**	
6.1	• [redacted] • Details of commissioning to be determined – possible commission late June, target time for completion 6 – 9 months. • Steering Group arrangements to be established – maybe on a sub-regional basis e.g. Coventry and Warwickshire. • Advise of potential consultants to be invited to tender	ALL
7	**Local Aggregate Assessment**	
7.2	Metropolitan Authorities to provide contacts to set up a LAA sub-group to progress	Met LAs to AD
8	**Any on the business**	
8.1	None	
9	**Date of Next Meeting**	
9.1	Tuesday 21st June @14:00	

Local Plan Update May 2022

GBBCHMA / WMCA Local Plan Reviews as at May 2022	
Birmingham	Issues and Options to be published autumn 2022
Black Country	Regulation 19 consultation winter 2022
South Staffordshire	Regulation 19 autumn 2022, possibly September. Submission early 2023
Lichfield	Regulation 19 plan approved by cabinet, no within call in period. Anticipated submission to PINS to late May / June
Bromsgrove	Regulation 18 Preferred Option summer 2022
Tamworth	Issues and Options summer 2022
Redditch	Regulation 18 Preferred Option late summer / autumn 2022
Shropshire	Plan submitted September 2021, hearings commence July 2022.
South Warwickshire **(Warwick and Stratford-on- Avon)**	Still committed to formal joint plan. South Warwickshire Issues and Options late summer 2022, anticipated submission 2024 and adoption 2025. Stratford-upon- Avon SAD with reserve sites for Birmingham to Cabinet May 23rd.
Rugby	Local Plan review to formally commence summer 2022 (from January notes)
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire
Cannock Chase	Should be at Regulation 19 around now, Cabinet report to consider Regulation 19 plan July 2022, LDS will be updated also.
Solihull	Examination hearings finished February 2022, have completed responding Inspectors' questions. Inspector written requesting a further hearing session on NEC. Date to be confirmed but will be available via website.
Coventry	Cabinet report to trigger review no later than November 2022
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet in June.

Wyre Forest	Plan formally adopted 26th April, now in six week period for legal challenge.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP

Tuesday 21st June 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM Update
4. Local Plan updates
5. Statement of Common Ground
6. 2021 update of Position Statement [redacted]
7. Strategic Employment Sites Update
8. Local Housing Need and 2021 Affordability Ratios
9. Local Aggregate Assessment
10. AOB
11. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 21 June 2022, 14:00 – 16:00 **Note of main points and actions**	
	In attendance: Ian Culley – chair, Wolverhampton, Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi (Cannock Chase), Lauren Lymer, Helena Tuck (Lichfield), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn (Birmingham), Kelly Harris (South Staffordshire), John Careford (Stratford on Avon / Warwick), Richard Powell, (Tamworth), Vicki Popplewell (Dudley), Liam Edge, (TfWM), Martin Hutchings (PAS), Andrew Seaman (IPe), Gavin Ashford (Telford), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Patricia McCullagh (Sandwell)
	Apologies: Heather Stone (Wyre Forest), Eddie West (Shropshire), Stephen Stray (Lichfield)
1	[redacted]
1.1	[redacted]
2	**TfWM update**
2.1	Looking to have all 2021 data by end of July, contact LE or Sue Balu if there are any problems. Next step is data quality check. Noted that first Census results due end of June.
3	**Local Plan updates –** see separate schedule
4	**Draft Statement of Common Ground (SoCG)**
4.1	[redacted] (IPe, commissioned by PAS) presented his initial findings of review of draft GBBCHMA SoCG. Main points as follows: • Useful summary of plan making activity and extant plan provision. Effective and ongoing engagement thus far. • Currently focuses too much on what has happened rather than being forward looking – should focus on next 15 years and engage with LHN needs. • Focus of review on legal compliance, soundness and compliance with national policy and discharging DtC. • Focus should be on strategic matter of housing – other SoCgs for different topics. • Needs to clearly express areas of agreement and disagreement • GBBCHMA commenced early, many SoCGs put together at last minute

	• Commonality of principles needs expressing more clearly along with objectives of officer group and cross over to member group. • Details of member group need to be strengthened. • Consider whether Gypsy and Traveller issues need to be included. • Consider core principles around methodologies for compiling evidence
	Any further comments to AS by close of play Thursday 23 June. Final report to be available within next couple of weeks.
5	**GBBCHMA Position statement / WMCA Housing Deal Monitoring**
5.1	Data for year end 2021 has now been requested. [redacted]
6	**Strategic Employment Sites Study**
6.1	One of Black Country authorities to procure, possibly July. Nominees for membership of Steering Group required.
7	**Local Housing Need and Affordability Ratios**
7.1	Paper shared which shows that affordability ratio in Birmingham may be artificially inflated in 2021 due to pandemic and associated Government response i.e. Stamp Duty holiday. Comparison made with OBR forecasts at national level. Defer to next meeting for consideration.
8	**Local Aggregate Assessment**
8.1	Reminder to provide contact details of contact for Metropolitan LAA preparation to AD. Have Birmingham and Coventry.
9	**Any on the business**
9.1	None
10	**Date of Next Meeting**
10.1	Tuesday 19 July @14:00

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 19 July 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM Update
4. Local Plan updates
    - By LPA

    Evidence Base for the new Birmingham Plan | Birmingham City Council (Birmingham HEDNA)

    - WMCA Black Country Brownfield Land Capacity Report

    https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4m/
5. 2021 update of Position Statement and WMCA Housing Deal Monitoring schedule – progress to date
6. AS / IPe Report in Respect of Draft WMCA SoCG
    - Recommendations
    - Next Steps
7. Strategic Employment Sites Study 3 Update
8. 2021 Census first results
9. Local Housing Need and 2021 Affordability Ratios
10. Local Aggregate Assessment
11. AOB
12. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 19 July 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley – chair, Wolverhampton, Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi (Cannock Chase), Lauren Lymer, Helena Tuck (Lichfield), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn (Birmingham), Kelly Harris (South Staffordshire), John Careford (Stratford on Avon / Warwick), Richard Powell, (Tamworth), Vicki Popplewell (Dudley), Liam Edge, (TfWM), Martin Hutchings (PAS), Andrew Seaman (IPe), Gavin Ashford (Telford), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Patricia McCullagh (Sandwell)	
	Apologies: Heather Stone (Wyre Forest), Eddie West (Shropshire), Stephen Stray (Lichfield)	
1	**Matters arising**	
1.1	[redacted]	[redacted]
2	**TfWM update**	
2.1	Looking to have all 2021 data by end of July, contact LE or [redacted] if there are any problems. Next step is data quality check. Noted that first Census results due end of June.	
3	**Local Plan updates –** see separate schedule	
4	**Draft Statement of Common Ground (SoCG)**	
4.1	• Review of changes to report made in response to IPe/PAS report into SoCG. • Pragmnatic approach take in terms of what can be addressed now and what needs to be considered in the future. • As different geographies, deliberate focus on housing with employment signposted. • Make clear what are objectives for SoCG and DNG • Make it clear the SoCG is complementary to othe DtC exercises between local authorities. • Make it clear that by being a signatory it is considered that cooperation has been effective and ongoing.	

	• Issue regarding maturity of Strategic Growth Study and it is only one source of evidence. • Make it clear that at present shortfalls are Birmingham and Black Country, which make up wider HMA shortfall. • Issue of apportioning between Birmingham / Black Country a future workstream • Shared evidence documents to be considered where appropriate, not universally	ALL
	Next Steps	ALL
	• Further draft to be issued taking on board views expressed today further comments by Friday 29th July. • All encouraged to socialise Members with the document, may take some authorities longer to get there than others. • South Staffordshire deadline for document being in public domain end of September, not necessarily signed off by all authorities. Once officer draft completed South Staffordshire to formally send to all LPAS. • Member body should be a 'board' not 'forum' and timetable for establishing this required. • Details need completing e.g. LHN, housing requirements, footnotes, links etc. •	
5	**Notes of last meeting and matters arising**	
5.1	Outstanding matter of WMCA employment forecasts, Pat Willoughby to liaise [redacted]	PW
6	**TfWM update**	
6.1	Resource constraints mean some LPAs will not be able to provide data this year. Schedule of returns to date shared and to be circulated with notes.	AD/SB
7	**Local Housing Need and Affordability Ratios**	
7.1	Paper shared which shows that affordability ratio in Birmingham may be artificially inflated in 2021 due to pandemic and associated Government response i.e. Stamp Duty holiday. Comparison made with OBR forecasts at national level. Defer to next meeting for consideration.	
8	**Local Aggregate Assessment**	

8.1	Reminder to provide contact details of contact for Metropolitan LAA preparation to AD. Have Birmingham and Coventry.	ALL
9	**Any on the business**	
9.1	None	
10	**Date of Next Meeting**	
10.1	Tuesday 16 August @14:00 – 16:00	

Local Plan Update July 2022

GBBCHMA / WMCA Local Plan Reviews as at July 2022	
Birmingham	Issues and Options to be published autumn 2022. Target date to Cabinet October 2022 with consultation to be completed before Christmas. HEDNA to be published imminently.
Black Country	Further Regulation 18 consultation on additional Green belt sites in Walsall July 2022. Regulation 19 full plan consultation winter 2022
South Staffordshire	Regulation 19 autumn 2022. Submission early 2023
Lichfield	Plan submitted to PINS for examination
Bromsgrove	Regulation 18 Preferred Option summer 2022
Tamworth	Issues and Options likely September 2022
Redditch	Previously Regulation 18 Preferred Option late summer / autumn 2022 but now under review
Shropshire	First two weeks of Stage 1 hearings completed, awaiting Inspectors' advice.
South Warwickshire **(Warwick and Stratford-on- Avon)**	Still committed to formal joint plan. South Warwickshire Issues and Options late summer 2022, anticipated submission 2024 and adoption 2025. Stratford-upon- Avon SAD with reserve sites for Birmingham to Cabinet May 23rd.
Rugby	Local Plan review to formally commence summer 2022

North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire
Cannock Chase	Regulation 19 Plan to be considered by Cabinet in August 2022, Full Council 2022.
Solihull	Further hearings completed 8th July 2022, awaiting Inspectors' next steps
Coventry	Cabinet report to trigger review no later than November 2022
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan.
Wyre Forest	Plan formally adopted 26th April

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 16 August 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. Local Plan updates
4. 2021 update of Position Statement and [redacted]
5. Final draft Statement of Common Ground (SoCG)
6. AOB
7. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 16th August 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley – chair, Wolverhampton, Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi (Cannock Chase), Gurdip Nagra (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn, Sarah Scannell (Birmingham), Kelly Harris (South Staffordshire), Richard Powell, (Tamworth), Jennie Plant (Dudley), Liam Edge, (TfWM), Mike Dittman, (North Warwickshire), Patricia McCullagh (Sandwell), Mike Dunphy Bromsgrove, Eddie West (Shropshire),	
	Apologies: Uyen Phan Han (Birmingham), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley), Clare Eggington (Coventry).	
1	**Actions from last meeting**	
1.1	Agreed as an accurate record	
2	**Local Plan updates**	
2.1	See attached schedule. Noted Nuneaton and Bedworth missing from schedule.	
3	**2021 update of Position Statement and WMCA monitoring**	
3.1	Responses thus far from Birmingham, Coventry, Bromsgrove, Redditch, and Cannock Chase. Outstanding response to be provided ASAP. [redacted]	ALL
4	**Final draft of Statement of Common Ground (SoCG)**	
4.1	Amendments have been made to the SoCG following receipt of the Intelligent Plans and Examinations (IPe) report. Additional officer comments have been taken on board and clean / tracked changes copies of the SoCG were circulated in advance of this meeting. Agreed that document largely complete subject to inclusion of last-minute changes and final proofread.	KH
4.2	SSDC to send document to those local authorities (officers / members) present at 15th December 2021 meeting inviting responses as to their intentions regarding endorsement and accompanying timetables.	KH

	Covering letter on behalf of SSDC cabinet member will make it clear that this is not an SSDC led /owned exercise but rather a collective effort on behalf of HMA and other related local authorities. The driver is that SSDC need something to accompany their Regulation 19 plan due to be published in Autumn 2022. Responses to this request will determine whether a further member meeting is required.	
4.3	Noted that the document will continue to evolve as local plans progress e.g. Birmingham Issues and Options later this year.	
4.4	SSDC having difficulty producing a boundary map showing relationships within / beyond / and overlapping HMAs. TfWM may be able to assist with this.	LE/GN/ KH
5	**Any other business**	
5.1	None.	
6	**Date of next meeting**	
6.1	Tuesday 20th September @14:00 – 16:00	

SEPTEMBER MEETING CANCELLED

NO OCTOBER MEETING

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 1st November 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM data update
4. Local Plan Updates*
5. Housing Statement of Common Ground (SoCG)
6. Response to South Staffordshire District Council request

- Implications of latest local plan updates
- Next steps

7. 2021 update of Position Statement and [redacted]
8. Strategic Employment Sites phase 3 Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting
12. Quite a lot of activity since August meeting Birmingham, Black Country, Shropshire, Bromsgrove, Solihull, Tamworth, Cannock Chase, Nuneaton and Bedworth.

GBBCHMA / WMCA Officer meeting – Tuesday 1st November 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley – chair, Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn, Uyen Phan Han (Birmingham), Kelly Harris, Ed Fox (South Staffordshire), Richard Powell, (Tamworth), Liam Edge, (TfWM), Mike Dittman, (North Warwickshire), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Eddie West, Dan Corden (Shropshire), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest), Neville Ball (Walsall), Rebecca Brown (Redditch), Joanne Bozdoganli (Stratford on Avon)	
	Apologies: Sarah Scannell (Birmingham), Amanda Holland (WMCA), Dorothy Barratt (North Warwickshire)	
1	**Actions from last meeting**	
1.1	Addressed as tidying up SoCG, which has now been issued.	
2	**TfWM Update**	
2.1	2019/20 is baseline year for PRISM. Awaiting Black Country 20/21 data, Walsall confirmed it had been sent, others to check	MR, PM, VP
3	Work has been done pulling together Investment Zones expressions of interest but policy initiative short lived. Information may be useful for future initiatives / Commissions e.g., SESS work	
3.1	Information to be packaged and made available.	LE
4	**Local Plan updates**	
4.1	See separate schedule	
5	**GBBCHMA plus SoCG**	
5.1	South Staffordshire has sent the HMA plus SoCG document to relevant local authorities and most responses thus far have been to the effect that document is under consideration, not necessarily with definitive dates. Those local authorities who haven't made any response yet encouraged to do so. It is not currently published on the website but is available on request, a FOI request has already been made.	

5.2	Whilst the HMA plus SoCG is the final version, those between SSDC and individual authorities are in draft form. All documents will be on the website individual authorities to accompany SSDC's Regulation 19 plan, these are to be published on the website Friday 11th November, so if any amendments required, contact SSDC. PAS has advised this approach.	ALL
5.3	Bromsgrove, Redditch, and Stratford on Avon all advised that officer comments were likely to be available within this timeframe, but that member endorsement was to come afterwards.	
5.4	NWBC confirmed that it was intending to take a Committee Report on 21st November addressing the matter.	
5.5	Noted that circumstances had changed since the SoCG was issued In August, notably the abandonment of a joint Black Country Plan. Agreed that an addendum to the HMA plus SoCG be added advising that circumstances had changed since it was published, and the document will be updated at some point. The workstreams identified in the document remain valid and still need to progress.	
5.6	Noted that no local authority is compelled to sign the document, but that SSDC will need to report to the Inspector what response there has been.	
6	[redacted]	
[redacted]	[redacted]	[redacted]
7	**Strategic Employment Sites Study**	
7.1	Dudley has utilised the Homes England multi-disciplinary framework seeking expressions of interest by 5th December.	
8	**Local Aggregate Assessment**	
8.1	Noted as this needs progressing, there are other examples out there to use as a template	
9	**Any other business**	

9.1	Reminder that session arranged for 15th November with WMCA regarding Oxford Economics job forecasts	
10	**Date of next meeting**	
10.1	Tuesday 13th December @ 14:00	

Local Plan Update November 2022

GBBCHMA / WMCA Local Plan Reviews as 1st November 2022	
Birmingham	Into second week of Issues and Options consultation period. Housing shortfall of approximately 72,500 homes and 17 hectares of employment land. All neighbours have been advised of consultation and Duty to Cooperate requirements. Face to face meetings with individual authorities have been offered.
Black Country	Following Dudley's decision to withdraw from the Black Country Plan (BCP), four separate borough plans will be prepared. New LDSs' being taken through approval channels: **Wolverhampton:** Went to Cabinet 26 October 2022 **Sandwell:** Revised LDS to Cabinet 14 November 22, seeking approval to proceed with issues and Options February / March 2023 **Walsall:** Revised LDS to Cabinet 2nd November, plan period to be extended so higher housing / employment requirements than previous draft BCP. **Dudley:** Currently discussing way forward with members Other key points: • Authorities considering the extent to which existing BCP evidence can be used • Shortfalls are distributed disproportionally across the local authorities, with the largest being in Sandwell • External contributions need to be apportioned to individual authorities rather than the Black Country • Could add two to three years to adoption time in some instances
South Staffordshire	In the process of agreeing Regulation 19 publication plan. It goes to full council next week on the 8th of November, then to subject to agreement, starting the consultation on the 11th of November. So next Friday there will be a six- week consultation then until the 23rd of December. Target submission date spring 2023, work around air quality and Habits Regulation to be completed.
Lichfield	Website states consultation on Regulation 19 plan ended on 30th August. NWBC advised that this had been extended to 12th November 2023.

Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable, possibly before Christmas, but conscious of potential changes to national policy.
Tamworth	Currently consulting on Issues and Options, two weeks left to run.
Redditch	Revised LDS for review scheduled for January 2023.
Shropshire	Further virtual session on compliance with Duty to Cooperate on 17th January 2023. Inspectors requested up to date SoCG's and have asked what consequences of cessation of Black Country plan are.
South Warwickshire **(Warwick and Stratford-on- Avon)**	Issues and Options document to be considered by Joint Committee on 7th December with a view to consultation in January 2023.
Rugby	Local Plan review to formally commence summer 2022 (no update, from earlier schedule)
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire (no change from previous schedule).
Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as awaiting finalisation of evidence base documents.
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view.
Coventry	Cabinet report to trigger plan review 15th November and Full Council 6th December.
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan. (no change from last update)
Wyre Forest	Plan formally adopted 26th April (no change from previous schedule)

Nuneaton and Bedworth	Issues and Options consultation in 2021, with a view to consulting on draft plan in October 2023. Media report states that this has been delayed enabling the HEDNA to be updated considering the 2021 Census. Another 'disappointing' delay to Nuneaton and Bedworth future housing plan - CoventryLive (coventrytelegraph.net)

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 13th December 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM data update
4. Levelling Up and Regeneration Bill
5. 2021 update of Position Statement [redacted]
6. Local Plan Updates
7. Strategic Employment Sites phase 3 Study
8. Housing Statement of Common Ground (SoCG)*
9. Review / Update of Strategic Growth Study
10. Apportioning need contributions
11. Establishing member board
12. Local Aggregate Assessment
13. Any other business
14. Date of next meeting

* Will be influenced by Item 4.

GBBCHMA / WMCA Officer meeting – Tuesday 13th December 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley – chair, Michele Ross (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Maria Dunn, (Birmingham), Kelly Harris, Ed Fox (South Staffordshire), Richard Powell, (Tamworth), Mike Dittman, Dorothy (North Warwickshire), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Dan Corden, Liam Cowden (Shropshire), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest), Neville Ball (Walsall), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth)	
	Apologies: Sarah Scannell (Birmingham), Liam Edge (TfWM), Clare Eggington (Coventry)	
1	**Actions from last meeting**	
1.1	AD to ask LE for summary of Investment Zone data for circulation.	AD / LE
2	**TfWM Update**	
2.1	No update from previous meeting	
3	**Levelling Up and Regeneration Bill**	
3.1	Secretary of State's letter and Parliamentary Statement noted, main points: • Changes to joint working • Urban uplifts to be met in situ • No need to review Green Belt to meet housing needs NPPF prospectus due to be published before Christmas**.**	
3.2	Initial thoughts as follows:	
3.3	**Cannock Chase** At Regulation 19 Stage and may proceed with Green Belt releases as they are necessary to support infrastructure delivery.	
3.4	**Shropshire**	

	Currently at examination stage, Green Belt and other land releases as much about permitting existing settlements to grow sustainably.	
3.5	**Birmingham** Issues and options consultation has just ended, some late responses referring to SoS letter accepted. Need to consider implications of NPPF Prospectus before forming a view how to proceed**.**	
3.6	**South Staffordshire** Currently at regulation 19 stage and need to consider the implications.	
3.7	**Wolverhampton** Intended to publish Issues and Options in in New Year but will now await NPPF Prospectus.	
3.8	**Dudley** Letter welcomed by elected members but need to consider details in Prospectus.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
5	**Local Plan updates**	
5.1	See separate schedule. AD to prepare briefing on South Warwickshire Issues and Options.	AD

6	**Strategic Employment Sites Study**	
[redacted]	[redacted]	
6.2	Attention drawn to local elections and the need for any release of the study to be managed accordingly.	
7	**Statement of Common Ground**	
7.1	Two main issues: • Progress on signing bi-lateral and joint SoCGs. • Progressing identified workstreams In general, it was noted that the latest SoS letter is causing uncertainty regarding future joint working arrangements.	
7.2	To date Birmingham, Cannock Chase and South Staffordshire have signed joint SoCG	
7.3	North Warwickshire reported that members had concerns about appendix 2. Having adopted a growth led plan there were concerns that the necessary infrastructure was not coming forward as envisaged. It was suggested that NWBC may wish to reflect this in responding.	
7.4	Solihull reported that the attention was for both to be signed but noted that it was 'of it's time' and much had changed since the August 2022 agreement date. These matters need to be picked up in future iterations, but we must not lose momentum now. Important to make the distinction between agreeing to further commissions and agreement as to what may come out of them. Member (governance) inputs need to be factored in also.	
7.5	Request that member signatures are sent to SSDC as a photo for easy insertion into final document.	ALL
7.6	Bromsgrove reported that reports to be considered in January but members may want to take account SoS and future announcements given that document dated August 2022.	

7.7	Dudley also noted that members may wish to consider the proposed changes to national policy.	
7.8	Also noted that apportionments will need to be re-considered in light of the BCP no longer proceeding.	
7.9	Agreed that AD / SSDC progress with a first draft of a brief / programme for further consideration.	AD/SSDC
8	**Local Aggregate Assessment**	
8.1	AD advised of initial meeting 14th December with Walsall and Solihull.	
9	**Any other business**	
9.1	None	
10	**Date of next meeting**	
10.1	Tuesday 24th January 2023 @14:00 – 16:00	

West Midlands Development Needs Group

Agenda and Notes of Meeting

2023

OFFICIAL

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 24 January 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM data update
4. Local Plan Updates
5. NPPF Prospectus
6. GBBCHMA plus SoCG – progress towards agreeing and future work streams
7. 2021 update of Position Statement [redacted]
8. Local Aggregate Assessment
9. Any other business
10. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 24 January 2023, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley – chair, Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Gurdip Nagra, Patricia Willoughby, Amanda Holland (WMCA), Gary Palmer, (Solihull), Maria Dunn, Uyen Phan Han(Birmingham), Ed Fox (South Staffordshire), Richard Powell, (Tamworth), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Eddie West (Shropshire), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Rob Haigh (Coventry), Liam Edge (TfWM), Gavin Ashford (Telford and Wrekin)	
	Apologies: Sarah Scannell (Birmingham), Clare Eggington (Coventry), Mike Dittman, Dorothy Barratt (North Warwickshire), Neville Ball (Walsall), Dan Corden (Shropshire)	
1	**Actions from last meeting**	
1.1	Agreed as an accurate record and relevant matters on agenda. AD to remind LE for Investment Zones data.	[redacted]
1.2	Update on Strategic Employment Sites Study given as not on the agenda. Dudley commissioned and Mace / Iceni successful bidder, inception meeting with steering group to be convened.	
2	**TfWM Update**	
2.1	TfWM processing most recent returns and updating uncertainty log for PRISM. Clarification being sought where necessary	
3	**Local Plan Updates**	
3.1	See separate schedule	
4	**NPPF Review**	
4.1	Two main strategic issues of relevance: • Approach to housing numbers, more flexibility • Proposed change to Green Belt policy, housing need not necessarily an exceptional circumstance	
4.2	Initial thoughts: • Potentially easier to progress plans without Green Belt releases • Duty to Co-operate arrangements in place until 2025, but tools to address it blunted. Implications for 300,000 dpa national target. Duty to Cooperate requires legislative not just policy change. • Unclear / confusing transitional arrangements • More focus on non – Green Belt locations, funding to deliver • Greater emphasis on urban centres meeting their uplift.	
4.3	Agreed to share emerging responses to consultation.	ALL
5	**GBBCHMA plus statement of Common Ground**	
5.1	Most local authorities have responded explaining if / how taking it through internal processes, around five formal signatories to date. SSDC to send a reminder email.	
5.2	Suggested that this reminder refers to fact that this was drafted at a point in time, August 2022, and acknowledge that circumstances within	

	the GBBCHMA have changed; also note that NPPF proposed changes do not do away with the need to work together.	
5.3	**Comments from local authorities:** **Bromsgrove / Redditch** Not in a position to take to members yet until further clarity regarding national policy. It is in the forward plan and this does not mean it will not be signed in the future	
5.4	**Solihull** Noted August 2022 date and that future iterations may differ. Very sensitive politically.	
5.5	In terms of the brief for further work Main issues • What is shortfall • What is capacity • What are realistic options	
5.6	Agreed all to comment on brief. Uncertainty acknowledged but ideally need to be in position to commence work once the changes to national policy are formalised.	
6	**GBBCHMA Position statement and WMCA Housing Deal Monitoring**	
6.1	Latest figures (2021) show that shortfall fallen to just above 2000 due to additional capacity being identified in Birmingham. There is headroom of nearly 20,000 in terms of meeting WMCA Housing Deal target although attention drawn to fact that Treasury seek assurance that commitments are in regulation 19 plans to give certainty.	
6.2	Note that is this is for 2021, additional capacity in emerging plans may not have been picked up but would be in 2022, although some may be removed again e.g. Black Country.	
6.3	Telford data taken from AMR, assumptions made for Shropshire as data not in same format as GBBCHMA / WMCA template, Solihull data taken from eip trajectory.	
6.4	Noted that baseline need in Position Statement is based on 2014 HHPs plus a vacancy rate allowance. It does not take account of affordability / urban uplifts, which will need to be considered as part of future need. Opportunity to look at future need scenarios for GBBBCHMA.	AD
6.5	CWHMA has published a HEDNA, which deviates from using 2014 HHPs and is based on more accurate Census data. Noted that 2014 HHPs significantly overestimate Birmingham's growth.	
6.6	No disagreement in principle to publishing a 2021 addendum to the GBBCHMA Position Statement.	AD
6.7	All to check that data has been transcribed accurately	All
7	**Local Aggregate Assessment**	
7.1	Sales data now available, noted future need estimates problematic as Regional Guidelines not available beyond 2020. [redacted]	AD
8	**Any other business**	
8.1	None	

9	**Date of next meeting**	
9.1	Tuesday 21st February 2023 @14:00 – 16:00	ALL

Local Plan Update January 2023

GBBCHMA / WMCA Local Plan Reviews as at January 2023	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. All neighbours have been advised of consultation and Duty to Cooperate requirements. Face to face meetings with individual authorities have been offered. Currently analysing consultation responses, no firm date for regulation 18 consultation.
Black Country	**Wolverhampton:** LDS agreed by Cabinet 26 October 2022, detailed programme to be determined following outcome of NPPF consultation. **Sandwell:** Revised LDS to Cabinet 14 November 22. Issues and Options consultation 6th February until 20th March. **Walsall:** Revised LDS to Cabinet 2nd November, plan period to be extended so higher housing / employment requirements than previous draft BCP. *No change from last meeting* **Dudley:** Revised LDS going to Cabinet 26th January 2023, Regulation 18 plan anticipated Summer 2023.
South Staffordshire	Regulation 19 publication plan published for consultation until the 23rd of December, responses currently being analysed. Intention to submit in April 2023 but suspended pending outcome of NPPF consultation.
Lichfield	Website states consultation on Regulation 19 plan ended on 30th August. NWBC advised that this had been extended to 12th November 2023. *No change from last meeting*
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last meeting*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up.
Shropshire	Further virtual session on compliance with Duty to Cooperate completed on 17th January 2023.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options document agreed by Joint Committee on 7th December, consultation to commence 9th January to 6th March. *No change from last meeting*
Rugby	In December members agreed to a full review of the local plan. Issues & Options consultation due to take place June/July 2023. This may change I light of NPPF review.
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire *No change from last meeting*
Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as awaiting finalisation of evidence base documents. *No change from last meeting*
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position.
Coventry	Proceeding as per updated Local Development Scheme with the intention to do Reg 18 in the summer. (Full plan review). The C&W

	HEDNA was published in December and proposes an alternative to the standard method, using the 2021 census as the basis for the figures given that the 2014 figures have been shown to be hugely inaccurate.
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan. *No change from last month*
Wyre Forest	Plan formally adopted 26th April *No change from last month*
Nuneaton and Bedworth	Issues and Options consultation in 2021, intention to consult on a Regulation 19 plan in April 2023. Potential delay until June as awaiting transport assessment work.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 21 February 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. Local Plan Updates
5. GBBCHMA plus SoCG
    - Progress on signing
    - Further work brief
    - [redacted]
    - [redacted]
    - Plan for Growth

    https://www.wmca.org.uk/what-we-do/economy-and-innovation/plan-for-growth/
7. GBCHMA matters
    - Position Statement refresh
    - Future housing need scenarios
8. Strategic Employment Sites Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 21 February 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ed Fox (South Staffordshire) – chair, Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Patricia Willoughby, (WMCA), Gary Palmer, (Solihull), Maria Dunn, Sarah Scannell (Birmingham), Sam Holder (Sandwell), Mike Dunphy (Bromsgrove), Dan Corden (Shropshire), Jennie Plant (Dudley), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Clare Eggington (Coventry), Jackie Padbury (Nuneaton and Bedworth), Mike Dittman, Dorothy Barratt (North Warwickshire), Neville Ball (Walsall), Michele Ross (Wolverhampton). Chris Styles (Coventry)	
	Apologies: Ian Culley (Wolverhampton) Uyen Phan Han (Birmingham), Kelly Harris (South Staffordshire), Maria Bailey (Nuneaton and Bedworth), Gavin Ashford (Telford and Wrekin), Liam Edge (TfWM), Richard Powell (Tamworth), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest).	
1	**Actions from last meeting**	
1.1	Wrong date on last Meeting's notes, correct and re-circulate	AD
1.2	AD to remind LE for Investment Zones data.	AD / LE
1.3	Reminder that there is still time to share NPPF responses	All
2	**TfWM Update**	
2.1	Collection of data ongoing	
3	**Local Plan Updates**	
3.1	See separate schedule	
4	**GBBCHMA SoCG**	
	Signing SoCG	
4.1	Schedule showing how had responded to GBBCHMA SoCG previously circulated and SSDC has sent a reminder.	
4.2	**Solihull:** Necessary approvals secured **Shropshire**: Agreed in principle, going through relevant approval processes **North Warwickshire**: Members uncomfortable with Appendix Two of HMA SoCG, but fine with bi-lateral one	
4.3	Thus far only Stratford on Avon had commented on draft further work brief, main points as follows: • Study date to 2042, South Warwickshire Local Plan (SWLP) extends to 2050 • Must not duplicate 2018 study • Must not infringe on areas of local plan responsibility • Coventry and Warwickshire HEDNA uses standard method inputs derived from 2021 Census, not 2014 HHPs. • Links with employment, not just housing • Prefer commencement sooner rather than later to feed into SWLP	

4.4	Agreed that Stratford's comments be circulated	AD
4.5	**Solihull comments:** • Uncertainty around need given 2021 census results • NPPF Green Belt and density proposals need to be factored in • 35% uplift down to areas' accessibility so should not be exported	
4.6	**Birmingham comments:** • Cannot meet own need even without 35% uplift so export inevitable • Reiterate concerns over housing need uncertainty • Suggested factoring in each authority's position on Green Belt release	
4.7	**North Warwickshire comments:** • Transport infrastructure to support local plan implementation the missing link as A5 funding stalled and necessary to bring forward major local plan allocations. • Members want to see infrastructure to support growth	
4.8	**South Staffs comments:** • Reiterated uncertainty over numbers • Factor in rail corridors served settlements • Need something for those looking to submit during transitional arrangements (until 2025) and noted that DtC in current form applies until then.	
4.9	Conclusion that need to await finalisation of NPPF review but to continue commenting on the draft brief.	ALL
5	**WMCA Matters**	
	[redacted]	
[redacted]	[redacted]	
	WMCA Plan for Growth	
5.2	• Not a formal strategy, but a plan for post pandemic recovery given that West Midlands's relative economic performance dipped • Identifies eight clusters, with a focus on interventions to grow industries • May be of relevance to Strategic Employment Sites Study • Agreed to bring a more detailed presentation to future meeting	[redacted]
6	**GBBCHMA Matters**	
6.1	Paper circulated earlier which estimates shortfall to 2031 and post 2031	

	• Shortfall largely cleared by 2031 for Position Statement Addendum refresh • As the shortfall has been driven by that in the Birmingham Development Plan (BDP). In 2022 the BDP was five years old son LHN rather than OAN is the default need; this is much higher. • Taking published Birmingham and Black Country shortfalls and potential contributions, a best-case scenario estimate of the gap is 92,000 and worst case 106,000.	
6.2	Further paper circulated looking at 2021 Census outputs and previous HHPs: • This looked at what implications may be for GBBCHMA if used Census outputs like CWHMA HEDNA. Much of CWHMA difference driven by international students counted in but not out • 2014 HHPs overestimate Birmingham's growth significantly compared to the 2021 HHPs so using 2014 HHPs likely to significantly over-estimate growth across HMA. There would, however, be 'winners and losers with 2014 HHPs lower for some authorities • Noted that DLUCH only committed to considering 2021 Census outputs and request use of 2014 HHPs. • Draft NPPF gives more scope to challenge Standard Method, but option there for development industry also. • LPAs may wish to comment on this in responding to NPPF review proposals.	AD
7	**Strategic Employment Sites Study**	
7.1	• Steering Group met with consultants for inception meeting earlier this month • Data requests circulated for 25 ha plus sites and completions / commitments for units over 9,000 sqm	
7	**Local Aggregate Assessment**	
7.1	No update since last meeting	
8	**Any other business**	
8.1	None	
9	**Date of next meeting**	
9.1	Tuesday 21st March 2023 @14:00 – 16:00	

Local Plan Update February 2023

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Black Country	**Wolverhampton:** LDS agreed by Cabinet 26 October 2022, but new LDS to Cabinet 1st March. Anticipate preparation under existing system. **Sandwell:** Revised LDS to Cabinet 14 November 22. Issues and Options consultation 6th February until 20th March. Call for sites commenced, anticipate completing under existing system. **Walsall:** Revised LDS to Cabinet 2nd November, plan period to be extended so higher housing / employment requirements than previous draft BCP. Anticipate completing under new system **Dudley:** Revised LDS going to Cabinet 26th January 2023, Regulation 18 plan anticipated Summer 2023. Call for sites commenced.
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Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as

	awaiting finalisation of evidence base documents. *No change from last meeting*
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February.
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GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 21 March 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting

[redacted]

[redacted]

[redacted]

4. TfWM update
5. Local Plan Updates
6. GBBCHMA plus SoCG

- Progress on signing
- Further work brief responses

7. 2021 GBBCHAM Position Statement Update
8. Strategic Employment Sites Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 22nd March 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West. Midlands Met Authorities), Heidi Hollins (Cannock Chase), Patricia Willoughby, John English, Paul Edwards, Rob Lamond(WMCA), Gary Palmer, (Solihull), Maria Dunn, Uyen Phan Han (Birmingham), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Eddie West (Shropshire), Jennie Plant, Vicki Popplewell (Dudley), Joanne Bozdoganli (Stratford on Avon), Rob Haigh (Coventry), Jackie Padbury (Nuneaton and Bedworth), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Michele Ross (Wolverhampton). Alex Evans, Patrick Walker (South Staffs.), Patrick Jervis (Lichfield), Richard Powell (Tamworth), (Heather Stone (Wyre Forest), Liam Edge, Matt Malin (TfWM)	
	Apologies: Sarah Scannell (Birmingham) Dorothy Barratt (North Warwickshire) Clare Eggington (Coventry)	
1	**Actions from last meeting**	
1.1	All matters arising on agenda	
1.2	AD to remind LE for Investment Zones data.	AD / LE
1.3	Reminder that there is still time to share NPPF responses	All
[redacted]		
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	TfWM update	
3.1	Most requests to clean up data now been responded to, now moving towards updating PRISM uncertainty log	
3.2	Two new staff members, Matt Malin (data co-ordinator), who will be requesting land use data going forward and Owen O'Neill (senior researcher).	
3.3	Anyone new to region and unfamiliar with data returns to contact LE for advice.	ALL
4	**Local Plan updates**	
4.1	See separate schedule.	
4.2	Solihull inquired whether Black Country authorities have sought assistance with housing numbers yet and what the context is. Sandwell is most advanced and is currently seeking advice from PAS on DtC.	
4.3	Noted that consultation on Environmental Statements and CIL commenced, may be something on alignment test that will replace DtC shortly.	
5	**Statement of Common Ground**	
5.1	North Warwickshire reiterated that the appendices were a concern for members	

5.2	Bromsgrove and Redditch both not in a position to sign at present but may be in the future once NPPF clarity.	
5.3	SSDC to update brief considering comments when capacity permits.	PW
6	**GBBCHMA Position statement refresh**	
6.1	2021 data shows shortfall has fallen since 2020 data published December 2021. Attention drawn to fact that need is now far greater than that assumed in the Strategic Growth Study (2014 HHPs plus vacancy allowance).	
6.2	All to check data / document with a view to signing off at next meeting. Requests have been made from the private sector regarding publication.	ALL
6.3	AD to send JB copy of proforma to familiarise.	AD
7	**Strategic Employment Sites Study**	
7.1	Data requests made by consultancy team. Interim statement due late April / May and to be brought to this group.	
7	**Local Aggregate Assessment**	
7.1	No update since last meeting.	
8	**Any other business**	
8.1	None	
9	**Date of next meeting**	
9.1	Tuesday 18 April 2023 @14:00 – 16:00. AD to send meeting dates for after June.	AD

Local Plan Update March 2023

GBBCHMA / WMCA Local Plan Reviews, March 2023	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. All neighbours have been advised of consultation and Duty to Cooperate requirements. Face to face meetings with individual authorities have been offered. Currently analysing consultation responses, no firm date for regulation 18 consultation. *No change from last month*
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Lichfield	Plan submitted for examination in 2022 but a 12-month pause agreed with Inspector so that team can be resourced. Currently dealing with Inspector's initial queries.
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last meeting*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*
Shropshire	Further virtual session on compliance with Duty to Cooperate completed on 17th January 2023 and Inspectors findings recently received. Have complied with DtC but requested further clarification / SA work around Black Country contribution. Council working on response with a view to examination re-convening in June 2023.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options document agreed by Joint Committee on 7th December, consultation to commence 9th January to 6th March. Hope to complete under existing system. . *No change from last month*
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	No *change from last month*
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Coventry	Proceeding as per updated Local Development Scheme with the intention to Issues and options Summer 2023. (Full plan review). The C&W HEDNA was published in December and proposes an alternative to the standard method, using the 2021 census as the basis for the figures given that the 2014 figures have been shown to be hugely inaccurate. . *No change from last month*
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GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 18 April 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. Local Plan Updates
5. Local Housing Need – 2022 Affordability Ratios

Improving affordability ratios should not mask near-record highs in much of England | Turley

6. WMCA update
7. GBBCHMA plus SoCG
    - Progress on signing
    - Further work brief responses
8. 2021 GBBCHAM Position Statement Update
9. Strategic Employment Sites Study
10. Local Aggregate Assessment
11. Any other business
12. Date of next meeting

GBBCHMA Development Needs Group – 18 April 2022, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West. Midlands Met Authorities), Heidi Hollins (Cannock Chase), Patricia Willoughby, Amanda Holland (WMCA), Gary Palmer, (Solihull), Maria Dunn, (Birmingham), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Dan Corden (Shropshire), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Michele Ross (Wolverhampton). Alex Evans, Patrick Walker, Kelly Harris, Alex Evans (South Staffs.), Patrick Jervis (Lichfield), Liam Edge, Owen O'Neill (TfWM), Sushil Birdi (Cannock Chase), Pooja Agrawal (Public Practice)	
	Apologies: Sarah Scannell, Uyen Phan Han(Birmingham) Dorothy Barratt (North Warwickshire) Clare Eggington, Rob Haigh (Coventry), Vicki Popplewell (Dudley), Richard Powell (Tamworth)	
	[redacted]	
	[redacted]	
	[redacted]	[redacted]
2	**TfWM Update**	
2.1	Owen O'Neill in post and to take over more of the land use planning liaison. LE to contact Solihull regarding a query on development returns	LE
2.2	Confirmed that there is a script to handle the internal migration matrices, AD to contact LE regarding latest data availability	AD / LE
3	**WMCA Update**	
3.1	Plan for Growth covering report to be circulated. Request made for overview of employment land position across WMCA area, representatives from this group invited to join a working group to progress this.	PW
4	**Local Plan Updates**	
4.1	See separate schedule	
5	**2022 Affordability ratios and new Local Housing Need figures**	
5.1	Table presented and noted that figures consistent with those published by Turley. Little difference across GBBCHMA from last year but some differences for individual local authorities.	
5.2	On wider planning reforms, some suggestion that revised NPPF will not be published until late summer. Also, there will be a separate consultation on the alignment test to replace the Duty to Cooperate (DtC), but formal removal of the DTC would require new legislation. Concern expressed that late publication of NPPF would not lead to an extension of transition arrangements / timeframe to progress a plan review under current arrangements.	

[redacted]	[redacted]	
	[redacted]	
[redacted]	[redacted]	
	[redacted]	
7	**Statement of Common Ground**	
7.1	To date 8 local authorities have formally signed the SoCG with Walsall, Lichfield, Shropshire and Telford and Wrekin indicating that they will shortly.	
7.2	In terms of the brief for further work early comments have been addressed: • Extending time horizons to coincide with local plan reviews • Issue of 2014 household projections being out of date, noted that South Warwickshire plan seeking comments on need estimates derived from 2021 Census, which corrects previous Coventry errors but increases need in Warwick and Stratford on Avon • Steer on impact of urban uplift and whether it can be exported • Consider implications of Strategic Employment Sites Study • Consider growth around rail links and wider transport infrastructure implications.	
	[redacted]	[redacted]
7.4	Noted that the NPPF review will have a bearing and agreed probably taken as far as we can now but further comments to be provided at the end of the month to South Staffordshire.	

7.5	Issue of member Governance arrangements and fact that new members would need to get up to speed after the local elections. Initial ToR for member group to be worked up for discussion	ALL/PW
8	**GBBCHMA Position statement refresh**	
8.1	Updated document circulated, attention drawn to new paragraphs 6,7 and 8 which set out the post 2031 context and the need to address Local Housing need rather than the Strategic Growth Study Baseline.	
8.2	Comments to AD by 30th April and indicate when 2022 data will be available. Intention to sign of document for publication at next meeting	ALL
9	**Strategic Employment Sites Study**	
9.1	Consultants are reviewing information received, reaching out to stakeholders, and undertaking technical desktop work. Initial findings due to Steering Group early May and will be shared with this group.	
9.2	Schedule of outstanding local authority information circulated but may be out of date as more updates likely to have been received. Noted that Dr Colin Clinton, WMCA Business and Partnership lead not included on stakeholder contact list. IC to advise consultants	IC
10	**Local Aggregate Assessment**	
10.1	No progress since last meeting but noted that Regional Aggregate Working Party meeting at end of month and an update will be required.	AD
11	**Any other business**	
11.1	None	
12	**Date of next meeting**	
12.1	Tuesday 16 May 2023 @14:00 – 16:00.	

Local Plan Update April 2023

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Redditch	New timetable for plan review being drawn up. *No change from last month*
Shropshire	Further virtual session on compliance with Duty to Cooperate completed on 17th January 2023 and Inspectors findings recently received. Have complied with DtC but requested further clarification / SA work around Black Country contribution. Council working on response with a view responding to these by the end of June 2023. Further session on minerals and waste to take place 4th May 2023.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options document agreed by Joint Committee on 7th December, consultation to commence 9th January to 6th March. Hope to complete under existing system. . *No change from last month*
Rugby	In December members agreed to a full review of the local plan. Issues & Options consultation due to take place June/July 2023. This may change I light of NPPF review. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. No

	formal full review timetable, but propose employment and gypsy/traveller DPDs No *change from last month*
Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as awaiting finalisation of evidence base documents. *No change from last meeting*
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February. Council now agreed to pause examination to consider implications of NPPF review.
Coventry	Proceeding as per updated Local Development Scheme with the intention to Issues and options Summer 2023. (Full plan review). The C&W HEDNA was published in December and proposes an alternative to the standard method, using the 2021 census as the basis for the figures given that the 2014 figures have been shown to be hugely inaccurate. . *No change from last month*
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan. *No change from last month*
Wyre Forest	Plan formally adopted 26th April *No change from last month*
Nuneaton and Bedworth	Issues and Options consultation in 2021, intention to consult on a Regulation 19 plan in April 2023 but slippage of a couple of months likely. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 16 May 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. Local Plan Updates
6. West Midlands Strategic Sites Study
7. GBBCHMA plus SoCG
    - Progress on signing
    - Further work brief responses
8. 2021 GBBCHAM Position Statement Update
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – 16 May 2023, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West. Midlands Met Authorities), Heidi Hollins, Jemma March (Cannock Chase), John English, Amanda Holland (WMCA), Mark Andrews, Charlene Jones (Solihull), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Eddie West (Shropshire), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Ed Fox, Kelly Harris, (South Staffs.), Patrick Jervis (Lichfield), Clare Eggington (Coventry), Richard Powell (Tamworth); Vicki Popplewell (Dudley),	
1	**Actions from last meeting**	
1.1	Addressed via agenda items	
2	**TfWM Update**	
2.1	Not available	
3	**WMCA Update**	
3.1	Reported that the inaugural meeting of Employment Land Working Group had met, with a future meeting to be convened. Issue around local authorities with no affiliation to WMCA, yet have a functional relationship, e.g., SSDC. Agreed that WMCA formally set out remit of group and extend invitation to SSDC. Copy of presentation to working group to be circulated.	AH / AD
4	**Local Plan Updates**	
4.1	See separate schedule, only change from April is that the Shropshire Minerals and Waste hearings have now taken place.	
4.2	Of those local authorities present, most are hoping to progress plans under the current arrangements, rather than those proposed in the draft NPPF revisions.	
4.3	Tamworth remains uncertain, due to no overall control post local elections, but is continuing in line with current arrangements. Other local authorities with no overall control are as follows: Cannock Chase, Lichfield, North Warwickshire, and Bromsgrove.	
5	**Strategic Employment Sites Study**	
5.1	Presentation previously given to Steering Group had been circulated previously.	
5.2	Summary of Comments made as follows: **North Warwickshire:** • Issue raised by members, are individual authorities / sub-regions all chasing / attracting same demand e.g., M54/M6 and M42? • Also, it would be a political concern if Warwickshire expected to accommodate similar levels of growth as in the past, especially with infrastructure constraints.	
5.3	**South Staffordshire**: • How do MDS based forecasts relate to the likes of Oxford / Experian forecasts?	

	• Manufacturing and warehousing may have different locational requirements, e.g., former closer proximity to workforce, latter to motorway junctions.	
5.4	Any further comments to AD / IC for forwarding to consultants by 26/05/23.	ALL
6	**Statement of Common Ground**	
6.1	Bi-lateral statements continue to be agreed. Regarding the HMA (plus) SoCG, Bromsgrove, Redditch and North Warwickshire are unable to agree in its current form / at this time. Of the other outstanding local authorities, Shropshire confirmed that the matter was in hand and Lichfield has not yet appointed a portfolio holder. Walsall and Telford to be contacted outside of the meeting.	
	Phase 2 brief for follow up commission	
6.2	Only issue not included was for brief to suggest locations etc. based on commuting flows. Agreed that whilst this may be an option, it was for the consultants to propose a methodology, taking account of all relevant factors.	IC
6.3	Note that any request to consider the standard method inputs needs to be consistent with the approach undertaken in Coventry / Warwickshire.	
6.4	NPPF delays and implications for submitting plans under current arrangements remain a matter of concern. Agreed a backstop of September meeting for determining if / how to proceed with commission.	
6.5	[redacted]	[redacted]
6.6	Agreed that a final version of the brief (v3 without track changes) is circulated for noting.	AD/PW
	Draft Member Group Terms of Reference	
6.7	Latest document presented by SSDC; this is based on the successful Cannock Chase SAC Partnership Board ToR. Any further comments to AD / PW by 26/5/23	ALL
7	**GBBCHMA Position statement refresh**	
7.1	Updated document circulated, attention drawn to new paragraphs 6,7 and 8 which set out the post 2031 context and the need to address Local Housing Need rather than the Strategic Growth Study Baseline going forward. Comments to AD by 26/05/23: **Main document:** Michele Ross's track changes have been accepted, please check that you are content with the wording especially new paragraphs 6,7 and 8 **Appendix 1**: Last check on figures, these should be fine as we have been through them before **Appendix 2**: Please check that you are happy with the wording around your plan review status and dates etc. Again, MR changes accepted and corrections from Birmingham, Cannock, and Stratford.	

8	**Local Aggregate Assessment**	
8.1	Some progress being made but query regarding the status of some Walsall reserves, which have been identified in the Regional Monitoring Report	
9	**Any other business**	
9.1	None	
10	**Date of next meeting**	
10.1	Changed to Tuesday 28th June – subsequently cancelled so next meeting 18th July @14:00	

Local Plan Update May 2023

GBBCHMA / WMCA Local Plan Reviews, May 2023	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. All neighbours have been advised of consultation and Duty to Cooperate requirements. Face to face meetings with individual authorities have been offered. Currently analysing consultation responses, no firm date for regulation 18 consultation. *No change from last month*
Black Country	**Wolverhampton:** LDS agreed by Cabinet 26 October 2022, but new LDS to Cabinet 1st March. Anticipate preparation under existing system. **Sandwell:** Revised LDS to Cabinet 14 November 22. Issues and Options consultation 6th February until 20th March. Call for sites commenced, anticipate completing under existing system. **Walsall:** Revised LDS to Cabinet 2nd November, plan period to be extended so higher housing / employment requirements than previous draft BCP. Anticipate completing under new system **Dudley:** Revised LDS going to Cabinet 26th January 2023, Regulation 18 plan anticipated Summer 2023. Call for sites commenced. *No change since last meeting*
South Staffordshire	Regulation 19 publication plan published for consultation until the 23rd of December, responses currently being analysed. Intention to submit in April 2023 but suspended pending outcome of NPPF consultation. *No change from last meeting*
Lichfield	Plan submitted for examination in 2022 but a 12-month pause agreed with Inspector so that team can be resourced. Currently dealing with Inspector's initial queries, hearings may convene October / November 2023. *No change from last meeting*
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last meeting*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*

Shropshire	Further virtual session on compliance with Duty to Cooperate completed on 17th January 2023 and Inspectors findings recently received. Have complied with DtC but requested further clarification / SA work around Black Country contribution. Council working on response with a view responding to these by the end of June 2023. Further session on minerals and waste to took place 4th May 2023.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options document agreed by Joint Committee on 7th December, consultation to commence 9th January to 6th March. Hope to complete under existing system. . *No change from last month*
Rugby	In December members agreed to a full review of the local plan. Issues & Options consultation due to take place June/July 2023. This may change I light of NPPF review. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. No formal full review timetable, but propose employment and gypsy/traveller DPDs No *change from last month*
Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as awaiting finalisation of evidence base documents. *No change from last meeting*
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February. Council now agreed to pause examination to consider implications of NPPF review. *No change from last meeting*
Coventry	Proceeding as per updated Local Development Scheme with the intention to Issues and options Summer 2023. (Full plan review). The C&W HEDNA was published in December and proposes an alternative to the standard method, using the 2021 census as the basis for the figures given that the 2014 figures have been shown to be hugely inaccurate. . *No change from last month*
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan. *No change from last month*
Wyre Forest	Plan formally adopted 26th April *No change from last month*
Nuneaton and Bedworth	Issues and Options consultation in 2021, intention to consult on a Regulation 19 plan in April 2023 but slippage of a couple of months likely. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 18 July 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
    - Monitoring returns
    - Freight and the Planning System – Call for Evidence.

    Freight and logistics and the planning system: call for evidence - GOV.UK (www.gov.uk)
4. WMCA Update
    - [redacted]
    - Employment Land Working Group
5. Local Plan Updates
6. West Midlands Strategic Sites Study
7. GBBCHMA plus SoCG
    - Progress on signing
    - Members' ToR
    - Further work brief
8. 2021 GBBCHMA Position Statement Update
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 18 July 2023, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West. Midlands Met Authorities), Jemma March (Cannock Chase), Pat Willoughby, Amanda Holland (WMCA), Mark Andrews, (Solihull), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Dan Corden (Shropshire), Joanne Bozdoganli (Stratford on Avon), Dorothy Barratt, (North Warwickshire), Neville Ball (Walsall), Kelly Harris, (South Staffs.), Patrick Jervis (Lichfield), Clare Eggington, Chris Berry (Coventry), Richard Powell (Tamworth); Vicki Popplewell (Dudley), Owen O'Neill, Matt Malin, Helen Davies (TfWM), Patricia McCullagh (Sandwell)	
	Apologies	
	Sarah Scannell (Birmingham), Mike Dittman (North Warwickshire), Gavin Ashford (Telford and Wrekin)	
1	**Actions from last meeting**	
1.1	Addressed via agenda items	
2	**TfWM Update**	
2.1	**Freight and the planning system – call for evidence**	
2.2	TfWM is preparing a response as a key cluster in plan for growth and a large employment sector. No policy changes proposed at this juncture, rather evidence sought to inform future policy. Any comments / views to [redacted] TfWM by 31st August. HD to return to September meeting with update. Consultation response deadline 6th October. Response likely to be endorsed by TfWM Board of Directors.	HD/all
2.3	Birmingham noted that lorry parking is an issue. North Warwickshire likely to submit own evidence given the amount of logistics related development in the area.	
2.4	AD to provide HD with link to 2021 Strategic Employment Sites study	AD
	Data collection	
2.5	Progress on cleaning up 2020 and 2021 data and making the collection process less onerous. Data to be available on Arcinfo GIS and DNG member s will have access; data can be provided in other formats too. Be helpful to compare totals with those presented in GBBCHMA Position Statement.	
[redacted]	[redacted]	
	[redacted]	
[redacted]	[redacted]	
	Employment Land	
3.2	Progress being made on 5 workstreams identified at first meeting. Work being led by [redacted] and further meeting to be scheduled at the end of July.	
4	**Local Plan Updates**	
4.1	See separate schedule.	
5	**Strategic Employment Sites Study**	

5.1	Work has progressed identifying where large units have been delivered on small sites and small units on large sites, the former more likely in urban areas. Level of need being refined with the upper end of the range likely to fall. Ongoing liaison with Highways England and other highways authorities.	
5.2	Agreed that presentation to be given to Coventry and Warwickshire authorities following Mike Dittman's request.	
5.3	Issue raised as to whether stage papers were to be available or just presentations. IC to pursue.	IC
5.4	Also, is there any evidence of B8 premises having more than one storey as this may impact on land take. To be raised with consultancy team	AD
[redacted]	[redacted]	[redacted]
6	**Statement of Common Ground**	
6.1	No change since last meeting: • Lichfield to contact South Staffordshire directly. • Dudley reiterated that members awaiting NPPF details. • Shropshire's position unlikely to change but have a new portfolio holder	
6.2	Noted that this was drafted in August 2022 and circumstances were very different now.	
6.3	All to take soundings and give indication at August 15th meeting whether prepared to commission further work and whether agree to members terms of reference.	ALL
7	**GBBCHMA Position Statement refresh**	
7.1	Completed with 2021 data and ready for internal sign off / publication. Local authorities to advise when publishing it on websites	ALL
7.2	Attention drawn to fact that document no makes reference to the post 2031 shortfall.	
8	**Local Aggregate Assessment**	
8.1	No progress since previous meeting	
9	**Any other business**	
9.1	None	
10	**Date of next meeting**	
10.1	Tuesday 15 th August @ 14:00. Subsequently changed to Tuesday 26th September @14:00	

Local Plan Update July 2023

GBBCHMA / WMCA Local Plan Reviews, July 2023	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. New LDS to be presented to Cabinet in October, slight slippage of Preferred Option to February 2024. Looking to proceed to adoption under current arrangements
Black Country	**Wolverhampton:** LDS agreed by Cabinet 26 October 2022, but new LDS to Cabinet 1st March. Anticipated Regulation 18 plan July / August 2023, but if slips will need to approve new LDS. **Sandwell:** Revised LDS to Cabinet 14 November 22. Issues and Options consultation 6th February until 20th March. Draft Plan scheduled for October Cabinet, with consultation November / December. **Walsall:** Revised LDS to Cabinet 2nd November 22, plan period to be extended so higher housing / employment requirements than previous draft BCP. First meeting of Local Plan Board last week. LDS not yet updated but Regulation 18 Plan likely to slip until January 2024 cabinet with consultation commencing March 24. **Dudley:** Revised LDS going to Cabinet October 2023, Regulation 18 plan anticipated Autumn / Winter 2023. Call for sites commenced.
South Staffordshire	Currently brining new members up to speed and intend to 'unpause' local plan. A further year needs to be added and there will be a further round of consultation next year. As a Green Belt authority, mindful of the possible NPPF changes. LDS not updated as yet.
Lichfield	Plan submitted for examination in 2022 but a 12-month pause agreed with Inspector so that team can be resourced. Currently dealing with Inspector's initial queries, hearings may convene October / November 2023. *No change from last meeting*
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last meeting*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*
Shropshire	Further virtual session on compliance with Duty to Cooperate completed on 17th January 2023 and Inspectors findings recently received. Have complied with DtC but requested further clarification / SA work around Black Country contribution. Cabinet report responding to these interim findings to cabinet 19/7/23, including identification of sites likely to accommodate additional Black Country in-migrants. LDS also revised, now anticipate adoption June 2024.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options document agreed by Joint Committee on 7th December, consultation to commence 9th January to 6th March. Hope to complete under existing system. *No change from last month*
Rugby	In December members agreed to a full review of the local plan. Issues & Options consultation due to take place June/July 2023. This may change I light of NPPF review. *No change from last month*

North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/23, but this omits the local plan review due to uncertainty around national policy. Continuing with employment and gypsy / traveller DPDs.
Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as awaiting finalisation of evidence base documents. *No change from last meeting*
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February. Council now agreed to pause examination to consider implications of NPPF review. A report has gone to portfolio holder regarding how to progress with paused plan as some developers may submit proposals for draft allocations.
Coventry	Proceeding as per updated Local Development Scheme with the intention to Issues and options Summer 2023. (Full plan review). Issues and Options consultation launched 18/7/23 for eight weeks. Consulting on three housing growth options: • Full LHN • LHN minus urban uplift • HEDNA derived number using 2021 Census outputs. Keeping watching brief on Sheffield and Bristol, who have challenged LHN.
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan. *No change from last month*
Wyre Forest	Plan formally adopted 26th April *No change from last month*
Nuneaton and Bedworth	Issues and Options consultation in 2021, intention to consult on a Regulation 19 plan in April 2023 but slippage of a couple of months likely. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 26th September 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
    - Freight call for evidence
    - Monitoring returns
4. WMCA Update
    - [redacted]
    - Employment Land
5. Local Plan Updates
6. West Midlands Strategic Employment Sites Study
7. GBBCHMA plus SoCG
8. DLHC Local Plan reforms consultation
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 26 September 2023, 14:00 – 16:00 Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton), Andrew Donnelly (West. Midlands Met Authorities), Jemma March, Grace Lockley (Cannock Chase), John Godfrey, Amanda Holland (WMCA), Maria Dunn, (Birmingham - chair), Mike Dunphy (Bromsgrove), Dan Corden, Eddie West (Shropshire), Joanne Bozdoganli (Stratford on Avon), Mike Dittman Barratt, (North Warwickshire), Neville Ball (Walsall), Ed Fox, (South Staffs.), Patrick Jervis (Lichfield), Clare Eggington, (Coventry), Richard Powell (Tamworth); Vicki Popplewell (Dudley), Helen Davies (TfWM), Patricia McCullagh (Sandwell), Jacqueline Padbury, Maria Bailey (Nuneaton and Bedworth), Andrew Cornfoot (Warwick), Sally Horne (Wyre Forest)	
	Apologies	
	Sarah Scannell (Birmingham), Dorothy Barratt (North Warwickshire), Gavin Ashford (Telford and Wrekin), Neville Ball (Walsall), Gary Palmer (Solihull)	
1	**Actions from last meeting**	
1.1	Addressed via agenda item other than Position Statement Refresh, the action was for local authorities to approval through internal processes and publish.	
2	**TfWM Update**	
	Freight and the planning system – call for evidence	
2.1	TfWM draft responses circulated for comment and response framed following discussions / events with Midlands Connect, Urban Transport group and CIHT..	HD/all
2.2	Main issues include: • Sector a major employer, some 100,000 jobs in the West Midlands • Lack of reliable data, a Freight Observatory has been established in the West Midlands hosted at Aston University • Need for decarbonisation – shift to rail and waterways • Difficulty of workers accessing jobs as often in peripheral locations • Limited guidance in NPPF as written for local plans when many issues regional and national • HS2 provides extra capacity / opportunities • Better integrated of planning and transport policies needed • Difficulties in forecasting requirements • Last mile deliveries important and innovative solutions required e.g. e-cargo bikes	
2.2	Comments [redacted] by 4th October for 6th October submission.	ALL
2.3	Link to CIHT seminar to be provided	AD
	Data collection	
2.5	No update available	

[redacted]	[redacted]	
	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	
	[redacted]	
[redacted]	[redacted]	
	Employment Land	
3.5	Dates of meetings to be circulated and a simple spreadsheet has been circulated requested completion of baseline data.	
4	**Local Plan Updates**	
4.1	See separate schedule.	
5	**Strategic Employment Sites Study**	
5.1	Consultancy team has circulated information on land parcels for verification to Steering Group members for cascading downwards. Confirmation given that this has been actioned.	
5.2	Agreement that all need to understand and be comfortable with the demand side methodology as it needs to be conveyed locally and defended, at present it was not considered to be especially clear. Short note to be requested from consultancy team	AD
6	**GBBCHMA plus Statement of Common Ground**	
6.1	At the last meeting (July) it was agreed to take stock regarding agreement to progress a refresh of the Strategic Growth Study and whether members were comfortable with the Terms of Reference. Responses received to date shown on schedule circulated. Note that the draft ToR document circulated still says draft.	
6.2	South Staffordshire confirmed that, in principle, it supported refresh, contribution and ToR.	
6.3	Birmingham reiterated support in principle but any financial commitments must be subjected to spend and control	
6.4	Bromsgrove, and Redditch reiterated that not in a position to commit either way until understood implications of the NPPF	

6.5	Wolverhampton has a new leader and Portfolio Holder and is not in a position to commit until details of NPPF known	
6.6	Common view that NPPF details critical, especially regarding Green Belt exceptional circumstances test and use of more up to date household projections, which in some instances could change the numbers significantly.	ALL
6.7	Noted that those anticipating adopting a plan under the current arrangements need to comply with the Duty to Cooperate, whilst those proceeding with new arrangements will need to comply with the as yet unspecified Alignment Test. It is understood that the Alignment test will be a lower bar and not apply to housing.	
6.8	Role of local authorities outside of HMA and whether they will be invited to contribute financially needs clarification.	
6.9	Clarification required whether for regional housing legacy funds are available to support study refresh	IC
6.10	Agreed that updated table to be circulated for completion	AD/ALL
7.1	Local Plan Reforms consultation	
7.2	Summary of proposals and first thoughts circulated. Noted that the reforms were mostly about process and there may still be delays with policy issues, e.g. site allocations, unmet housing need. Also issues around capacity of PINS to support new arrangements as some plans been in examination for over two years.	
8	**Local Aggregate Assessment**	
8.1	Helpful meeting with DLUHC and Aggregate Working Party Secretariat about how to produce a Local Aggregate Assessment.	
9	**Any other business**	
9.1	None	
10	**Date of next meeting**	
10.1	Tuesday 17th October @ 14:00 cancelled. Next meeting Tuesday 21st November 14:00 to 16:00.	

Local Plan Update September 2023

GBBCHMA / WMCA Local Plan Reviews, September 2023	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. Revised LDS to be presented to Cabinet 17th October. Looking to proceed to adoption under current arrangements
Black Country	**Wolverhampton:** Awaiting revised NPPF, if published in autumn as anticipated, then issues and options Jan/Feb 2024. Anticipate adoption under current arrangements. **Sandwell:** Issues and Options consultation 6th February until 20th March. Draft Regulation 18 Plan scheduled for October Cabinet, with consultation November / December. **Walsall:** Revised LDS to Cabinet 2nd November 22, plan period to be extended so higher housing / employment requirements than previous draft BCP. First meeting of Local Plan Board last week. LDS not yet updated but Regulation 18 Plan likely to slip until January 2024 cabinet with consultation commencing March 24. *No change from last meeting* **Dudley:** Call for sites completed. Seeking cabinet approval of Regulation 18 plan in October for consultation November / December
South Staffordshire	Cabinet report being prepared to update the LDS, seeking Cabinet agreement to undertake further Regulation 19 consultation in April 2024. Will be contacting neighbours advising than plan preparation no longer paused.
Lichfield	A Cabinet report scheduled for consideration by Full Council at its October meeting recommends that the local plan is withdrawn from examination.
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last meeting*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*
Shropshire	Further virtual session on compliance with Duty to Cooperate completed on 17th January 2023 and Inspectors findings recently received. Have complied with DtC but requested further clarification / SA work around Black Country contribution. Cabinet report responding to these interim findings to cabinet 19/7/23, including identification of sites likely to accommodate additional Black Country in-migrants. LDS also revised, now anticipate adoption June 2024. Since responding to the Inspectors, a pre-action for judicial review has been received on behalf of promoters of an omission site at M54 Junction 3. The Council is waiting advice from the Inspectors.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options consultation now completed. Looking to revise timetable looking forward to Preferred Option and beyond.

Rugby	In December members agreed to a full review of the local plan. Issues & Options consultation due to take place June/July 2023. This may change in light of NPPF review. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/23, but this omits the local plan review due to uncertainty around national policy. Continuing with employment and gypsy / traveller DPDs. *No change from last month*
Cannock Chase	Regulation 19 Plan was considered by Cabinet in August 2022 and Full Council in September 2022. Not started consultation yet as awaiting finalisation of evidence base documents. *No change from last meeting*
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February. Council now agreed to pause examination to consider implications of NPPF review. A report has gone to portfolio holder regarding how to progress with paused plan as some developers may submit proposals for draft allocations. *No change from last meeting*
Coventry	Proceeding as per updated Local Development Scheme with the intention to Issues and options Summer 2023. (Full plan review). Issues and Options consultation launched 18/7/23 for eight weeks. Consulting on three housing growth options: • Full LHN • LHN minus urban uplift • HEDNA derived number using 2021 Census outputs. Keeping watching brief on Sheffield and Bristol, who have challenged LHN. The issues and options consultation has been extended for a fortnight until 29th September. LDS may be revised after representations considered.
Telford and Wrekin	Local Development Scheme for plan review scheduled to go be considered by Cabinet on 23 June 2022. Relying on earlier Issues and Options consultation so straight to draft plan. *No change from last month*
Wyre Forest	Plan formally adopted 26th April *No change from last month*
Nuneaton and Bedworth	Currently consulting on Regulation 19 plan, closing date for representations 16th October with a view to submission December 2023.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 21st November 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update

[redacted]

- Employment Land

5. Local Plan Updates
6. West Midlands Strategic Employment Sites Study
7. GBBCHMA plus SoCG
8. Local Aggregate Assessment
9. Any other business
10. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 21st November 2023, 14:00 – 16:00 Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton - chair), Andrew Donnelly (West. Midlands Met Authorities), Jemma March, Grace Lockley (Cannock Chase), John English, Amanda Holland (WMCA), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Dan Corden, (Shropshire), John Careford (Stratford on Avon), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Ed Fox, (South Staffs.), Patrick Jervis (Lichfield), Clare Eggington, (Coventry),); Vicki Popplewell, Jennie Padbury (Dudley), Patricia McCullagh (Sandwell), Jacqueline Padbury, (Nuneaton and Bedworth), Heather Stone (Wyre Forest), Gary Palmer (Solihull), Michele Ross (Wolverhampton), Owen O'Neill (TfWM)	
1	**Apologies**	
1.1	Dorothy Barratt (North Warwickshire), Jo Bozdoganli (Stratford on Avon), Richard Powell (Tamworth), Andrew Cornfoot (Warwick	
2	**Actions from last meeting**	
2.1	Noted that Neville Ball include in attendance and apologies. Apologies were received.	
2.2	All other matters included on the agenda.	
3	**TfWM Update**	
3.1	Data Insight team reworking data for public facing portal, primarily transport data but some socio-economic material. Request that demonstration given at next meeting.	OO/AD
3.2	Catch up planned with SESS consultancy team to discuss learning points / scope for future working.	
3.3	Mayor has requested Police and Crime Commissioner powers, practical implications of this being considered.	ALL
4	**WMCA update**	
	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
	Employment land	
4.5	Feedback provided on recent Employment Land Working Group including Strategic Employment Sites Study, Local Transport Plan, and skills agenda. Intention is that working group will draw up some objectives and share with this group.	

4.6	Request to populate and return outstanding employment land supply proformas to WMCA.	[redacted]
4.7	In general, attention drawn to fact that several work / funding streams ongoing in CA around investment Zones, Levelling Up Zones, affordable housing with Homes England. Local Authorities advised to make contact if have not already.	
5	**Local Plan Updates**	
5.1	**See separate schedule**	
6	**Strategic Employment Sites Study**	
6.1	Some ongoing work regarding rail-based logistics need being completed and continued engagement with Warwickshire CC Highways. Draft report awaited for circulation to this Group (via Steering Group).	
6.2	Final report will pick up outstanding queries, e.g., demand side methodology	
7	**GBBCHMA plus Statement of Common Ground / Strategic Growth Study Refresh**	
7.1	Schedule circulated showing local authority positions regarding study refresh and support for governance arrangements. Strategic Growth Study refresh cannot commence until clarity via revised NPPF but understood that Duty to Cooperate will be in place under planning making system with alignment test coming thereafter.	
7.2	The 'original' SoCG will also need to be refreshed as circumstances are much different to now, for example plan delays / withdrawals.	
[redacted]	[redacted]	
7.4	Noted that Birmingham's financial position means any spending requests have to be submitted to spend and control process	
7.5	Attention drawn to potential political realities should the NPPF confirm that no need to review Green Belt boundaries to meet own need then buy in to look at wider need may be difficult regardless of technical merits of further study.	
7.6	Noted that revisiting housing need figures will not be helpful for those authorities currently consulting on draft plans.	
7.7	Agreed that position to be reviewed at subsequent meeting once NPPF published.	
8	**Local Aggregate Assessment**	
8.1	Meeting of Regional Aggregate Working Party las week. Noted Staffordshire's succinct LAA could be used as a template.	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
10.1	Tuesday 19th December @ 14:00 cancelled. Next meeting Tuesday 16th January 10:30 – 12:30.	

Local Plan Update November 2023

GBBCHMA / WMCA Local Plan Reviews, November 2023	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. Revised LDS agreed by Cabinet November 2023. Preferred Option now slipped until (probably) June 2024, with submission scheduled for June 2025 under current arrangements
Black Country	**Wolverhampton:** Awaiting revised NPPF, if published in autumn as anticipated, then issues and options Jan/Feb 2024. Anticipate adoption under current arrangements. **Sandwell:** Regulation 18 consultation continues until 18th December 2023. Shortfall estimate 18,000. **Walsall:** Revised LDS scheduled to go to Cabinet in December 2023, intention to proceed under new arrangements. **Dudley:** Regulation 18 plan published for consultation 10th November until 22nd December. Regulation 19 scheduled for consultation in autumn 2024.
South Staffordshire	Cabinet report agreed endorsing further Regulation 19 consultation in April 2024. HMA authorities / non-HMA neighbours previously contacted seeking views on potential strategy changes in light of draft NPPF. End date will now be 2041 and evidence bases being updated accordingly. Proposed submission January 2025.
Lichfield	Full Council agreed in October to withdraw plan and consider alternative options/
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last meeting*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*
Shropshire	Still under examination. Pre-action protocol letter received threatening judicial review should PINS proceed without addressing identified matter. PINS has requested further information from Shropshire on soundness rather than legal grounds. Correspondence is available on EIP website.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options consultation now completed. Joint Committee meeting on 23rd November to endorse revised timetable. Submission now anticipated in summer 2026 with adoption by end of 2027.
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Cannock Chase	Report to cabinet 14th December seeking approval to consult on Regulation 19 plan during January / February 2024.

Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February. Council now agreed to pause examination to consider implications of NPPF review. A report has gone to portfolio holder regarding how to progress with paused plan as some developers may submit proposals for draft allocations. *No change from last meeting*
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Nuneaton and Bedworth	Regulation 19 plan consultation now complete and analysing responses. May need to revise LDS to allow another month or so for submission.

West Midlands Development Needs Group

Agenda and Notes of Meeting

2024

OFFICIAL

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 16th January 2024, 10:30 – 12:30, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
    - Demonstration of Data Insight Portal (provisional)
    - Land use monitoring
4. WMCA Update
    - [redacted]
    - Employment Land
5. Local Plan Updates
6. Revised NPPF
    - Main changes
    - Implications for future workstreams / governance / SoCG
7. West Midlands Strategic Employment Sites Study
8. 2022 Housing Delivery Test Results
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 16th January 2024, 10:30 – 12:30 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton – chair, Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland (WMCA), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Eddie West, Dan Corden, (Shropshire), Jo Bozdoganli (Stratford on Avon), Mike Dittman, Dorothy Barrat(North Warwickshire), Neville Ball (Walsall), Ed Fox, Kelly Harris, Alex Evans(South Staffs.), Patrick Jervis (Lichfield), , Vicki Popplewell, Jennie Hadley (Dudley), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Michele Ross (Wolverhampton), Owen O'Neill, Liam Edge(TfWM), Richard Powell (Tamworth), Neil Glover (Nuneaton and Bedworth)	
1	**Apologies**	
1.1	Andrew Donnelly (West. Midlands Met Authorities), Clare Eggington, Chris Styles (Coventry) Jacqueline Padbury, (Nuneaton and Bedworth)	
2	**Actions from last meeting**	
2.1	Items covered on agenda.	
3	**TfWM Update**	
3.1	Demonstration of Data Insight Portal, main points: • Catalogue tab has user guide. • Public and facing with private parts of site requiring login, contact TfWM for access. • Strategic planning hub contains information on the likes of green space, housing, employment forecasts, demographics. • Data primarily for Metropolitan Area but tagged where it is available over a wider geography. • Non constituent authorities not obliged to provide housing / employment monitoring data, but it would be welcomed. • FAQs section being developed as questions asked. • Monitoring forms for 2022/23 to be issued shortly. • Check up on TfWM visit to NWBC to explain format data required in • Check mailing list to ensure data request gone to non-constituent partners in particular. • Contact OO if want data putting on strategic planning page	OO OO OO
4	**WMCA update**	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	

[redacted]	[redacted]	
4.4	Request that employment land information schedules be returned to [redacted] and copied to LP. Have from all constituent authorities except Sandwell and Solihull. From non-constituent authorities Shropshire and Nuneaton have responded	ALL
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
5	**Local Plan Updates**	
5.1	See separate schedule	
6	**Revised NPPF December 2023**	
6.2	Discussion in two strands: What are the main changes / issues? Implications for future workstreams	
6.3	• Duty to Cooperate • Calculating Housing Need • Green Belt	
6.4	Duty to Cooperate remains and understood that the legal duty will remain until the next iteration of the NPPF / new arrangements for preparation when a replacement Alignment Test will be introduced. Local plans progressing through current arrangements, therefore, need to comply with the Duty to Cooperate as before.	
6.5	Confirmed that standard method a starting point for calculating local housing need and that scope to deviate restricted	
6.6	Confirmed that urban uplifts to be met in-situ unless conflicts with other parts of Framework or voluntary agreements to accommodate.	
6.7	Confirms that Green Belt boundaries do not have to be reviewed unless LPAs choose to do so. This applies to release for all uses, not just housing as was the case in the 2022 draft. Discussion about whether it was a binary choice to review or not or whether reviews could be partial. Noted that Written Ministerial Statement is a material consideration.	
6.8	Tension identified between para 154 (Green Belt) and para 35, positively prepared and meeting need.	
6.9	Will be implications for LPA's with hinterlands beyond the Green Belt.	
7	**GBBCHMA plus Statement of Common Ground / Strategic Growth Study Refresh**	
7.1	Some support previously expressed for updating the Strategic Growth Study, particularly those proceeding under current arrangements as it	

	would assist in demonstrating compliance with Duty to Cooperate. Views expressed summarised below:	
7.2	**North Warwickshire** - Has an up-to-date plan and is struggling to get the promised infrastructure investment in place to deliver major allocations, which include a major contribution towards HMA shortfall, therefore no political appetite at present. This may change if infrastructure was delivered and requested that study considers emphasising the importance of the NWBC contribution (and necessary infrastructure) to the wider HMA.	
7.3	**South Staffordshire** - Observed that the previous study is now out of date so support an update. The brief will need amending in light of new NPPF para. 145.	
7.4	**Solihull –** No formal position yet but question purpose of a study which considers Green Belt options when even LPAs generating shortfalls are not considering Green Belt review as the NPPF now gives that option. Also, existing study has been interpreted differently by LPAs.	
7.5	**Birmingham** - Supportive as acknowledge the importance of an update to assist in meeting Duty to Cooperate requirements.	
7.6	**Sandwell –** As Birmingham above.	
7.7	**Dudley** – Officer acknowledgement that work needed for Duty to Cooperate compliance but not yet taken political soundings. Of the view that it is LPA view whether to review Green Belt or not. Brief needs to be worded very carefully to reflect this.	
7.8	**Lichfield** – Officer view only but supportive and would like to be involved. Needs to be policy off and reflect NPPF that it is a matter of choice by LPA whether to review Green Belt. Study needs to be future proofed in the event of change in Government.	
7.9	**Shropshire** – Non-constituent and not in HMA, on outside looking in and have been part of the Duty to Cooperate process. Local plan quite advanced and have passed the Duty to Cooperate test so would impact on next plan. Would need to carefully consider political risk of involvement.	
7.10	**WMCA** – supportive of need for infrastructure asks alongside new development, GLA commissions such studies to assist in building Green Book cases and secures much more funding than the West Midlands.	
7.11	Also suggested broadening brief to look at appropriate densities in different locations and if LPAs were looking at Green Belt release, what design codes would apply.	
8	**Strategic Employment Sites Study**	
8.1	Comments on draft report to consultancy team by 19th January. Agreed that most suitable way is to reference comments in a word document.	
8.2	Issue raised regarding proximity of locations to areas of high unemployment but considered that report too far advanced to introduce new issues.	
9	**Housing Delivery Test**	
9.1	Consider at next meeting	

10	**Local Aggregate Assessment**	
10.1	Consider at next meeting	
11	**Date of next meeting**	
11.1	Tuesday 20th February 2024, 14:00 – 16:00	

Local Plan Update January 2024

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Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*
Shropshire	Still under examination. Pre-action protocol letter received threatening judicial review should PINS proceed without addressing identified matter. PINS has requested further information from Shropshire on soundness rather than legal grounds.

	Correspondence is available on EIP website. Letter received 18/1/23 containing Inspectors latest instructions.
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2. Actions from last meeting

[redacted]

4. TfWM update
5. WMCA Update

[redacted]

- Employment Land

6. Local Plan Updates
7. Future workstreams – revised Strategic Growth Study Refresh brief
8. West Midlands Strategic Employment Sites Study
9. Strengthening planning policy for brownfield development consultation

Strengthening planning policy for brownfield development - GOV.UK (www.gov.uk)

10. Housing Delivery Test results
11. Local Aggregate Assessment
12. Any other business
13. Date of next meeting

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1	**Apologies**	
1.1	Sarah Scannell (Birmingham), Maria Dunn (Birmingham), Maria Bailey (Nuneaton and Bedworth), Richard Powell (Tamworth)	
2	**Actions from last meeting**	
2.1	Items covered on agenda – note next meeting should have said 20 February not 19 March	
[redacted]		
[redacted]		
[redacted]		
[redacted]		
[redacted]		
[redacted]		
[redacted]		
[redacted]		
4	**TfWM update**	
4.1	No update from last meeting. Agreed to look at possibility of putting the internal migration datasets on data insight.	AD/OO
5	**WMCA update.**	

[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
5.3	WMCA is preparing a Housing Monitor, currently this pulling together datasets publicly available e.g. affordability, completions and will be presented at tomorrow's Housing and Land Delivery Steering Group. Agreed to bring an update to future meeting of this group.	LP
5.4	Solihull, South Staffordshire, Cannock, and Telford employment land supply returns outstanding. Return to AH as soon as possible. Suggested that employment land shortfalls in emerging local plans are monitored.	
6	**Local Plan Updates**	
6.1	See separate schedule	
7	**Strategic Growth Study Refresh**	
7.1	Brief updated to address comments made at last meeting and to reflect changes in the revised NPPF. Local authority views summarised below.	
7.2	**Solihull** – Reiterated its view as recorded at last meeting.	
7.3	**South Warwickshire** – Supportive as need to tackle issue head on and collaboratively	
7.4	**South Staffordshire** – Supportive as progressing under current system and need to demonstrate compliance with the Duty to Cooperate	
7.5	**Dudley –** Supportive in principle and suggest taking soundings from Planning Advisory Service.	
7.6	**Sandwell** – Position unchanged, supportive.	
7.7	**Birmingham –** Continue to be supportive in principle	
7.8	**Lichfield** – Had steer from portfolio holder and supportive	
7.9	**Cannock Chase** – Supportive in principle subject to overall level of support and remit.	
7.10	**WMCA –** Supportive and agreed to make contribution	
7.11	**Bromsgrove** – Not yet an official position but unlikely to be supportive.	
7.12	**Redditch** – Yet to be established, but likely to be as Bromsgrove.	
7.13	**Walsall** – Awaiting lead from portfolio holder, probably supportive.	
7.14	Agreed Actions: • Amend brief to take account of revised NPPF density policy. • Consult informally with PAS. • Soft test brief with consultants on a without prejudice basis	 AD IC IC
8	**Strategic Employment Sites Study**	
8.1	All thanked for comments to consultants on draft study. Direction note from consultants should be issued next week	

8.2	Query as to whether work would be completed for invoicing this budget year.	
9	**Strengthening planning policy for brownfield development consultation**	
9.1	Noted that Reading BC had offered to coordinate a response on behalf of the nineteen largest urban areas (excluding London), view emerging that separate tier of national policy for urban areas.	
9.2	WMCA is drafting a response and welcomes views of planning authorities	ALL
9.3	Walsall briefing note to be shared and all to consider sharing draft responses	NB/ALL
10	**Housing Delivery Test**	
10.1	Noted that results, in the main, are impressive but measurement is over past three years and includes capped local plan figures and does not yet include the urban uplifts.	
11	**Local Aggregate Assessment**	
11.1	No update from last meeting	
12	**Any other business**	
12.1	Noted that the Greater Manchester Spatial Framework Inspectors' Report has been published	
13	**Date of next meeting**	
13.1	Tuesday 19th March 2024, 14:00 – 16:00	

Local Plan Update February 2024

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Cannock Chase	Consultation on Regulation 19 plan commenced 5th Feb - 18th March 2024.
Solihull	Inspectors' letter confirmed housing requirement and 2,000 HMA contribution. However, queried delivery rates at NEC, which results in a 1700 shortfall. Solihull written back to Inspectors (7th October) questioning the basis of their view. Inspectors responded 13th December 2023 reiterating earlier position, Solihull responded to this 8th February. Council now agreed to pause examination to consider implications of NPPF review. A report has gone to portfolio holder regarding how to progress with paused plan as some developers may submit proposals for draft allocations. Inspectors written to Council now new NPPF published reiterating earlier position. Solihull MBC has responded on14 February stating that the NPPF has 'indirect' effects and inviting the Inspectors to re-open the hearings for further representaitons.
Coventry	Proceeding as per updated Local Development Scheme with the intention to Issues and options Summer 2023. (Full plan review). Issues and Options consultation launched 18/7/23 for eight weeks. Consulting on three housing growth options: • Full LHN

	• LHN minus urban uplift • HEDNA derived number using 2021 Census outputs. Keeping watching brief on Sheffield and Bristol, who have challenged LHN. The issues and options consultation has been extended for a fortnight until 29th September. Currently analysing responses to consultation and a further call for brownfield sites is imminent. Revised LDS approved February 2024, aim to submit under current arrangements.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 19th March 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. Department for Education engagement with local planning authorities' – John Pilgrim and Andrew Carter (Department for Education)
4. TfWM update
5. WMCA Update
   - [redacted] / Housing Monitor

   Housing Monitor Report.pdf (wmca.org.uk)

   - Employment Land
6. Local Plan Updates
7. Future workstreams – Strategic Growth Study Refresh
8. West Midlands Strategic Employment Sites Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 19th March 2024, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton – chair), Jemma March, Grace Lockley (Cannock Chase), Leo Pollak (WMCA), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), , John Careford (Stratford on Avon), Dorothy Barratt (North Warwickshire), Neville Ball (Walsall), Alex Evans(South Staffs.), Patrick Jervis (Lichfield), Jennie Hadley, (Dudley), Richard Powell (Tamworth), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill, Gurdip Nagra (TfWM), Michele Ross (Wolverhampton), Andy Donnelly (WM Metropolitan Authorities, Clare Eggington (Coventry), Neil Glover (Nuneaton and Bedworth) Andrew Carter, John Pilgrim (Department for Education - DfE)	
1.1	**Apologies** Sarah Scannell (Birmingham), Amanda Holland (WMCA), Dan Corden, Eddie West (Shropshire) Jo Bozdoganli (Stratford on Avon), Gavin Ashford (Telford and Wrekin), Vicki Popplewell (Dudley).	
2	**Actions from last meeting**	
2.1	WMCA response to Strengthening planning policy for brownfield development consultation to be circulated	GN
2.2	Noted that response being prepared by Reading BC on behalf of 19 largest LPAs outside of London being progressed	
2.3	AD to liaise with OO regarding internal migration data, note that this also been raised with ONS via regular Birmingham liaison meetings.	AD/OO
	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
4	**GBBCHMA Strategic Growth Study Refresh**	
4.1	Brief circulated following soft market testing. Main changes: [redacted]	

	• Greater clarity as to how the 2018 study had been considered i.e. where recommendations had / hand not been taken forward, and whether there are any further potential locations. • Removed need to provide alternative housing need scenarios but refer to alternatives that LPAs may be considering through local plan reviews.	
4.2	WMCA offered to commission if local authorities in agreement and subject to internal resources.	
4.3	IC to contact Regional Housing Group to establish whether any funding available, also to contact PAS for informal views.	IC
[redacted]	[redacted]	
4.5	Anticipation that those authorities not contributing would still be required to provide relevant information to support study, otherwise published information would be drawn on.	
4.6	At present agreement to actively participate / financially contribute recorded in notes of this group. Need to consider whether a more formal approach needs to be made.	
4.7	Any further comments on this iteration of brief to AD.	ALL
5	**TfWM update**	
5.1	Currently occupied with procurement of new strategic model and clearing up various reports so that they can be automated.	
6	**WMCA update.**	
	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
	Housing Monitor	
6.3	Inaugural report circulated; data sourced from secondary published sources. Any suggestions of additional data that could feature in future iterations requested. This report has previously been presented to WMCA's Housing and Land Delivery Steering Group and Housing and Land Board.	[redacted]
7	**Local Plan Updates**	
7.1	See separate schedule	
8	**Strategic Employment Sites Study**	
8.1	Comments on advanced draft received by consultancy team. IC to meet with consultants and Rugby BC next week to address the issues raised by Rugby	IC/NH
9	**Local Aggregate Assessment**	

9.1	Some preliminary drafting commenced drawing on Regional Monitoring Report and other county LAAs.	
10	**Any other business**	
10.1	Group asked to consider if any appetite for face to face or hybrid meetings. Noted that Birmingham CC meeting room availability was now very limited, although WMCA offices could be a possibility. Noted that a previous in person WMCA Housing and Land Delivery Group meeting in Shropshire included a site visit, which may be an approach to consider going forward on an occasional basis.	ALL
11	**Date of Next Meeting**	
11.1	Tuesday 16th April @ 14:00 vis MS Teams	

Local Plan Update March 2024

GBBCHMA / WMCA Local Plan Reviews, March 2024	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. Revised LDS agreed by Cabinet November 2023. Preferred Option now slipped until (probably) June 2024, with submission scheduled for June 2025 under current arrangements. *No change from last month*
Black Country	**Wolverhampton:** Regulation 18 Preferred Options to be considered by Cabinet 21st Regulation 18 plan now published for consultation. **Sandwell:** Regulation 18 consultation completed December 2023. Shortfall estimate 18,000. *No change from last month* **Walsall:** Revised LDS scheduled to go to Cabinet in December 2023, intention to proceed under new arrangements. *No change from last month* **Dudley:** Regulation 18 plan published for consultation 10th November until 22nd December. Regulation 19 scheduled for consultation in autumn 2024. *No change from last month*
South Staffordshire	Cabinet to consider Regulation 19 plan for consultation in April 2024, this will have a lower housing requirement and fewer Green Belt releases than the previous iteration. End date will now be 2041 and evidence bases being updated accordingly. Proposed submission January 2025.
Lichfield	Full Council agreed in October to withdraw plan and consider alternative options. Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system.
Bromsgrove	Progress delayed as further work with County around transport and education. A revised timetable is in preparation but conscious of potential changes to national policy. *No change from last month*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	New timetable for plan review being drawn up. *No change from last month*

Shropshire	Still under examination. Pre-action protocol letter received threatening judicial review should PINS proceed without addressing identified matter. PINS has requested further information from Shropshire on soundness rather than legal grounds. Correspondence is available on EIP website. Letter received 18/1/23 containing Inspectors latest instructions. *No change from last month*
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options consultation now completed. Joint Committee meeting on 23rd November to endorse revised timetable. Submission now anticipated in summer 2026 with adoption by end of 2027.
Rugby	Local plan review Issues and Options and call for sites live until 2nd February 2024. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/23, but this omits the local plan review due to uncertainty around national policy. Draft Employment DPD published for consultation until 9/5/24, Gypsy / Traveller DPDs deferred for further consideration. *No change from last month*
Cannock Chase	Consultation on Regulation 19 plan commenced 5th Feb - 18th March 2024. *No change from last month*
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Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 21st May 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
    - Mayor's manifesto commitments
    - [redacted] Housing Monitor
    - Employment Land
5. Local Plan Updates
6. Strategic Growth Study Refresh
7. West Midlands Strategic Employment Sites Study
8. Local Aggregate Assessment
9. Future agenda items
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 21st May 2024, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton – chair), Jemma March, Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland (WMCA), Maria Dunn, (Birmingham), Mike Dunphy, Alison Grimmett (Bromsgrove), Jo Bozdoganli (Stratford on Avon), Mike Dittman (North Warwickshire), Neville Ball (Walsall), Alex Evans, Jennie Hadley, Ed Fox (South Staffs.), Richard Powell (Tamworth), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill (TfWM), Andy Donnelly (WM Metropolitan Authorities), Clare Eggington (Coventry), Neil Glover (Nuneaton and Bedworth), Dan Corden (Shropshire), Vicki Popplewell (Dudley)	
1	**Apologies** Sarah Scannell (Birmingham), Gurdip Nagra (TfWM), Dorothy Barratt (North Warwickshire), Patrick Jervis (Lichfield), Heather Stone (Wyre Forest).	
2	**Actions from last meeting**	
2.1	ONS has developed a tool to extract the internal migration data, it is currently undergoing quality assurance	
[redacted]	[redacted]	[redacted]
3	**TfWM update**	
3.1	Currently focussed on Local Transport Plan metrics but will resume housing / employment monitoring once completed, Solihull MBC query regarding access to 2022 smart-sheets noted	00
3.2	Local Transport Plan will contain area-based strategies for individual local authority areas, these will need to align with land use policies / proposals.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
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[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
5	**Local Plan updates**	
5.1	See separate schedule	
6	**Strategic Growth Study Refresh**	
6.1	No further changes requested to brief. Tracked changes to be removed and brief circulated with covering email seeking willingness to participate / contribute financially, suggested date for response 14th June. Still need to establish whether any regional legacy funds available to support budget.	IC
6.2	Need to be clear that this is primarily to assist existing plans in complying with Duty to Cooperate. Whilst it may support any future more formal strategic planning work, it is not a precursor to it.	
7	**Strategic Employment Sites Study**	
7.1	Direction note recently circulated addressing issues raised, final draft of report anticipated this week. Main outstanding matter is reconciliation with recommendations and the strategic B8 component of the Coventry and Warwickshire HEDNA.	
7.2	Need to consider when / how publish final study, when individual local authorities publish it, colleagues elsewhere need to be aware so that they can deal with any queries. Potential for report to be reported through WMCA Housing and Land Board.	
8	**Local Aggregate Assessment**	
8.1	Some initial drafting done and circulated to Metropolitan LPA contacts / leads and information shortfalls identified. Metropolitan Area inevitably reliant on imports, especially from Staffordshire.	
8.2	General concerns about outdated regional production guidelines and lack of information on recycled and secondary aggregates	
8.3	Agreed to bring more worked up draft to future meeting of this group.	AD
9	**Future agenda items**	
9.1	RTPI research on strategic planning, some have had contact with Catriona Riddell / University of West England who is working on this, consider inviting to a future meeting when study completed.	

9.2	WMCA has been doing work on energy infrastructure / capacity with local authorities, which may be of interest to this group as grid capacity for new development has been an issue in some areas e.g. Ealing.	
9.3	[redacted] Chairs Coventry and Warwickshire Critical Infrastructure Group and requested that LP copy him into anything. National Grid has a useful substation mapping tool which identifies capacity but difficulty sourcing information about wider grid capacity. Currently have photovoltaic and battery storage proposals which may have difficulty connecting to the grid in the short term.	LP
9.4	Shropshire's ecologists have noted that some developers are looking immediately to offsite BNG provision, which is likely to be more expensive than on-site provision. Asked whether other LPAs were experiencing the same. Agreed as an item for a future agenda.	
10	**Any other business**	
10.1	None	
11	**Date of next meeting**	
11.1	Tuesday 18th June, 14:00 – 16:00	
11.2	Meeting invitations July – December to be circulated	AD

Local Plan Update May 2024

GBBCHMA / WMCA Local Plan Reviews, May 2024	
Birmingham	Issues and options consultation ended 5th December 2022. Housing shortfall of approximately 78,415 homes and 17 hectares of employment land. Revised LDS agreed by Cabinet November 2023. Preferred Option to be considered by Cabinet on June 25th with consultation starting in July. Submission scheduled for June 2025 under current arrangements.
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Lichfield	Full Council agreed in October to withdraw plan and consider alternative options. Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing

	under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system.
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements.
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough.The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024
Shropshire	Still under examination. Further SA work has been undertaken following receipt of a pre-application protocol. Aproval to consult on four further papers agreed by Cabinet last month, these are: • Sustainability Appraisal • Housing Land • Employment Land • Green Belt Inspectors requested an indication as to where the Black Country need being addressed by Shropshire was likely to be met. Consultation closing date 11/6/24.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options consultation now completed. Joint Committee meeting on 23rd November to endorse revised timetable. Submission now anticipated in summer 2026 with adoption by end of 2027.
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Solihull	Plan now been under examination for three years. Inspectors written to Council once NPPF published reiterating earlier position that Solihull needed to identify additional sites for 1700 dwellings as transitional arrangements imply that the 'old' NPPF should be used. Solihull MBC has responded on 14 February stating that the 'new' NPPF has 'indirect' effects and inviting the Inspectors to re-open the hearings for further representations. To date no response has been received and SMBC written again to Inspectors (8th May) with further information on land supply and progress on proposed allocations. SMBC is minded to approve applications on emerging allocations via the 'very special circumstances' test. Thus far 14 applications have been received on ten allocations for 3,500 homes.
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved

	February 2024. Still intend submitting in early 2025 with Regulation 19 Autumn 2024.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
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GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 18 June 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. [redacted]
5. Local Plan Updates
6. Strategic Growth Study Refresh
7. West Midlands Strategic Employment Sites Study
8. Local Aggregate Assessment
9. [redacted]
10. Energy Infrastructure and capacity in the West Midlands – Kate Ashworth and Gordon Telling (WMCA)
11. Any other business
12. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 18th June 2024, 14:00 – 16:00 **Note of main points and actions**		
	In attendance: Ian Culley (Wolverhampton – chair), Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland, Max Abbot, Gordon Telling, Kate Ashworth (WMCA), Maria Dunn, (Birmingham), Mike Dunphy, Alison Grimmett (Bromsgrove), Jo Bozdoganli (Stratford on Avon), Mike Dittman (North Warwickshire), Neville Ball (Walsall), Alex Evans, Jennie Hadley, (South Staffs.), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Clare Eggington, Rob Haigh (Coventry), Neil Glover, Chris Kingham (Nuneaton and Bedworth), Eddie West (Shropshire), Vicki Popplewell (Dudley), Patrick Jervis (Lichfield), Michele Ross (Wolverhampton).	
1	**Apologies** Sarah Scannell (Birmingham	
2	**Actions from last meeting**	
2.1	Issue of others experience of a preference for Biodiversity Net gain (BNG) to be provided off-site raised by Shropshire at previous meeting. Solihull advised that it had been part of a pilot scheme prior to BNG becoming mandatory. AD / IC to meet with Solihull / Shropshire planners and ecologists, plus Mike Webb (WMCA) to pull together a note on issues / experience for a future meeting.	AD/IC/GP/ Dan Corden
3	**TfWM update**	
3.1	Currently focussed on Local Transport Plan metrics but conscious of outstanding request to make land use monitoring Smartsheets available.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
	[redacted]	

[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
5	**Local Plan updates**	
5.1	See separate schedule. SMBC to circulate committee report which sets out how they are dealing with applications on emerging allocations under 'very special circumstances' arrangements	GP
6	**Strategic Growth Study Refresh**	
6.1	Deadline for formal responses extended until the end of next week due to overlap with local elections. • **Birmingham**: Finance agreed, awaiting formal sign off as new Strategic Director. • **Bromsgrove:** Declined • **Solihull:** Yet to be determined. • **Redditch:** Yet to be determined, change of political control	
7	**Strategic Employment Sites Study**	
7.1	Final Steering Group meeting with consultancy team tomorrow. There have been separate side discussions with Coventry and Warwickshire authorities regarding alignment of this study with their HEDNA.	
7.2	Noted that North Warwickshire currently has an appeal on a site at M42 J10 (area A in study), which is contrary to the local plan. Appellants are drawing on earlier SESS studies.	
7.3	Once completed, this group will need to decide when / how the final study is published.	
8	**Local Aggregate Assessment**	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	

		
10	**Any other business**	
10.1	None	
11	**Date of next meeting**	
11.1	Tuesday 16th July, 14:00 – 16:00	

Local Plan Update June 2024

GBBCHMA / WMCA Local Plan Reviews, June 2024	
Birmingham	Issues and options consultation ended 5th December 2022Preferred Option to be considered by Cabinet on June 25th with consultation starting in July. Submission scheduled for June 2025 under current arrangements. Key points: • Shortfall fallen from 78,415 homes to circa 46,000. • Identified capacity for approximately 103,000 homes via densification in city centre. • No additional Green Belt release advocated. • Considered elevating BNG to 20% but remains at 10%. • Different affordable housing requirements across city.
Black Country	**Wolverhampton:** Regulation 18 plan been consulted on (closed April 2024, 11,400 housing shortfall. **Sandwell:** Regulation 18 consultation completed December 2023. Housing shortfall estimate 18,000. Will be contacting HMA and associated LPAs shortly setting out extent of shortfall and whether others can assist. Looking to prepare a SOCG similar to South Staffordshire's in 2022.

	Walsall: Revised LDS scheduled to go to Cabinet in December 2023, intention to proceed under new arrangements. *No change from last month* **Dudley:** Regulation 18 plan published for consultation 10th November until 22nd December, housing shortfall 1,078 dwellings. Regulation 19 scheduled for consultation in autumn 2024.
South Staffordshire	Cabinet to consider Regulation 19 plan for consultation in April 2024, this will have a lower housing requirement and fewer Green Belt releases than the previous iteration. End date will now be 2041 and evidence bases being updated accordingly. Proposed submission January 2025. Regulation 19 consultation closes at noon 31/5/2024. *No change from last month.*
Lichfield	Full Council agreed in October to withdraw plan and consider alternative options. Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. *No change from last month*.
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements. Progress has been suspended in the light of the General Election.
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough. The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024. *No change from last month*.
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GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 16 July 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update

[redacted]

5. Wider planning reforms

Chancellor Rachel Reeves is taking immediate action to fix the foundations of our economy - GOV.UK (www.gov.uk)

6. Local Plan updates
7. Strategic Growth Study refresh
8. West Midlands Strategic Employment Sites Study
9. Local Aggregate Assessment
10. Accessible Housing in The West Midlands – representative (s) from Habinteg
11. Any other business
12. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 16th July 2024, 14:00 – 16:00 Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton – chair), Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland, (WMCA), Maria Dunn, (Birmingham), Mike Dunphy, (Bromsgrove), Jo Bozdoganli (Stratford on Avon), Dorothy Barratt, Mike Dittman (North Warwickshire), Neville Ball (Walsall), Alex Evans, Kelly Harris, (South Staffs.), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Clare Eggington, (Coventry), Neil Glover, Chris Kingham (Nuneaton and Bedworth), Eddie West, Dan Corden (Shropshire), Vicki Popplewell (Dudley), Patrick Jervis (Lichfield), Michele Ross (Wolverhampton), Dr Mark Fosbrook, Simon Hall (WMCA), Fara Muneer (CAE), Christina McGill (Habinteg)	
1	**Apologies** Sarah Scannell (Birmingham	
2	**Actions from last meeting**	
2.1	Solihull MBC's report detailing how they are dealing with applications on proposed local plan allocations circulated for information.	
2.2	Coventry and Warwackshire authorities to follow up with WMCA energy capacity contacts regarding future capabilities of the modelling.	
2.3	Meeting with Shropshire ecologists / planners and AD / IC / WMCA to be arranged	AD
3	**TfWM update**	
3.1	The 2023 housing / employment site schedules have been circulated to local authorities for completion.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
5	**Local Plan Updates**	

5.1	See revised schedule	
5.2	Continued uncertainty as a new NPPF is anticipated by the end of July and whether plans could proceed under the current policy framework dependent on transitional arrangements. Also, whether Government would make more immediate policy changes via Written Ministerial Statements.	
6	**Strategic Growth Study Refresh**	
6.1	Revised schedule of those wishing to participate circulated. Solihull MBC has now agreed to participate, North Warwickshire BC confirmed that whilst it would not be actively participating, as it was struggling to deliver its earlier share of the shortfall, it was willing to provide information as required.	
6.2	Noted that governance arrangements need to be considered along the usual lines of a steering group and wider reference group comprising all participating LPAs.	
7	**Strategic Employment Sites Study**	
7.1	Final draft now received for final typo / omissions check. Report to be published in September to coincide with the reconvened Nuneaton and Bedworth eip.	
7.2	WMCA to consider taking to a future board, mainly for information – date to be confirmed.	
8	**Local Aggregate Assessment**	
8.1	Deferred until a future meeting	
9	**Any other business**	
9.1	None	
10	**Date of next meeting**	
10.1	20 August 2024 @14:000	
[redacted]	[redacted]	
[redacted]	[redacted]	



Local Plan Update July 2024

GBBCHMA / WMCA Local Plan Reviews, July 2024	
Birmingham	Issues and options consultation ended 5th December 2022Preferred Option to be considered by Cabinet on June 25th and consultation now commenced. Submission scheduled for June 2025 under current arrangements. Key points: • Shortfall fallen from 78,415 homes to circa 46,000. • Identified capacity for approximately 103,000 homes via densification in city centre. • No additional Green Belt release advocated. • Considered elevating BNG to 20% but remains at 10%. • Different affordable housing requirements across city. Pen invitation to neighbours if they want a Duty to Cooperate meeting, will progress SoCGs to coincide with the Regulation 19 plan.
Black Country	**Wolverhampton:** Regulation 18 plan been consulted on (closed April 2024, 11,400 housing shortfall. **Sandwell:** Regulation 18 consultation completed December 2023. Housing shortfall estimate 18,000. Will be contacting HMA and associated LPAs shortly setting out extent of shortfall and whether others can assist. Looking to prepare a SOCG similar to South Staffordshire's in 2022.

	Walsall: Revised LDS scheduled to go to Cabinet in December 2023, intention to proceed under new arrangements. *No change from last month* **Dudley:** Regulation 18 plan published for consultation 10th November until 22nd December, housing shortfall 1,078 dwellings. Regulation 19 scheduled for consultation in autumn 2024.
South Staffordshire	Cabinet to consider Regulation 19 plan for consultation in April 2024, this will have a lower housing requirement and fewer Green Belt releases than the previous iteration. End date will now be 2041 and evidence bases being updated accordingly. Proposed submission January 2025. Regulation 19 consultation closes at noon 31/5/2024. Currently seeking to complete final SoCGs.
Lichfield	Full Council agreed in October to withdraw plan and consider alternative options. Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. *No change from last month*.
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements. Progress has been suspended in the light of the General Election.
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough. The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024. *No change from last month*.
Shropshire	Still under examination. Further SA work has been undertaken following receipt of a pre-application protocol. Approval to consult on four further papers agreed by Cabinet last month, these are: • Sustainability Appraisal • Housing Land • Employment Land • Green Belt Inspectors requested an indication as to where the Black Country need being addressed by Shropshire was likely to be met. Consultation closing date 11/6/24. *No change from last month*.
South Warwickshire (Warwick and Stratford-on- Avon)	Issues and Options consultation now completed. Joint Committee meeting on 23rd November to endorse revised timetable. Submission now anticipated in summer 2026 with adoption by end of 2027.
Rugby	Local plan review Issues and Options and call for sites live until 2nd February 2024. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/23, but this omits the local plan review due to uncertainty around national policy. Draft Employment DPD

	published for consultation until 9/5/24, Gypsy / Traveller DPDs deferred for further consideration. *No change from last month*
Cannock Chase	Consultation on Regulation 19 plan commenced 5th Feb - 18th March 2024. *No change from last month*
Solihull	Plan now been under examination for three years. Inspectors written to Council once NPPF published reiterating earlier position that Solihull needed to identify additional sites for 1700 dwellings as transitional arrangements imply that the 'old' NPPF should be used. Solihull MBC has responded on 14 February stating that the 'new' NPPF has 'indirect' effects and inviting the Inspectors to re-open the hearings for further representations. To date no response has been received and SMBC written again to Inspectors (8th May) with further information on land supply and progress on proposed allocations. SMBC is minded to approve applications on emerging allocations via the 'very special circumstances' test. Thus far 14 applications have been received on ten allocations for 3,500 homes. PINS has advised that that live eip's will not progress until after the General Election.
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Still intend submitting in early 2025 with Regulation 19 Autumn 2024. *No change from last month*.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 17 September 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. NPPF review
    - Responses
    - Next Steps
6. Local Plan update and significant appeal updates
7. Strategic Growth Study refresh
8. West Midlands Strategic Employment Sites Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

	West Midlands Development Needs Group, 17 September 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland, (WMCA), Rebecca Brown, (Birmingham), Mike Dunphy, Alison Grimmett (Bromsgrove), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Ed Fox, Kelly Harris, (South Staffs.), Charlene Jones (Solihull), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Jacqueline Padbury Nuneaton and Bedworth), Vicki Popplewell (Dudley), Patrick Jervis (Lichfield), Michele Ross (Wolverhampton), Andrew Cornfoot (Warwick), Richard Powell (Tamworth)	
1	**Apologies**	
1.1	Dorothy Barratt, Mike Dittman (North Warwickshire), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Maria Dunn, Sarah Scannell (Birmingham), Clare Eggington, (Coventry),	
2	**Notes of last meeting**	
2.1	Biodiversity Net Gain - Meeting took place between Wolverhampton planners and Shropshire planners / ecologists. Main concern was tendency of developers to immediately seek to go off-site and the lack of local habitat banks to accommodate this. Understood that Coventry / Warwickshire may have developed a mechanism to deliver BNG on sites they own, and this may be something others could learn from. Matter to be considered at a future meeting	
2.2	Brief note of meeting to be circulated along with Iceni article on off-site BNG	AD
3	**TfWM update**	
3.1	Note that ONS had agreed to provide an informal demonstration on how to extract the migration data. Guidance notes and dataset to be circulated in case anyone has the opportunity to look at it.	AD
3.2	Request for latest housing and employment returns has been circulated for attention, thanks to those who have responded. Agreed that employment returns need to include a hectares field as well as square metres. Square metres unlikely to be known until a planning application received whereas plan allocations will be in hectares. Also query whether wheelchair accessible dwellings in the pipeline could be collected as part of the housing returns as information is currently limited.	OO
4	**WMCA Update**	
4.1	Received final draft of Accessible Housing Report, one of key recommendations is to build in need for accessible housing into local plan need assessment work. NBBC requested any supportive data on need as currently a live issue at eip.	LP
4.2	Note that governance arrangements are being reviewed following abolition of Housing and Land Delivery Board – new groupings proposed focussing on jobs, skills, homes, and journeys; officer groups to follow	
5	**National Planning Policy Framework review**	
5.1	Main points in emerging WMCA response as follows: • Support a standard method in principle but scope for it to be more nuanced to reflect demographic change / factors.	

	• Grey Belt definition unclear and scope for disputes. If Green Belt reviews are necessary, then better guidance on how to undertake them would be welcome. • Need assurances that development can fund the necessary infrastructure given scale of growth requirements. • Increased allocations do not necessarily lead to higher build out rates – absorption rates and skill/materials availability, greater scope for build-out conditions. • Transport guidance too vague. • Support increased fees to fully fund planning services. • Supportive of focus on key economic sectors but should include advanced manufacturing. • Weak on the likes of embedded carbon and circular economy	
5.2	**Local Authority comments** • **Dudley** - Response broadly aligned on approach to housing need and vague definition of Grey Belt. Also concern about tight transitional arrangements. • **Solihull** – Share concerns regarding change to standard method and also concerned that Green Belt will become a reservoir for development and its function eroded. • **Walsall** - Again, concern over standard method changes as stock-based approach does not reflect where growth pressures, and hence need is. • **Stratford on Avon** -: Note that much higher housing need figure, but less likely to be asked to meet urban shortfalls. Not adverse to reviewing Green Belt but concern that approach could lead to fragmentation. Assurances regarding necessary infrastructure required. • **Warwick:** Members very keen on full fee recovery to support planning services. • **Wolverhampton:** Grey Belt definition unhelpful as it is Green Belt that makes least contribution, which would be the first to be released anyway. More guidance on how to conduct Green Belt reviews would be more useful.	
5.3	Any LPA comments (on WMCA approach) please advise WMCA asap as closing date 24/8/24, slides to be circulated after the meeting. Draft response to be made available but needs quick turnround due to tight timescales.	ALL
5.4	Note that a report would be going to West Midlands Metropolitan Area Chief Executives next month setting out implications and potential options for strategic planning. Will recommend an exploratory questionnaire sent to LPAs within constituent area and beyond.	
6	**Local Plan Updates / Major Appeals**	
6.1	See separate schedule	
6.2	Halesowen Battery Farm decision to be circulated	VP/AD
7	**Strategic Growth Study Refresh**	
7.1	Main points of discussion: • Need something to provide narrative for Duty to Cooperate compliance for plans seeking submission via transitional arrangements.	

	• NPPF review, however, means more uncertainty as plans will be submitted under different versions, need to re-brief members. • Anything done before revised NPPF will need to be revisited as part of whatever strategic planning arrangements emerge. • The challenge remains the same in that we have unmet need across a common geography. • Attention drawn to overlap with New Towns Taskforce, due to report summer 2025. • For those LPAs who will be without a local plan when the new NPPF is in place, commissioning a study may help deal with speculative applications. • Suggestion that brief nuanced to take account of gentle density increases, design typologies etc. • Despite uncertainty, suggestion that some things could be done e.g. extent that previous options considered, major infrastructure requirements.	
8	**Strategic Employment Sites Study**	
8.1	Note that this is now in public domain via the Nuneaton and Bedworth eip website	
9	**Local Aggregate Assessment**	
9.1	Convene meeting of relevant officers to progress and identify difficulties obtaining relevant data.	
10	**Any other business**	
10.1	None	
11	**Date of Next Meeting**	
11.1	Tuesday 15th October, 14:00 – 16:00	

Local Plan Update September 2024

GBBCHMA / WMCA Local Plan Reviews, September 2024	
Birmingham	Consultation on Regulation 18 Preferred Options has now ended: Key points: • Shortfall fallen from 78,415 homes to circa 46,000. • Identified capacity for approximately 103,000 homes via densification in city centre. • No additional Green Belt release advocated. • Considered elevating BNG to 20% but remains at 10%. • Different affordable housing requirements across city. Open invitation to neighbours if they want a Duty to Cooperate meeting, will progress SoCGs to coincide with the Regulation 19 plan. Submission scheduled for June 2025 under current arrangements. Looking to take revised LDS to Cabinet in January 2025
Black Country	**Wolverhampton:** Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. **Sandwell:** Regulation 19 consultation approved for consultation this month to start 23rd September 2024. Housing shortfall estimate 18,000.

	Walsall: Revised LDS considered by Cabinet in December 2023, intention to proceed under new arrangements. **Dudley:** Regulation 19 to be considered by Cabinet 25th September, consultation to start 18th October
South Staffordshire	Regulation 19 plan consulted on during April / May 2024. Proposed submission January 2025. Recent meeting with PINS drew attention to Matt Pennycook's letter stating that Inspectors are no longer expected to remedy defective plans once submitted.
Lichfield	Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. Regulation 18 Preferred Options plan to be considered by Cabinet and Overview and Scrutiny early October 2024, with a view to consultation commencing by the end of the month.
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements. Progress has been suspended in the light of the General Election. *No change from last month*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough. The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024. *No change from last month*.
Shropshire	Still under examination. Further SA work has been undertaken following receipt of a pre-application protocol. Approval to consult on four further papers agreed by Cabinet last month, these are: • Sustainability Appraisal • Housing Land • Employment Land • Green Belt Inspectors requested an indication as to where the Black Country need being addressed by Shropshire was likely to be met. Consultation closing date 11/6/24. *No change from last month*.
South Warwickshire (Warwick and Stratford-on- Avon)	Aiming for Joint Cabinet meeting in December 2024 to agree Regulation 18 Preferred Option for consultation in early 2025. Submission now anticipated in summer 2026 with adoption by end of 2027.
Rugby	Local plan review Issues and Options and call for sites live until 2nd February 2024. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/23, but this omits the local plan review due to uncertainty around national policy. Draft Employment DPD published for consultation until 9/5/24, Gypsy / Traveller DPDs deferred for further consideration. *No change from last month*

Cannock Chase	Looking to take Submission Version of Plan to Cabinet later this month (September 2024), with a view to submitting for examination before the end of the year.
Solihull	Inspectors have written to the Council on 4th September requesting that the plan be withdrawn from examination. INS011 04.09.24 (solihull.gov.uk)
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Still intend submitting in early 2025 with Regulation 19 Autumn 2024. *No change from last month*.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 15th October 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. NPPF review – next steps
6. Local Plan and significant appeal updates
7. Strategic Growth Study refresh
8. West Midlands Strategic Employment Sites Study – feedback from stakeholders
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

	West Midlands Development Needs Group, 15 October 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), Jemma March (Cannock Chase), Leo Pollak, Amanda Holland, (WMCA), Maria Dunn, (Birmingham), , Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Ed Fox, Alex Evans, (South Staffs.), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Sarah Matile (Nuneaton and Bedworth), , Patrick Jervis (Lichfield), Richard Powell (Tamworth) Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Mike Dittman (North Warwickshire).	
1	**Apologies**	
1.1	Sarah Scannell (Birmingham), Clare Eggington, (Coventry), Mike Dunphy, Alison Grimmett (Bromsgrove), Vicki Popplewell (Dudley)	
2	**Notes of last meeting**	
2.1	Confirmed that Coventry / Warwickshire has identified sites to meet need in vicinity of where BNG contributions arise so potential for others to replicate the approach; this is being coordinated by the Warwickshire CC ecologist. To be discussed outside of this meeting with a view to brining to a future meeting of this group / separate session.	IC/AD/MDi
2.2	Awaiting details from ONS Local for demonstration about how to extract internal migration data. Would need to be run informally for a couple of people as a larger event would need to be facilitated as a formal webinar, this would take longer to set up.	AD
3	**TfWM update**	
3.1	Ongoing collection and input of housing / employment monitoring returns.	
3.2	Advised that Local Transport Plan is on hold as will need to reflect the new Mayor's priorities.	
4	**WMCA Update**	
4.1	Been in discussion with MHCLG about the English Devolution and Planning and Infrastructure Bills and awaiting further clarity / certainty.	
4.2	Ongoing liaison with Government regarding the Integrated Settlement. Seeking better alignment with the planning process regarding affordable housing programme, e.g. where there are local viability issues.	
4.3	Work commissioned looking at the likes of migration, travel to work and spending data at different geographies. Anticipate sharing more widely once completed.	
5	**National Planning Policy Framework Review**	
5.1	Report taken to West Midlands (Metropolitan) Chief Executives on 11 October. This set out the main strategic / cross boundary implications and, current working arrangements; authorisation was given to issue the questionnaire to identify strategic issues and resources / capacity to address the agenda. Request to report back in January.	
5.2	Agreed that the questionnaire would be circulated to this group and that approximately a month would be given for responses. To be sent to both Housing Market Areas and LPAs with functional linkages, with political sign off.	

5.3	Concern expressed regarding the sequencing of reforms and transitional arrangements. Some local plans seeking to proceed under the new NPPF, whereas others would be using the revised version.	
5.4	Also, how strategic matters would be dealt with when there is effectively a round of plan making before Spatial Development Strategies (SDS) are introduced. For example, if a local plan reviews Green Belt boundaries, would this be expected again as part of SDS preparation? The findings of the New Towns Task Force add another layer of uncertainty.	
5.5	Noted that whilst the focus is on housing, North Warwickshire is addressing strategic employment land matters, including an Employment DPD (including Green Belt review) and anticipates that this work will roll forward to inform any future SDS.	
6	**Strategic Growth Study Refresh**	
6.1	Discussions have taken place with WMCA regarding procurement arrangements	
6.2	Noted that the NPPF review has created further uncertainty as brief currently reflects NPPF published in December 2023.	
6.3	Within the conurbation overall need remains broadly the same but with a different distribution, whilst in the shire districts it increases significantly, doubling in some cases.	
6.4	Noted that the brief is phased and that the initial stages can be progressed, e.g. evaluation of the 2018 study recommendations, but later part needs to be flexible to respond to new NPPF once published. Brief to be amended and re-circulated.	AD/IC
6.5	Contributions circa £7,000 per local authority, some will have difficulty increasing contributions due to tight budgetary constraints. May be left over funds from Strategic Employment Sites Study. Need to check with Dudley	IC
6.6	In terms of management, suggested all contributing LPAs are on steering group with a smaller group convened to appraise tenders.	
7	Local Plan Updates and Major Appeals	
7.1	See separate schedule for local plan updates	
	Major Appeals	
7.2	**Strategic Employment Site M42 J10, North Warwickshire –** Inspector accepted the strategic need for a site in this general vicinity but refused the appeal on grounds that it conflicted with the adopted local plan strategic gap policy. NBBC will address the issue via its Employment Land DPD.	
7.4	**Green Belt housing proposal, Sandwell –** 150 homes on site unallocated in emerging local plan, 40% affordable housing and a countryside park, site a SINC and contains ancient hedgerows. Appeal dismissed on grounds of significant harm to Green Belt purposes, also noted that it would make little contribution to addressing the shortfall. Decision notice to be circulated.	PM / AD
8	**Strategic Employment Sites Study**	
8.1	The study was addressed during the Nuneaton and Bedworth hearings and a further report has been commissioned, which reconciles it with the Coventry and Warwickshire HEDNA.	

8.2	Acknowledged that the timing of report's release meant it could not be fully reflected in the local plan but some interesting observations whether the 25-ha strategic site definition could be disaggregated.	
8.3	NWBC advised that the report would advise preparation of and responses to its Employment Land DPD.	
9	**Local Aggregate Assessment**	
9.1	Meeting of officers arranged for 17/10/24	
10	**Any other business**	
10.1	None	
11	**Date of Next Meeting**	
11.1	Tuesday 19th November, 14:00 – 16:00	

Local Plan Update October 2024

GBBCHMA / WMCA Local Plan Reviews, October2024	
Birmingham	Consultation on Regulation 18 Preferred Options has now ended: Key points: • Shortfall fallen from 78,415 homes to circa 46,000. • Identified capacity for approximately 103,000 homes via densification in city centre. • No additional Green Belt release advocated. • Considered elevating BNG to 20% but remains at 10%. • Different affordable housing requirements across city. Open invitation to neighbours if they want a Duty to Cooperate meeting, will progress SoCGs to coincide with the Regulation 19 plan. Will now not be submitting plan by June 2025 so will be aligned with the new NPPF. Need to refresh evidence base and potentially consult again on a Preferred Option; revised LDS to January Cabinet.
Black Country	**Wolverhampton:** Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. **Sandwell:** Regulation 19 consultation approved for consultation this month to start 23rd September 2024 until 11th November. Housing shortfall estimate 18,000. **Walsall:** Revised LDS considered by Cabinet in December 2023, intention to proceed under new arrangements. **Dudley:** Regulation 19 to be considered by Cabinet 25th September, consultation to start 18th October
South Staffordshire	Regulation 19 plan consulted on during April / May 2024. Proposed submission January 2025, although this may be brought forward. Currently seeking final sign of of SoCGs. Recent meeting with PINS drew attention to Matt Pennycook's letter stating that Inspectors are no longer expected to remedy defective plans once submitted.
Lichfield	Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline

	for progressing under current system. Subject to not be called in, Issues and Options document consultation to commence 30/10/24.
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements. Progress has been suspended in the light of the General Election. *No change from last month*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough. The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024. *No change from last month.*
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Cannock Chase	Looking to take Submission Version of Plan to Cabinet later this month (September 2024), with a view to submitting for examination before the end of the year.
Solihull	Following the Inspectors of 4th September, Full Council resolved to withdraw the plan on 8th October and agreed to progress preparation of a new plan; a revised LDS is scheduled to go to December Cabinet
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Still intend submitting in early 2025 with Regulation 19 Autumn 2024. *No change from last month*.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*

Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024 and hearings now completed.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 19th November 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. Climate Change Adaptation- Bethany Haskins (WMCA)
4. TfWM update
5. [redacted]
6. Strategic Growth Study refresh – [redacted]
7. Local Plan and significant appeal updates
8. New Towns Task Force – Expressions of interest
9. West Midlands Strategic Employment Sites Study – feedback from stakeholders
10. Local Aggregate Assessment
11. Any other business
12. Date of next meeting

	West Midlands Development Needs Group, 19 November 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak, Bethany Haskins(WMCA), Maria Dunn, (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Ed Fox, (South Staffs.), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Neil Glover (Nuneaton and Bedworth), , Patrick Jervis (Lichfield), Richard Powell (Tamworth), Gary Palmer (Solihull), Mike Dittman (North Warwickshire), Eddie West, Dan Corden (Shropshire), Clare Eggington, (Coventry), Mike Dunphy, Alison Grimmett (Bromsgrove), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest)	
1	**Apologies**	
1.1	Sarah Scannell (Birmingham), Jemma March (Cannock Chase), Gavin Ashford (Telford and Wrekin), Andrew Cornfoot (Warwick), Patricia McCullagh (Sandwell),	
2	**Notes of last meeting**	
2.1	AD / IC still to discuss BNG on local authority sites with MD (NWBC)	IC/AD/MD
2.2	NB has extracted migration data from ONS files, to share with AD	NB/AD
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
4	**TfWM update**	
4.1.1	Bus fare cap has been main TfWM preoccupation recently	
4.2	Data Insight currently collecting planning data from local authorities with a view to maps / data being available in next few weeks.	
[redacted]	[redacted]	

[redacted]	[redacted]	
[redacted]	[redacted]	
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6	**Strategic Growth Study Refresh**	

[redacted]	[redacted]	
6.2	Suggested that although the brief is flexible, it is more upfront and that phase three may need tweaking to reflect new NPPF when it is published.	IC
7	**Local Plan Update**	
7.1	Dudley MBC will circulate a SoCG apportioning contributions from relevant local authorities for comment and endorsement. Noted that if Shropshire's plan is withdrawn, then its contribution is no longer available. If we are able to process the migration data in time, then more up to date figures can be used, but it is not considered that this will drastically change the distribution as migration flows are well established.	VP
7.2	See separate schedule also	
8	**New Towns Task Force (NTTF)**	
8.1	NTTF has invited expressions of interest from local authorities and invited Mayor to a roundtable.	
8.2	In terms of local authority submissions, Stratford members are considering the pros and cons, especially in terms of additional infrastructure, but unclear whether it counts towards local plan need. Matt Pennycook has stated that New Towns are additional to the standard method derived need. Also noted that some proposals may come forward via call for sites exercises.	
[redacted]	[redacted]	
8.4	Agreed to circulate details of any local authority or other stakeholder proposals, closing date for submissions 13 December.	ALL
9	**Strategic Employment Sites Study**	
9.1	A couple of technical queries have been received, which may need referral to Iceni / Mace. There is a small amount of money unspent, which could be used if required. Noted that Coventry / Warwickshire had received a report from Iceni which aligned the SESS with its HEDNA.	
10	**Local Aggregate Assessment**	
10.1	Aim to have a more worked up draft by end of November.	
11	**Any other business**	
11.1	None	
12	**Date of Next Meeting**	
12.1	Tuesday 17th December, 14:00 – 16:00	

Local Plan Update November 2024

GBBCHMA / WMCA Local Plan Reviews, November 2024	
Birmingham	Consultation on Regulation 18 Preferred Options has now ended: Key points: • Shortfall fallen from 78,415 homes to circa 46,000. • Identified capacity for approximately 103,000 homes via densification in city centre.

	• No additional Green Belt release advocated. • Considered elevating BNG to 20% but remains at 10%. • Different affordable housing requirements across city. Open invitation to neighbours if they want a Duty to Cooperate meeting, will progress SoCGs to coincide with the Regulation 19 plan. Will now not be submitting plan by June 2025 so will be aligned with the new NPPF. Need to refresh evidence base and potentially consult again on a Preferred Option; revised LDS to January Cabinet. *No change from last month*
Black Country	**Wolverhampton:** Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. *No change from last month* **Sandwell:** Regulation 19 consultation approved for consultation this month to start 23rd September 2024, consultation now completed. Housing shortfall estimate 18,000. **Walsall:** Revised LDS considered by Cabinet in December 2023, intention to proceed under new arrangements. *No change from last month* **Dudley:** Regulation 19 to be considered by Cabinet 25th September, consultation now completed
South Staffordshire	Regulation 19 plan consulted on during April / May 2024. Proposed submission January 2025, although this may be brought forward. Currently seeking final sign of of SoCGs. Recent meeting with PINS drew attention to Matt Pennycook's letter stating that Inspectors are no longer expected to remedy defective plans once submitted. *No change from last month*
Lichfield	Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. Subject to not be called in, Issues and Options document consultation to commence 30/10/24. *No change from last month*
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements. Progress has been suspended in the light of the General Election. *No change from last month*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough. The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024. *No change from last month.*
Shropshire	Still under examination. Further SA work has been undertaken following receipt of a pre-application protocol. Approval to consult on four further papers agreed by Cabinet last month, these are:

	• Sustainability Appraisal • Housing Land • Employment Land • Green Belt Programmed further hearings have been cancelled following the Inspectors raising unspecified soundness concerns; further correspondence awaited.
South Warwickshire (Warwick and Stratford-on- Avon)	Aiming for Joint Cabinet meeting in December 2024 to agree Regulation 18 Preferred Option for consultation in early 2025. Submission now anticipated in summer 2026 with adoption by end of 2027. *No change from last month*
Rugby	Local plan review Issues and Options and call for sites live until 2nd February 2024. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/24, but this omits the local plan review due to uncertainty around national policy. Draft Employment DPD published for consultation until 9/5/24, Gypsy / Traveller DPDs deferred for further consideration. *No change from last month*
Cannock Chase	Looking to take Submission Version of Plan to Cabinet later this month (September 2024), with a view to submitting for examination before the end of the year. *No change from last month*
Solihull	Following the Inspectors of 4th September, Full Council resolved to withdraw the plan on 8th October and agreed to progress preparation of a new plan; a revised LDS is scheduled to go to December Cabinet *No change from last month*
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Still intend submitting in early 2025 with Regulation 19 Autumn 2024. *No change from last month*.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024 and hearings now completed. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 17th December 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. Strategic Growth Study refresh – commissioning arrangements
6. GBBCHMA SoCG
7. [redacted]
8. 2024 NPPF [redacted]
9. Local Plan and significant appeal updates
10. New Towns Task Force – Expressions of interest
11. Local Aggregate Assessment
12. Any other business
13. Date of next meeting

	West Midlands Development Needs Group, 17th December 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak (WMCA), Maria Dunn, (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Ed Fox, Alex Evans, Kelly Harris(South Staffs.), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Jacqueline Padbury (Nuneaton and Bedworth), Chris Brewerton(Lichfield), Richard Powell (Tamworth), Gary Palmer (Solihull), Mike Dittman (North Warwickshire), Eddie West, Dan Corden (Shropshire), Clare Eggington, Chris Styles (Coventry), Mike Dunphy, Alison Grimmett (Bromsgrove), Vicki Popplewell (Dudley), Heather Stone, Robert Wall (Wyre Forest), Michelle Ross (Wolverhampton), Jemma March, Grace Lockley (Cannock Chase), Vicki Popplewell (Dudley), Andrew Cornfoot, Philip Clarke (Warwick)	
1	**Apologies**	
1.1	Sarah Scannell (Birmingham), Patricia McCullagh (Sandwell), Patrick Jervis (Lichfield)	
2	**Notes of last meeting**	
2.1	AD / IC still to discuss BNG on local authority sites with MD (NWBC)	IC/AD/MD
3	**TfWM update**	
3.1	Finalising analysis of employment and housing site returns, to be available after Christmas.	OO
4	**WMCA Update**	
4.1	Matters to be addressed via other agenda items throughout meeting.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
6	**Statement of Common Ground**	
6.1	Officer agreed document previously circulated with position in November 2024; outstanding minor amendment requested by Sandwell to be included.	VP
6.2	Noted that this is position as of November 2024, and new NPPF published since. Suggested amending paragraph 3.11 to reflect this	VP
6.3	New NPPF changes Birmingham's need changed significantly, which will have implications for any shortfall, although precise details yet to be established.	

6.4	Assumed that the North Warwickshire contribution was towards the shortfall in the adopted Birmingham Development Plan. NWBC to check that satisfied with reference to this.	MDi/VP
[redacted]	[redacted]	
[redacted]	[redacted]	
8	**National Planning Policy Framework and Devolution White paper**	
8.1	New Government's NPPF published 12th December, extension of transitional arrangements from one to three months welcomed.	
8.2	Local Authorities intending to submit during transitional period:	
8.3	**Dudley** – but acknowledge due to transitional arrangements will need to commence immediate review.	
8.4	**Coventry** – Regulation 19 plan approved for consultation 10th December, helpfully new NPPF LHN is similar to HEDNA derived figure.	
8.5	**South Staffordshire** – Plan submitted 11/12/24, but as less than 80% of new NPPF housing need, need to twin -track review.	
8.6	**Nuneaton and Bedworth** – Examination hearings completed and awaiting Inspectors response regarding modifications. Anticipate adopting by April 2025 but need to commence immediate review as do not meet new LHN.	
8.7	**Wolverhampton** – Regulation 19 consultation ends 9th January, so submit for examination under transitional arrangements.	
8.8	**Shropshire** – Still awaiting further response from Inspectors following their decision to cancel final hearings.	
8.9	**Birmingham** – given scale of change in new NPPF from draft, will probably need to do an additional Regulation 18 plan. Unfortunately, as not at Regulation 19 stage, not in a position to bid for the extra funding, despite evidence base needing major overhaul.	
8.10	General view that resources had not been considered for immediate local plan reviews and that internal budgets may not have been sought.	
8.11	Concern around progressing immediate plan reviews, as instructed in new NPPF, and whether the evidence base etc. would be compatible with the 30-month preparation arrangements proposed by the previous administration.	
8.12	Noted that funding is available to support local authorities undertaking Green Belt Assessments and Local Plan Reviews. Eligibility criteria differ. Expressions of interest are sought by 17th January, with final funds awarded in February.	
8.13	Awards of up to £70k are available for Green Belt Assessments and joint bids are encouraged. General consensus that a joint approach has merit in terms of consistency and in attracting consultants as they will be in high demand. This could be in terms of commission or shared, agreed methodology.	
8.14	Logistically, however, it will be difficult to coordinate a joint bid in within the tight timeframe and also if it needs Section 151 officer approval / oversight. Would one Section 151 officer need to take responsibility for all authorities?	

8.15	Agreed to insert a reference to exploring joint commission with neighbours. Arrange meeting for 7th, 8th, or 9th of January to discuss further.	AD
8.16	Noted that MHCLG has promised further guidance on Green Belt assessments. Hopefully, this will enable existing assessments to be updated, rather than having to start again.	
8.17	Suggestion whether could tie in with analysis of wider analysis taking a more dynamic view of the Green Belt looking at matters that aren't strictly Green Belt purposes, such a recreation and access, biodiversity, carbon storage etc, which would inform Local Nature Recovery Strategies and future Spatial Development Strategies (SDS).	
8.18	Agreed that this would be useful but considered that it is beyond the narrow remit of the funding guidelines. Agreed to contact London and Greater Manchester to see how they were approaching this. Also, noted that RSS Phase three had started looking at such matters and background information may still be available.	LP
	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
9	**Local Plan Updates**	
9.1	Mostly addressed via item 8	
9.2	NWBC are to consider whether to combine Employment DPD with review of local pan, which will commence in summer 2025.	
10	**New Towns Task Force**	
10.1	Known expressions of interest previously circulated.	
11	**Local Aggregate Assessment**	
11.1	Awaiting outstanding information and summary / conclusion to be drafted	
12	**Any other business**	
12.1	None	
13	**Date of Next Meeting**	

13.1	21st January 2025 @14-16:00	

West Midlands Development Needs Group

Agenda and Notes of Meeting

2025

OFFICIAL

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 21st January 2025, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. Strategic Growth Study refresh – commissioning and next steps
6. GBBCHMA SoCG

[redacted]

8. 2024 NPPF expressions of interest:
    - Green Belt assessment
    - Local Plan reviews
9. Local Plan and significant appeal updates
10. Local Aggregate Assessment
11. Any other business
12. Date of next meeting

	West Midlands Development Needs Group 21st January 2025, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak (WMCA), Maria Dunn (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Alex Evans (South Staffs.), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Neil Gover (Nuneaton and Bedworth), Patrick Jervis (Lichfield), Richard Powell (Tamworth), Gary Palmer (Solihull), Mike Dittman (North Warwickshire), Eddie West, (Shropshire), Clare Eggington, (Coventry), Mike Dunphy, Alison Grimmett (Bromsgrove), Vicki Popplewell (Dudley), Heather Stone, (Wyre Forest), Michelle Ross (Wolverhampton), Jemma March, Grace Lockley (Cannock Chase), Vicki Popplewell (Dudley), Patricia McCullagh (Sandwell),	
1	**Apologies**	
1.1	None	
2	**Notes of last meeting**	
2.1	Stratford on Avon and North Warwickshire advised that Coventry/ Warwickshire/ Solihull had prepared a Natural Capital Investment Strategy, which is being taken through their respective cabinets. This proposes a hierarchy approach to meeting BNG requirements starting on site. It proposes identifying sites in the sub-region to fulfil requirements when on-site provision is not possible. Appx1 - NCIS final draft 7 Mar 24.pdf	
3	**TfWM update**	
3.1	Housing and employment returns being finalised and will be handed to consultants developing the new Regional Strategic Model, which will replace PRISM.	
4	**WMCA Update**	
4.1	SQW Economic Geographies Report previously circulated; this takes migration, commuting, spend, and mobile phone data to consider changes in economic geography, focusing on the Metropolitan Area. This will help inform strategic planning arrangements going forward, especially as economic interactions do not stop at the Metropolitan Area's boundary. Any comments on report to WMCA. West Midlands Economic Geography	ALL
[redacted]	[redacted]	
4.3	Progressing Place Based Strategies with Metropolitan Authorities; these articulate investment priorities and will inform future development plans.	
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
4.6	Air Quality Framework agreed by WMCA Board, an action is to prepare planning guidance to implement it. Further local authority	LP/AD

	representation is sought to develop this. LP to provide AD with further information for circulation.	
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[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
6	**Statement of Common Ground**	
6.1	Revised document circulated, need to determine a final timescale for endorsement, noting that sign of procedures differ, and some local plans are well advanced.	
6.2	Noted that this reflected a certain point in time and that some local plans were progressing using the 'old' LHN and that contributions may change. Acknowledged that at some point it may need to be revised.	
6.3	VP to send a reminder email.	VP
6.4	Advised that a Black Country Functional Economic Area SoCG was to be circulated shortly to Black Country authorities and those identified as having a functional relationship in the HEDNA. This will set out the Black Country's shortfall and any contributions.	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	

[redacted]	[redacted]	[redacted]
8	**2024 NPPF funding expressions of interest**	
8.1	All confirmed that submitted Expressions of Interest for funding to support Green Belt reviews. North Warwickshire advised that it has applied retrospectively as has already commenced a Green Belt assessment, albeit to identify employment land rather than housing.	
9	**Local Plan Reviews and Significant Appeals**	
9.1	Shropshire received detailed letter from PINS (6/1/25) raising soundness concerns with the plan. The Council has been asked how it wishes to proceed and a six-month time frame to complete the additional work that has been specified; the Council is considering its position.	
9.2	Others, please advise AD so schedule can be updated for next meeting	ALL
9.3	Attention drawn to appeals coming forward under new Grey Belt definition, particular reference to Chapel Lane Battery Storage Facility, Walsall. NB to share appeal decision and views, see below paragraph.	NB
9.4	This is available from PINS at Reference: APP/V4630/W/24/3347424 We haven't decided how or whether to respond to the decision, but it raises a couple of points of wider concern: Paragraph 24: The inspector's interpretation of 'sprawl' (as referred to in NPPF paragraph 143 under green belt purpose a)) suggests that any development on GB land that is physically and visually discrete from the built-up area is not sprawl so should be allowed. Paragraphs 26 and 58: The inspector considered that 40 years is 'temporary' and the landscape impact will be acceptable because the development will be screened by hedgerow and trees after 15 years	
10	**Local Aggregate Assessment**	
10.1	Awaiting outstanding information and summary / conclusion to be drafted	
11	**Any other business**	
11.1	None	
12	**Date of Next Meeting**	
12.1	18th February 2025 @14:00 -16:00	

Local Plan Update January 2025

GBBCHMA / WMCA Local Plan Reviews, January, 2025	
Birmingham	Consultation on Regulation 18 Preferred Options completed July / August 2024. The new NPPF proposes a much lower housing need for Birmingham, so an additional Regulation 18 consultation exercise is to be undertaken. A revised LDS was approved in January 2025, key milestones are as follows:

	• Additional Regulation 18 consultation: November/December 2025 • Regulation 19 Consultation: June/July 2026 • Submission for examination: October 2026
Black Country	**Wolverhampton:** Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. *No change from last month* **Sandwell:** Submitted for examination December;2024. Housing shortfall estimate 18,000. **Walsall**: Cabinet agreed revised LDS December 2024, aiming to prepare under the current regulations, deadline for submitting December 2026. • Regulation 18 consultation on a hybrid issues and options/ preferred options expected in Autumn 2025 • Regulation 19 consultation in Summer 2026. **Dudley:** Regulation 19 to be considered by Cabinet 25th September, consultation now completed. Plan to be submitted for examination in February under NPPF 2023 and NPPF 2024 transitional arrangements
South Staffordshire	Regulation 19 plan consulted on during April / May 2024. Proposed submission January 2025, although this may be brought forward. Currently seeking final sign of of SoCGs. Recent meeting with PINS drew attention to Matt Pennycook's letter stating that Inspectors are no longer expected to remedy defective plans once submitted. *No change from last month*
Lichfield	Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. Subject to not be called in, Issues and Options document consultation to commence 30/10/24. *No change from last month*
Bromsgrove	Propose further consultation summer 2024 and likely to progress under the new arrangements. Progress has been suspended in the light of the General Election. *No change from last month*
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	The review of the Redditch Local plan has commenced with elements of the evidence base being assembled. The Council is now beginning to prepare for the first stages of consultation on the future plan for Redditch Borough. The first consultation on the review of the Redditch Local Plan is envisaged for Autumn / Winter 2024. *No change from last month*.
Shropshire	Still under examination. Further SA work has been undertaken following receipt of a pre-application protocol. Approval to consult on four further papers agreed by Cabinet last month, these are: • Sustainability Appraisal

	• Housing Land • Employment Land • Green Belt Programmed further hearings have been cancelled following the Inspectors raising unspecified soundness concerns. The Council received further detail regarding these concerns on 6/1/25 and is considering its position.
South Warwickshire (Warwick and Stratford-on- Avon)	Aiming for Joint Cabinet meeting in December 2024 to agree Regulation 18 Preferred Option for consultation closes 7/3/25. Submission now anticipated in summer 2026 with adoption by end of 2027.
Rugby	Local plan review Issues and Options and call for sites live until 2nd February 2024. *No change from last month*
North Warwickshire	Second post NPPF plan adopted, no formal timetable for review yet but joint work commissioned with Coventry and Warwickshire. Full Council agreed to review local plan in June. Executive Board is considering a new LDS 19/7/24, but this omits the local plan review due to uncertainty around national policy. Draft Employment DPD published for consultation until 9/5/24 and ongoing, Gypsy / Traveller DPDs deferred for further consideration. Local Plan review to commence later this year now policy clarity
Cannock Chase	Local Plan review submitted for examination and Inspector appointed in December 2024.
Solihull	Following the Inspectors of 4th September, Full Council resolved to withdraw the plan on 8th October and agreed to progress preparation of a new plan; a revised LDS is scheduled to go to December Cabinet *No change from last month*
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Consultation on Regulation 19 plan until 3/3/25 with submission to follow later this year.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024 and hearings now completed. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 18 February 2025, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update

[redacted]

- Consultation exercises

[redacted]

6. Strategic Growth Study refresh – commissioning and next steps

- Reflections on introductory meeting
- Next steps

7. GBBCHMA SoCG
8. Responses to NPPF Expressions of Interest (if available):

- Green Belt assessment
- Local Plan reviews

9. Local Plan and significant appeal updates
10. Local Aggregate Assessment
11. Any other business
12. Date of next meeting

	West Midlands Development Needs Group 18th February 2025, 2025, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak (WMCA), Maria Dunn (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Jennie Hadley, Ed Fox (South Staffs.), Andy Donnelly (WM Metropolitan Authorities), Neil Gover (Nuneaton and Bedworth), Patrick Jervis (Lichfield), Richard Powell (Tamworth), Gary Palmer (Solihull), Mike Dittman (North Warwickshire), Eddie West, Dan Corden (Shropshire), Clare Eggington, (Coventry), Mike Dunphy, (Bromsgrove), Vicki Popplewell (Dudley), Heather Stone, (Wyre Forest), Michelle Ross (Wolverhampton), Grace Lockley (Cannock Chase), Patricia McCullagh (Sandwell),	
1	**Apologies** Owen O'Neill, Gurdip Nagra (TfWM), Clare Eggington (Coventry), Vicki Popplewell (Dudley), Hether Stone (Wyre Forest), Andrew Cornfoot (Warwick).	
2	**Notes of last meeting**	
2.1	Coventry, Solihull, Warwickshire Nature Capital Investment Strategy, Economic Geographies Report (WMCA) and Green Belt battery farm appeal (Walsall) embedded in notes of last meeting.	
2.2	Charles Goode (University of Birmingham) presentation to be circulated	[redacted]
2.3	Emails sent regarding representation on WMCA air quality task and finishing group and volunteers to assist with climate change adaptation learning tool .	
3	**TfWM update**	
3.1	Resources currently focussed on bus network and funding changes, no progress on housing and employment returns since last meeting	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	

[redacted]	[redacted]	
6	**Strategic Growth Study Refresh**	
6.1	First full client-side meeting with Arup last week and slide pack circulated. Lessons learned from previous study have been shared with Arup as have the Turley critiques of the previous approach and the relevant Solihull MBC matters statements where the data was scrutinised.	
6.2	Awaiting circulation of data requests, which should be imminent, and study start date needs to be clarified. Query whether engagement with Arup would be bolted onto this meeting or would be separate. Agreed that it would be whatever would work best, if it was a short update, it could be bolted onto this meeting; if a workshop, then a bespoke meeting would be required.	
7	**Statement of Common Ground**	
7.1	**Signed off**: Sandwell, Lichfield, Dudley, Birmingham, South Staffs **Confirmed dates for sign off:** Wolverhampton – end of February, Bromsgrove - mid /late March, Redditch - mid/late March, Stratford – end of February, Walsall – end of February, Wyre Forest – March **No responses received**: North Warwickshire, Telford, Shropshire, Cannock Chase, Tamworth, Solihull.	
7.2	Noted that most of the contributions were coming from local authorities yet to sign the SoCG, so important that task is completed. Shropshire / Solihull advised that response be sent shortly. Confirmed	all

	that of those local authorities present, all were intending signing the SoCG.	
7.3	Final version of Black Country FEMA circulated following consultation, signed responses requested as soon as possible.	All
8	**Green Belt Assessment funding – Expressions of interest**	
8.1	Outcome of bids not yet announced, new guidance on Green Belts has also been delayed and the planned PAS sessions pushed back.	
8.2	Noted also that local authorities at Regulation 18 sate of local plan could now bid for up to £100k (by 28/2/25), this was previously only available to those at Regulation 19. Bids can be made for both funds.	
8.3	Discussion regarding a joint approach but noted that some local authorities needed to commission earlier than others to inform preferred options. Suggested that local authorities share the technical specification of their briefs with neighbours.	
8.4	Birmingham likely to submit tender first, possibly before guidance issued, but stating it must be compliant with it. Suggested separate discussion with Solihull and potentially sharing technical (not procurement) detail with wider group.	MD/GP
8.5	Also suggested that SGS refresh could provide a steer on how Green Belt assessments inform growth options.	
8.6	Noted that land use Consultants and DAC planning are advertising their availability to conduct Green Belt assessments via Linkedin.	
8.7	WMCA is undertaking some mapping work which shows pinch points on transport service levels and connectivity along with energy infrastructure, which may assist in addressing the sustainability criteria around Green Belt reviews. Agreed to bring to this group once completed.	LP
9	**Local Plan reviews and appeal decisions**	
9.1	See separate schedule	
10	**Local Aggregate Assessment**	
10.1	Emails sent requesting final information so that draft report can be completed.	Met. Area
11	**Any other business**	
11.1	None	
12	**Date of next meeting**	
12.1	18th March 2025 @14:00 -16:00	

Local Plan Update February 2025

GBBCHMA / WMCA Local Plan Reviews, February, 2025	
Birmingham	Consultation on Regulation 18 Preferred Options completed July / August 2024. The new NPPF proposes a much lower housing need for Birmingham, so an additional Regulation 18 consultation exercise is to be undertaken. A revised LDS was approved in January 2025, key milestones are as follows: • Additional Regulation 18 consultation: November/December 2025 • Regulation 19 Consultation: June/July 2026 • Submission for examination: October 2026 *No change from last month*

Black Country	**Wolverhampton:** Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. *No change from last month* **Sandwell:** Submitted for examination December;2024. Housing shortfall estimate 18,000. *No change from last month* **Walsall**: Cabinet agreed revised LDS December 2024, aiming to prepare under the current regulations, deadline for submitting December 2026. • Regulation 18 consultation on a hybrid issues and options/ preferred options expected in Autumn 2025 • Regulation 19 consultation in Summer 2026. *No change from last month* **Dudley:**. Plan to be submitted for examination in February 2025 under NPPF 2023 and NPPF 2024 transitional arrangements
South Staffordshire	Regulation 19 plan consulted on during April / May 2024. Proposed submission January 2025, although this may be brought forward. Currently seeking final sign of of SoCGs. Recent meeting with PINS drew attention to Matt Pennycook's letter stating that Inspectors are no longer expected to remedy defective plans once submitted. *No change from last month*
Lichfield	Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. Subject to not be called in, Issues and Options document consultation to commence 30/10/24, now complete *No change from last month*
Bromsgrove	LDS to Cabinet February 2025. Proposes a draft plan in summer 2025, will proceed under new system once details finalised.
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	LDS to Cabinet February 2025. Proposes issues and options consultaion spring 2025 will proceed under new system once details finalised.
Shropshire	Still under examination. Further SA work has been undertaken following receipt of a pre-application protocol. Approval to consult on four further papers agreed by Cabinet last month, these are: • Sustainability Appraisal • Housing Land • Employment Land • Green Belt Programmed further hearings have been cancelled following the Inspectors raising unspecified soundness concerns. The Council received further detail regarding these concerns on 6/1/25 and is taking a report to Cabinet proposing a way ford to keep the plan on track.

South Warwickshire (Warwick and Stratford-on- Avon)	Aiming for Joint Cabinet meeting in December 2024 to agree Regulation 18 Preferred Option for consultation closes 7/3/25. Submission now anticipated in summer 2026 with adoption by end of 2027. *No change from last month*
Rugby	Local plan review Issues and Options and call for sites live until 2nd February 2024. *No change from last month*
North Warwickshire	Draft Employment DPD published for consultation until 9/5/24 and ongoing, Gypsy / Traveller DPDs deferred for further consideration. LDS to Cabinet February 2025 for local plan review: • Issues and options spring 2025 • Regulation 18 summer 2025 • Regulation 19 December 2025
Cannock Chase	Local Plan review submitted for examination and Inspector appointed in December 2024. *No change from last month*
Solihull	Following the Inspectors of 4th September, Full Council resolved to withdraw the plan on 8th October and agreed to progress preparation of a new plan; a revised LDS approved by Cabinet December 2024: • Winter 24/25 – Launch Call-for-Sites exercise • Autumn 25 – Publish a Regulation 18 Preferred Options Plan • Summer 26 – Publish a Regulation 19 Draft Submission Plan • Autumn 26 – Submit plan for examination • Winter 26/27 – Examination hearings
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Consultation on Regulation 19 plan until 3/3/25 with submission to follow later this year. *No change from last month*
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Housing requirement approximately double LHN minimum. *No change from last month*
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024 and hearings now completed. *No change from last month*

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 18 March 2025, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update

[redacted]

- Consultation exercises
- Other matters of interest

[redacted]

[redacted]

6. Green Belt PPG and assessments commissioning
7. Strategic Growth Study refresh –
8. GBBCHMA SoCG
9. Local Plan and significant appeal updates
10. Local Aggregate Assessment
11. Any other business
12. Date of next meeting

	West Midlands Development Needs Group 18th March 2025, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak, Amanda Holland (WMCA), Maria Dunn (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Kelly Harris(South Staffs.), Andy Donnelly (WM Metropolitan Authorities), Sarah Matile (Nuneaton and Bedworth), Patrick Jervis (Lichfield), Richard Powell (Tamworth), Charlene Jones (Solihull), Dorothy Barratt (North Warwickshire), Eddie West, Dan Corden (Shropshire), Clare Eggington, (Coventry), Mike Dunphy, (Bromsgrove), Liz Vesty (Dudley), Robert Wall, (Wyre Forest), Michelle Ross (Wolverhampton), Grace Lockley, Jemma March (Cannock Chase), Patricia McCullagh (Sandwell), Owen O'Neill, Gurdip Nagra (TfWM), Andrew Cornfoot (Warwick).	
1	**Apologies** Vicki Popplewell (Dudley), Gary Palmer (Solihull), Heather Stone (Wyre Forest),	
2	**Notes of last meeting**	
[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]
3	**TfWM update**	
3.1	Latest housing and employment schedules circulated for completion, please advise if ways of simplifying process.	ALL
3.2	Note that some Data Insight staff are to provide a wider corporate function, rather than just serving TfWM.	
[redacted]	[redacted]	
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[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	
6a	**Green Belt Planning Practice Guidance**	
6.1	• Concern that Grey Belt definition will apply to a large proportion of Green Belt • Time/cost of assessments as a more granular approach will be required with smaller parcels. • Interplay with relatively remote parcels that do not make major contributions to the Green Belt but are not in sustainable locations; transport accessibility alone does not mean a location is sustainable. • Definition of towns and villages not clear. Many residents consider reasonably large settlements as villages. • Concern that applications will be submitted rather than sites coming forward through local plan review call for sites	
6b	**Green Belt Assessments - commissioning**	
6.2	NWBC had already commissioned a review pre-PPG release looking primarily for employment sites, this is now being expanded to support local plan review.	
6.3	South Staffordshire, Cannock Chase, Lichfield, Tamworth, and Stafford looking to commission a joint study – economies of scale and consistent approach. Tamworth leading procurement, target date for tendering end of month.	
6.4	Birmingham has gone out to tender without a specified budget but has had enquiries what the budget is; hopeful work will commence early May. Methodology from Birmingham's brief to be circulated	MDunn/AD
6.5	Understood if do not spend all of the grant on Green Belt review, then it can be used for complementary work, such as landscape / habitat assessment or general local plan staff resources.	
6.6	Solihull is looking to commission shortly, last assessment done in 2016, has had sight of Birmingham's brief.	
6.7	Shropshire previously used Land Use Consultants but will have to go out to competitive tender.	

6.8	Bromsgrove intends updating its existing Land Use Consultant's study in line with new guidance.	
6.9	Redditch will be starting review from scratch.	
6.10	Green Belt assessments are unlikely to be completed by end of June to directly inform the Strategic Growth Study refresh but will need to feed into growth options in some manner.	
6.11	Nuneaton and Bedworth has commissioned assessment and will share proposed methodology	SM/AD
6.12	Suggested that groupings / individual authorities meet outside of this meeting to compare notes.	
6.13	Understood that consultants are prioritising previous / exiting clients.	
7	**Strategic Growth Study Refresh**	
7.1	Data requests have been issued with early April deadline	
7.2	Stratford asked whether timetable would slip as the data collection task was behind schedule. Confirmed that no formal slippage to timetable had been advised / agreed.	
8	**Statement of Common Ground**	
8.1	**Signatories**: Birmingham, Sandwell, Dudley, Walsall, South Staffordshire, Shropshire, Cannock Chase. **Confirmed dates for response**: Stratford upon Avon, Bromsgrove, Redditch, and Wyre Forest. **Awaiting response**: Telford, North Warwickshire, Solihull, and Tamworth	
8.2	Dudley Inspector has written drawing attention to need for a fully signed document, letter on website.	
8.3	North Warwickshire to pursue response	
8.4	Solihull requested latest version of document be resent to ensure viewing the correct one. LV to action.	LV
8.5	Tamworth to pursue, assistant director authorised to sign off.	
8.6	Stratford requested up to date list to confirm to Members that others had signed	LV
8.7	Stratford asked whether Position Statement was to be updated as the shortfall in the last published version has been cited in an appeal to release a reserve site – hearing scheduled for July 2025.	
8.8	Advised that it had not been updated, because the need used to calculate the shortfall was out of date, but it was not clear whether this had been formally noted agreed; a formal position would assist Stratford.	
8.9	Once Arup has completed the data collection for the Strategic Growth Study Refresh, it may be possible to establish a supply estimate for 2031 to compare with the latest LHN need figure. This is subject to all authorities agreeing that the data can be put in the public domain prior to the study reporting	
8.10	The unmet need in the Position Statement was based primarily on the adopted Birmingham Development Plan shortfall. This is now out of date as Birmingham's five-year supply is calculated against its current LHN. Noted that Birmingham had recently won an appeal on five-year supply. MDunn to share with Stratford	MDunn.
8.11	Birmingham's supply position vs. need will not be clear until the further Regulation 18 plan is available, likely to be November 2025. The previous regulation 18 plan estimated a large shortfall still, but Birmingham's LHN has changed significantly.	
9	**Local Plan reviews and appeal decisions**	
9.1	Schedule to be circulated again and any updates forwarded to AD	All

9.2	Shropshire advised that it had received a letter from PINS rejecting the proposed project plan and advising withdrawal or an unsound report; a formal decision to withdraw requires full council resolution.	
9.3	A consequence is that a contribution can no longer be made towards the Black Country shortfall, Shropshire will be advising accordingly	
10	**Local Aggregate Assessment**	
10.1	Largely completed. Walsall advised that no sign of extraction at Branton Hill quarry, so understood that consent has not been implemented.	
11	**Any other business**	
11.1	None	
12	**Date of next meeting**	
12.1	15th April 2025 @14:00 -16:00	

Local Plan Update March 2025

GBBCHMA / WMCA Local Plan Reviews, March, 2025	
Birmingham	Consultation on Regulation 18 Preferred Options completed July / August 2024. The new NPPF proposes a much lower housing need for Birmingham, so an additional Regulation 18 consultation exercise is to be undertaken. A revised LDS was approved in January 2025, key milestones are as follows: • Additional Regulation 18 consultation: November/December 2025 • Regulation 19 Consultation: June/July 2026 • Submission for examination: October 2026 *No change from last month*
Black Country	**Wolverhampton:** Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. Plan submitted for examination March 2025 **Sandwell:** Submitted for examination December;2024. Housing shortfall estimate 18,000. *No change from last month* **Walsall**: Cabinet agreed revised LDS December 2024, aiming to prepare under the current regulations, deadline for submitting December 2026. • Regulation 18 consultation on a hybrid issues and options/ preferred options expected in Autumn 2025 • Regulation 19 consultation in Summer 2026. *No change from last month* **Dudley:**. Plan submitted for examination in February 2025 under NPPF 2023 and NPPF 2024 transitional arrangements
South Staffordshire	Regulation 19 plan consulted on during April / May 2024. Plan submitted for examination December 2024, hearings to commence May 2025.
Lichfield	Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. Subject to not be called in,

	Issues and Options document consultation to commence 30/10/24, now complete *No change from last month*
Bromsgrove	LDS to Cabinet February 2025. Proposes a draft plan in summer 2025, will proceed under new system once details finalised.
Tamworth	Local Plan issues and Options consultation period now ended. *No change from last month*
Redditch	LDS to Cabinet February 2025. Proposes issues and options consultaion spring 2025 will proceed under new system once details finalised.
Shropshire	The Inspector's have rejected the Council's project plan to address the outstanding issues and advised that the plan is withdrawn or receive an unsound report. Withdrawing the plan requires a resolution from full council.
South Warwickshire (Warwick and Stratford-on- Avon)	Aiming for Joint Cabinet meeting in December 2024 to agree Regulation 18 Preferred Option for consultation closes 7/3/25. Submission now anticipated in summer 2026 with adoption by end of 2027. *No change from last month*
Rugby	Preferred Option consultation 24 March 2025 until 5pm on 19 May 2025.
North Warwickshire	Draft Employment DPD published for consultation until 9/5/24 and ongoing, Gypsy / Traveller DPDs deferred for further consideration. LDS to Cabinet February 2025 for local plan review: • Issues and options spring 2025 • Regulation 18 summer 2025 • Regulation 19 December 2025
Cannock Chase	Local Plan review submitted for examination and Inspector appointed in December 2024. *No change from last month*
Solihull	Following the Inspectors of 4th September, Full Council resolved to withdraw the plan on 8th October and agreed to progress preparation of a new plan; a revised LDS approved by Cabinet December 2024: • Winter 24/25 – Launch Call-for-Sites exercise • Autumn 25 – Publish a Regulation 18 Preferred Options Plan • Summer 26 – Publish a Regulation 19 Draft Submission Plan • Autumn 26 – Submit plan for examination • Winter 26/27 – Examination hearings
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Consultation on Regulation 19 plan until 3/3/25 with submission to follow later this year. *No change from last month*
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Regulation 19 plan consultaion plan published, closing date for representations 5th May 2025.
Wyre Forest	Plan formally adopted 26th April 2022. *No change from last month*
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024 and hearings now completed. Consultation on main modifications to commence 6th May for six weeks.

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS GROUP

Tuesday 15 April 2025, 14:00 – 16:00, via MS Teams,

AGENDA

[redacted]

Regular items

1. Notes / actions from last meeting
2. WMCA update
3. Green Belt Assessment progress
4. Local plan updates
5. Any other business
6. Date of next meeting

	West Midlands Development Needs Group 15th April 2025, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak, Amanda Holland (WMCA), Maria Dunn (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Kelly Harris(South Staffs.), Andy Donnelly (WM Metropolitan Authorities), Sarah Matile (Nuneaton and Bedworth), Patrick Jervis (Lichfield), Richard Powell (Tamworth), Charlene Jones (Solihull), Dorothy Barratt (North Warwickshire), Eddie West, Dan Corden (Shropshire), Clare Eggington, (Coventry), Mike Dunphy, (Bromsgrove), Liz Vesty (Dudley), Robert Wall, (Wyre Forest), Michelle Ross (Wolverhampton), Grace Lockley, Jemma March (Cannock Chase), Patricia McCullagh (Sandwell), Owen O'Neill, Gurdip Nagra (TfWM), Andrew Cornfoot (Warwick).	
	Apologies Vicki Popplewell (Dudley), Gary Palmer (Solihull), Heather Stone (Wyre Forest),	
1	**Arup Strategic Growth Study Refresh – Housing Data Workshop**	
1.2	The presentation, along with a summary and reflections has been circulated under separate cover	
	Regular items	
2	**Notes of last meeting and actions**	
2.1	Stratford on Avon request to update Position Statement – will need to be considered in the context of the emerging Arup data.	
2	**WMCA update**	
3.1	Update to be provided at the next meeting	
4	**Green Belt Assessments**	
4.1	Birmingham – Tender attracted five bids, assessment of these to commence this week.	
4.2	**North Warwickshire** – Had already appointed LUC prior to new Green Belt PPG. Have extended the contract to include Grey Belt and other changes.	
4.3	**Solihull** – Not yet commissioned due to changes in procurement officers and procedures	
4.4	**Walsall** – Have appointed consultant, attention drawn to report in Planning Resource that there is capacity for 11 million homes on Grey Belt land.	
4.5	**Wolverhampton / Sandwell / Dudley –** Intend commissioning joint study.	
5	**Local Plan Updates**	
5.1	Noted that Wolverhampton and Dudley have had meetings with MHCLG regarding progressing plans through the transitional arrangements	
5.2	All to send AD any local plan updates	All
6	**Any other business**	
6.1	Advised that WMMA Local Aggregate Assessment to be sent to RAWP Secretariat for sharing with wider group for comment	
7	**Date of next meeting**	
7.1	20th May 2025, 14:00 – 16:00	

South Staffordshire Functional Economic Market Area

Statement of Common Ground

November 2022

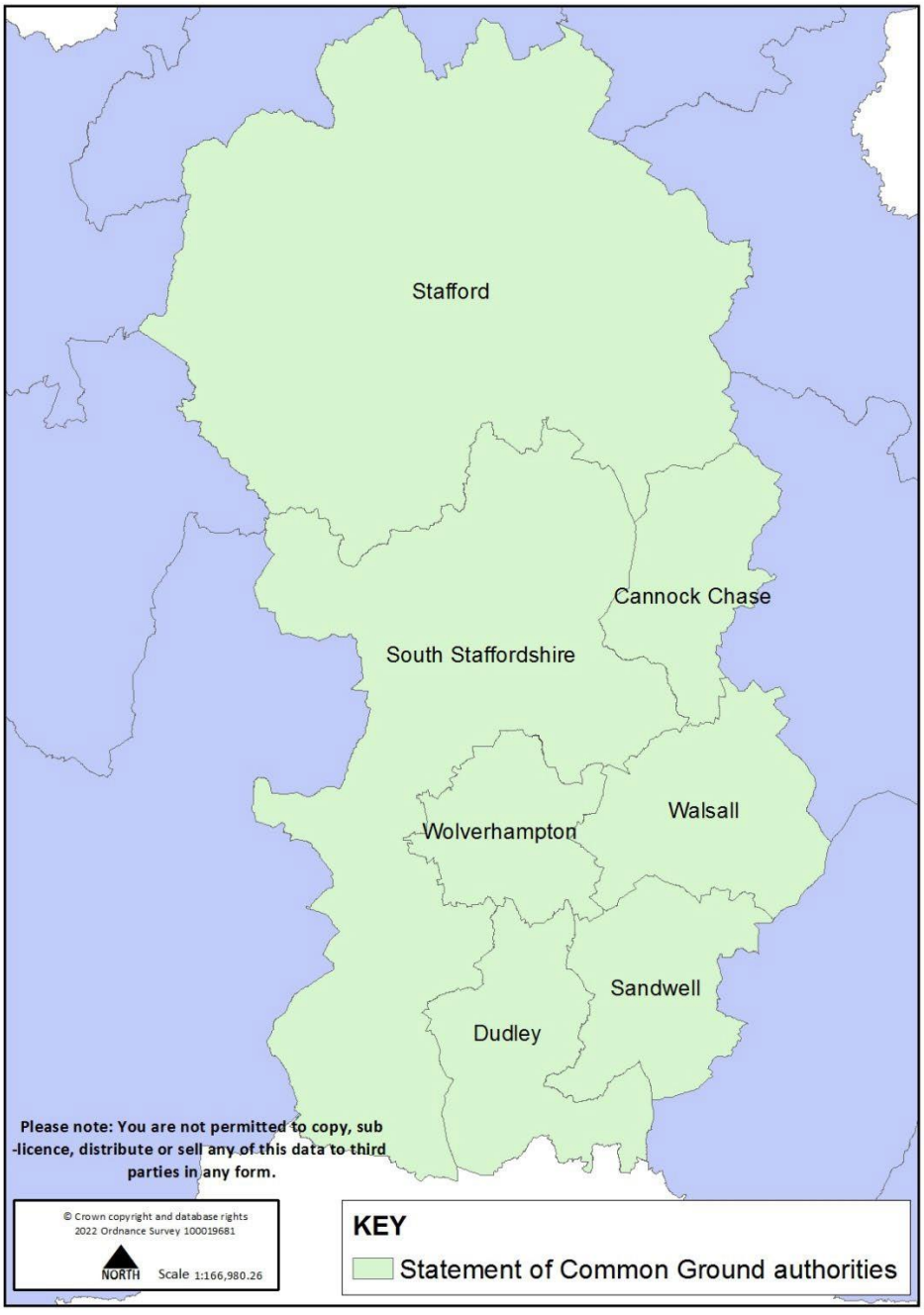
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1. Purpose and list of Parties involved in this Statement of Common Ground

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

1.2 The parties to this statement of common ground comprise of the local planning authorities set out below, as shown on the following map.

Figure 1: Employment Statement of Common Ground authorities



Local planning authorities within the South Staffordshire FEMA

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

Other related local planning authorities outside of the South Staffordshire FEMA

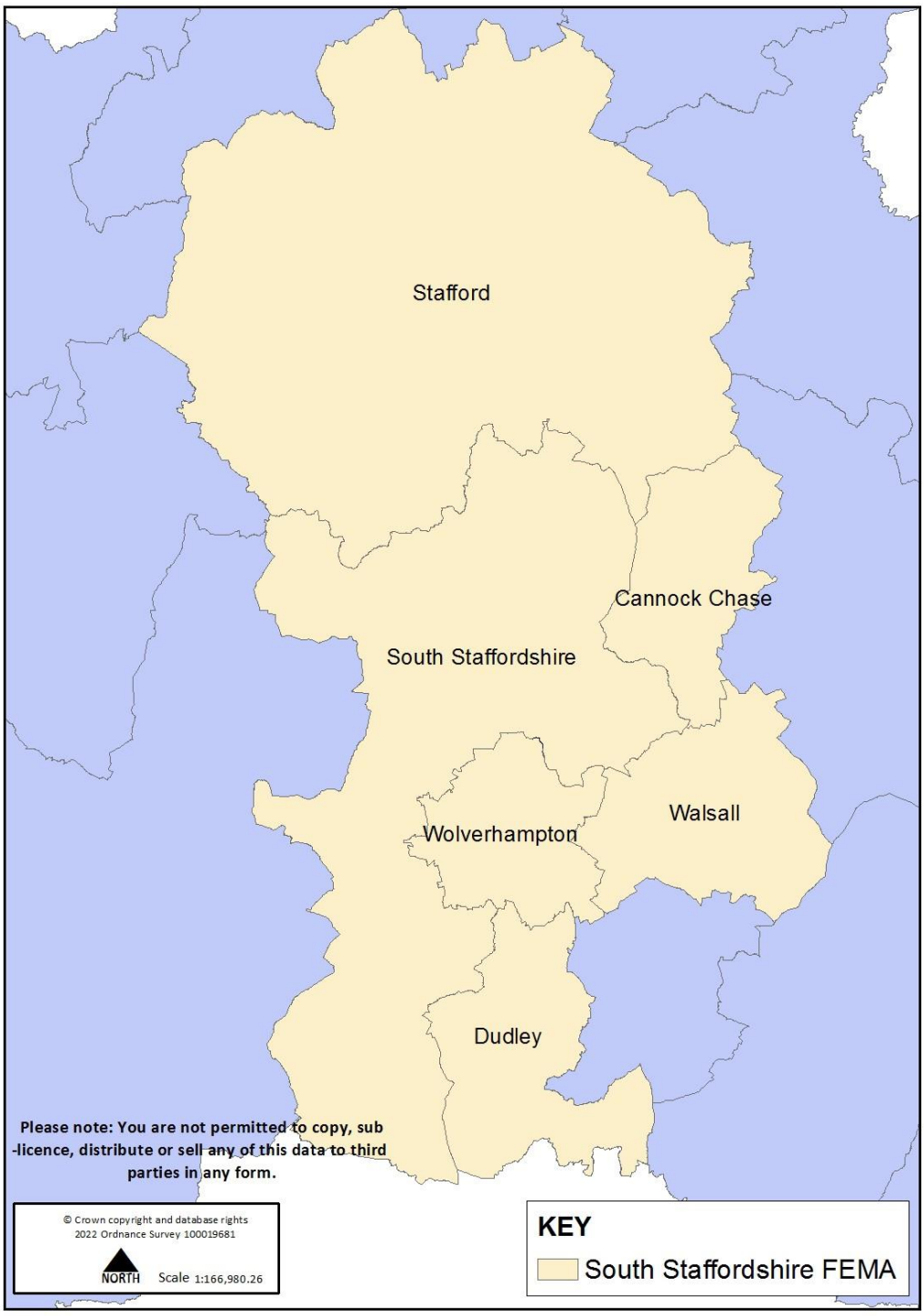
- Sandwell Metropolitan Borough Council

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2. Strategic Geography

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

Figure 1: South Staffordshire FEMA authorities



2.2 In addition to these local authorities, Sandwell Metropolitan Borough Council has also been included within this statement of common ground, despite being outside of the functional geography set out in the South Staffordshire EDNA 2020 – 2040. Sandwell has been included within this statement to recognise the emerging shortfall identified across the four Black Country authorities through work on the Black Country Plan[1]. While work on the Black Country Plan ceased in October 2022, the published evidence to support the Black Country Plan will inform the approach and assessments taken by the four Councils in producing their own individual Local Plans.

2.3 The Black Country Plan Regulation 18 draft, published in 2021 indicates that the Black Country as a whole (including Sandwell) was required to export 210ha of employment land through the Duty to Cooperate in order to address its employment needs. This shortfall is based on the balance of employment land need and supply across the individual Black Country local authorities.

2.4 Both the Black Country Economic Development Needs Assessment 2017 and Economic Development Needs Assessment Update August 2021 concluded that the four Black Country authorities (Wolverhampton, Walsall, Dudley and Sandwell) form a single functional economic market area (FEMA), albeit with complex and varying functional interactions between the four Council areas within it. The work also confirms that the FEMA authorities have functional links to South Staffordshire, Birmingham, Wyre Forest, Bromsgrove, Solihull, Tamworth, Lichfield and Cannock Chase. Given this extensive geography, the relationship between the individual Black Country FEMA authorities and the authorities within this wider area also varies.

2.5 The 2021 update also identified functional links to Shropshire from the Black Country FEMA authorities. Therefore, aside from Stafford, there is strong overlap between the South Staffordshire FEMA and the authorities functionally related to the Black Country FEMA, with South Staffordshire and Cannock sitting in both groups.

2.6 Given the above context, Sandwell has been included in this statement of common ground, to ensure that the Black Country's employment land shortfall is addressed in a coherent manner and to recognise the functional links that Cannock and South Staffordshire have to the Black Country FEMA.

2.7 As indicated above in relation to the Black Country, parties to this SoCG also have evidence of FEMAs that differ from South Staffordshire's FEMA. The Cannock Chase Economic Development Needs Assessment 2019 identifies the FEMA for Cannock Chase as Cannock Chase District, Stafford, Lichfield Walsall and South Staffordshire District. The Stafford Borough Economic Development Needs Assessment 2020 identifies the FEMA predominantly aligns with the Borough's administrative boundary.

[1] https://blackcountryplan.dudley.gov.uk/t2/p5/

3. Strategic Matter - Meeting Employment Needs

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

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

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	Regulation 18 Issues and Options consultation complete (2020)	exported through the Duty to Cooperate is identified by this consultation. Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the borough through the 2021 Stantec Report[2] The issues and options consultation sought views on a range of levels of employment growth and land supply options to meet this growth, identifying a need to allocate employment land to accommodate this need. No surplus or shortfall to be exported through the Duty to Cooperate was identified through this consultation.
Black Country authorities (Wolverhampton, Dudley, Sandwell, Walsall)	Regulation 18 Preferred Options consultation complete (2021). October 2022 confirmation that work on the Black Country Plan has ceased and the Council's will be preparing individual Local Plans. The timescale to be confirmed late 2022 / early 2023.	Identifies a shortfall of 210ha of employment land over the plan period. Supporting work commissioned to examine the apportionment of West Midlands Interchange (WMI) suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities. This is broken up on the following basis: • Dudley – 14ha • Sandwell – 18ha • Walsall – 19ha • Wolverhampton – 16ha

Work to date on the Black Country employment land shortfall

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

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

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

3.3 Following completion of this evidence, the most recent published evidence from the 2021 Draft Black Country Plan consultation indicated that the shortfall had fallen since 2017 but remained significant, amounting to 210ha of land which needs to be exported through the Duty to Cooperate process. The Draft Plan suggested this would be informed by an update to the Black Country's EDNA and would be distributed to authorities that have a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway.

3.4 Following this in April 2022 the Association of Black Country Authorities wrote to neighbouring and housing market area authorities (Appendix 2). This letter requested clarification that all opportunities to accommodate unmet employment needs had been explored in local plan work and queried whether authorities would be willing to participate in an update to the 2021 West Midlands Strategic Employment Sites work. It also indicated that the Black Country's employment shortfall had fallen to around 108ha, taking account of West Midlands Interchange's contribution to the Black Country and the proposed contribution from Shropshire Regulation 19 Local Plan. The correspondence requested that local planning authorities enter into a Statement of Common Ground with Black Country to regularise their positions on its employment shortfall. However, this is yet to be progressed.

3.5 In October 2022, the Black Country Councils confirmed that work on the Black Country Plan had ceased, and that the four Council's would be preparing individual Local Plans. The Local Development Schemes confirming the programmes for these Local Plans are likely to come effect in late 2022 / early 2023. The Plans will be informed by an update of the 2021 EDNA which was commissioned on the basis of it supporting the Regulation 19 Black Country Plan. This update will confirm the employment land demand scenario and associated shortfall arising in each of the local authority areas and the associated sum across the FEMA as a whole.

<u>Contributions to date from the South Staffordshire FEMA to the Black Country's shortfall</u>

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

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

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

3.7 South Staffordshire has also historically had an oversupply of employment land which has contributed towards the unmet needs of the wider region. This has been reflected in historic local plans, such as the district's Site Allocations Document 2018, which allocated modest extensions to the district's strategic employment sites to address regional unmet needs from beyond the district. South Staffordshire's current emerging Local Plan Review has similarly identified a surplus of employment land supply against South Staffordshire's own needs. The district has formally indicated to the Black Country through Duty to Cooperate correspondence that this 36.6ha oversupply could contribute to the unmet employment land needs identified in the Regulation 18 Draft Black Country Plan.

3.8 To date neither Cannock Chase District Council nor Stafford Borough Council have proposed surplus employment land contributions towards the Black Country's employment land shortfalls. The reasoning and context for these positions is set out in Section 4 below.

Contributions to date from areas outside of the South Staffordshire FEMA

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

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

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

[4] Including the Black Country, Birmingham and wider Staffordshire market areas
[5] West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)
[6] Bromsgrove DC, Lichfield DC, Solihull MBC, Tamworth BC and Wyre Forest DC

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

South Staffordshire District Council's position

4.2 South Staffordshire has been clear in Duty to Cooperate correspondence since 2018 that it will contribute surplus employment supply above its own needs to reduce the unmet needs of the Black Country authorities. The South Staffordshire ENDA 2018 identified a 19-38ha employment land oversupply against past completions and GVA growth predicted over the plan period. It indicated that this could contribute to part of the Black Country's employment shortfall (whilst acknowledging that Sandwell was not in South Staffordshire's FEMA) and that any oversupply to the Black Country should be secured through a Statement of Common Ground. Since this work was completed at the start of the district's plan review, South Staffordshire has revisited it's EDNA in 2022, which identified a 36.6ha surplus of strategic employment land to meet cross boundary unmet needs.

4.3 In addition to this, South Staffordshire have also made clear that the West Midlands Interchange (WMI) Development Consent Order could contribute further to reduce the Black Country's shortfall. This was granted by the Planning Inspectorate in 2020, which creates around 200ha of B8 employment land within South Staffordshire's Green Belt. South Staffordshire has worked with the Black Country to identify the proportion of this land take that could be attributed to the Black Country's shortfall, firstly through the 2021 Stantec Report[7] and then through the district's 2020-2040 EDNA[8]. This work identified a **minimum** 67ha B8 contribution to the Black Country's unmet needs solely from WMI, which the Stantec Report indicates could increase if other local authorities within the WMI travel to work area do not require their 'share' of the site's considerable land supply. South Staffordshire understands that the Black Country is working with other local authorities within the WMI travel to work area to understand if more land from WMI could be counted towards the Black Country's shortfalls, hence why this figure is an absolute minimum at this stage.

4.4 As communicated in the district's June 2022 Duty to Co-operate letter to the Black Country Authorities, the Council considers that there is a minimum of 103.6ha of surplus employment land within South Staffordshire which could contribute to addressing the Black Country's 210ha employment land shortfall. As set out in previous Duty to Cooperate correspondence the District Council does not consider there is further suitable employment land to reduce this shortfall further within its administrative area, which reflects the findings of our Employment Site Assessment Topic Paper 2021.

4.5 The District Council is also already releasing 232ha of Green Belt land to deliver the West Midlands Interchange site and therefore contribute 67ha to the Black Country's

[7] West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)
[8] South Staffordshire Economic Development Needs Assessment 2020-2040

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

Cannock Chase District Council's position

4.6 Evidence to support the Cannock Chase Local Plan review identifies that the Cannock Chase FEMA includes areas of South Staffordshire, Walsall, Lichfield and Stafford.

4.7 Cannock Chase District Council wrote to the local authorities identified as being in its FEMA in December 2021 advising that it could not meet its employment land needs without removing sites from the Green Belt. The correspondence asked if the authority was able to assist in meeting some of Cannock Chase's employment land needs using land which is not in the Green Belt? The correspondence also asked in principle if the authority had any concerns regarding Cannock Chase District removing land from the Green Belt within its own administrative area to meet its local need for employment land.

4.8 South Staffordshire response in December 2021 advised potentially there may be capacity / sites in an emerging development plan which were not in the Green Belt and sought further discussions. South Staffordshire also sought further discussions regarding Cannock Chase removing land from the Green Belt within its own administrative area to meet the local need for employment land. They advised that they were updating their evidence and subject to its findings, there may be scope for some surplus employment land arising due to the West Midlands Interchange contributing towards the Cannock's supply.

4.9 The West Midlands Interchange lies within South Staffordshire district and the approach taken by South Staffordshire to the apportionment of land from this and their surplus employment land is set out within this statement.

4.10 The Black Country Authorities provided a joint response to the letter in December 2021 and advised they also had a shortfall in land supply to meet their own needs.

4.11 The Association of Black Country Authorities advised in December 2021 that the 2021 West Midlands SRFI Employment Issues Response Paper commissioned by the Black Country Authorities (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/) suggests

[9] Page 49 of the Black Country Economic Development Needs Assessment May 2017 Stage 1 Report

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

4.12 Stafford Borough responded and advised that they had no land within their administrative boundary to assist in meeting some of the employment land need which was not in the Green Belt and that they had no concerns in principle regarding the removal of land from the Green Belt within Cannock Chase's administrative area and considered no further discussions were necessary at the time subject to the sites being identified.

4.13 Cannock Chase District Council has stated in its 2022 Regulation 19 Pre-submission consultation that it will provide for up to 66ha of land for employment uses during the plan period. This is based on a robust assessment of the suitability, availability and achievability of employment site options within the district. The provision of 66ha figure is an upper limit on the supply of employment land and incorporates the 10ha of employment land apportioned at the West Midlands Interchange which could form part of Cannock Chase's employment land supply and further release of land within the Green belt within the District. Cannock Chase District Council does not currently consider that it has surplus in employment land provision available at this time to assist with the Black Country FEMA's employment land shortfalls which can be exported through the Duty to Cooperate. The Regulation 19 Pre-submission consultation had not commenced at the time of this Statement of Common Ground.

4.14 Cannock Chase District Council has committed to the funding of the update to the West Midlands Strategic Employment Sites Study and respond to findings of this study in future local plan reviews.

<u>Stafford Borough Council's position</u>

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

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

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

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

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Black Country – employment land need and supply

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

4.17 Work is ongoing to update the exact extent of the shortfall across the FEMA as a whole and those of the constituent local authority areas through and update to the Black Country EDNA. But it is still imperative that local authorities with functional ties to the Black Country authorities examine whether they can reduce the Black Country FEMA shortfall through Local Plan Reviews.

4.18 The Black Country Councils are currently engaging with authorities they consider to have functional economic relationships with in order to identify potential contributions to address the relatively significant employment land shortfall across the individual authority areas and the FEMA as a whole. To date this has led to a minimum contribution of 103.6ha of employment land from South Staffordshire which could contribute to the needs of the Black Country FEMA. Duty to Cooperate work between the Black Country authorities and other authorities in the WMI travel to work area may increase this amount further, through identifying a greater share of West Midlands Interchange which is attributable to the Black Country FEMA. Given the sizeable nature of this contribution and the number of other local authorities with functional economic relationships with the Black Country, this is considered an appropriate contribution to the Black Country's employment land needs, although the Black Country authorities would expect South Staffordshire to participate in future updates to the West Midlands Strategic Employment Sites Study and respond to the findings of this study in future local plan reviews. The Black Country FEMA authorities have also agreed the appropriateness of Shropshire's proposed 30ha contribution towards its unmet needs subject to the inclusion of an early review mechanism should a shortfall remain in the light of the current round of Local Plans reviews and this position has been recorded in a separate Statement of Common Ground with Shropshire.

4.19 The Black Country authorities have made representations to the Cannock Chase and Stafford Borough emerging Local Plans to request that those Plans consider making a contribution towards addressing the Black Country employment land shortfall. The Black Country authorities will consider the evidence prepared to inform those Local Plans to inform a review of this position.

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5. Summary of Current Position

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

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

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

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

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Summary of key issues relating to the South Staffordshire FEMA

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

Summary of key areas of agreement

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

Key areas where agreement is yet to be reached

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

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

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

5.2 There is considerable variety in the progress and status of local plans across the South Staffordshire FEMA and it is likely that the position on the unmet employment needs of the Black Country will change over time as plan-making within that area progresses. Notwithstanding this complexity, the signatories to this statement will seek to engage proactively and positively on employment land shortfalls, seeking to maximise agreement on the approach to distributing any shortfalls and using shared evidence bases wherever possible.

5.3 It is anticipated that the following key steps will be required to address the outstanding issues identified in this section:

- The Black Country authorities will approach other authorities beyond South Staffordshire and Shropshire to request evidence of ability to assist with unmet employment needs (including areas functionally related to Black Country outside of South Staffordshire FEMA)
- The West Midlands Strategic Employment Sites Study update work will be progressed alongside other local authorities within the study area identified in that work
- Duty to Cooperate discussions between Black Country authorities and Stafford/Cannock will continue to understand whether an agreed position can be reached on their contributions to Black Country employment shortfalls

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Signatories (Senior Officer and Councillor)

Cannock Chase District Council

Name:

Position:

Name:

Position:

Dudley Metropolitan Borough Council

Name:

Position:

Name:

Position:

Sandwell Metropolitan Borough Council

Name:

Position:

Name:

Position:

South Staffordshire District Council

Name:

Position:

Name:

Position:

DRAFT

Stafford Borough Council

Name:

Position:

Name:

Position:

Walsall Metropolitan Borough Council

Name:

Position:

Name:

Position:

City of Wolverhampton Council

Name:

Position:

Name:

Position:

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

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

Dear Colleagues

Black Country Plan Review
Duty to Co-operate: Strategic Housing and Employment land Issues

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

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

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

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

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darwall Street, Walsall, WS1 1TP.
Tel: 01922 650000
Web: www.walsall.gov.uk

Strategic Housing Issues

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

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

Strategic Employment Land Issues

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

Potential contributions from Non-Green Belt Areas

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

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darwall Street, Walsall, WS1 1TP.
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Therefore, we would request that your authority confirms if your existing or emerging Local Plan is seeking to deliver levels of housing and / or employment land in excess of local needs on non-green belt land and, if so, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.

Green Belt Areas

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

Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study[1] concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan[2]. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands.

As the majority of the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for potential delivery of housing in the Green Belt, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham, may reasonably conclude that the housing market areas in Dudley and Walsall could only be expected to deliver up to a maximum of 5,000 homes in each of the two boroughs (providing a maximum total of 10,000 homes) over the 15-year Plan period. We hope to publish further delivery evidence to refine this figure by the end of the year. On the basis of this approach, the Black Country is facing a 'gap' of some 17,000 homes that cannot be accommodated within the Black Country.

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

[1] https://www.birmingham.gov.uk/downloads/file/1750/pg3_housing_delivery_on_green_belt_options_2013pdf

[2] https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper

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

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

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

Duty to Cooperate progress

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

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

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

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

Statement of Common Ground

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

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

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

Timetable for Responses

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

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darwall Street, Walsall, WS1 1TP.
Tel: 01922 650000
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We will be inviting your authority to attend a meeting in October 2020 to discuss the responses we have received to this letter and to agree a way forward, with the view to developing a Statement of Common Ground to accompany the Draft Black Country Plan by spring 2021.

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

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

Yours sincerely



Councillor Patrick Harley
Leader
Dudley Metropolitan Borough Council



Councillor Mike Bird
Leader
Walsall Metropolitan Borough Council



Councillor Maria Crompton
Deputy Leader
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield
Leader
City of Wolverhampton Council

Dr Helen Paterson, Secretary to ABCA
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ABCA
Association of Black Country Authorities
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW
Date: 26 April 2022

Dear Colleagues,

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

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

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

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

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

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Recent progress

1. The Regulation 18 BCP consultation took place between August and October 2021. We received around 20,800 responses and all of the representations can be viewed online via the link - https://blackcountryplan.dudley.gov.uk/bcp/ . The bulk of feedback centred around the potential use of green belt land for development and we are currently reviewing all of the responses to inform the preparation of the Regulation 19 BCP programmed for consultation in the Autumn of this year.

2. We received responses from a number of neighbouring authorities – Bromsgrove, Cannock Chase, Lichfield, Redditch, Solihull, South Staffordshire, Stafford, Staffordshire and Worcestershire. These representations raised a variety of issues at a strategic level, recognising the broad scale of the shortfall and the need for ongoing and better aligned engagement going forward, in order to ensure a consistent and fair approach be taken to address longer term needs once the final shortfalls are confirmed.

3. The next sections of this letter summarise the current scale of the housing and employment land shortfalls and how we intend to address them.

Strategic Housing Issues

4. The Regulation 18 BCP identifies a housing shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 2031-39). This shortfall is based on the most up to date local housing need (including the 35% uplift for Wolverhampton), the most recent housing monitoring information and land supply on sites allocated in the draft BCP including land currently designated as green belt. The Regulation 18 BCP proposes that this shortfall is addressed via the Duty to Cooperate through 'exporting' to sustainable locations in neighbouring areas.

5. As part of the preparation of the Regulation 19 BCP, we are undertaking further evidence gathering in relation to urban land supply. This will involve an update of the existing Urban Capacity Study including a detailed assessment of the implications of the ongoing restructuring of some retail and commercial sectors which may 'free up' space in town and city centres. However, the scale of any additional capacity is likely to be limited and is not anticipated to make significant headway into the shortfall outlined above.

6. As set out above, through the Duty to Cooperate, we are pleased that some Local Plans have responded positively to our request initially raised in 2018 for assistance in addressing our future growth needs. Potential contributions through our Duty to Cooperate engagement to date are outlined in the table below.

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

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

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7. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.

8. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.

9. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.

10. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.

11. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

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

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

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

Strategic Employment Land Issues

13. As is the case with housing needs, the Black Country is unable to meet its identified employment land requirements in full. The Black Country Plan employment land shortfall to 2039 is 210ha as set out in the Regulation 18 Black Country Plan – this figure the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the split of employment land provided for by the Plan comprise around 30% of B8 activity and 70% for E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. We are reviewing these requirements in the light of updated economic projections which include a more up to date understanding of the CV-19 recession recovery trajectory. This work may result in a refinement of the requirements but it is highly likely that our shortfall will remain.

14. In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

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15. At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/). This suggests that a minimum of some 67ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be largely satisfied by this site should the programmed South Staffordshire EDNA update confirm a surplus of employment land against local needs. **This could reduce the Black Country employment land shortfall to 138ha. Any additional surplus of employment land arising from the South Staffordshire EDNA update would reduce the shortfall further.**

16. In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, **reducing the shortfall to some 108ha**. We are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford, but no contributions have been put forward by those authorities and the BCAs will continue to press this matter through Local Plan examinations, particularly those authorities within the areas of strong economic transactions with the Black Country as listed above. We will also be seeking the participation of authorities listed in paragraph 14, and any others able to contribute to BCA employment shortfalls, in a Statement of Common Ground (SoCG) addressing this issue to inform the Black Country's Regulation 19 plan and will use the responses to this letter to inform the draft SoCG. **As is the case with housing, additional sources of land supply must be identified if the Black Country is able to meet its growth needs in full.**

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

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

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18. The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.

19. The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.

20. There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. Through the HMA Group and liaison with those bodies who were party to the 2021 Study, a draft brief has been prepared to address the recommendations for the 2021 Study and strongly recommend that this work is progressed in partnership with the local planning authorities across the 2021 Study geography, and other areas which share a functional relationship with the Black Country, for example Shropshire.

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

Next steps

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

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22. In the short term we will be continuing to engage with individual Local Plans to ensure 2018 Growth Study recommendations are maximised and to confirm current contributions to help address the Black Country shortfall, particularly in relation to those housing contributions which have been expressed at HMA level and not yet distinguishing a specific Black Country apportionment. For those Local Plans which are less progressed, we will engage in a positive and robust manner to ensure that the unmet needs of the Black Country are fully recognised and all opportunities to assist in meeting our needs are comprehensively explored. This will include opportunities identified in the 2018 Growth Study.

23. **But these current workstreams may not address our needs in full, and we strongly recommend to you that there is a compelling need to address this matter in a comprehensive and inclusive manner across a wide but functional geography.** We are also mindful of the forthcoming Birmingham Local Plan review and the potential for this to further increase the shortfall arising from the West Midlands conurbation. We outlined our suggestions on a potential programme of work as part of the 15th December South Staffordshire Duty to Cooperate meeting. This was shared with you in advance and we attach it to this letter. The key elements of this work programme are:

    - To review the extent of the HMA in order to understand if this is the most appropriate geography by which housing needs and mechanisms to accommodate any shortfalls can be considered;
    - To confirm the scale of the housing shortfall across the whole of the HMA over a period of at least 15 years to inform the approach taken by current and emerging Local Plan reviews.
    - A review of whether the growth locations identified in the 2018 Growth Study work remain appropriate and whether new growth areas should be identified for testing through Local Plan preparation. This work may well result in the need for a new Growth Study but we would not want to pre-judge the work before confirming that is the case.

24. This work programme is currently subject to ongoing discussions largely through the HMA officer group, and we recognise that the existing governance arrangements are in need of review to ensure that we have in place mechanisms to manage and oversee the implementation of this work. The nature of these governance arrangements and the parties involved should be informed by the evidence but at this stage, a Statement of Common Ground across the HMA geography and including other authorities which have a functional relationship with it which sets out the nature of how we work together going forward is essential. We strongly encourage your authority to fully engage in this work.

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

25. Turning to employment land, as with housing we will pursue a Statement of Common Ground with functionally related authorities to both secure current contributions and engage with less progressed Local Plans through the Duty to Cooperate to establish potential for further contributions. We have set out the compelling need for a follow-up study to address the recommendations of the 2021 West Midlands Strategic Employment Sites Study and have asked if your authority would be willing to participate in this work and assist with its resourcing.

26. Common to both the housing and employment land shortfalls is the final element of our strategy – for Local Plans to include an early review mechanism. This is important given the potential for there could continue to be a shortfall following the current round of Local Plan preparation. This shortfall should trigger the detailed evaluation of opportunities identified from the recommendations of the proposed work outlined above in relation to both housing and employment land through updated Local Plans. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. We consider that a failure to include an early review mechanism is a serious omission and must be addressed in order for the Plan to be sound.

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

Timetable for responses

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

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28. To enable us to meet this timetable, and clear understanding of opportunities through the Duty to Cooperate is critical. **We therefore ask that you consider the requests set out in this letter and respond in writing to: blackcountryplan@dudley.gov.uk within six weeks of the date of this letter.** If you wish to discuss the contents of this letter before responding, please get in touch. We appreciate that this letter may raise difficult issues that need thorough consideration from both officers and Councillors. However, given the time that has already passed since the Black Country initially identified a shortfall in 2018 and the wider work already being undertaken across the HMA, we would be grateful if you could adhere to these timescales. If you anticipate **c1delay** is being able to provide a response, it would be helpful if you could let us know as soon as possible.

Yours sincerely



Councillor Patrick Harley
Leader
Dudley Metropolitan Borough Council



Councillor Mike Bird
Leader
Walsall Metropolitan Borough Council



Councillor Kerrie Carmichael
Leader
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield
Leader
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South Staffordshire Council

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6 June 2022

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

Dear Councillor,

RE: Black Country Plan Review
Duty to Co-operate: Strategic Housing and Employment Land Issues

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely

[redacted]

Councillor Terry Mason
Cabinet Member for Planning & Business Enterprise

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 Council and Natural England in relation to air quality.

4th December 2024

Background

5. The interest features of a number of European Sites in and around the partner authorities' geography are recognised as being sensitive to increased air pollution.

6. Any new development could increase air pollution on European Sites directly or indirectly. The two main ways this can occur are:

    - By emissions arising directly from the development during its operational life (i.e. industrial units, livestock housing units, energy generation etc).
    - By indirectly resulting in a significant increase in the scale of vehicular movements on roads within 200m of a European site (this increase in

vehicular movement may occur both in the construction and operational phases of the development).

7. Since being made aware of the potential issue in 2019, the Cannock Chase SAC Partnership[3] has undertaken a number of actions to ascertain the impact of NOx emissions and their contribution to nutrient nitrogen deposition on the SAC designation to 2050.

8. In May 2020, the SAC Partnership proposed a strategic solution to the nitrogen issue; 'A road map to mitigation scheme'. Natural England was supportive of the measures the Partnership proposed, however could not provide an assurance that they would not object to any plans and projects for the 3 year 'grace' period needed to implement the 'road map' where increased nitrogen deposition resulted in an AEOSI of a European site.

9. The SAC Partnership agreed to commission evidence in the form of an air quality assessment to determine the likely scale of air pollution from vehicle movements on 6 European Sites over a 20-year period (2020 to 2040). Work was due to commence in early 2020 but this was delayed due to the Covid Pandemic. Data on NOx concentrations at appropriate locations has been collected monthly since October 2020 using diffusion tubes, with ammonia monitoring commencing on the same basis in 2021. Monthly monitoring of both pollutants continues to-date.

10. NE reviewed the data collected (alongside modelling predictions on the Air Pollution Information System) and were content that the NOx concentrations shown at the air quality collection points were below the threshold for concern. However, monitored ammonia concentrations were higher than modelling predictions. In addition, modelling predictions indicated that all six sites were receiving nitrogen deposition inputs above their critical loads.

11. It was necessary to establish if NOx emissions would remain under threshold once the proposed allocations in competent authority plans are factored in alongside proposals with consent or allocation in adopted local plans based

[3] The SAC Partnership is a partnership between organisations who have legal responsibilities in relation to the Cannock Chase Special Area of Conservation (SAC). The purpose of the partnership is to ensure that the ecological integrity of the SAC is maintained and all legal obligations in relation to the SAC are met. The Partnership is funded by mitigation contributions collected by seven local authorities from new housing development within 15km of Cannock Chase. These contributions fund both the Partnership and a series of works which mitigate the increase in recreational activity arising from new development. The SAC Partnership includes all partner authorities subject to this SoCG with the exception of Dudley MBC and Sandwell MBC.

on the precautionary principle, and whether the local plans would worsen the impacts of ammonia and nitrogen deposition.

12. In October of 2022, Middlemarch Environmental was instructed by South Staffordshire District Council (SSDC), on behalf of the nine partner authorities, to prepare a brief[4] to provide a detailed step-by-step methodology of how the partners could establish a scientific and robust evidence base to determine the likely air pollution impacts (both alone and in-combination) via increased traffic generation on several European sites as a result of Local Plan proposals coming forward. The brief (Appendix A) identified the European sites relevant to the partner authorities plans as follows:
    - Bees Nest and Green Clay Pits SAC
    - Cannock Chase SAC
    - Cannock Extension Canal SAC
    - Fens Pools SAC
    - Midlands Meres and Mosses Phase 1 Ramsar Site
    - Midlands Meres and Mosses Phase 2 Ramsar Site
    - Mottey Meadows SAC
    - Pasturefields Salt Marsh SAC
    - Peak District Dales SAC
    - West Midlands Mosses SAC

13. The Middlemarch brief was able to scope out the following sites for various reasons but in most cases due to there being no ‘A’ or ‘B’ roads within 200m of the boundary of the European site:
    - Aqualate Mere (Midlands Meres and Mosses Phase 2 Ramsar Site)
    - Bees Nest & Green Clay Pits SAC
    - Betley Mere (Midlands Meres and Mosses Phase 1 Ramsar[5] Site)
    - Black Firs & Cranberry Bog (Midlands Meres and Mosses Phase 2 Ramsar Site)
    - Chartley Moss (West Midlands Mosses SAC)
    - Mottey Meadows SAC
    - Peak District Dales SAC
    - Wynbunbury Moss (Midlands Meres and Mosses Phase 1 Ramsar Site)

14. This resulted in a recommendation for the following European Sites to be taken forward for detailed traffic and air quality modelling:

[4] Creation of an Air Pollution Evidence Base Brief to Support Local Plan HRA Staffordshire, Wolverhampton, Walsall, Sandwell and Dudley (March 2023)

[5] Ramsar sites are treated in planning as having equivalent protection of SACs and SPAs and are therefore included in this study. The Ramsar designation is underpinned by Site of Special Scientific Interest designation in England.

- Cannock Chase SAC
- Cannock Extension Canal SAC
- Cop Mere (Midlands Meres and Mosses Phase 2 Ramsar Site)
- Fens Pool SAC
- Oakhanger Moss Site of Special Scientific Interest (SSSI) (Midlands Meres and Mosses Phase 2 Ramsar Site)
- Pasturefields Salt Marsh SAC

15. NE were consulted on the Middlemarch brief in a letter dated 14 April 2023 (See Appendix B) and confirmed that "*it has been prepared in full accordance with Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. We are therefore able to support the report's methodology and its conclusions*".

16. In August 2023 Sweco Ltd were appointed by SSDC (on behalf of the partner authorities) to undertake the traffic and air quality modelling in line with the Middlemarch brief. Following completion of the modelling, Sweco's draft assessment (Appendix C(i) and Appendix C(ii)) concluded that of the sites detailed in paragraph 14, only the four European sites detailed below were subject to air pollution exceedance:
    - Cannock Chase SAC
    - Cannock Extension Canal SAC
    - Fens Pool SAC
    - Oakhanger Moss SSSI (Midlands Meres and Mosses Phase 2 Ramsar Site)

17. A steering group meeting took place between the partner authorities, Sweco and NE on 11th September 2024 in order to discuss the assessment findings. At this meeting, the findings of the baseline report were agreed unanimously by the partner authorities and NE. At this meeting all four European Sites were discussed to understand likely impact(s) on the qualifying feature(s)[6] of the sites and potential mitigation, with a number of actions agreed along with a commitment to further meetings.

18. At a subsequent meeting held on 25th September 2024 it was agreed by NE that AEOSI could be ruled out on Fens Pool SAC. The site is designated for Great Crested Newts (GCN) which are not sensitive to air quality. Furthermore, it has been confirmed by Dudley MBCs Countryside Services Team that the ponds that GCN use for breeding are located away from the exceedance areas. It was also agreed at the meeting of 25th September 2024 by NE that Oakhanger Moss could be screened out after further analysis by

[6] As defined by the relevant SAC/SSSI citation documents.

Sweco demonstrated that the air pollution exceedance at the site was predominantly caused by national traffic growth outside of the air quality project area due to its proximity to the M6 motorway, and that air pollution directly resulting from the partner authorities was de minimis compared to national growth.

19. At a Steering Group meeting on 14th November 2024, Cannock Chase SAC and Cannock Extension Canal SAC were discussed in detail in relation to understanding whether adverse effects on site integrity were likely to occur or not.

20. In relation to Cannock Chase SAC, Natural England confirmed that they had reviewed maps that show the extent of the habitats on Cannock Chase SAC that are reasons for designation of the SAC within the areas of exceedance indicated by modelling; RAP01, RAP02 and RAP03.

21. For RAP01 most of the area is mapped as site fabric, as such adverse effects can be ruled out in this area. Some of the area is mapped as heathland, however the area that the exceedance falls within is immediately adjacent to the road and is predominantly woodland/trees. As heathland has a mosaic nature (which includes trees), and because the presence of trees near the road is likely to be buffering the SAC area behind from air emissions from the road, Natural England concluded that they would not wish to restore this area to heathland by tree removal. As such a conclusion of no adverse effects on site integrity can be made for RAP01.

22. For RAP02 the area of exceedance falls entirely within site fabric of the SAC, and therefore adverse effects on site integrity can be ruled out on that basis.

23. For RAP03 there is an incredibly small area of qualifying habitat in the exceedance area. NE advised that adverse effects to site integrity can be ruled out because the associated area of qualifying habitat within the area of exceedance is negligible.

24. Based on the information in paragraphs 20-23 inclusive, adverse effects to site integrity can be ruled out in relation to Cannock Chase SAC.

25. Regarding Cannock Extension Canal SAC, the document ‘Ecology of the Floating Water Plantain’ (Lansdown RV & Wade PM (2003), understood to be the authoritative document on floating water plantain in the UK, states that floating water plantain which is the qualifying feature of Cannock Extension Canal SAC is tolerant of a broad range of nutrient conditions. The plant is also the submerged phenotype along the Cannock Extension Canal SAC and so

direct deposition of nutrients to the plant are not likely to occur; particularly in relation to ammonia and NOx.

26. Natural England commented that the ‘Ecology of the Floating Water Plantain’ (Lansdown RV & Wade PM (2003) document indicates that floating water plantain can take some time to show responses to effects from additional nutrients, however it is likely that this would have been observed at the SAC given the prolonged presence of the A5 immediately adjacent to the Cannock Extension Canal SAC.

27. Based on the apparent high degree of tolerance of floating water plantain to a range of environmental conditions and nutrient levels, as well as its submerged nature at the Cannock Extension Canal SAC, it was agreed that a conclusion of ‘no adverse effects on site integrity’ could be drawn.

Appendix 25 – Education Documents

19.12.2018 – CWC response to SSDC Issues & Options Consultation

CITY OF WOLVERHAMPTON COUNCIL

19 December 2018

Strategic Planning Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Issues and Options Consultation

Thank you for the opportunity to comment on the Local Plan Review Issues and Options Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 12 December 2018.

The following principles underpin our response:

1. Support for the preferred housing growth option of local housing need plus 4,000 homes of Greater Birmingham and Black Country Housing Market Area need;

2. 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 Greater Birmingham and Black Country Housing Market Area Strategic Growth Study areas of search, subject to the findings of the joint South Staffordshire and Black Country Green Belt Review and other evidence;

3. Support for the sites submitted by CWC to South Staffordshire as part of the "Call for Sites", as approved by Cabinet Resources Panel on 2 October 2018;

4. Support for the employment growth option to allocate additional employment land to help address unmet cross boundary employment land needs for the Black Country, in locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce;

5. Request for acknowledgement that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment land and logistics provision;

6. Support for the existing Brinsford Strategic Park and Ride site allocation and

request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;

7. Request that the impact of developments on the wider transport network is assessed, and that developments minimise trip generation through all available mechanisms;

8. Request that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links;

9. Request that any development on the edge of Wolverhampton take into consideration any health, education and environmental implications.

The detailed response to specific consultation questions is attached to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

Lead Planning Manager (Sub-Regional Strategy)

Direct: 01902 [REDACTED]
Email: [REDACTED]@wolverhampton.gov.uk

12.12.2019 – Staffordshire County Council response to SSDC SHSID Consultation

James Chadwick

Economic Development and Planning Policy

Wedgwood Building

Tipping Street, Stafford, ST16 2DH

Telephone: (01785)

E-mail: [REDACTED]@staffordshire.gov.uk

Website: www.staffordshire.gov.uk

Local Plans Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Via Email only
12 December 2019

Dear Kelly

Re: Local Plan Review – Spatial Housing & Infrastructure Delivery

Thank you for consulting Staffordshire County Council on your Local Plan Review Spatial Housing Strategy & Infrastructure Delivery document. We acknowledge that this consultation was discretionary on the part of South Staffordshire District Council and recognise the benefits of consulting on the approach to housing growth.

At the last round of consultation, we set out that it would be important for the housing target to not fluctuate significantly as it would affect infrastructure evidence and requirements. Section 2.4 of the Plan stipulates that if the extent of the housing shortfall from the wider Housing Market Area falls then the contribution South Staffordshire is making may reduce. Should this occur then there may be consequences for infrastructure requirements that could ultimately affect the scale of growth in certain locations.

We also noted that we have been liaising with the Black Country authorities to understand the possible implications of growth on school places. As the preferred Option G looks to deliver circa 40% of the housing growth via urban extensions to neighbouring urban areas, we can start to consider what areas

will be affected in more detail as sites begin to emerge. It will be important to continue a dialogue with the neighbouring authorities to understand any infrastructure issues and agree how any required schemes, if any, will be delivered and funded.

We acknowledge the search for a New Settlement and have a lot of experience around the Ministry for Housing Communities and Local Government garden settlement programme; sustainability appraisals; addressing deficit in existing infrastructure; and associated 'policy-off' process considerations. We would be able to help shape the thinking around the concept and would welcome the opportunity to engage in early discussions. Given the area of search defined in the preferred option it may also be worthwhile considering applying the Garden Settlement principles to the existing villages within the area of search to compare how they would perform against a standalone new settlement.

Transport

The transport comments provided on the Issues & Options document are still applicable including:

- The need to assess sites in terms of all methods of sustainable transport and reducing the need to travel, informed by accessibility analysis
- Consideration of the cumulative traffic impact of committed sites and the preferred growth option, informed by existing traffic volume and journey time data, spreadsheet models (to be developed) and available strategic traffic models, taking into account committed transport schemes
- Working with the County Council and public transport providers to identify sustainable transport and highway mitigation required to accommodate the preferred growth option

In relation to moving the plan forward it is noted that Highways England have recommended that the larger scale housing allocations proposed in the preferred option should be assessed to determine their impact along the Strategic Highway Network. Where possible a strategic transport modelling approach should be followed to enable the impact on their network to be determined and for mitigation measures to be tested. SCC has requested access to Highways England's SATURN Model (prepared to support the case for the M54-M6 Link Road) for this purpose. Elsewhere in South Staffordshire where there is no available strategic model coverage, the impact of generated traffic on surrounding highway networks will be initially determined using other transport planning techniques supplemented by appropriate traffic modelling.

Consultants have been appointed by Staffordshire County and South Staffordshire Councils to examine the case for a new railway station with parking facilities to be provided at Brinsford. The first stage of the study will identify whether there are any insurmountable constraints in terms of engineering, timetabling and finance for the project.

Preferred Option – Spatial Housing Strategy Option G

The Page 42 summary should emphasise that the A449 corridor has been chosen as a search for a new settlement due to its good connectivity to the M6, M54 and rail network at Penkridge, together with the highway capacity benefits associated with the proposed M54/M6 Link Road. However, traffic modelling will be required to ensure that a new settlement can be accommodated in transport terms.

The 'strategic infrastructure needs around the ROF Featherstone strategic employment site' requires definition, such as the M54/M6 Link Road and the desire for a new rail station. The ROF Featherstone access road, is solely required to serve the development site and does not have significant wider strategic traffic benefits

At Paragraph 5.3 it is recognised that the accommodation of the preferred growth strategy will need to be supported by new infrastructure, however in order to make the strategy sustainable and affordable, it is essential to make best use of existing infrastructure.

The preferred strategy focuses on sustainable accessibility by public transport. There also needs to be recognition of all methods of sustainable travel and opportunities to reduce the need to travel. It is acknowledged that the Sustainability Appraisal favours development sites that are accessible to the four rail stations in South Staffordshire and the need for sustainable transport options. It is expected that this will be carried through to policies and mitigation proposals.

Glossary of Terms

The following amendments are required to the Glossary for future iterations of the Plan:

- Local Transport Plan – This is the South Staffordshire District Integrated Transport Strategy.
- Infrastructure – As well as roads, this should refer to rail and bus provision, walking and cycling routes and broadband.
- Green Infrastructure – This should refer to off-road walking and cycling routes.

Appendix 3: Options for Growth and Rationale

Due to the proximity of Cannock Chase Special Area of Conservation (SAC) to potential development locations in Penkridge, Huntington and South of Stafford, consideration should be given to the potential for increased traffic flows within the SAC boundary.

The following high-level sustainable transport requirement at each main growth location should be acknowledged. Highway mitigation, generally in the form of junction improvements, is also expected to be required to accommodate residual traffic growth on the local highway network, to be determined through appropriate traffic modelling to inform the local plan and

transport assessments submitted with planning applications.

Bilbrook / Codsall **-** Recently enhanced rail services at Codsall will support growth at this location. Significant enhancements to Bilbrook and Codsall rail station facilities including growth in car parking will be required and the establishment of Community Rail Partnerships, will be desirable. In the longer term, improved frequency of rail services to Bilbrook will be beneficial, together with electrification of the Wolverhampton to Shrewsbury line, re-signalling and an increase in line speed.

It will be important to improve bus accessibility to the conurbation, particularly to Wolverhampton, and integrate new development sites with the existing settlement, particularly in terms of walking and cycling permeability.

Cheslyn Hay / Great Wyrley / North of Black Country conurbation – Recently enhanced rail services at Landywood will support growth at this location. Significant enhancements to Landywood rail station facilities, including growth in car parking will be required and the establishment of a Community Rail Partnership, will be desirable. In the longer term, direct services on the Chase Line to Stafford and beyond would be beneficial.

Opportunities to enhance bus accessibility north towards Cannock and south to the conurbation would be supported and integration with existing settlements, particularly in terms of walking and cycling permeability, will be important.

Wombourne / Western Edge of Black Country urban area - As recognised in Appendix 5, Wombourne receives a lower score in terms of public transport accessibility to employment compared to other locations served by rail. In order to minimise vehicle trip generation, new residents will need to rely on high quality and frequent bus services, particularly to the conurbation. Local accessibility and integration with the existing settlement will be essential, particularly in terms of walking and cycling permeability.

Perton – As recognised in Appendix 5, Perton receives a lower score in terms of public transport accessibility to employment compared to other locations served by rail. In order to minimise vehicle trip generation, new residents will need to rely on improved accessibility to Codsall and Bilbrook rail stations, and high quality and frequent bus services to the conurbation and Shropshire. Local accessibility and integration with the existing settlement will be essential, particularly in terms of walking and cycling permeability. Junction improvements will also be required in Perton where there is likely to be highway capacity concerns particularly at the junction with the A41 and local access onto Wrottesley Park Road.

ROF Featherstone – It is essential that the development site is served by high quality public transport, preferably a new rail station that could provide rail accessibility for new residents and employees and parking facilities that could cater for a rail park and ride facility. The current wording in Appendix 3 (Option G) refers to a 'Park and Ride along the A449' which could incorrectly imply a bus park and ride.

South of Stafford – Public transport accessibility will rely on high quality and frequent bus services to Stafford town centre. Local accessibility and integration with the existing settlement will be essential, particularly in terms of walking and cycling permeability, together with consideration of highway capacity improvements.

Infrastructure Delivery Plan 2019

The County Council provided an update on the IDP in August 2019. Since then there has been progress on the delivery of schemes, particularly the rail service enhancements. When work has progressed on the identification of mitigation measures to support the preferred option, the County Council will feed into an update of the IDP which will also be reflected in an updated version of the South Staffordshire District Integrated Transport Strategy.

Paragraph 5.2 – The wording should clarify the importance of making best use of existing infrastructure and should recognise all forms of sustainable transport, not just public transport.

Paragraph 5.3 – The acknowledgement that making the most of existing infrastructure provision when setting levels of housing growth is supported.

Paragraph 5.10 – Additional parking at Penkridge should also serve the rail station, as well as local retail.

Education

Staffordshire County Council has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning; 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne,
3) Codsall & Perton and 4) Penkridge. These areas are broken down into smaller planning areas and are used to plan the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

There are many different options and scenarios being considered as part of South Staffordshire District Council's (SSDC) Local Plan SHSID Consultation.

It is noted that the preferred option is to deliver 8,845 houses. This number would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Local Plan should help to ensure that there is sufficient education infrastructure available to meet the needs of the homes that are proposed to be delivered in a local area. Where additional capacity is required developer contributions will be necessary to cover the cost of any works. In addition, there may be instances where additional land is required to deliver the requisite places. The Plan should ensure that, where necessary, adequate land is allocated for educational infrastructure when considering areas for development. This maybe land adjacent to existing schools, land within a large proposed development or separate land to cover the cumulative needs of several proposed developments.

To mitigate the preferred dwelling number of 8,845 a total of 1,327 first school places, 1,061 middle school places, 796 high school places and 265 post 16 places are required if all the dwellings were in the three-tier areas. If all the dwellings were in the two-tier areas a total of 1,857 primary school places and 1,327 secondary school places and 265 post 16 places are required. It should be noted that if the developments are spread across the whole SSDC area then a combination of provision would be needed of three-tier and two-tier. This level of detail cannot be provided at this stage, where the location and number of new dwellings in any one location in not known. It is appreciated that the accompanying appendices to the Plan set out indicative levels of growth in each and we have sought to provide some commentary on the locations for growth at the end of this section. We will continue to work with SSDC throughout the site selection process. It should be noted that these numbers do not include additional Nursery provision, additional SEND provision and home to school transport costs. Provided below are some general principles that should be considered in the site selection process when determining scale of growth, location of sites and potential policy considerations.

When considering school sizes these can be referred to in relation to Forms of Entry (FE), which are multiples of 30 relating to class size e.g. a 2FE school would have 2 classes (30 pupils in each) in every year group. It is also possible for schools to operate at half forms of entry i.e. 1.5FE equals 45 children per year group. From an educational perspective some schools and governing bodies believe that teaching children from two age groups in one class (mixed age teaching) is beneficial to the pupils. However, there are many educators who don't believe this is the most appropriate method to organise and teach pupils, as it can present challenges due to the differences in ages and abilities which can affect learning outcomes. As you are aware there is a forever changing outlook on education provision, and more academies are being established through new schools, or maintained schools converting or being sponsored. It is therefore important that the views of schools and governing bodies need to be considered when proposing expansions, or new schools which may require a different class organisation than currently being used or preferred. Currently we believe that any options that require a school to

organise into mixed age teaching would not be the preferred option by the majority of schools.

For clarity a development or a cluster of small developments of 750 dwellings may trigger the need for a new first/primary school, 4,000 dwellings for a new middle school, 5000 dwellings for a new high/secondary school. A 0.5FE (15 places per year group) expansion to an existing school would require a development of at least 330 dwellings.

It should be made clear to prospective developers that large residential sites of 750 plus dwellings would be required to provide land for school site(s) in addition to education contributions to mitigate the development. Where cumulatively a number of proposed developments in one area totalled 750+ dwellings land would need to be allocated/safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land, which should be understood and agreed as part of the plan making process.

Any new first schools would need to be at least 1FE (150 places) and would require land of 7,635m2 to be allocated to facilitate this. To deliver a new 1FE First (150 places + nursery provision) would cost in the region of £4.6 million pounds. (as at Q3-2019). A 2FE (300 places + nursery provision) would require land of 12,870m2 to be allocated to facilitate this and would cost in the region of £6.7 million pounds.

Any new primary schools would need to be at least 1FE (210 places) and require land of 11,415m2 to be allocated to facilitate this. To deliver a new 1FE Primary (210 places+ nursery provision) would cost in the region of £5.2 million pounds. (as at Q3-2019)

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m2 to be allocated to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £20 million pounds plus. Where new schools are required the sites would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school, free from contamination and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as (but not exhausted to) drainage and vehicular access and will be detailed and discussed when appropriate.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

As noted above we will continue to work alongside SSDC whilst decisions are made as to where the housing will be located to ensure that there is adequate provision for education infrastructure, which is best found through continued liaison. For areas where there are pressure points consideration would be

given for potential expansion of existing school sites and in the more rural areas, we would also look to consider the implications on school transport.

Children in the villages without schools would be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age so there would be additional implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards additional school places, transport costs and highway improvements such as crossing points. However, consideration needs to be given before to whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

As the preferred options proposed growth along the border of the West Midlands conurbation there will need to be joint working and agreement with neighbouring authorities on the likely impact on education infrastructure and the possible solutions if required. This should culminate in a Statement of Common Ground between the relevant authorities for the Local Plan examination. We have already begun conversation across the border, which have helpfully included officers from SSDC, we will need to continue this joint approach to working alongside neighbouring Local Authorities to establish the impact of the Local Plan housing in SSDC and their own Housing requirements and the potential impact on cross border pupil movement.

An initial desktop analysis has been completed for all school sites in South Staffordshire in terms of potential expansion within their existing site boundary using the Department for Education Area Guidelines for Mainstream Schools Building Bulletin 103 (2014). This is presented via a RAG (red, amber, Green) rating for expansion potential Green being the highest potential and Red lowest or none.
It should be noted though that an extensive feasibility study & cost analysis would need to be undertaken to determine fully whether a school can be expanded to the size indicated on the desktop analyses, but the desktop analyses provide a useful starting point for considering site allocations and new infrastructure requirements.
School Organisation Team comments on the SSDC preferred areas of growth are as follows:

<u>Preferred Areas of Growth: Penkridge, Wheaton Aston & Brewood</u>

Penkridge operates a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools.

Penkridge contains eight first schools, one catholic primary school, two middle schools and one high school which are divided into 2 first school planning areas, 2 middle school planning areas and 1 high school planning area.

St Leonards CE (VC) First School at Dunston is its own planning area.

In addition, The Rural Enterprise Academy operates as a standalone education provider for year 9 – year 11.

Name of School	Education Phase	PAN (Published Admission Number)	RAG rating
St Michael's CE (A) First School, Penkridge	FIR (First)	30	
Marshbrook First School	FIR	30	
Princefield First School	FIR	45	
St John's CE (VC) First School, Bishops Wood	FIR	15	
St Mary & St Chad's CE (VC) First School, Brewood	FIR	30	
St Mary's Catholic Primary School, Brewood	PRI (Primary)	15	
St Mary's CE First Academy, Wheaton Aston	FIR	25	
St Paul's CE (VC) First School, Coven	FIR	30	
St Leonard's C of E (C) First School, Dunston	FIR	15	
Penkridge Middle School	MID (Middle)	100	
Brewood C of E Middle School	MID	120	
Wolgarston High School	HIG (High)	220	

Summary:
Penkridge Town has room for some growth at all phases of education subject to proposed numbers of housing.

There is room for growth in Wheaton Aston at primary phase but there is limited room for growth in Brewood. The first school is unable to increase capacity at its existing site, the Catholic Primary can increase but this will complicate education provision in Brewood as the primary school is the only Primary in a two-tier education model, which provides catholic provision to the wider community. The remainder of schools in this area operate a three-tier education model.

Brewood C of E Middle has limited growth available dependent on the proposed number of housing.

Any housing proposed in the rural areas would also require school transport to middle and to high school.

<u>Preferred Areas of Growth: Codsall, Perton & Pattingham</u>

Codsall & Perton operate a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools.

Codsall & Perton contains six first schools, one catholic primary school, three middle schools and one high school which are divided into 2 first school, 1 middle school and 1 high school planning area.

Name of school	Education Phase	PAN	RAG rating
St Nicholas CE (VC) First School, Codsall	FIR	60	
Lane Green First School	FIR	30	
Birches First School	FIR	30	
St Christopher's Catholic Primary School	PRI	30	
Perton First School	FIR	60	
Perton Primary Academy	FIR	60	
St Chad's CE (VC) First School, Pattingham	FIR	30	
Codsall Middle School	MID	120	
Perton Middle School	MID	120	
Bilbrook CE(VC) Middle School	MID	50	
Codsall Community High School	HIG	250	

Summary:
Codsall First planning area has very limited room for growth and is a priority school place planning area as the schools are currently full. The Plan identifies a potential need for a new 2FE first school. It will be important to ensure that the scale of growth directed to this area is commensurate with the proposed education infrastructure and that any new school is appropriately located. We will need to work collaboratively to ensure all issues are understood and to agree future infrastructure requirements.

Perton First have room for growth subject to proposed numbers of housing.
There is room available for growth at both middle school and high school phase subject to the proposed number of housing.

Discussions with colleagues in Wolverhampton Local Authority are ongoing as there are a number of children being educated in Codsall from Wolverhampton. Wolverhampton are also reviewing their Local Plan and it is important that cross border school place planning is continued to be considered.
Any housing proposed in Perton would also require school transport to high

school Preferred Areas of Growth: Wombourne, Kinver & Swindon

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Kinver & Wombourne.

Kinver & Wombourne contains eight primary schools plus one infant and one junior school and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Name	Education Phase	PAN	RAG rating
Brindley Heath Junior School	JUN	60	

Foley Infant School	INF	60	
Bhylls Acre Primary School	PRI	30	
All Saints CE (VC) Primary School, Trysull	PRI	15	
Corbett CE (VA) Primary School, Bobbington	PRI	14	
St Benedict Biscop CE Primary School	PRI	30	
St Bernadette's Catholic Primary School, Wombourne	PRI	15	
Blakeley Heath Primary School	PRI	50	
Westfield Community Primary School	PRI	60	
St John's CE (VC) Primary School, Swindon	PRI	15	
Kinver High School and Sixth Form	HIG	120	
Wombourne High	HIG	192	

Summary:
There is room for growth at most of the primary schools in Kinver and Wombourne subject to the proposed number of housing. It should be noted that in the area of Foley Infants and Brindley Heath Juniors both schools would need to be expanded as the schools cover one primary phase.

There is room for growth at Kinver High School, but further investigation would be needed to ascertain if Wombourne High School could grow subject to proposed number of housing.

Discussions with colleagues in Dudley Local Authority need to commence as there are a number of children being educated in Kinver and Wombourne from Dudley. Dudley are also reviewing their Local Plan and it is important that cross border school place planning is considered.

Some areas in Kinver and Wombourne High School catchments would also require school transport to high school

Areas of search Urban extension: Essington, ROF, Dunston, edge of Wolverhampton from Perton, through Kinver to Wombourne.

Cheslyn Hay and Great Wyrley- Essington and ROF
Cheslyn Hay & Great Wyrley contains eight primary schools and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Name of school	Education Phase	PAN	RAG rating
Glenthorne Community Primary School	PRI	45	
Cheslyn Hay Primary School	PRI	60	
Landywood Primary School	PRI	60	
Moat Hall Primary	PRI	60	
St Thomas More Catholic Primary School	PRI	25	
St John's Primary Academy, Essington	PRI	60	
Featherstone Academy	PRI	30	

Havergal CE Primary Academy	PRI	30	
Cheslyn Hay Academy	HIG	224	
Great Wyrley Academy	HIG	195	

Summary:
St Leonards CE (VC) First School at Dunston is its own planning area and is unable to expand using its current capacity. (Noted in table as this is part of the Penkridge Town First School Place Planning Area)

St John's Primary Academy, Essington and Featherstone Academy are currently full, but both have room for growth subject to the proposed number of housing.
There is limited growth available at Cheslyn Hay Academy and Great Wyrley Academy dependent on the proposed number of housing.

Discussions with colleagues in Wolverhampton and Walsall Local Authorities are ongoing as there are a number of children being educated in the Cheslyn Hay and Great Wyrley School Place Planning Areas from Wolverhampton and Walsall. Wolverhampton and Walsall are also reviewing their Local Plan and it is important that cross border school place planning continues to be considered.

<u>New settlement Area of search –Dunston and Penkridge to Wolverhampton (A449 corridor)</u>

The Spatial Housing Options has identified an area of search for a new settlement of circa 10,000 dwellings, along the A449 corridor between Dunston and Gailey, due to existing good transport links.

A new settlement of this size would need its own education infrastructure across all phases. It would also allow for the locations of the new schools to be carefully considered and planned to give greater opportunity for children to walk, cycle to school whilst encouraging families to be healthy and independent. In addition, through careful master planning of street layout, pedestrian routes and other facilities/amenities around the school etc it should be possible to design out issues that present at start/end of the school day at existing schools across the country. We would welcome the opportunity to work with SSDC to develop education infrastructure ideas for a new settlement.

Landscape

From a landscape perspective we support the approach to and content of the evidence base for the South Staffordshire local plan review - and have reviewed the following documents in order to make strategic landscape comments:

- Local Plan Spatial Housing Strategy and Infrastructure Delivery Oct. 2019 and Executive Summary
- Green Belt Study Stage 1 & 2 report July 2019
- Landscape Sensitivity Assessment July 2019
- Landscape Sensitivity Assessment Appendix 1

- Appendix 5 Policy and Physical Constraints
- Appendix 6 Site Selection Method

We agree in principle that the preferred option G has the potential to satisfy the strategic housing needs whilst minimising harm to landscape character, the green belt and designated historic landscapes.

Where relevant, the policies of the National Planning Policy Framework 2019 (NPPF) should inform the preparation of the Preferred Option. In particular, regard should be paid to:

- first considering the release of Green Belt which is *previously developed or well-served by public transport (138)*
- considering the *implications for sustainable development for channelling development* past the Green Belt (138)
- supporting *housing developments that reflect local needs* (77)
- locating housing *where it will enhance or maintain the vitality of rural communities. allowing villages to grow and thrive, especially where this will support local services* (78)
- *focusing significant development on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes,* whilst recognising that sustainable transport solutions will vary between urban and rural areas (103)
- *directing growth towards areas with the least environmental or amenity value*

(171)

Proposals should take into account, and avoid detrimental effects on, landscape and historic character including key characteristics, local distinctiveness, visual amenity, key views and tranquillity. The cumulative impact of development proposals on landscape character should be considered. Opportunities should be taken to enhance landscape character where possible and should be read in conjunction with the Green Infrastructure and other Natural Environment policies to achieve this.

In relation to the locally distinctive raised, domed landform of Cannock Chase Area of Outstanding Natural Beauty (CCAONB), we feel that more emphasis should be placed on the impact of development on views to and views from the AONB as highlighted in the CCAONB 2019 Management Plan (Policy LCP8 and Associated

Action A15) as the plan progresses. The two areas particularly affected by this Policy are the M6/ A449 corridor between Penkridge and Stafford, and the possible urban extension to the south of Stafford.

We concur with the summary conclusions of the Landscape Sensitivity Study and have reproduced extracts from the report below in italics to give them more emphasis as part of our consultation response.

Areas within South Staffordshire located alongside the West Midlands conurbation (Dudley, Wolverhampton and Walsall) often have a lower sensitivity to development than the rural villages within the district, due to the

urbanising influences of the adjacent conurbation. Generally, the visual influence of adjacent development and infrastructure extending from the urban area, as well as development beyond the settlement edge, semi-rural land uses, and the consequent erosion of field patterns, landscape features and loss of strong rural perceptual qualities, all combine to lower landscape sensitivity to further development.

However, the sensitivity of these landscapes are sometimes increased due to their role in providing a perceived gap and preventing coalescence between the wider conurbation and individual villages such as Wombourne, Perton, Codsall or between different settlements within the conurbation such as Penn and Sedgley.

Many areas, particularly along the northern settlement edge of Wolverhampton are also located in close proximity to major transport corridors, particularly those along the M54 between its junctions with the A449, A460 and the M6 or to the south of Cannock along the M6/M6 Toll and are often of the lowest sensitivity. These areas are often degraded both physically and perceptually, with little public access and limited natural features or are influenced by their proximity to large scale modern development typically found near major road junctions.

This conclusion should emphasise the potential impact of new or improved road infrastructure such as the M6- M54 link road currently in preparation.

The influence of adjacent historic landscapes and areas with a strong time-depth can increase sensitivity to development such as the areas west of Dudley adjacent to Himley Hall Registered Park and Garden the designed parkland at Wrottesley Hall, the historic parkland between Oaken and Codsall or the many areas with intact small scale historic field patterns.

The Spatial Strategy should make more reference to the context and setting of such historic landscapes and views to and from the parklands.

The landscape areas north of the M54, in the corridor between the M6 and the A449 are often of lower sensitivity due to the impact of modern infrastructure, including the motorways and busy trunk roads, the prevalence of prominent power lines, industrial estates and on-going mineral extraction. This is particularly apparent north and south of the busy A5 where the landscape contains areas of strongly contrasting character with large scale industry neighbouring small scale mixed farming and further north adjacent to J13 of the M6 near Dunston.

However, sensitivity increases rapidly away from the motorway corridor, due to the intact rural character, particularly where the landscape to the west of the motorway is separated by the north-south running railway line or to the east on the elevated landscape at Acton Hill.

Landscapes adjoining the rural South Staffordshire villages generally have the highest sensitivity to development, due to their strong sense of rural character, tranquillity and lack of larger scale modern development. The Conservation

Areas of these historic settlements often extend into the surrounding countryside, and development in these areas would adversely affect the settlement edge. The historic cores of these villages are often positioned along river corridors, or in hilltop positions where the surrounding countryside provides a distinctive element in views that are key to the character of the settlement.

Areas within the Cannock Chase AONB are of higher sensitivity, due to their natural and recreational character and consideration of the impact of development on the special qualities of the landscape as part of a nationally designated landscape.

Landscape Sensitivity Criteria selection was based on *the attributes of the landscape most likely to be affected by development and considered both 'landscape' and 'visual' aspects of sensitivity*. The criteria used were:

- *Scale (the scale of the landscape);*
- *Landform (the topographical complexity of the landscape);*
- *Landscape pattern and time depth (the complexity of landscape pattern and the extent to which the landscape has 'time depth' – a sense of being a historic landscape);*
- *Natural character (the presence of natural or semi-natural features that are important to landscape character);*
- *Built character (the extent that built character contributes to landscape character);*
- *Recreational value (the value of the area for recreation in which experience of the landscape is important);*
- *Perceptual aspects (qualities such as rurality, traditional land uses with few modern, human influences, sense of remoteness or tranquillity);*
- *Settlement setting (the extent to which the area relates or contributes to the form and pattern of existing adjacent settlement, and the character of the adjacent settlement edge);*
- *Visual prominence (visual prominence of the area and the character of skylines); and*
- *Inter-visibility (the degree of inter-visibility with surrounding designated landscapes and the role the area plays in contributing to valued views).*

In each Landscape Character Area within the District, the relative significance of the above criteria should be ranked according to their different key characteristics and the Study should acknowledge this in some way.

It is considered that the following evidence would be of use in taking the Plan forward:

Green Infrastructure Report: Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. The Spatial Strategy could include an innovative Green Infrastructure Evidence report which could investigate the feasibility of such a strategy to be undertaken hand in hand with site selection options on a strategic level. Such a report could take an overarching view on climate change, habitat loss and replacement over the whole District. The precedent for this approach is the Forest of Mercia and

National Forest. Large scale woodland creation could be seen in the context of the wealth of historic designed parklands throughout South Staffordshire.

- Topography: A strategic topographical analysis of the Green Belt may assist in refining the Spatial Strategy and it could be readily undertaken as a digital terrain model or series of models highlighting for example the areas of significant visual impact in relation to the existing urban edge and or other key historic landscape features.
- Dark Skies evidence: A strategic review of Dark Skies in the district may assist in refining the potential harm to Green Belt and open countryside in less disturbed areas. There is an existing dark skies database undertaken by Land Use Consultants on behalf of CPRE.

Ecology

In the Policy and Physical Constraints paper sections 5.20 -5.23 are welcomed. Regarding 5.22 biodiversity opportunity areas while these remain helpful in terms of characterising biodiversity priorities in the District, they are somewhat outdated. We are aware that SSDC is hoping to work with partners to refine this approach in line with other districts; this would form an important part of the Local Plan evidence base.

There is no mention of locally designated sites - these include Local Wildlife Sites and Biodiversity Alert Sites. The conclusions (p34) refer to nationally and internationally designated sites. Those nearby but across boundaries in Shropshire and the West Midlands should also be included in the evidence base (for example Fenns Pool, Dudley)

In Appendix 6 – Section 8 'Other known Site Constraints' refers to designated and non-designated wildlife sites. It is noted that the natural environment is not considered in a separate section which could be interpreted that the natural environment is not considered as important, or as much of a constraint, as historic environment or landscape sensitivity. Natural habitats such as woodlands, open water and populations of species should be considered important. Similarly, this section does not mention geological or geomorphological sites or features.

Irreplaceable habitats include Ancient Woodland and veteran trees, which are referenced in NPPF 175 (c). They may also include other habitats such as species- rich grassland with a strong history of management. Where veteran trees are concerned, the setting, nearby trees of future veteran status, and how management of the trees will be secured should also be considered.

For all natural environmental considerations, the mitigation hierarchy should be applied (NPPF 175 (a) refers:
When determining planning applications, local planning authorities should apply the following principles:

> *a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

Although this reference is to planning permission, rather than strategic processes, it would be illogical to not apply this principle at an early stage, thus avoiding conflicts later. The hierarchy is now enshrined in best practice and is a keystone of the move towards mandatory net gain for biodiversity.

Archaeology / Historic Environment

It is welcomed that South Staffordshire Council has acknowledged (section 3.6) that historic environment constraints, such as Conservation Areas may constrain the level of growth in an area and that it may be appropriate to consider a lesser amount of growth in some locations. This is particularly pertinent given that the District Council's preferred Spatial Housing Option (Option G) will result in settlement growth in some of the district's historic rural villages, which comprise or are in the vicinity of a number of historic environment constraints such as designated heritage assets such as conservation areas, listed buildings, scheduled monuments, and registered parks and gardens. Furthermore, it is noted that the District Council specifically identifies such growth in the Penkridge area (a historic settlement with conservation area) as a disadvantage of the preferred option. Ensuring that the process of selecting sites that minimise the impact on the special historic character of Penkridge and other historic settlements in the District will be key, and, as the District Council have outlined (Appendix 6), a robust and consistent methodology for doing this is required.

The key criteria for the identification of sites, in terms of the Historic Environment/Archaeology, appears to be comprehensive in nature and there seems to be a good outline understanding of the historic environment and heritage sensitivities (informed by the Historic Environment Character Assessments and Extensive Urban Surveys) of the district's historic villages and proposed urban extension areas (Appendix 5 provides a useful summary of the key designated heritage assets in these areas). In terms of the methodology proposed for assessing the impact on the historic environment as part of the site selection process (Appendix 6), what is proposed is supported, and it is welcomed that this will be carried out will full regard to relevant Historic England guidance. Staffordshire County Council's Historic Environment Team have had an opportunity to review and comment on the proposed assessment methodology and, in general, are supportive of the proposed approach, however we would strongly recommend that Historic England's recent comments and suggested amendments, which largely focus on the setting and significance of heritage assets, are reflected in the final methodology.

Rights of Way

We welcome the inclusion of footpaths as part of the Design Principles set out in the SPD and the suggestions that footpaths and bridleways should be considered as a necessity to link public areas; as enhancements to the setting of developments; and as key connections between urban and rural areas.

We have recently published the 4th Review of the Definitive Map and Statement for South Staffordshire and the District Council have been provided with copies of the maps and Statement to indicate the alignment of

all recorded routes. We expect this to be used as evidence in planning sites to ensure that all public rights of way are protected and, where possible, enhanced in conjunction with any development.

At this stage in the Plan making process it is too early to consider specific paths. However, there are also a number of historic paths in some of the areas proposed for growth, including the Monarch's Way and these should be retained on their original lines where possible.

Flood Risk

At this stage in the preparation of the Local Plan there is not much to add from a Flood Risk perspective. We would expect more involvement when it comes to assessment of specific sites. However, the Spatial Housing Strategy – 3.6 Environmental Constraints, could add 'Flood Zone 3 and areas at risk from surface water flooding'. In addition, Appendix 6 – Section 9 Other Site-Specific Opportunities' could add 'opportunities to reduce existing flood risk where development allows'.

Adult Social Care

In relation Affordable housing and housing mix SPD references to specialist housing for older people could be extended to include the housing needs of people with disabilities and limited mobility. We support the approach of offering certain amounts of affordable housing to these groups which recognises that social housing needs may change as people move through the different age brackets.

With regards to paragraphs 14.2 and 14.3 when determining housing options for older people and people with disabilities, consideration should be given to mechanisms other than single story dwellings (which usually increase land use) which are accessible and meet peoples' needs. Other housing offers which could meet the needs of older or disabled people and enable them to age in place include lifetime housing in appropriately adapted or adaptable property which does not need to be single storey, for instance in adaptable accommodation a lift would give access to other floors.

On the Rural services audit document, sections 3.6 and 3.13, the acceptable walking distance for older, frail people and the mobility impaired is much lower (we use a return walking distance of 360m when we consider accessibility of services) so the impact on this group will be much greater and should be borne in mind when considering accessibility to services and amenities.

Minerals and Waste

We have reviewed the consultation documents with a view to assessing consistency with the mineral safeguarding policies within the Minerals Local Plan (Policy 3) and the NPPF (Chapter 17, esp. Para. 204(c)). Given the strategic nature of the alternatives under consideration, there are no specific comments to make now. It is, however, important to note that mineral safeguarding should be considered at some point in the Plan development process. There is a recent guide produced by the Mineral Products Association and the Planning Officers' Society which advises on how this can best be achieved -

https://mineralproducts.org/documents/MPA_POS_Minerals_Safeguarding_Guidan ce_Document.pdf .

Much of South Staffordshire falls within a Mineral Safeguarding Area (MSA), and whilst this should be recognised in the emerging Plan as a constraint, it would not be appropriate to eliminate all such land from consideration for development. Most of the MSAs relate to sand and gravel (Superficial Sand and Gravel or Bedrock Sand), and the widespread nature of the resource, both within the District and beyond, means that the loss of some areas is unlikely to be significant.

The situation for Brick Clay, however, is rather different. Etruria Marl is a nationally scarce resource, which is essential to support brick and tile production in the region. The MSA occupies a relatively small area to the south of Cheslyn Hay, so the emerging Plan should take care to avoid the sterilisation of this resource.

It is noted that the various options under consideration do vary in the amount of development they plan to direct towards the area south of Cheslyn Hay, so it might be reasonable to assume that those that direct less development in this area would most easily be able to avoid sterilisation of clay resources. The preferred option does not appear to be among the options which direct less development into this area.

The Minerals Planning Team will be happy to provide ongoing advice and support to South Staffordshire as the Plan evolves.

Enc. – Consultation Questions

Question 1: Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?

The evidence base broadly covers the main areas that are to be expected for the Housing Options at this stage in the process.
Further data on Green Infrastructure may be required. Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. Such data could assist site selection options and policy formation on a strategic level.

A strategic topographical analysis of the Green Belt may assist in refining the Spatial Strategy and it could be readily undertaken as a digital terrain model or series of models highlighting for example the areas of significant visual impact in relation to the existing urban edge and or other key historic landscape features.

A strategic review of Dark Skies in the district may assist in refining the potential harm to Green Belt and open countryside in less disturbed areas. There is an existing dark skies database undertaken by Land Use Consultants on behalf of CPRE.

Regarding 5.22 biodiversity opportunity areas – these remain helpful in terms of characterising biodiversity priorities in the District but are somewhat outdated. We are aware that SSDC is hoping to work with partners to refine this approach in line with other districts; this would form an important part of the Local Plan evidence base moving forward.
There is no mention of locally designated sites - these include Local Wildlife Sites and Biodiversity Alert Sites.
The conclusions (p34) refer to nationally and internationally designated sites. Those nearby but across boundaries in Shropshire and the West Midlands should also be included in the evidence base (for example Fenns Pool, Dudley)

Question 2: Do you agree that taking account of housing land supply from the start of the new plan period (1 April 2018) is the correct approach?

As there is potential for some of this supply to be delivered ahead of adoption of the Plan this approach is acceptable.

Question 3: Do you agree that all Safeguarded Land identified in the SAD should be released as a priority and should be delivered at an average density of 35 dwelling per hectare?

Where Safeguarded Land aligns with the preferred option it should be released. A blanket approach to density may not provide for design and housing types that reflect the location and local needs. A refined site by site approach would perhaps be more applicable

Question 4: Are there any other options we should consider?

Question 5: Do you agree that the 7 Spatial Housing Options set out above are appropriate options to consider? Are there any alternative options we have not considered?

Whilst there is a level of duplication across some of the 7 options, they are considered appropriate.

Question 6: Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?

In the absence of strategic agreement across the HMA on how to allocate the unmet needs Option G is considered appropriate.

Question 7: Do you agree that we should continue to explore options for a new settlement?

Yes, we would be keen to explore this with you in detail.

Question 8: What other information (if any) should we consider before concluding that Green Belt release is justified?

Given the level of Green Belt coverage in the District and the housing needs the information included to date and proposed is considered appropriate for Plan making.

Question 9: Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?

The site selection criteria in Appendix 6 broadly covers the relevant areas. In relation to section 4 the NPPF sets out at paragraph 138 criteria for consideration of greenbelt boundaries where it has been concluded necessary to release green belt. In this it refers to previously developed land and/or areas well served by public transport. On the latter point around public transport it may be useful for Appendix 6 to provide some further clarity. It may be useful to qualify what 'well served' means for example villages with train stations should be considered to be better served by public transport that those without. It may be the case that a particular Green Belt location is not currently well served by public transport simply because there is not enough there to serve. However, the development of an area may facilitate the provision of public transport where it previously was poor or didn't exist.

In Section 8 'Other known Site Constraints' refers to designated and non-designated wildlife sites. It is noted that the natural environment is not considered in a separate section which could be interpreted as the natural environment is not considered as important, or as much of a constraint, as historic environment or landscape sensitivity. Natural habitats such as woodlands, open water and populations of species should be considered important. Similarly, this section does not mention geological or geomorphological sites or features.

Question 10: Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?

This approach is acceptable as it allows sensible consideration of all potential sites against the objectives of the strategy and doesn't impose a blanket restriction that may result in less effective delivery of objectives.

23.04.2021 – duty to cooperate meeting notes

Wolverhampton City Council/South Staffordshire District Council/Staffordshire County Council cross-boundary education meeting 23.04.2021

Present:
South Staffordshire District Council (SSDC) – Edward Fox, Patrick Walker
Staffordshire County Council (SCC) – Karen Richards, James Chadwick
Wolverhampton City Council (WCC) – Michelle Ross, Laura King, Dawn Long

Initial views offered on sites, subject to further joint work to assess forecast demand/pupil numbers in light of planned development:

1. Linthouse Lane (South Staffordshire) and Grassy Lane area (Wolverhampton)

- WCC currently anticipate existing/new primary schools within Wolverhampton will likely absorb anticipated demand from Grassy Lane sites
- Primary school likely to be required on-site on Linthouse Lane, subject to further joint work to establish size and phasing with Wolverhampton
- Secondary school places from Linthouse anticipated to be accommodated at Chelsyn Hay Academy due to lack of demand for Wolverhampton secondary schools, with any overspill going to Great Wyrley Academy – extension of existing bus provision anticipated
- Appears likely (subject to further work) that both local authorities can deliver necessary primary and secondary capacity improvements within their own areas without need for transferring of s106 sums cross boundary

2. Land at Coven Heath/west of ROF Featherstone (South Staffordshire)

- SCC anticipate likely catchment change to bring site into primary school catchment of Featherstone Academy, with secondary pupils directed to Cheslyn Hay Academy
- Approach is due to capacity issues in existing first catchment – requires Wolgarston/Brewood school's agreement
- Secondary school places generated are unlikely to cause capacity impacts in Wolverhampton due to current demand patterns and distance to nearest school

3. Land East of Bilbrook (South Staffordshire)

- SSDC/SCC anticipate new first school to be delivered at Bilbrook
- Cross boundary impacts mainly relate to likely pushback of Wolverhampton students currently in Codsall/Bilbrook, particularly at Middle School stage onwards – timing depends on phasing of delivery

4. Langley Road (South Staffordshire)

- Site is within Kinver school catchment, but in very close proximity to Bhylls Acre Primary
- Unlikely that SCC would want to expand Bhylls Acre, but delivery of site and phasing would likely mean that new Staffordshire students from development could displace existing Wolverhampton students over time, subject to sufficient primary capacity in Wolverhampton

- Despite proximity, WCC suspect its unlikely that Highfields could be expanded further – already at capacity despite recent capacity increases
- SCC anticipate Wombourne/Kinver could accommodate high/secondary school places required

- **Agreed next steps:**
- Ultimately need to work towards a SSDC/SCC/Black Country Statement of Common Ground covering cross-boundary education issues, prior to consultation on respective Publication Plan consultations in 2022.
- To support this, evidence needs to be prepared/pulled together to support cross-boundary capacity/demand/push back assumptions discussed. Due to concentration of new development sites in South Staffordshire, SCC officers will begin preparation of this evidence with input from WCC education colleagues as needed.
- SSDC/SCC/WCC officer will aim to agree work internally before July 2021 (so that scope and approach can be referenced in Black Country Draft Plan) and completed/published in September 2021 to sit alongside South Staffordshire Preferred Options consultation.

03.05.2021 – duty to co-operate agenda and email chain

From: Patrick Walker

To: Edward Fox; "Richards, Karen (F&C)"; "Dawn Long"; "Michele Ross"; "Laura King"; "Chadwick, James (E,I&S)"

Subject: RE: Wolverhampton/South Staffs cross-boundary education meeting agenda

Date: 03 May 2021 14:56:00

Attachments: WCC SSDC SCC cross boundary education meeting 23.04.21.docx

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Hi all,

Please see attached for finalised minutes of the cross-boundary education meeting we had on 23rd April. Many thanks for all of your help with this.

Kind regards
Patrick Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

From: Patrick Walker

Sent: 23 April 2021 16:34

To: [REDACTED]

Subject: RE: Wolverhampton/South Staffs cross-boundary education meeting agenda

Hi everyone,

Many thanks for taking the time to meet and discuss this with us today, we really appreciated your help and found it a useful discussion. Please see attached for my initial notes of key points raised at the meeting to inform our Duty to Co-operate evidence base at a later date. As discussed, we appreciate that all views on capacity/pushback/demand will require preparation of further evidence and are only snapshots in time/initial views and have tried to reflect the need for the further evidence discussed in the notes.

Please read through carefully, particularly the agreed next steps, and let us know if you have

any comments by 30th April. Appreciate there was a lot discussed and that I may have got the wrong end of the stick so please correct/clarify as needed!

Kind regards
Patrick Walker

Senior Planner (Urban Design/Landscape Planning)
Strategic Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

From: Patrick Walker

Sent: 19 April 2021 09:31

To: [REDACTED]

Subject: Wolverhampton/South Staffs cross-boundary education meeting agenda

Hi all,

Hope you're all well, thought we'd circulate an agenda for this Friday's cross-boundary education meeting to ensure we pick up all relevant sites. We'll come with maps of the South Staffs sites – Michelle if you're able to show us the Wolves sites we're discussing then that might assist in discussing cumulative impacts. If anyone wants to add anything then please let us know.

1. Introductions
2. Emerging preferred sites (South Staffs and Black Country)
3. South Staffordshire edge-of-Wolverhampton sites:
   - **Linthouse Lane** (South Staffordshire) – potential for secondary demand to be accommodated in Wolverhampton?
   - **ROF/Coven Heath** (South Staffordshire) – potential cross-boundary opportunities to meet demand
   - **Langley Road** (South Staffordshire) – potential for Bills Acre primary/Highfields to accommodate demand
4. Potential areas of student push back and implications for Wolverhampton schools (e.g. Codsall to Wolves)
5. Timescales and work towards Statement of Common Ground on strategic cross-boundary education issues

Kind regards
Patrick Walker

Senior Planner (Urban Design/Landscape Planning)
Strategic Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

21.10.2021 – duty to co-operate meeting minutes

Minutes of Black Country, South Staffordshire and Staffordshire Duty to Cooperate Meeting

Date – 21st October 2021
Venue – Teams

Attendees:
Ian Culley (Chair, Black Country Planning Leads)
Carl Mellor (Planning Manager, Dudley MBC & BCPlan Site Assessment lead)
Vicki Popplewell (Principal Planning Officer, Dudley MBC & BCPlan consultation lead)
Neville Ball (Principal Planning Policy Officer, Walsall MBC)
John Raine (Principal Planning Policy Officer, Walsall MBC & BCPlan Infrastructure Lead)
Andy Miller (Strategic Planning & Transportation Manager, Sandwell MBC & BCPlan Transportation lead)
Marianne Page (Service Manager – Transport Strategy, City of Wolverhampton)
Michele Ross (Lead Planning Manager, City of Wolverhampton & BCPlan Housing lead)
Kelly Harris (Lead Planning Manager, South Staffordshire Council)
Ed Fox (Strategic Planning Team Manager, South Staffordshire Council)
Patrick Walker (Senior Planner, South Staffordshire Council)
Mark Parkinson (Head of Planning Policy and Enabling, Staffordshire County Council)
James Chadwick (Principal Planning Policy Officer, Staffordshire County Council)

Issue	Key issues and actions
Levels of Growth and Spatial Strategies – Black Country Plan	
Plan status	Reg 18 Plan published for consultation September 2021.
Levels of Growth	Target of over 76,000 homes and 565ha of employment land.
Strategy	Strategy is an iteration of existing Core Strategy with the majority of development within the BC on brownfield land within the urban area. BC urban capacity of 41,000 homes and 306ha of employment land. This shortfall means the BCPlan has had to test capacity in the green belt. It allocates green belt sites which can provide 7,700 homes within the Plan period and further capacity beyond the Plan period for those sites which will be built out beyond 2029. The Plan also identifies 48ha of employment land on sites within the green belt. Strategy focusses urban development on the four strategic centres and the corridors which link them. A number of the green belt sites are close to the South Staffordshire boundary. This means there is a gap of around 28,0000 homes and 210ha of employment land which cannot be met within the BC. This has informed DtC with neighbouring local authorities.
DtC	DtC contributions currently 'on the table' provide around 8,000 homes and 102-126ha of employment land. These contributions are at different stages and expressed in different ways – some to the HMA as a whole and some specifically to the BC.

Issue	Key issues and actions
	But a shortfall of around 20,000 homes after taking into account the current DtC 'offers' remains. Across the HMA the current shortfall is calculated to 2031 and is around 3,000 homes. This may increase in the light of evidence informing the preparation of the Birmingham Development Plan when this is published later this year.
Levels of Growth and Spatial Strategies – South Staffordshire Local Plan	
Plan status	Consultation to run to 13th December 2021. Plan covers the period to 2038.
Levels of growth	Housing requirement of just under 9,000 homes made up of local need and 4,000 contribution to the wider HMA.
Strategy	Vast majority of growth directed to larger Tier 1 villages in the most sustainable locations close to transport infrastructure, plus locations on the urban edge of the BC. Four strategic housing allocations adjoining the BC – Cross Green (RoF site)(1,200 homes), Linthouse Lane (1,200 homes within Plan period), Bilbrook (848 homes) and Langley Rd (390 homes). Employment land supply is made up of the four existing strategic sites and the more recently consented WMI. The employment land evidence is being reviewed and due to be published in February. This will inform whether SStaffs can make a contribution to meeting unmet employment needs arising in the BC.
Infrastructure evidence – Black Country	
Transportation	The two key pieces of work are the Transport Modelling work and Accessibility Work. Accessibility work completed to inform the draft plan and mainly focussed on local accessibility. Transport modelling work has just been commissioned jointly between the BCAs and TfWM. Starting point is the existing LTP and will be based on three scenarios – 2039, 2032 (LTP refresh) and baseline (2024). National Highways will be involved in this work going forward. Key current issue for the work is to confirm which infrastructure projects should be assumed to be delivered for each of the three scenarios. Current assumptions are: • By 2024 key projects delivered are M6 J10 and M54/M6 link. • By 2032 key projects delivered are Walsall to Aldridge Railway extension and associated new stations, Brinsford Parkway, Wolverhampton to New Cross Rapid Transit and A449 Corridor. • By 2039 anticipate extension of BC rapid transit, electrification of Wolverhampton to Shrewsbury. TfWM are currently

Issue	Key issues and actions
	considering changes to the frequency of services on this line and whether this will happen prior to electrification. The modelling work should be completed in February to inform the Publication version of the Plan – identifying any constraints associated with the development proposals and required mitigation. Staffs Highways team are involved in the transport modelling work as there are a number of sensitive locations in southern Staffordshire which may be affected by development. JD requested further liaison with Nick Dawson and John Jarvis to understand these wider impacts on other southern Staffordshire districts. This to ensure consistency between the BC Transport model and the Staffs Transport model. MP advises that Brinsford Parkway should be delivered by 2028 and therefore in line with the 2032 date for the purposes of the modelling. Tettenhall Station is also being promoted by TfWM and will need to be considered in the model. Third piece of transport work is the Car Park Study. First stage complete and next stage to inform the Publication Plan. **Action – AM to share schedule of infrastructure Projects with SStaffs and Staffs to confirm that the assumptions on project delivery are accurate.** **Action – Staffs County Highways team to be invited to next Transport modelling meeting.**
Education	Draft BCPlan includes a new policy to secure funding from residential development for new education infrastructure given the scale and location of new housing proposed in the Plan. For the sites allocated in the Plan we have tested whether any should provide new schools within the site given their scale and capacity of existing provision. The Wolverhampton LEA team have advised the need for one new Primary School in the NE of the City. In Walsall there are a number of sites where new primary schools may be required and this is being confirmed with LEA colleagues to inform the Publication Plan. There is unlikely to be a need for new secondary school in Walsall but this to be confirmed at Publication stage. There have been ongoing discussions with Staffs and SStaffs over cross-boundary education provision over the last two years given anticipated scale and location of growth. At this stage it is understood that each LEA can provide for school place needs within their local authority area. IDP is in preparation and will be completed for the Publication Plan. This will confirm education and school infrastructure needs and how they will be met.

Issue	Key issues and actions
	In summary, it is understood that both Local Plans are likely to be able to accommodate their own demand for education infrastructure without the need for cross-boundary funding mechanisms to deliver infrastructure in another local authority area. The Linthouse Lane site will provide a new primary school which will accommodate demand from Staffordshire. Moving forward, it is critical that the timing of the delivery of new schools is coordinated on a cross-boundary basis to ensure that there is no excess capacity in new schools which may affect attendance at existing schools as best we can. This commitment to ongoing dialogue and joint-working to confirm the trajectory for new school opening should be the key element of the SoCG. **Action – JR to share IDP with Staffs and South Staffs colleagues.**
IDP	Utilities Infrastructure Study prepared by Stantec and considered gas, electricity, sewerage, communications and the findings of the Water Cycle Study. It identified some issues in relation to electricity and gas supply. The subsequent Infrastructure paper also produced by Stantec was tasked with understanding whether there were any critical infrastructure constraints associated with the scale and location of growth proposed in the Reg 18 Plan. It advised that there are no significant infrastructure strategic constraints subject to the findings of the Transport Modelling work. The IDP is well-progressed but needs to be updated in the light of the findings of the Transport Modelling work and ongoing dialogue with the LEAs particularly in Walsall. CCGs and NHS bodies have been engaged as part of the preparation of the draft Plan and they have not identified any specific infrastructure that will be required to support the delivery of the Plan. The plan does include a Policy that can secure funding for health infrastructure associated with specific development proposals where a need can be evidenced.
Infrastructure evidence – South Staffordshire	
IDP	Draft IDP will be published as part of the Preferred Options consultation. This to be updated for Publication Stage in the light of responses to the PO consultation and ongoing evidence.
Highways	Staffs CC are undertaking highway modelling work using the SATURN model as the starting point to test the impact of development proposed in the Local Plan. This work will inform identification of a package of mitigation to address impacts and high-level indicative costs. This package of projects is being informed by discussions with BC Transport colleagues. For Wolverhampton, the main outstanding issue for this modelling is around the Linthouse Lane development proposal and the access arrangements.

Issue	Key issues and actions
Education	Strategic sites are anticipated to require new primary school provision. No anticipated need for new secondary schools.
Health	Discussions with CCGs and NHS Trusts. SStaffs also considering a Policy mechanism to secure funding for new health infrastructure and this will be reflected in the viability study. MR suggested the Linthouse lane site could accommodate a new heathcare facility but the evidence for this from the CCGs is unclear at this stage.
SFRA and Water Cycle Study	SFRA completed. Scope of detailed Level 2 SFRAs will be confirmed in the light of responses to the PO consultation. Water Cycle Study completed and ongoing discussions with Severn Trent but no showstoppers identified. May be some local site-specific mitigation. Lead local flood authority have been engaged in site selection in relation to surface water flooding. **Action – SStaffs to convene joint meeting with Black Country and Severn Trent to discuss any cross-boundary constraints in relation to sewerage capacity. MR to email SStaffs to set out potential cumulative impacts.**
Summary	
Summary	There is a strong level of joint working and cooperation on cross-boundary infrastructure issues. There are no major areas of concern between the three parties in terms of any gaps in the existing evidence or the scope of emerging evidence. There are no proposals at this stage which raise significant cross-boundary concerns not being addressed by this evidence.

07.09.2023 – Codsall & Bilbrook email chain

From:	Kellner, Tracey (C&F)
To:	Patrick Walker; Edward Fox; Kelly Harris; Annette Roberts
Cc:	Chadwick, James (E,I&S); Haycock, Tracy (Corporate); Richards, Karen (C&F)
Subject:	RE: Codsall/Bilbrook Potential Site Allocations
Date:	07 September 2023 15:22:17
Attachments:	

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Hi Patrick,

The proposed developments as set out in your email of 17th August 2023 total 613 dwellings in Codsall/Bilbrook, and as indicated in my email of 31st August 2023 this number of new homes cannot be mitigated in existing education provision and will necessitate a new 1FE school.

As shown in the table in my previous email (and below), a new 1FE school could mitigate between 750 to 1,000 new homes on the basis of the standard pupil yield of 3 pupils per 100 dwellings per year group. The developer(s) would need to meet the full cost of delivering the new school irrespective of the number of homes delivered, and therefore **the cost per dwelling would be lower if more houses are delivered**. At 613 dwellings we are concerned that this may cause viability issues for the allocations. If SSDC wish to take forward development of this scale we'd need to be comfortable that this has been addressed in decision making and covered in the Plan with concessions made against other policy requirements if necessary to ensure that critical infrastructure is funded, such as a new school in this case.

It is not possible to say definitively whether a new 1FE school would be sustainable should only 613 new homes be delivered as it depends on a number of factors including (but not limited to), timing and phasing of the development(s), pupil yield, inward and outward pupil mobility.

However, using a standard pupil yield which is used for developments in South Staffordshire, development of 613 new homes would be expected to generate 92 first school aged pupils. **If only 613 new homes are delivered in Codsall/Bilbrook and generate the standard pupil yield, there may be insufficient numbers of children living in the development alone to fill the new school** which could result in:

a. The new school having available places – **risk of viability to new school**
b. The new school fills but an existing local school having available places – **risk of viability to existing school(s)**
c. The new school and existing school(s) available places being taken up by more pupils residing outside of Staffordshire – **risk of increased inward mobility and potentially more traffic** on the road network

The table below (copied from my previous email) shows the size of new school that would be required to mitigate the indicated number of dwellings in a standard pupil yield area:

Number of Dwellings	Size of School
750 – 1,000	1 FE – 30 places per year group
1,001 – 1,500	1 ½ FE – 45 places per year group
1,501 – 2,000	2 FE – 60 places per year group

We assume that from a practical perspective there may be wider benefits of delivering housing numbers closer to the higher figure in each range, for example to spread the cost of infrastructure delivery, and maximise opportunity for walking and cycling, but these are areas that would need further consideration by SSDC taking into consideration the wider infrastructure requirements and consultation with all relevant parties.
Ultimately the quantum of housing proposed is a matter for SDDC but anything below 750 potentially has issues with viability of the allocation and its ability to meet all policy aspirations, potential viability issues with the new school and existing schools locally, and possibly higher than anticipated vehicle traffic for school trips as mentioned above.
Kind Regards,

Tracey Kellner

Tracey Kellner | School Sufficiency Lead
School Organisation Team

1 Staffordshire Place, Tipping Street, Stafford, ST16 2DH Tel: **(01785) [REDACTED]**

Email: [REDACTED]@staffordshire.gov.uk
www.staffordshire.gov.uk

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From: Patrick Walker

Sent: Wednesday, September 6, 2023 10:16 AM

To: Kellner, Tracey (C&F) ; Edward Fox ; Kelly Harris ; Annette Roberts

Cc: Chadwick, James (E,I&S) ; Haycock, Tracy (Corporate) ; Richards, Karen (C&F)

Subject: RE: Codsall/Bilbrook Potential Site Allocations

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Hi Tracey,
Many thanks for coming back to us but I don't think it answers the question we critically need to be able to move this matter forward.

We understand from your email below that a 1 new 1FE school is required in Codsall/Bilbrook, that developers would have to fund the full cost of delivery and the typical ranges of dwelling growth associated with different sizes of new first school. However, what we need confirmation of is whether the allocated/permitted/safeguarded land in the attached email ('*School numbers for Codsall/Bilbrook*') would be sufficient, in the view of SCC, to sustainably support a new 1FE school in terms of additional pupil numbers, or whether additional housing growth is required on top of these sites to achieve a level of housing growth that SCC would accept as sustainable to support a new 1FE school. This is the principal question upon which we shall have to base our plans on.

Critically, SCC have already offered a view on this matter in confidential correspondence with Bloor Homes (see attached '*FW: Bilbrook – Private & Confidential*'), but we have nothing public to rely on with this matter that can be relied up on as evidence and now urgently need to confirm your stance on this matter as it will be integral to determining our future growth strategy in these settlements, as discussed and agreed with Karen and James at our recent meeting.

We would be grateful if you could confirm SCC's stance on the above matter as soon as you are able to. For absolute clarity the key question is below:
Are the allocated/permitted/safeguarded land in the attached email ('*School numbers for Codsall/Bilbrook*') sufficient, in the view of SCC, to sustainably support a new 1FE school in terms of additional pupil numbers. Alternatively, is additional housing growth required on top of these sites to achieve a level of housing growth that SCC would accept as sustainable to support a new 1FE school?
Many thanks
Patrick Walker

Senior Planning Officer
Strategic Planning

South Staffordshire Council

(Working hours; Monday, Tuesday, Wednesday and Thursday AM)
Tel: 01902 696000

www.sstaffs.gov.uk

From: Kellner, Tracey (C&F) <[REDACTED]@staffordshire.gov.uk>

Sent: Thursday, August 31, 2023 5:03 PM

To: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>; Annette Roberts

<A.Roberts@sstaffs.gov.uk>; Patrick Walker <P.Walker@sstaffs.gov.uk>

Cc: Chadwick, James (E,I&S) <[REDACTED]@staffordshire.gov.uk>; Haycock, Tracy (Corporate)

<[REDACTED]@staffordshire.gov.uk>; Richards, Karen (C&F)

<[REDACTED]@staffordshire.gov.uk>

Subject: Codsall/Bilbrook Potential Site Allocations

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Hi Patrick,

Karen asked me to respond as she is on leave this week.
Allocation of 613 dwellings at Codsall/Bilbrook cannot be accommodated in existing infrastructure and would necessitate a new 1FE (150 places) first school. We would anticipate the allocated sites of 613 dwellings over time to generate 92 children of first school age against a capacity of 150 for the school.

The new school would only be required to mitigate the impact of the proposed development(s), we would expect the Local Plan policy to be clear that the allocated sites in Codsall/Billbrook will need to fund the **full** cost of delivery of the school. Without policy in place Developers may argue at application stage that they should only fund a proportion of the school cost which would leave a shortfall in funding and put pressure on the public purse - public funding is not available to assist in the delivery of the school to mitigate the impact of the proposed developments.

New schools are normally opened partway through delivery of a housing development to ensure that there are school places available to accommodate children living in the development. Whilst the development is only partially complete, and children are still to be generated from as yet unbuilt properties, pupils living outside the development may apply for a place at the school.

The table below shows the size of new school that would be required to mitigate the indicated number of dwellings in a standard pupil yield area:

Number of Dwellings	Size of School
750 – 1,000	1 FE – 30 places per year group
1,001 – 1,500	1 ½ FE – 45 places per year group
1,501 – 2,000	2 FE – 60 places per year group

Let us know if you need any further information, Kind Regards,

Tracey Kellner

Tracey Kellner | School Sufficiency Lead
School Organisation Team

1 Staffordshire Place, Tipping Street, Stafford, ST16 2DH Tel: **(01785) [REDACTED]**

Email: [REDACTED]@staffordshire.gov.uk
www.staffordshire.gov.uk

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Staffordshire County Council Education Response to South Staffordshire Council Publication Plan (Regulation 19)

Introduction

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning: 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne, 3) Codsall & Perton and 4) Penkridge. These areas are broken down into 'smaller school place planning areas' and are used to plan the number of school places required. These school place planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas in line with Department for Education guidance.

This is the second Regulation 19 consultation that has been carried out for the Local Plan Review. This is due to changes to the National Planning Policy (NPPF) in late 2023 and as a result of those changes there are fewer Green Belt sites in the plan. The largest impact this change has had was for the additional 4,000 dwellings proposed as part of unmet housing for the Greater Birmingham Housing Market Area (GBHMA) which has now been reduced to 640 dwellings.

The new Local Plan will run for a 15 year period from 2023-2041 with an annual requirement of 227 dwellings per annum. Making a total requirement to deliver 4,726 dwellings of which 4086 dwellings are for own need and 640 dwellings for GBHMA need.

This consultation response does not assess the impact or requirement for additional school transport, nursery or SEND provision.

The response is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period that the revision of the Local Plan covers, circumstances may change which could change education infrastructure requirements.

Supporting Information

In line with Department for Education (DfE) guidance the School Organisation Team plan school places on a planning area basis; groups of schools based on geographical location, local demographics and other factors such as pupil movement and school phases.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

School sizes are referred to as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group).

Currently within South Staffordshire District 30 of the 46 schools physically located in the area are Academies or Free Schools. This number is growing all the time as new schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the Department for Education/Secretary of State would be the decision maker for significant changes to an academy.

A development or a combination of small developments in an area of 750+ dwellings may trigger the need for a new primary school and a development or a combination of small developments of 4000+ dwellings for a new secondary school.

It should be made clear to prospective developers that where a new school is required developers must provide land for school site(s) in addition to education contributions to mitigate the development.

We would seek assurance from SSDC that where a number of proposed developments in one area necessitate a new school, land would be safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land.

Whilst this is not an exhaustive list, where new schools are required, the sites would need to be of regular shape, level, flat and without significant topographical features that would be considered incongruent with use as a school, free from contaminants and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as but not restricted to the provision of utility services onto the site, drainage and vehicular access and will be detailed and discussed when appropriate.

There would need to be a vehicular access route from the adopted highway to the school site at least sufficient and suitable for construction vehicles and vehicles for the delivery of materials for the construction of the school on the school site until the school opens at which point the vehicular access needs to be of an adaptable nature. Other site requirements may be required, and these will be detailed and discussed when appropriate.

Additional land adjacent to any new school may also need to be safeguarded as education land to ensure future growth.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

Consideration is also required of the implications of proposed housing developments on school transport. Children in villages and settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age. There would be additional implications in terms of coach park capacity, transport costs, logistics and highway constraints around school sites in these circumstances. This could involve education contributions being sought towards additional school places, larger coach parks, transport costs and highway improvements such as crossing points.

Any proposed development where the catchment and nearest schools are all over the reasonable walking distance noted above may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional costs related to new development. However, prior consideration needs to be given before to whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

New settlements and urban extensions should be expected to meet the full education requirement either through new schools, expansions or use of existing capacity. Should it not be possible to increase or provide additional capacity to mitigate housing development it may be necessary to transport pupils to areas where there is capacity or the potential for it to be provided. In such circumstances it would be expected that the developer meets these additional transport costs, along with contributions sought towards additional school places, as the need would have arisen as a direct result of their housing development. Provision of additional school transport in order to provide school places away from the local area impacts on the ability of pupils to use sustainable modes of travel to attend school. This could impact on the local highway infrastructure from the potential increase in vehicles and impacts negatively on proposals to reduce carbon emissions.

Education contributions will be sought towards mitigating the impact of new housing developments where necessary.
Any new first school(s) would need to be at least 1FE (150 places) plus nursery provision and would require land of 7,635m2 to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE First School (150 places + nursery provision) would cost in the region of £6.2 million pounds (as at Q2-2022). A 2FE First School (300 places + nursery provision) would require land of 12,870m2 to be provided and allocated within the local plan to facilitate this and would cost in the region of £8.2 million pounds (as at Q2-2022).
Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m2 to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £7.6 million pounds (as at Q2-2022). A 2FE Primary School (420 places + nursery provision) would require land of 20,430m2 to be provided and allocated within the local plan to facilitate this and would cost in the region of £11.4 million pounds (as at Q2-2022).
Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m2 to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £26.6 million pounds (as at Q2-2022).
The costs above are based on estimated new school costs as at Q2 2022. The building cost multiplier and new school costs are due to be updated and it is anticipated that the estimated cost could increase significantly due to current market conditions. This is a minimum cost to deliver any new school and will need to be updated as and when any new school is required.

Delivery of construction projects has become challenging with issues in demand, supply and project risk and opportunity. Commodities prices for copper, steel, and aluminium have all increased. Figures released by the Department for Business, Energy & Industrial Strategy (BEIS) in May 2022 show the Construction Materials Index rising by 3.6% - a 22.9% increase over the last 12 months. With the continued high energy prices, further price increases for heavy side materials should be expected.

There have been major changes in Building Regulations for the first time since 2013 to reflect changes in how buildings are being constructed and the environment, which are expected to further increase the capital cost to deliver construction projects.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of the proposed new homes in the right place at the right time. SCC would request that land is allocated for educational infrastructure when considering areas for development. Whether this is land adjacent to existing schools, land within a large, proposed development or land within a number of proposed developments.

In relation to the proposed areas of growth and the housing allocations for other areas we comment as follows:

Proposed Housing Growth – Locality 1

Penkridge Town

There are 1,297 dwellings proposed in Penkridge as part of the updated Local Plan.

This number of new homes is likely to generate 195 First school aged pupils, 156 at Middle school pupils, 117 at High school pupils and 39 pupils in sixth form.

Penkridge operates a three tier education system and contains three first schools, one middle school and one high school; the high school serves Penkridge Centre and the wider rural area.

To fully mitigate the proposed new housing further educational infrastructure would be required. We note that 1.5 hectares of land has been allocated for a new 1.5FE First School (225 places + nursery provision) which is of a sufficient size and other land requirements are detailed above. Education contributions will also need to be secured for the cost of the school building which is in the region of £6.7 million pounds (as at Q2-2022).

Penkridge Middle School and Wolgarston High School would both require up to 1FE of additional school infrastructure to mitigate the impact of the proposed developments (an additional 120 and 90 places respectively).

Southern Edge of Stafford – (A34 corridor)

There are 81 dwellings proposed in the Southern edge of Stafford as part of the updated Local Plan.

This number of new homes is likely to generate 17 Primary school aged pupils, 12 Secondary School pupils and 2 pupils in sixth form.

For school place planning purposes this site, due to its geographical location fall into Stafford South Primary Cluster and Stafford High School Cluster. Stafford operates a two-tier education system.

Additional infrastructure may be required at both primary and secondary phase to mitigate the cumulative impact of the Local Plan dwellings proposed together with those included in the Stafford Borough Local Plan, therefore education contributions will be required to make these developments acceptable in planning terms.

Huntington

There are 39 dwellings proposed in Huntington as part of the updated Local Plan.

This number of new homes is likely to generate 8 Primary school aged pupils, 6 at Secondary School pupils and 1 pupil in sixth form.

For school place planning purposes these sites, due to their geographical location fall into Cannock 1 Primary Cluster and Cannock High School Cluster. Cannock operates a two-tier education system.

Additional infrastructure may be required at both primary and secondary phase to mitigate the cumulative impact of the Local Plan dwellings proposed together with those included in the Cannock District Local Plan, therefore education contributions will be required to make these developments acceptable in planning terms.

Proposed Housing Growth – Locality 2

Brewood

There are 63 dwellings proposed in Brewood as part of the updated Local Plan.

This number of new homes is likely to generate 9 First school aged pupils, 8 at Middle school pupils, 6 at High School pupils and 2 pupils in sixth form.

Brewood operates a three-tier education system and contains one first school, one catholic primary and a middle school which serves the wider rural area. Brewood falls into the catchment area of Wolgarston High.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment, therefore education contributions will be required to make these developments acceptable in planning terms.

Transport to high school education would be required from these sites.

Coven

There are 48 dwellings proposed in Coven as part of the updated Local Plan.

This number of new homes is likely to generate 7 First school aged pupils, 6 at Middle school pupils, 4 at High School pupils and 1 pupil in sixth form.

Coven operates a three-tier education system and contains one first school. For Middle and High provision Coven falls into the catchment areas of Brewood Middle and Wolgarston High.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the

school's catchment therefore education contributions will be required to make these developments acceptable in planning terms.

Transport to middle/high school education would be required from this site.

Wheaton Aston

There are 18 dwellings proposed in Wheaton Aston as part of the updated Local Plan.

This number of new homes is likely to generate 3 First school aged pupils, 2 at Middle school pupils, 2 at High School pupils and 1 pupil in sixth form.

Wheaton Aston operates a three-tier education system and contains one first school. For Middle and High provision Wheaton Aston falls into the catchment areas of Brewood Middle and Wolgarston High.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment therefore education contributions will be required to make these developments acceptable in planning terms.

Transport to middle/high school education would be required from this site.

Proposed Housing Growth – Locality 3

Cheslyn Hay/Great Wyrley

There are 499 dwellings proposed in Cheslyn Hay & Great Wyrley as part of the updated Local Plan.

This number of new homes is likely to generate 105 Primary school aged pupils, 75 at Secondary School pupils and 15 pupils in sixth form.

Cheslyn Hay/Great Wyrley operates a two-tier education system and contains eight primary schools and two secondary schools.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Featherstone

There are 35 dwellings proposed in Featherstone as part of the updated Local Plan.

This number of new homes is likely to generate 7 Primary school aged pupils, 5 at Secondary School pupils and 1 pupil in sixth form.

Featherstone operates a two-tier education system and includes two primary schools, and the area falls into the Cheslyn Hay/Great Wyrley High school place planning area.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Transport to secondary education would be required from this site.

Proposed Housing Growth – Locality 4

Codsall/Bilbrook

There are 1194 dwellings proposed in Codsall & Bilbrook as part of the updated Local Plan.

This number of new homes is likely to generate 179 First school aged pupils, 143 at Middle school pupils, 107 at High School pupils and 36 pupils in sixth form.

Codsall/Bilbrook operates a three-tier education system and contains three first schools, one catholic primary, two middle schools and one high school.

To fully mitigate the proposed new housing further educational infrastructure would be required. We note that 1.3 hectares of land has been allocated for a new 2FE First School (300 places + nursery provision) which is of a sufficient size and other land requirements are detailed above. Education contributions will also need to be secured for the cost of the school building which is in the region of £8.2 million pounds (as at Q2-2022).

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is likely that the proposed developments can be accommodated within the existing middle school infrastructure within Codsall/Bilbrook however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.

Perton

There are 150 dwellings proposed in Perton as part of the updated Local Plan.

This number of new homes is likely to generate 23 First school aged pupils, 18 at Middle school pupils, 14 at High School pupils and 5 pupils in sixth form.

Perton operates a three-tier education system and contains two first schools, one middle school and falls into the catchment area of Codsall High School.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook,

Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.

Transport to high school education would be required from this site.

Pattingham

There are 17 dwellings proposed in Pattingham as part of the updated Local Plan.

This number of new homes is likely to generate 3 First school aged pupils, 2 at Middle school pupils, 2 at High School pupils and 1 pupil in sixth form.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.

Transport to middle/high school education would be required from these sites.

Proposed Housing Growth – Locality 5

Wombourne

There are 280 dwellings proposed in Wombourne as part of the updated Local Plan.

This number of new homes is likely to generate 59 Primary school aged pupils, 42 at Secondary School pupils and 8 pupils in sixth form.

Wombourne operates a two-tier education system and contains four primary schools and one secondary school.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Kinver

There are 120 dwellings proposed in Kinver as part of the updated Local Plan.

This number of new homes is likely to generate 25 Primary school aged pupils, 18 at Secondary School pupils and 5 pupils in sixth form.

Kinver operates a two-tier education system contains one infant, one junior school and one secondary school.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Swindon

There are 10 dwellings proposed in Swindon as part of the updated Local Plan.

This number of new homes is likely to generate 2 Primary school aged pupils, 2 at Secondary School pupils.

Swindon operates a two-tier education system and has one primary school and pupils in Swindon can access secondary education at Wombourne/Kinver High School cluster.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Transport to secondary school education may be required from this site.

Proposed Housing Growth – Tier 4 villages/other settlements/tier 5 settlements/windfall sites

There are 824 dwellings proposed for Tier 4 villages/other settlements/tier 5 settlements/windfall sites as part of the updated Local Plan.

Dependent on location a total of 124 first school places, 173 primary school places, 99 middle school places, 124 secondary school places, 74 high school places and 25 post 16 places are required.

As the location and numbers are not known at this time, we would assess the required mitigation (if any) on a site-by-site basis in conjunction with any cumulative impact with other proposed Local Plan sites in the same school place planning area.

Appendix 26 – Health Documents

12.03.2018 – duty to co-operate meeting with South-East Staffordshire and Seisdon Peninsula CCG

Meeting between Kelly Harris, Ed Fox and Ian Saberton (South East Staffordshire and Seisdon Peninsula CCG).

12th March 2018

General

- Ian explained he is one of a number of Primary Care Development Managers that support the practices in the CCG – operating for Seisdon Locality as part of SESSP CCG)).
- 'GP Forward View' – national driver for larger practices and combined facilities
- Focus on education in making an appointment – not always required to see a GP.
- General issue with practices sustaining their workforce – particularly GPs and Advance Nurse Practitioners (ANPs) – very difficult to recruit.
- 10,000 practice population is the ideal number (outlined in the GP Forward Plan) in terms of financial management – likely to employ a full time practice nurse.
- Practices can draw their own catchment areas which can sometimes cross administrative boundaries – CCGs are responsible for buying health care for the people in their practices catchment areas.

Pattingham Surgery

- Now closed – not sustainable as a business. Some of the patients have gone to Perton practices others have stayed at Cleverley's main practice.
- Calverley practice (currently under SESSP CCG) has recently taken on a new partner from Shropshire which increases the chances that they could move to Shropshire CCG in the longer term.

Kinver, Moss Grove Surgery

- Approx. 5500 practice numbers
- Moss Grove Surgery also has a practice in Kinsgwindford (under Dudley CCG and under another NHS England regional team). The practice is considering whether to join Dudley CCG – this is currently supported by Dudley CCG but might not be by SESSP. SESSP will need to come to some financial agreement with Dudley CCG with NHS England ultimately deciding. This would see Kinver run as a branch surgery with service delivery not expected to change in the short term if it goes through.
- If the move to Dudley CCG doesn't take place and Kinver continue to struggle to recruit then Moss Grove could hand back the contract. The Seisdon CCG would ask if any other local surgery wanted to take it on in the first instance.
- Moss Grove, Kinver is currently not fit for the future and significant levels of growth would lead to a need for a new building

- One additional note is that the practice have now started the formal process of applying to transfer (April 2018) and are consulting with all stakeholders in including SESSP CCG and SSDC.

Wombourne, Gravel Hill

- Approx. 7500 patient population.
- Not interested in moving to Dudley CCG
- Recently applied for small improvements grant (for automatic doors etc.)
- Sustainable practice and forward thinking.
- Capacity is ok for now, but the size of the building constrains growth.
- No issues in term so quality of service (waiting lists etc.).

Wombourne, Dale Medical Practice

- Approx. 6500 patient population
- Older of the two Wombourne practices and with big expansion may not be fit for the future.
- Sustainable practice and forward thinking.
- ANP in place.

- 2500 additional people (approx. 1000 homes) should be able to be accommodated within the existing 2 practices, but this could depend on the side of the village development takes place.

Perton, Lakeside

- Approx. 6000 patient population
- Completed 'vertical integration' – partners in practice still have contract with SESSP CCG, however all their services are sub contracted to the Royal Wolverhampton Hospital Trust (RWHT). All their admin, ordering in etc will be done by the RWHT rather than the partners. Economies of scale, access to other practices and mobilisation of workforce are seen as some advantages.
- Sub contracting began Jan 2018

Perton, Tamar

- Approx. 4000 patient population
- Shown no interest in vertical integration with RWT
- Only 1 partner on the contract at the moment – Dr Gruelle
- Not sure how stable the practice is in the long term or what the workforce situation is like at the moment.

Codsall, Russell's House

- Approx. 7000 patient population.
- Building not fit for purpose, but being addressed through potential relocation
- No issue with the workforce

- Sustainable and forward thinking.
- ‘Russell House 2’ proposed as a teaching practice with 2 additional consultancy rooms for this purpose - will add flexibility should there be significant levels of growth

Bilbrook, Bilbrook Medical Practice

- Approx. 8000 patient numbers
- Sustainable and forward thinking.
- Good practice with good level of facilities and no current capacity concerns
- Unsure if they have expansion space, dependent on growth in Bilbrook

Featherstone, Featherstone Family Health Centre

- Approx. 5000 patient numbers
- Dr Lee and Dr Glover are the partners
- Relatively modern but small building – physically constrained with limited parking
- May need a new practice if significant growth takes place in this location

19.12.2018 – CWC response to SSDC Issues & Options Consultation

CITY OF WOLVERHAMPTON COUNCIL

19 December 2018

Strategic Planning Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Issues and Options Consultation

Thank you for the opportunity to comment on the Local Plan Review Issues and Options Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 12 December 2018.

The following principles underpin our response:

1. Support for the preferred housing growth option of local housing need plus 4,000 homes of Greater Birmingham and Black Country Housing Market Area need;

2. 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 Greater Birmingham and Black Country Housing Market Area Strategic Growth Study areas of search, subject to the findings of the joint South Staffordshire and Black Country Green Belt Review and other evidence;

3. Support for the sites submitted by CWC to South Staffordshire as part of the "Call for Sites", as approved by Cabinet Resources Panel on 2 October 2018;

4. Support for the employment growth option to allocate additional employment land to help address unmet cross boundary employment land needs for the Black Country, in locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce;

5. Request for acknowledgement that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment land and logistics provision;

6. Support for the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases

access to the rail network should be promoted in the new Plan;

7. Request that the impact of developments on the wider transport network is assessed, and that developments minimise trip generation through all available mechanisms;

8. Request that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links;

9. Request that any development on the edge of Wolverhampton take into consideration any health, education and environmental implications.

The detailed response to specific consultation questions is attached to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

Lead Planning Manager (Sub-Regional Strategy)

Direct: 01902 [REDACTED]
Email: [REDACTED]@wolverhampton.gov.uk

30.01.2019 – duty to co-operate meeting notes

Notes from meeting on 30th January 2019

10,000 is still the optimum number of patients per practice from a financial and operation sustainability point of view. However this is quite a conservative number and practices can operate effectively above this number. There is a move to do more on a locality network basis which would see health provision delivered on a more flexible basis. This could see practices merged which could in theory see 20,000 patients per practice. Broadly speaking 2000 patients per GP would be sustainable.

Waiting times – does not believe that a standardised waiting time has been set for non-emergency appointments. Emergency appointment would be seen within the day.

If there was a need for physical health infrastructure then the preference would always be extending existing facilities with additional clinical rooms in preference to building a new facility.

Penkridge – survey results indicate low satisfaction for getting through on the phone; low satisfaction for getting appointments and the type of appointments offered. However, it may be that they can reduce the number of appointments by improving the internal systems within the practice to create new capacity (i.e better signposting to online bookings. better signposting to nurses/the pharmacy where people don't need to see a GP; more effective use in getting the practice manager/nurses to do admin tasks that GPs who have traditionally done [e.g paperless prescribing], thereby increasing GPs capacity for appointments). Once patients see a GP the survey rating of their experience tends to be quite good. A+E use from patients is a good indicator - pretty low for Penkridge indicating that they are managing clinical need well. Low on outpatient activity - normally a lot of referrals to outpatients can indicate a lot of reliance on locums who will tend to be risk averse. Believe the patient enrolment for Penkridge and Brewood is around the 10,000 per practice.

Could list the number of GPs per practice in the IDP but this won't always give the full picture of capacity – e.g. some may be locums/part time.

Lots of referrals to outpatients normally indicates a lot of locum doctors

Practices broadly set their catchment area. If they are proposing part of their catchment to be covered by another GP surgery then this would need to get agreement from the other surgery and would need sign off by the CCG. Catchment area ids not currently mapped. Not a single practice in South Staffs has a closed list – therefore they are required to take anyone in their area who wants a GP.

Extended access programme – done on a locality area basis. Should be offering someone an appointment on a Saturday – should be offering an appointment at one of the other extended access clinics within the locality (e.g In Perton if no availability at Russell's House)

Acute visiting service – GPs will only do a home visit where there is a clinical need. Penkridge will often use the acute visiting service to send a GP out (not a paramedic) although this won't be a GP from the practice.

Pharmacy contracts managed by NHS England - running as independent businesses.

30.01.2019 – duty to co-operate meeting with CCG leads

Meeting with CCG & Health leads 17th May 2019

Attendees

KH - Kelly Harris – Strategic Planning Team Manager

AL – Andrew Lindop – Strategic Planning Assistant

GM – Grant Mitchell – Assistant Director Enterprise & Growth

EF – Ed Fox – Assistant Team Manager

MJ- Mark Jenkinson – Assistant Director of Community Services

GJ – Gareth Jones – NHS England & NHS Improvement

SH – Steven Howells – Sandwell and West Birmingham CCG

KH - Gave an overview of the adopted local plan and explained that the plan needed to be immediately reviewed. She explained that the I&O consultation for the new plan suggested that the district looked to provide for its own need of circa 5000 homes + 4000 from the wider Black Country and Birmingham shortfall.

KH – Further explained that the new plan is looking at a range of broad growth options to meet the need for the circa 9000 homes , from lower tier to higher tier settlements, through to urban extensions and new settlements. KH explained that new settlements are popular with members but that the lead in time is at least 10 years and as such would be something that needed to be considered in the next next plan.

SH – Explained that the NHS has a national target to deliver 27,000 homes on NHS owned land and that this would be something that would need to be discussed further with the Council's Strategic Planning Team. GJ and SH to send over potential NHS owned sites within South Staffordshire for consideration in due course.

KH – Explained that the Council's strategic planning team would begin member seminars in June 2019 to ascertain where development should go in broad terms (not site specific at this stage). A number of growth options will be presented but the focus will be on an officer endorsed infrastructure led growth option.

KH – Explained that under the infrastructure led growth option, with caveats that these are broad figures subject to change. Penkridge would be looking at circa 500 homes to help deliver leisure facilities, Codsall/ Bilbrook 1000 homes for a primary school, and Perton 200 homes for a Country Park etc

KH – Explained the rationale for how the districts settlements hierarchy had been arrived at. KH referenced the Council's Rural Facilities and Services Audit and access to train stations as being key factors in determining housing allocation numbers. KH explained that in the smaller settlements the Council would be looking at smaller sites of no more than 40 homes and that the overall growth is roughly apportioned as 60% to the villages and 40% to urban extensions.

KH- Explained that the Strategic Planning Team are looking at delivering two key strategic urban extensions. One option would be located north of the Black Country and is expected to accommodate around 1500-2000 homes including a school and a local centre, and a further 'employment led' option close to significant employment development in the proximity of Junction 2, M54.

EF – Explained that the Council were also looking at smaller urban edge extensions, which would potentially be 3 or 4 sites of around 200 homes. EF explained that the Strategic Planning Team intended to consult upon the preferred options for growth in spring 2020

SH – Explained that Wolverhampton CCG had been working with the Black Country to develop and approach and justification for S106 and CIL contributions.

SH – Explained that himself and GJ would have to consider what issues that cross border working with different CCG areas would cause and SH explained that in regards a strategic allocation north of the Black Country, there were two surgeries that could be impacted by the development. One in bushbury and the other is Ashmore park.

GJ – Explained that each CCG will be preparing estate strategies with a deadline of the 15th of July. GJ and SH said that they would share these strategies with the Strategic Planning Team but would need to do some internal work to ascertain what cross boundary issues would arise from these pieces of work. GJ explained that the strategies cover a 10 year period where as a local plan is much longer so they acknowledged that their estate strategies would need to have some flexibility.

SH – Explained that housing plans in the Black Country need to be considered as this could also affect GP surgeries over the border in South Staffordshire.

SH – Explained that in regards to a strategic allocation north of the Black Country, the Ashmore Park GP surgery was already struggling in terms of capacity and they may need to look at a strategic outline case to expand or relocate the surgery. The creation of a hub and spoke model needs to be explored with the Bushbury surgery but on reflection GJ explained that it may be better if the premises remained separate because of the potential development.

GJ – Agreed that there needed to be collaboration between the CCG's as to what is needed from development in order to support GP practices and collaborate over mapping, catchments, and estate strategies. For example the Featherstone surgery is landlocked so any development over the border in Wolverhampton could negatively affect the capacity of that surgery. GJ and SH also said that the impact of any significant development north of the Black Country on new cross hospital would need to be considered and their relevant representative invited to future meetings. Potential need at Perton has also been identified.

GJ – Agreed to send the Strategic Planning Team Maps of GP surgeries and their catchments areas and at the next meeting demonstrate findings from the NHS SHAPE GIS system. This will map deprivation and catchment's zones.

KH - Confirmed that getting the evidence of capacity issues and need was important but that the Strategic Planning Team needed the CCG's to devise a test as to how they could justify new facilities or financial contributions for site improvements.

10.12.2019 – NHS response to SSDC SHSID Consultation

South Staffordshire Council

Local Plan Review Consultation Response Form

Part A: Your Details (Please Print}

Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.

	Your Details	Agent's Details (if applicable)
Title	Mr	
First Name	Stephen	
Last Name	Howells	
E-mail Address	[REDACTED]@nhs.net	
Job Title (if applicable}	Strategic Development & Estates Manag	er
Organisation (if applicable}	NHS, Black Country CCG's & STP	
Address	Sandwell & West Birmingham CCG Kingston House 438-450 High Street West Bromwich	
Post Code	870 9LD	
Telephone Number	0121 612 1533 or [REDACTED]	

The South Staffordshire Local Plan review **Spatial Housing Strategy** & **Infrastructure Delivery** document is being consulted on for a period of 8 weeks from Thursday 17 October until 5pm Thursday 12 December 2019. For advice on how to respond to the consultation form please email localplanreview@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Thursday 12 December 2019.** Late comments will not be duly made under the Regulations.

- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However your contact details will not be published.

Part B: Please complete a new Part B for each representation

you wish to make. Name: Stpehen Howells, Strategic

Development & Estates Manager **Organisation:** NHS, Black

Country CCG's & STP

1. **Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation does this representation relate to?**

Chapter	Local Plan, Spatial Housing Strategy (Whole Document)
Paragraph	All under consideration.
Table	Within the context of the document
Question (if applicable)	Request consideration be given to the attached docume
Other document eg SA, HRA	IDP responded separately ts

2. **Please set out your comments below**

We request that the South Staffordshire Council, Local Plan Review Team accept the supporting documents accompanying this Local Plan Consultation Response Form, presented by the author on behalf of the NHS, Walsall CCG, Wolverhampton CCG, Sandwell & West Birmingham CCG, Dudley CCG and the Black Country STP.

The reposnse has been formulated following initial meetings and consultations in the presence of South Staffordshire Council, NHS Improvement and South Stafffordshire CCG.

Healthier Futures
Black Country and West Birmingham

NHS

9th December 2019

South Staffordshire Council

Local Plans Team

Council Offices

Codsall

South Staffordshire

WV8 1PX

Dear Sirs

Re - South Staffordshire Council, SHELAA, Spatial Housing Strategy & Infrastructure Delivery.

The Black Country CCGs, on behalf of our member practices, would like to respond to the Consultation, based on the local consultation and engagement of our members which consists of 241 Primary Care GP practices and 11 Secondary Care Hospital providers in the area. CCGs commission most of the hospital and community NHS services in their areas including all GP practices, however dental services fall outside this remit under separate commission.

Many residents are understandably concerned about implications for medical services. The complexity of the delivery situation is evident. However, this only serves to justify concerns about the scale of the increased provision that will be required and doubts about when and where it will be provided.

We recognise the need for additional developments in South Staffordshire to support the continued growth of the area as a vibrant and sustainable economy, but request that further work is undertaken to understand the implications regarding the impact of developments on healthcare infrastructure so that we can align our workforce and estate strategies accordingly and allow communities to consider the approaches proposed.

The provision of health is the responsibility of NHS England and CCGs. There is a need however, to consider this in the context of a declining number of GPs, a number of practices holding practice vacancies and the need to use different workforce models. In order to meet continued demand and challenges facing the workforce, there is a need for general practice to continue to build capacity and resilience and therefore we have seen the development of networks of practices (Primary Care Networks) which are looking at ways of working together.

Health Education England have already documented the changing skill mix of general practices, which signals a shift away from a GP-led workforce to a greater skill mix. The Black Country CCGs would welcome the opportunity to work with South Staffs Council to gain a greater understanding of the timescale and nature of the developments in each of communities so that this can be built into our forward planning, paying particular attention to our workforce and estate strategy and maintain a regular dialogue to ensure health can respond to developments.

The Local Plan Review process cannot properly allocate land specifically for health facilities because providers plan for their own operating needs and local demand. New GPs do not necessarily require new physical buildings. Existing practices determine for themselves (as independent businesses) whether to recruit additional clinicians in the event of their practice registered list growing.

Developers should therefore be encouraged to consult with the relevant CCG to ensure consideration of health provision in association with proposed developments. Proposals for health facilities e.g. doctors' surgeries and dentists will be supported subject to need, site constraints and location.

The CCGs would welcome the opportunity to be involved in the pre-application and Master-planning stages of housing developments across the District to ensure that healthy, active and sustainable communities are promoted through the built environment. The CCGs have identified that primary medical care capacity in the areas identified on the attached plan within the Black Country will not be sufficient to meet the need arising as a result of the planned housing growth in South Staffs, particularly within the urban edges areas of search. Consequently, there will be a requirement for additional infrastructural capacity in the locations noted on the attached Plan. A Primary Care Needs Assessment must inform site-specific proposals. Where appropriate such requirements should be referred to as part of the Site Proposals Criteria. The attached map looks at the option plan provided as part of the consultation and responds by super-imposing the Primary and Secondary Care SHAPE mapping data to measure the impact of development on the border with the Black Country. The attached map highlights with red symbols those Primary Care premises which may be affected by potential housing growth in South Staffordshire where close to the Black Country border.

Our key concern is to see that new (housing) developments are adequately considered and provided for (under Planning Obligations, such as CIL or S106), in respect to appropriate and consequential health care infrastructure needs, including where no specific scheme solution is included. We actively support the prospect of introduction of more specific (Planning) guidelines to prospective Developers about making provision for healthcare infrastructure associated with developments, and a CIL schedule of charges to create a financial contribution, rather than a site specific ascertainment or provision, in either South Staffs or across the border in the Black Country CCGs.

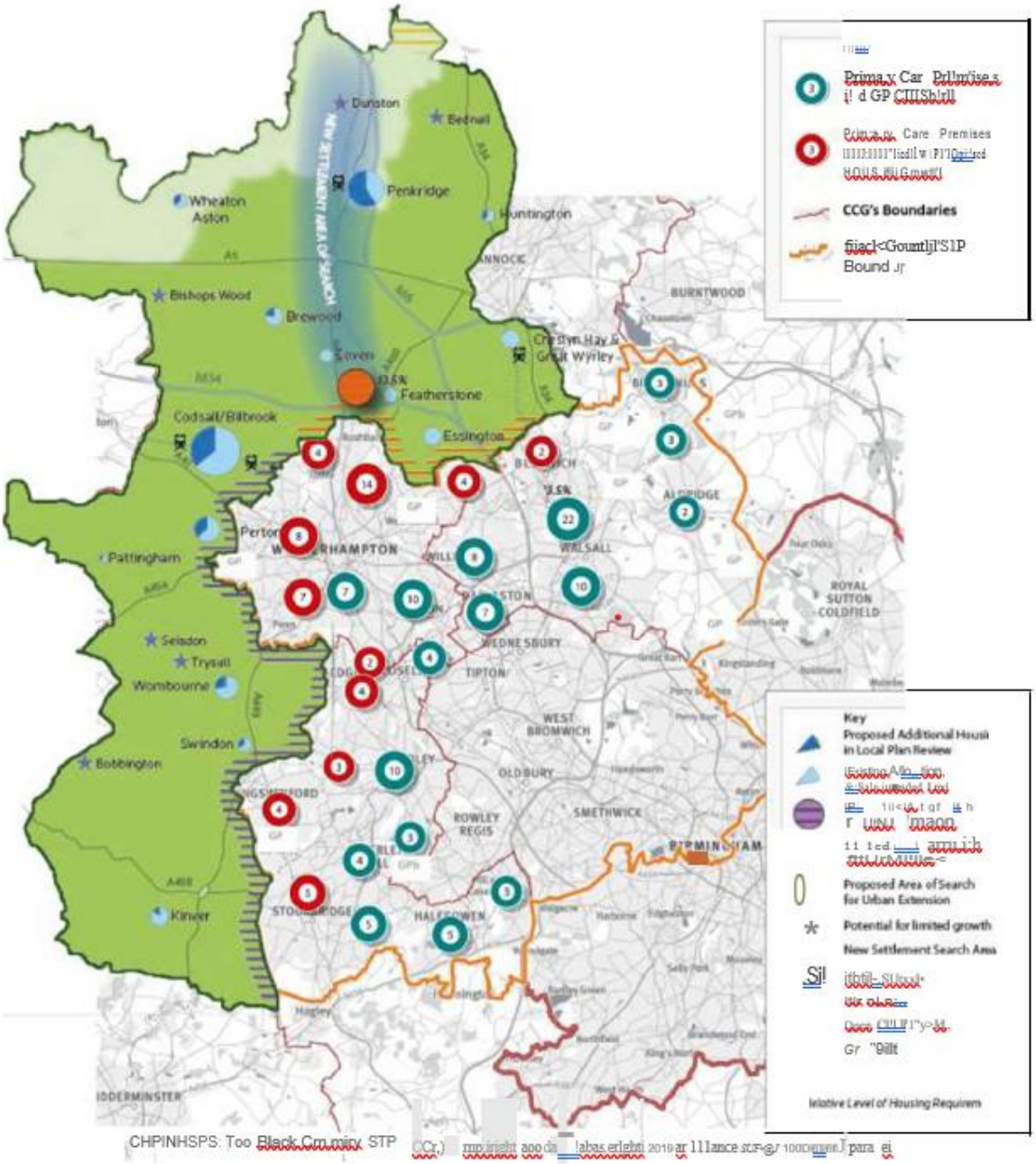
We would like the CCGs' support of the Plan and policies to be noted, along with recognition of the proactive nature of communication and collaboration involved with South Staffordshire Council, during these formative stages of its production as part of the Duty to Co-operate process, and that our concerns and comments have been sympathetically acknowledged and taken into account where practicable in this iteration of the Plan. Accordingly, we are satisfied that the proposed Local Plan and the evidence used to derive it, have been positively prepared; that is justified and well supported with documentary evidence of research and references; that it is deliverable and should support the ambition to create sustainable development and sustainable communities through its adoption.

Yours Faithfully

Mr S Howells

Strategic Estates & Development Manager

Sandwell & West Birmingham Clinical Commissioning Group
Working in Partnership with Wolverhampton CCG & Walsall CCG


CCG's Boundaries
Key
Proposed Area of Search for Urban Extension
Potential for limited growth
New Settlement Search Area
Penkridge
Featherstone
Essington
Codsall/Bilbrook
Bishops Wood
Brewood
Wheaton Aston
Huntington
Bednall
Dunston
Pattingham
Seisdon
Trysull
Wombourne
Swindon
Bobbington
Kinver
WOLVERHAMPTON
WALSALL
WEDNESBURY
TIPTON
WEST BROMWICH
OLDBURY
ROWLEY REGIS
SMETHWICK
BURNTWOOD
ALDRIDGE
ROYAL SUTTON COLDFIELD
HALESOWEN
IDDERMINSTER

12.03.2021 – email chain regarding South Staffordshire housing sites

From: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG)

To: Patrick Walker

Cc: Edward Fox

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Date: 26 November 2021 14:03:07

Attachments:

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Hi Patrick

With reference to the above and you email below, please find attached the 'SStaffs Sites' spread sheet, saved with the Black Country & West Birmingham (BCWB) assessment data added. You will see I have included additional columns (in the same way we approached the BCP) to indicate the priority Primary Care premises that would accommodate additional capacity through contributions towards reconfigurations or extensions to those respective existing premises.

Whilst most sites will no doubt be accommodated within Staffordshire Stoke on Trent CCG's strategy and are to far from the BCWB border, the close border developments to Wolverhampton and Walsall will require some development to accommodate the additional capacity through developer contributions.

Please let me know if you have any comments, queries

or questions. Kind Regards

Steve

From: Patrick Walker <P.Walker@sstaffs.gov.uk>
Sent: 17 November 2021 12:39 PM
To: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Cc: Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: FW: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi Stephen,

As previously discussed with Ed, please see attached for a list of proposed housing sites within the South Staffordshire Local Plan Review Preferred Options consultation. These are split into three categories as reflected in the spreadsheet tabs:

- **New allocations**: These are sites being identified for the first time in the Local Plan Review Preferred Options consultation
- **Safeguarded land delivery**: Sites which were previously identified through the Site Allocations Document 2018 as land safeguarded for development in future Local Plan Reviews (i.e. the current one)
- **Retained allocations**: Sites which were allocated through the Site Allocations Document 2018 for immediate housing development, but which (as of 1st April 2020) did not have a planning permission

I've removed the net developable area and density tabs as we don't have specific site densities or layouts at this stage for the sites in question – hopefully the information provided is still sufficient to establish health infrastructure impacts regardless.

Apologies it's taken us a while to get this information to you, but if you have any questions with this or anything else then please don't hesitate to get in touch.

Kind
regards
Patrick
Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

From: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 28 September 2021 16:21

To: Edward Fox <E.Fox@sstaffs.gov.uk>
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Hi Ed

No problem, is there any chance you could send over a list of sites in the same format or similar that Robyn did for the Black Country.

I have attached Robyn's original data for example, this would really help the process. I should be able to get the info to you the time frame you mention if not before if I can have a list like the attached.

Kind

Regards

Steve

From: Edward Fox <E.Fox@sstaffs.gov.uk>
Sent: 28 September 2021 02:27 PM
To: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi Stephen,

Apologies I did not come back to you on this – your email came in just before I went on annual leave so didn't get a chance to respond.

Are you able to confirm when you are likely to be able to get your assessment

of the impact of the South Staffordshire sites to us? For info, our consultation

will now be beginning 1st November-13th December so it would be helpful to

get this as part of your response to our consultation, or even before if possible.

Kind regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 16 September 2021 09:30

To: Edward Fox <E.Fox@sstaffs.gov.uk>; Ric Bravery < >
Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Hi Ed

We would be happy to assess any cross border impacts.

The original ask was to assess the impact of all new major housing applications accommodation schedule (not 2.5) on the Primary Care Infrastructure at this point in time, which is difficult to say the least. Our position remains the same as it always has been, we will assess a formal Pre-App or Planning Application at the time is submitted against the status of the respective Primary Care Infrastructure at that future time and will only request contributions if the additional patient list growth cannot be accommodated within the existing Primary Care premises capacity.

The housing projections recently provided to us is a valuable set of data which will help us plan for the future, being aware that not all sites will be delivered. Our Black Country CCG Estates Strategy does plan for natural population growth and targets our low capacity and gaps areas where possible, we do look for GP's or 3PD's to deliver new schemes and encourage them to include new housing growth if it has been identified to us. Therefore if we are planning a new Health Centre which will be impacted by new housing growth we do to a point try to include that increase in capacity, however it is worth noting that our Primary Care providers do not get reimbursed for space that are not using to deliver Primary Care Service against there recorded list size, a factor we must consider.

That said not all projects go ahead and get delivered for many reasons, because of the complex nature of the system, hence the spread sheet response previously attached looks at a blanket approach to housing impact across the Black Country CCG area, with a number of priority options listed in each column. It is worth noting that the Primary Care infrastructure does need significant investment because we have very little capacity at present, but as I mentioned earlier new projects are coming forward which we hope will ease the current climate and negate the need for developer contributions.

It is also worth noting that we have already been engaged on some planning applications and with some developers to discuss the impact of new housing development in the Black Country on the Primary Care estate the consultation results of which, reveal that a only a small proportion of these applications require contributions to the Healthcare Infrastructure.

Our aim is not to stand in the way of development but to ensure we collaborate effectively. I trust this clarifies our position and reiterate that we will consult on planning application with a pragmatic view using the data and intelligence available to us at that time.

Kind

Regards

Steve

From: Edward Fox <E.Fox@sstaffs.gov.uk>
Sent: 15 September 2021 05:11 PM
To: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>

Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Thanks Steve,

We'd also be interested in receiving a version of this work for South Staffordshire, however we do have some queries with the methodology used (assuming that it includes ALL Black Country allocation sites).

Currently it seems that a future need of 2.5 patients per new dwelling has been assumed across the board. We can understand the rationale of using this figure (or a slightly lower one to reflect average household size), but by implication this implies that every single GP surgery in the Black Country is currently incapable of accommodating new patients without further capital investment. Frankly, this approach seems to fly in direct opposition to advice we've previously had from the CCGs on local GP capacity. It also doesn't reflect the approach taken by other more established infrastructure bodies in seeking commuted sums (e.g. the Education Authority only request new schools sums if the additional pupils can't be accommodated within the existing classroom sizes).

If this approach is going to be used in South Staffordshire we would need further discussions on how it could be adjusted to reflect the capacity of existing surgeries in the surrounding area. Equally, we'd echo Black Country colleagues' comments regarding whether what we're talking about is new facilities or expanded existing facilities.

We'd welcome your thoughts on the above as soon as possible. For your information our Local Plan Preferred Options will be available in the public domain towards the end of this week; once available we'll be in touch with a link.

Kind

regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 15 September 2021 12:48

To: Edward Fox <E.Fox@sstaffs.gov.uk>;
Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Hi Ed, Ric, Robyn

With reference to the above and our email exchange below, I have now completed the housing impact assessment against the four area Housing Capacity Maps provided by Ric and the BCP Housing Allocations list provided by Robyn.

I have adapted the spread sheet to include the following columns;

- Anticipated Increase Patient List - calculation following NHSE's guidance against the number of new houses anticipated.
- Primary Care Premises impacted - Priority (by numerical priority) whereby the likely/closest/suitable or proposed new primary care project takes precedence
- Additional Number of Consulting Rooms or Contribution Required – which relies on the

use of the agreed
algebraic formula to calculate the potential number of additional consulting rooms to accommodate the housing growth of where in part a financial contribution can be calculated.

I hope this helps, but please let me know if you require any further information

or have any queries. Kind Regards

Steve

From: Edward Fox <E.Fox@sstaffs.gov.uk>
Sent: 23 July 2021 11:53 AM

To: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>

Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi Steve,

Many thanks for coming back to me.

If you could provide details of the site specific requirements and associated costs then that would be great. If these could be provided as part of your formal representation to our Local Plan Preferred Option consultation that that would be ideal. It is anticipated that the consultation will run until towards the end of November. Does that sound achievable?

Kind

regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: HOWELLS, Stephen (NHS BLACK COUNTRY AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 22 July 2021 13:30

To: Edward Fox <E.Fox@sstaffs.gov.uk>;

Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Hi Ed

Sorry for the delay in getting back to you and thank you for the clarity.

We will work through the precise proposal requirements for the identified housing target areas and provide you with the predicted details around, site specifics, possible costs and evidence based formulae for calculating contributions.

Could you let me know the timeframe or deadline for when you will require this

information from us. Kind Regards

Steve

From: Edward Fox <E.Fox@sstaffs.gov.uk>
Sent: 24 June 2021 03:19 PM

To: JONES, Gareth (NHS ENGLAND & NHS IMPROVEMENT - T1520) < >; HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) < >; Patrick Walker
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Dear Gareth/Steve,

Thanks for providing some clarity on how you see this issue being considered.

Gareth – regarding you request to Patrick regarding timescales for our viability study. Our site specific viability work will need to commence in November time so would need to

know then if a new health centre is required on any of our proposed large housing site allocations.

Unfortunately, the planning process now requires us to consider these infrastructure asks up-front through Local Plan preparation, rather than deferring the issues to later down the line when a planning application comes in. This is so such infrastructure asks can be factored into our Local Plan viability work, to ensure what we are proposing through the Local Plan is in fact deliverable.

As a comparison, for Education the local education authority are able to provide us with details of where a new school is required, predicted land take for a new school, and indicative costs. They also provide us with an evidence based formula for calculating contributions towards education, for example where a new school may not be required but there is scope to add an additional classroom to an existing school. Ideally, this is what we would also like to achieve for health, but any asks need to be fully evidenced and meet the national policy tests for planning obligations.

We look forward to hearing back from you as soon as you are able to offer a further progress update, and in the meantime, please let me know if you need anything else from us.

Kind

regards

Ed

Edward Fox

Strategic Planning Team
Manager Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: JONES, Gareth (NHS ENGLAND & NHS IMPROVEMENT - T1520) <[REDACTED]@nhs.net>
Sent: 24 June 2021 12:22

To: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>; Patrick Walker

<P.Walker@sstaffs.gov.uk>;

Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Dear all,

Completely agree with Steve's response in regard to having a joined up hypothesis across the two county lines to understand the impact of the existing services and buildings those services are being provided from. Patrick what timescales are you referring to for the NHS to provide their options and indicative costs to be factored into the local plan viability work.

Steve, Phil, Andy. Can I suggest we arrange a kick off meeting between us to consider moving this forward. At what pace is to be determined in my question to Patrick...

Kind RegardS

Gareth Jones MCIOB MAPM

Strategic Estates Lead - Black Country, Staffordshire and Stoke on Trent NHS Estates and Facilities Delivery Team

Commercial Directorate

NHS England and NHS Improvement

t: [REDACTED]

e: [REDACTED]@nhs.net

w: www.england.nhs.uk and

www.improvement.nhs.uk St Chads Court, 213

Hagley Rd, Birmingham B16 9RG

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immediately and should not disclose, use or rely on this email. We do not accept any liability arising from a third party taking action, or refraining from taking action, on the basis of information contained in this email.

Thank you.

From: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 24 June 2021 11:32

To: Patrick Walker <P.Walker@sstaffs.gov.uk>; Michele Ross <[REDACTED]@wolverhampton.gov.uk>
Cc: [REDACTED]

Subject: RE: Confidential: Health meeting to discuss cross boundary

SStaffs/Wolverhampton housing sites Hi All

My apologies for the late response.

If we take the both South Staffs and Black Country & West Birmingham CCG's as a whole in considering the proposed housing development we are reviewing in this respective area, we do have some capacity and ability to expand premises in Walsall and Wolverhampton as I mentioned with some S106 investment from developers.

However if we view purely from a South Staffs CCG, Essington Medical Centre close to Linthouse Lane and Featherstone Family Health Centre close to Junction 1 of the M54 both of which" appear to have no capacity and limited ability to be extended to accommodate any large scale housing development". The reason for saying this is that both of these respective primary care premises are constrained by tight boundary fences limiting the ability to expand these premises, add to the fact that they are both old properties with limited ability to increase size or reconfiguration. Notwithstanding this statement South Staffs CCG should validate this conclusion.

Hypothetically if a developer made a large scale housing application for development on the identified land, we would look to both South Staffs and Black Country & West Birmingham CCG's as a whole to respond to the consultation,
whereby we would suggest a number of viable options for a developer to consider, perhaps option one could be a new Primary Care Health Centre bringing together the two aforementioned Practices. Option two could be contributions towards expanding existing premises in Walsall or Wolverhampton or both, however both of these options are complicated by GP service contract constraints which is something both South Staffs and Black Country & West Birmingham CCG's would need to work through together.

I hope this provides some clarity on this potential of

proposed development. Kind Regards

Steve

From: Patrick Walker <P.Walker@sstaffs.gov.uk>
Sent: 15 June 2021 04:39 PM

To: Michele Ross <[REDACTED]@wolverhampton.gov.uk>; HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <t>
Cc: [REDACTED]
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi All,

Having discussed it on our end I think we'd agree with and raise the same queries as Michelle here. As a general principle, an inspector would expect us to bottom out the broad approach to mitigating impacts on health infrastructure well in advance of the planning application stage, and would expect that we'd tested the financial viability of any necessary mitigation measures through the Local Plan process.

It's therefore important we understand as soon as possible whether growth in this location is likely to require commuted sums to provide additional capacity at nearby existing surgeries (where consistent with statutory tests for planning obligations) or whether we're going to need to provide a new facility on one or more of the sites. The email trail below appears to imply that a new facility would be required for growth near Essington/Featherstone, as these have no capacity/room to expand, which was not the impression we had gotten from our April meeting. Given the implications this may have for site delivery we would also need more detail on this and any indicative costs to mitigate the impact of development so that these can be factored into any Local Plan viability work at the earliest possible opportunity.

Kind
regards
Patrick
Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

www.sstaffs.gov.uk

From: Michele Ross <[REDACTED]@wolverhampton.gov.uk>
Sent: 14 June 2021 08:54

To: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>; Patrick Walker <P.Walker@sstaffs.gov.uk>
Cc: [REDACTED]
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Sensitivity: RESTRICTED

Hi Stephen,

Sorry for the delay in getting back to you.

Given your response, I think we need a bit more detail. If the two health centres nearby have no capacity to expand sufficiently to address increased demand this seems to suggest the need for a new health centre to serve the developments. If so, this needs to be factored in at an early stage in the Plan making process, rather than at planning application stage.

Patrick / Ed – what are your views?

Thanks,

Michele Ross

Lead Planning Manager (Sub - Regional Strategy) Tel. Mobile: [REDACTED]

E-mail: [REDACTED]@wolverhampton.gov.uk City of Wolverhampton Council

---

From: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 25 May 2021 15:42

To: Michele Ross <[[REDACTED]@wolverhampton.gov.uk>; Patrick Walker <P.Walker@sstaffs.gov.uk>
Cc: [REDACTED]
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Hi Michelle

Sorry for the delay in getting back to you.
In summary Primary Care is fairly limited in the areas we are looking at and within Staffordshire CCG area. The only premises which could be impacted by the cross border development are Essington Medical Centre close to Linthouse Lane and Featherstone Family Health Centre close to Junction 1 of the M54 both of which appear to have no capacity and limited ability to be extended to accommodate any large scale housing development.

Any consultations resulting from planning application made on the sites in question, I would share with my Staffordshire CCG colleagues and contacts to obtain a collective consultation response.

Kind

Regards

Steve

From: Michele Ross <[REDACTED]@wolverhampton.gov.uk>
Sent: 12 May 2021 08:14 AM

To: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) < >; Patrick Walker <P.Walker@sstaffs.gov.uk>
Cc: Ric Bravery < >; Edward Fox <E.Fox@sstaffs.gov.uk>; JONES, Gareth (NHS ENGLAND & NHS IMPROVEMENT - T1520) < >
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Sensitivity: RESTRICTED

Hi Stephen,

The information you have provided below includes some overlap/ repetition of sites e.g. Linthouse Lane?

What we are after is a combined assessment of all of the sites which we have selected for development, both in Wolverhampton and South Staffordshire. These are shown on the attached plan, with housing figures labelled (confidential – please do not circulate!)

Thanks,

Michele

Ross

Lead Planning Manager (Sub - Regional Strategy)

Tel. Mobile: [REDACTED]

E-mail:
[REDACTED]@wolverhampton.gov.uk City
of Wolverhampton Council

From: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <t>
Sent: 10 May 2021 16:08

To: Patrick Walker <P.Walker@sstaffs.gov.uk>
Cc: Michele Ross <[REDACTED]@wolverhampton.gov.uk>; Ric Bravery <[REDACTED]@wolverhampton.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>; JONES, Gareth (NHS ENGLAND & NHS IMPROVEMENT - T1520) <[REDACTED]@nhs.net> **Subject:** RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

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Hi Patrick

Thank you for sending the GIS information through but unfortunately I could not open it, however Gareth did send the attached across to me, which I believe may be the same data.

Therefore I have listed below the impact on the Primary Care Estate and noted the GP Practices affected against the housing numbers and the potential impact mitigation, which could be covered either by commuted sum/contribution or physical developer building/procurement. I have only looked at the attached red line and pink hatched Housing Allocation proposals where patients would travel cross CCG border to access GP Primary Care Services, all other areas depending on their respective Planning Status would need to be accommodated within existing GP Primary Care estate. As part of the emerging Planning Policy we do have an algebraic formula for developers use to aid them in their financial viability appraisals.

582 Merry Hill (Langley Road) Area 400 Dwellings developed out between 2026 to 2035

The area is moderately served by immediate GP Primary Care coverage, close to Castlecroft Medical Practice a relatively new building with normal expected population growth capacity built in to the site. However the existing Warstones Health Centre equidistant to the site would require some capital investment due to the lack of capacity to accommodate the potential for additional patients. If the housing site generated 400 dwellings this would equate to say 1,000 patients which results in the addition of 1 extra consulting room (circa 1,100 patients per consulting room, as a general rule), required at the premises this could be in the form of an extension or internal reconfiguration.

646 a&b A449 Edge Wolves to Staffs Boarders 1200 units 2028 to 2038)

The area is moderately served by immediate GP Primary Care coverage, close to the following premises with a brief overview of the impact.

- Cromwell Road Surgery, a small branch practice with no additional capacity and no options to expand due to physical constraints.
- Prestbury Practice, a small branch practice with no additional capacity, and no options to expand due to physical constraints.
- Oxley, a small practice with no additional capacity, and no options to expand due to physical constraints.
- Ashfield Road Surgery, a small practice with no additional capacity, and no options to expand due to physical constraints.
- Fordhouses Medical Centre, a small practice with no additional capacity, and no options to expand due to physical constraints.
- Probert Road Surgery, a small practice with no additional capacity, and no options to expand due to physical constraints.

Probert Road Surgery and Oxley are currently developing plans to create a Health Centre Hub which fits the current estates strategy and meets the needs of the normal expected population growth, whilst dealing with condition and tenure problems currently being experienced, this may create an opportunity to include an element of future expansion to increase the planned capacity to accommodate additional housing growth between 2028 – 2038. If the housing site generated 1,200 dwellings this would equate to say 3,000 patients which results in the addition of 3 extra consulting rooms required at the premises, this could be in the form of an extension.

486c Linthouse Lane 2,000 units (2028 to 2040)

The area is moderately served by immediate GP Primary Care coverage, close to the following premises with a brief overview of the impact.

- MGS Medical Practice, a small branch practice with no additional capacity and no options to expand due to physical constraints.
- Keats Grove Surgery, a small practice with no additional capacity, and no options to

expand due to physical constraints.

- Cannock Road Surgery, a small practice with no additional capacity, and no options to expand due to physical constraints.
- Primrose Lane Health Centre, a medium practice with no additional capacity, and no options to expand due to physical constraints.
- Prestbury Medical Practice, a medium practice with no additional capacity, and no options to expand due to physical constraints.
- Dr Bilas, Wednesfield, a small practice with no additional capacity, and no options to expand due to physical constraints.
- Ashmore Park Health Centre, a medium practice with no additional capacity, and no options to expand due to physical constraints.

Prestbury Medical Practice are currently developing plans to create a Health Centre Hub which fits the current estates strategy and meets the needs of the normal expected population growth, whilst dealing with condition and capacity problems currently being experienced, this may create an opportunity to include an element of future expansion to increase the planned capacity to accommodate additional housing growth between 2028 – 2040. If the housing site generated 2,000 dwellings this would equate to say 5,000 patients which results in the addition of 5 extra consulting rooms required at the premises, this could be in the form of a future extension.

Linthouse (Grassy Lane) 300 Residential Only Build Out developed out between 2025 – 2030 (markers 80,88,48 and 95)

Bushbury North – 500 housing units developed out between 2025 – 2030 (markers 78, 124, 182, 148)

In terms of the collection of above sites there are two options we can consider, we either view the sites as a whole and due to there locations being close to 486c include additional planned capacity in a future expansion to the Prestbury Medical Centre Hub proposal such as an additional (800 dwellings this would equate to say 2,000 patients which results in the addition of) 2 extra consulting rooms over and above the capacity required for the 486c 2,000 dwellings at Linthouse Lane. Or we could include some way of accommodating the additional capacity through contribution through reconfiguring smaller existing premises. In any event this could be considered in detail at the time of the respective planning application pre-app or submission.

I appreciate the information is highly confidential, hence I am not intending to share this beyond this working group.

I hope this helps, however we do have an approved Estates Strategy in place, an emerging Planning Policy, a Working Viability Appraisal Template and an algebraic formula for calculating contributions.

Kind

Regards

Steve

Howells
Senior Estates Manager Strategy &
Development Mobile: [REDACTED]
Email: [REDACTED]

From: Patrick Walker <P.Walker@sstaffs.gov.uk>
Sent: 03 May 2021 02:36 PM

To: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) < >
Cc: 'Michele Ross' <[REDACTED]@wolverhampton.gov.uk>; 'Ric Bravery' <[REDACTED]@wolverhampton.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>; JONES, Gareth (NHS ENGLAND & NHS IMPROVEMENT - T1520) <[REDACTED]@nhs.net>
Subject: FW: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi Stephen,

Following the recent cross-boundary health meeting, please see attached for GIS layers setting out our confidential draft Preferred Options housing sites. This layer includes all current Preferred Option housing sites, including the following South Staffordshire sites discussed at the meeting:

- Site 486c: Linthouse Lane/North of Wednesfield (minimum 1,200 dwellings up to 2038, with potential for approx 750 additional dwellings beyond 2038)
- Site 646a&b: Land at Coven Heath (minimum 1,200 dwellings) •
- Site 582: Langley Road (minimum 390 dwellings)

To confirm the anticipated minimum dwelling numbers anticipated for these sites, please see the column marked 'Dwelling_n' in the attribute table.

Obviously these are highly confidential and not yet finalised as the consultation sites so should not be circulated any further. If you require anything else from us prior to doing the cumulative impact work to consider the cross-boundary impacts of the South Staffordshire/Wolverhampton then please let us know.

Many
thanks
Patrick
Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

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From: HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <[REDACTED]@nhs.net>
Sent: 28 April 2021 14:53

To: Patrick Walker <P.Walker@sstaffs.gov.uk>
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Patrick

Thanks for the notes
and info.

Kind Regards

Steve

From: Patrick Walker <P.Walker@sstaffs.gov.uk>
Sent: 26 April 2021 04:38 PM

To: 'Michele Ross' < >; 'Ric Bravery' < >; Edward Fox <E.Fox@sstaffs.gov.uk>; '[REDACTED]@staffordsurroundsccg.nhs.uk' < >; HOWELLS, Stephen (NHS SANDWELL AND WEST BIRMINGHAM CCG) <; JONES, Gareth (NHS ENGLAND & NHS IMPROVEMENT - T1520) <; 'admin@winterbhp.co.uk' <admin@winterbhp.co.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>; '[REDACTED]@staffsstokeccgs.nhs.uk' < >
Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi all,

Many thanks for meeting with us to discuss the approach to cross boundary health impacts in the emerging South Staffordshire/Black Country Local Plans. So we've got a record to inform our respective Duty to Co- operate audit trails at a later date, I've drafted some minutes that I think reflect the key points raised/agreed at the meeting. Please have a look through and let me know if you have any suggested amendments by **3rd May**.

Stephen – I'll be in touch separately with the GIS layers discussed at the meeting once I've checked with our IT regarding our licencing agreement and whether we need you to sign anything etc.

Please get in touch if you have any

queries. Kind regards

Patrick Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

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From: Patrick Walker

Sent: 20 April 2021 15:44

To: 'Michele Ross' ; 'Ric Bravery' ; Edward Fox <E.Fox@sstaffs.gov.uk>; '[REDACTED]@staffordsurroundsccg.nhs.uk'

Subject: RE: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi all,

Hope all's well, please see below for a draft agenda for this Friday's cross-boundary health meeting to support our respective Local Plan Reviews.

We'll present sites for both South Staffordshire and Wolverhampton at the meeting but if you can think of anything else that needs to be added or need to clarify anything in advance then please get in touch.

Draft agenda for Local Plan Review cross-boundary health meeting (1.30pm – 23rd April)

1. Introductions
2. Emerging preferred sites (South Staffs and Black Country)
3. Update on existing NHS/CCG estate review and capacity work
4. Potential areas where growth may warrant new GP surgery/expansion of existing nearby surgery?
5. Timescales and work towards SoCG on strategic cross-boundary health issues

Kind
regards
Patrick
Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

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From: Patrick Walker

Sent: 12 March 2021 09:47

To: Michele Ross < >; Ric Bravery < >; Edward Fox <E.Fox@sstaffs.gov.uk>; [REDACTED]@staffordsurroundsccg.nhs.uk; [REDACTED]@nhs.net; [REDACTED]@nhs.net; admin@winterbhp.co.uk; Kelly Harris <k.harris@sstaffs.gov.uk>;
[REDACTED]@staffsstokeccgs.nhs.uk
Subject: Confidential: Health meeting to discuss cross boundary SStaffs/Wolverhampton housing sites

Hi everyone,

We're looking to set up a meeting with South Staffordshire and Wolverhampton planning policy representatives, alongside CCG and NHS representatives, to confidentially discuss the health impacts of the likely housing sites along the Wolverhampton/South Staffordshire border from the upcoming South Staffordshire and Black Country local plan consultations later in the year.

The intention is that we'll go over where the sites are for both Wolverhampton and South Staffordshire at the meeting. We're hoping this will help to flag up potential cumulative health impacts from the potential sites and start discussions on what mitigation might be required (e.g. commuted sums, new health provision etc.).

To assist with this, could you please confirm if you'd be able to attend on any of the following dates; 12th April (am & pm)

13th April (pm only)

14th April (pm only, up to 4pm) 15th April (pm only)

16th April (am & pm) 19th April (pm only) 20th April (3pm – 5pm)

22nd April (am & pm) 23rd April (pm)

We've cast the net relatively wide here in terms of invites so please feel free to say if you don't think you'll need to attend. Equally, if I've missed off one of your colleagues whose input would be helpful then please say and I'll add them in.

Many thanks
Patrick Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

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23.04.2021 – duty to co-operate meeting with CWC, NHS & SAS CCG

Wolverhampton City Council/South Staffordshire District Council cross-boundary health meeting 23.04.2021

Present:
South Staffordshire District Council (SSDC) – Edward Fox, Patrick Walker, Kelly Harris
Wolverhampton City Council (WCC) – Michelle Ross, Ric Bravery
Stafford and Surrounds and Stoke-on-Trent Clinical Commissioning Groups (SASCCG)– Laura Bird
NHS England – Stephen Howells, Gareth Jones, Mike Harris

Key development locations discussed:

- Linthouse Lane/North of Wednesfield (South Staffordshire)
- Land at Coven Heath/west of ROF Featherstone (South Staffordshire)
- Langley Road (South Staffordshire)
- Land at Bushbury (Wolverhampton)
- Land at Grassy Lane (Wolverhampton)

Key points raised and actions agreed:

- **SSDC**; Keen to use meeting to understand if any potential sites on Wolverhampton boundary may require new facility, or if existing facilities can accommodate need
- **SASCCG**; last year COVID response has been priority, but estates review is being undertaken now – Phil Bremner should be able to provide update shortly
- **SASCCG**; Featherstone surgery may require expansion but have a tight plot, in discussions with practice now to explore options
- **NHS**; update being given to Staffordshire officers at upcoming meeting, will inform NHS' approach to developer contributions in Staffordshire
- Recognition that **WCC** evidence base is currently more advanced than Staffordshire's
- Based on work to date, **WCC** are likely to seek developer contributions for healthcare and will deliver SPD to support this
- **NHS**; work on developer contributions will have regard for need to balance planning contributions with lower land values. Work underway will give much more granular detail on surgery capacity/quality to support this, giving publicly available and transparent evidence base – likely to be done by end of the year
- **SSDC**; sought clarity on how contributions would mitigate impact of development, not pre-existing issues
- **NHS**; existing capacity issues already in NHS strategy for estates with associated investment – developer contributions will only relate to impact of new housing
- **NHS**; depends on evidence, but unlikely that new surgeries will be required – typically new surgeries/centre are only ever used to consolidate existing practices into one (e.g. Oxley – 3 GP practices into one health centre)
- **NHS**; agreed to undertake similar work for SSDC as had been done for Black Country authorities (e.g. Walsall), once South Staffordshire sends cross boundary sites over
- **SSDC** – agreed to send NHS cross boundary sites and cc WCC to allow this work to be completed

23.04.2021 – duty to co-operate meeting with CCGs

South Staffordshire Local Plan Review Health Infrastructure meeting 24/01/2022 - Minutes

Stephen Howells – Black Country CCG

Philip Murphey – Stafford and Surrounds CCG

Stephanie Marsh – Estates and support officer Black Country CCG

Phil Brenner – Estates Project Manager Stafford and Surrounds CCG

Ed Fox –Local Plans Manager, South Staffordshire District Council

Patrick Walker – Senior Planner, South Staffordshire District Council

EF – Local Plan intending to include Health Infrastructure policy to provide health contributions from development. Any contributions need to meet S106 tests and have evidence base behind them though. Previous discussions indicated there may be scope for a formulaic approach, welcome indication of if this is coming and when

PB – Can't say it'll be completely consistent in all cases as there's local nuances but have a HBN11-based formula based on standard guide for primary care premises design. Calculation is based on anticipated need for new rooms based on population growth (based on additional houses), which is then converted into new number of treating rooms etc. This is then converted into a built facility area (assumed as new build) giving a build rate per sqm that can then be converted into a commuted sum. Access rates to surgeries, type/tenure of development (e.g. 1bed flats, care homes) may adjust approach. Have local cost benchmarks of similar local facilities updated with reference to BCIS. Includes relevant non-construction costs, e.g. 20% VAT rate.

SH – HBN11 forms basis for Black Country contributions as well. Principles are the same but local rates are slightly different. Formula is simple but can reflect local nuances (e.g. type and tenure etc) to adjust things like population growth.

EF – So local plan requires general policy and then specifics to be worked out in individual apps?

SH – Yes, Black Country have similar approach with policy in the local plan using algebraic formula.

PB – Looking to expand formula to accommodate community health provision. Haven't started looking at that yet but it will be an additional ask in future. Costs can change over time to on large developments, looking into index linking costs based on TPI.

SH – Aren't including secondary care at this stage. Appeals and decisions suggest secondary care is more challengeable.

EF – From Local Plan perspective some of the detail is more relevant to planning app. What Local Plan needs is high level information similar to that provided by SH previously; need indicative cost per dwelling to factor into viability study due to competing policies (affordable housing, climate change, education). Others have provided similar info.

SH – Have provided similar for BC per dwelling for primary and secondary care to be tested in indicative typologies. Also provided consultation response showing what premises would be impacted and the number of consulting rooms generated by schemes. Similar has been provided for cross-boundary sites but costs per dwelling impacts haven't been given yet. Differs slightly from Staffs indicative values so suggest going to PB for values in the first instance.

EF – Would be useful to receive indicative values – needed for viability. On cross-boundary sites (E.g. Linthouse) we understand its contributions to existing facilities (not new).

SH – Correct from Black Country perspective, would want to be steered by Staffs policy on contributions available (led by SSoT values). Cross-boundary agreements needed to transfer costs. SSoT need to identify whether a new practice can be identified first, as GMS contract boundary creates complication for cross-boundary contributions.

PB – Hard to manage this. Linthouse Lane wouldn't be of sufficient scale for new multi-functional health centre advocated by NHS/govt policy (20,000-30,000 population growth required typically)

EF – At this stage, important thing is to have a starting point price-per-dwelling figure then

PB – Can be provided as long as its recognised that it's only a starting point prior to the planning app stage.

EF – Understood and agreed

SH – Working on assumption that new facilities not likely to be provided in Staffs and housing is closely tied to Black Country, is it worth using BC formula?

EF – Yes for Langley Road, Linthouse Lane and Land west of ROF Featherstone/Cross Green. Previously Pattingham mentioned too?

SH – Yes if there's nothing in Pattingham area it'll go towards Wood Road, but impact is very minimal so unlikely to require cross-border planning.

EF – SSoT CCG - Penkridge, CH/GW and Wombourne practises flagged in consultation response. Can figure be provided for these village locations?

PB – Regardless of where it is starting figure is likely to be similar – not at the stage where it'd be adjusted for local factors at this stage.

SH – Figure provided by BC was worked up 18months ago so needs to be updated.

EF – April date is likely deadline for indicative commuted sums to feed into viability/masterplanning – will **send around email to confirm what's required and timescales**

EF – Also want to understand from SSoT CCG if it's only certain locations that require contributions or not.

PB – Consultation response may not be up-to-date on this. Utilisation levels study also commissioned now giving more detailed information for practice capacity levels.

EF – Is this being published?

PB – Only being circulated around public authorities, not being formally published until full 300 page report is validated. Will form part of evidence base for future comments. Could the latest

documents with sites be shared? **PDF map with site locations (50+ dwellings) and associated spreadsheet with number of dwellings would be helpful**. Generally developments can be mitigated, only issues in the past are where Council has approved large developments in small existing settlements with expectations of new facilities on site (which are rarely realistic). Expectation management is important; can expand facilities in neighbouring areas if needed but new facilities are very unlikely to happen and this is important to understand.

PB – Have set up single email address for DM planning officer applications and have officer in post (Phil Murphy) to address health needs at the application level.

EF – In summary **key agreed actions are**:
- SH to provide updated figures for the Black Country
- PB to provide similar figures for South Staffs based on information to be forwarded (PDF maps and spreadsheets), so that key sites required to provide health contributions can be identified
- SSDC to involve all relevant CCGs in Strategic Development Framework work for the four large (850-2000 dwelling) sites.

04.05.2022 – letter from Staffordshire and Stoke-on-Trent CCGs

Cannock Chase Clinical Commissioning Group East
Staffordshire Clinical Commissioning Group North
Staffordshire Clinical Commissioning Group

South East Staffordshire and Seisdon Peninsula Clinical Commissioning Group
Stafford and Surrounds Clinical Commissioning Group

Stoke-on-Trent Clinical Commissioning Group

Our Ref: S Staffs LP/22

Date: 04/05/2022

South Staffordshire Local Plan Review – Health Infrastructure Provision

Dear Ed,

Thank you for issuing the allocation sites, which featured in your Preferred Options Local Plan consultation at the end of 2021.

Having reviewed the sites and anticipated housing numbers I have compiled a broad response to inform your forthcoming viability testing for the Local Plan Review.

You have of course now heard from my colleague about the continuing work in respect of producing strategic estates plans for the various Primary Care Networks (PCN) covering Staffordshire and Stoke-on-Trent. Accordingly, this response has been framed at the PCN level and the indicative minimum dwelling capacity for the various sites provided have been summed to understand the potential impact across the wider healthcare networks in place.

On the specific issue of coming up with a per unit cost it was agreed that an estimated cost figure would be provided for the purpose of viability testing but of course each case in future will be assessed on its own merits.

I have seen the information provided to you by Steve Howell and would confirm that Staffordshire and Stoke-on-Trent CCGs use the same Health Building Note as cited by the Black Country and West Birmingham CCG to calculate developer contributions. Basing a cost on the provision of a Consulting Room alone would equate to approximately £750 per property but you should be aware that our calculation also factors in the cost of providing a Treatment room using an assumption that 20% of patients will use a Treatment room and therefore on this basis we would suggest that a cost per dwelling of £900 should be assumed for the purpose of the viability exercise.

The site allocations in detail:

Stafford South PCN

This comprises five premises (3 practices and 2 branches) serving a population of approximately 30,000 patients:

- Brewood Medical Practice including 2 branches (Coven Surgery and Wheaton Aston Surgery)
- Penkridge Medical Practice
- Rising Brook Surgery

The sites currently provide a gross internal area (GIA) in excess of the advised requirement. All practices, except for Rising Brook Surgery, provide sufficient clinical rooms to serve the patient population.

The projected housing increase for the PCN would likely result in an increase of approximately 2,247 additional patients for the practices impacted with additional GIA likely to be required over this period.

Based on the total number of dwellings indicated within the information provided (Penkridge, Brewood, Coven, Wheaton Aston) the development would result in patient increases that require mitigation.

Utilising the current calculator, which uses Health Building Note 11-01: Facilities for primary and community care services and assuming a type and tenure of property that results in a household average of 2.4 a request totalling approximately £779,000 would be made to support the development of the PCN and affected practices.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Seisdon PCN

This comprises eight premises (8 practices) serving a population of approximately 48,600 patients:

- Bilbrook Medical Centre
- Claverley Medical Practice
- Dale Medical Practice
- Featherstone Family Health Centre
- Gravel Hill Surgery
- Lakeside Medical Centre
- Russell House Surgery
- Tamar Medical Centre

Only Bilbrook Medical Centre has more clinical rooms than the advised requirement with 5 of the remaining 7 practices all having a shortfall in the advised requirement when calculated against their current list sizes.

The projected housing increase for the PCN would likely result in an increase of approximately 8,000 additional patients and accordingly additional GIA and clinical rooms would be required to serve the patient population.

Based on the total number of dwellings indicated within the information provided (Codsall/Bilbrook, Wombourne, Kinver, Perton, Featherstone, Pattingham, Swindon and land

to the west of ROF Featherstone Urban Extension site) the development would result in patient increases that require mitigation.

Utilising the current calculator, which uses Health Building Note 11-01: Facilities for primary and community care services and assuming a type and tenure of property that results in a household average of 2.4 a request totalling approximately £1,732,000 would be made to support the development of the PCN and affected practices.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Cannock Villages PCN

This comprises fifteen premises (11 practices and 4 branches) serving a population of approximately 60,500 patients:

- Alderwood Medical Practice
- Essington Medical Centre
- Heath Hayes Health Centre including 1 branch (Chase Medical Practice)
- High Street Surgery including 1 branch (Great Wyrley Health Centre)
- Norton Canes Health Centre
- Norton Canes Practice
- Norton Canes Surgery
- Quinton Practice
- Red Lion Surgery
- Southfield Way Surgery
- The Nile Practice including 2 branches (Hednesford Valley Health Centre and Old Penkridge Road Surgery)

There is a shortfall of GIA across the network with 8 of the 11 practices having a shortfall against the advised requirement based on patient list size. This shortfall is mirrored in the provision of clinical rooms again with 8 of the 11 practices having an identified shortfall.

Based on the number of dwellings indicated within the information provided (the sites listed in Cheslyn Hay/Great Wryley) the developments would result in an increase of approximately 1,035 additional patients and accordingly additional GIA and clinical rooms would be required to serve the patient population.

Based on the total number of dwellings indicated within the information provided (Cheslyn Hay/Great Wyrley) the development would result in patient increases that require mitigation. Utilising the current calculator, which uses Health Building Note 11-01: Facilities for primary and community care services and assuming a type and tenure of property that results in a household average of 2.4 a request totalling approximately £303,000 would be made to support the development of the PCN and affected practices.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Cannock North PCN

This comprises eight premises (7 practices and 1 branch) serving a population of approximately 42,000 patients:

- Chadsmoor Medical Practice
- Dr I Rasib & Partners
- Hednesford Medical Practice
- Hednesford Valley Health Centre
- Moss Street Surgery
- Rawnsley Surgery
- The Colliery Practice including 1 branch (Colliers Way Surgery)

There is a shortfall of GIA across the network with all practices having a shortfall against the advised requirement based on patient list size. This shortfall is mirrored in the provision of clinical rooms again with all of the practices having an identified shortfall.

Based on the number of dwellings indicated within the information provided (the sites listed in Huntington) the developments would result in marginal increases in patient numbers and therefore each case would be assessed on its own merits, but it is apparent that additional capacity is required within this PCN to serve the existing patient population.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Stafford Central PCN

This comprises five premises (3 practices and 2 branches) serving a population of approximately 39,750 patients:

- Gnosall Surgery
- Mill Bank Surgery
- Weeping Cross Health Centre including 2 branches (Beaconside Health Centre and John Amery Drive Surgery)

Only Gnosall surgery has a GIA that is greater than the advised requirement based on their current list size, all other practices have a shortfall in GIA. This position is mirrored across the provision of clinical rooms within each practice albeit it should be noted that Weeping Cross Health Centre has a significant shortfall in clinical rooms when considered against the advised requirement to serve their patient list size.

Based on the number of dwellings indicated within the information provided (Urban extension site) the development would result in patient increases that require mitigation. Utilising the current calculator, which uses Health Building Note 11-01: Facilities for primary and community care services and assuming a type and tenure of property that results in a household average of 2.4 a request of approximately £110,000 would be made to support the development of the PCN and affected practices.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Remaining Urban Extension sites:

North of Black Country, Site ref. 486c, 1200 units –

Utilising the current calculator, which uses Health Building Note 11-01: Facilities for primary and community care services and assuming a type and tenure of property that results in a household average of 2.4 a request of approximately £982,000 would be made to support the development of the relevant PCN and affected practices.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Black Country western edge, Site ref. 582, 390 units –

Utilising the current calculator, which uses Health Building Note 11-01: Facilities for primary and community care services and assuming a type and tenure of property that results in a household average of 2.4 a request of approximately £294,000 would be made to support the development of the relevant PCN and affected practices.

All future submissions will of course be considered based on their own merits and the situation in respect of health capacity at that time.

Yours sincerely

Philip Murphy
Planning and Development Lead
Staffordshire & Stoke-on-Trent CCGs

20.05.2022 – Land North of Linthouse Lane Visioning Workshop

Workshop notes:

The workshop started with scene setting, providing an introduction to the site: the Excellence Framework mapping tool and the need for and role of a Vision and set of Development Objectives to inform the masterplanning process and preparation of the concept plan.

Hyas has reviewed previous work undertaken by the site promoters. The current draft Vision comprises a number of useful objectives for the development of the site – seeking good quality design; a good mix of housing types, tenures and sizes to meet local needs; delivery of a significant amount of green infrastructure and public open space. The site promoters are open to making changes to the scheme, and have a number of questions, in terms of facilities; access proposals; links to the former railway corridor etc

The aim is to create a balanced Vision and set of objectives, leading to a concept plan and framework masterplan to support the local plan submission.

Discussion of Key Issues

Context, including the relationship of the site with surrounding residential areas of Ashmore Park and Wood End

- The site fills in the gap in the current built form – in many ways forming a new edge to Wolverhampton and the urban area, as well as a new edge to the open countryside.
- There is potential for the site to connect well to the surrounding context and for the Important countryside edge and suburban edges to inform the built form and character of the development.
- There are different examples of built form in the established residential areas around the site which need to be considered (fronting onto or backing onto streets and open countryside); treatment of the countryside edges (density etc). Could consider now as part of the vision to set the scene for the future.
- The proposed allocation should be seen as an extension to Wolverhampton. Agree with the need to ensure linkages to existing facilities etc in the City – relates to sustainable travel; also relates to the types of facilities to be provided on the site.
- 2000 homes represents a significant new neighbourhood so would foresee the need for some new facilities to meet the residents' needs – some retail and community facilities; new primary school – potential to create a hub/ critical mass of facilities, irrespective of what is already available over the local authority boundary.
- There are not many facilities of note in the surrounding residential areas – no existing local centre to connect people to, just a few random facilities dotted around. No obvious heart to the locality.
- Design issues – whilst the proposed allocation represents an opportunity to create a new character for the development; it is important to respect the character of the land to the south. There may be potential for higher densities/different character area to the centre of the site – don't want to jar with the existing suburban character.
- The urban centre of Wednesfield is not far from the site. Ashmore Park has the greatest concentration of facilities (although still modest). Having good walking, cycling routs to Ashmore Park and Wednesfield would be advantageous.
- The northern edge of the site is quite sensitive in terms of transition into the wider countryside.

- Densities across the site will need to be managed in order to facilitate bus routes penetrating the site.

Green/Blue Infrastructure

- Consider if the scheme is sufficiently landscape driven? Landscape elements include the greenways/ connections to the country park; and the role of SUDS?
- Greenways – follow the alignment of the overhead cables? How will we treat the frontages of houses? Ideally houses would to front onto the greenways – this is best for surveillance and safe use of the greenways.
- Opportunity exists to create new character and drive the quality of the place through GI – not just the countryside edge, but by bringing GI into the heart of the development and linking it to the surrounding countryside.
- Explore the opportunity to create a north-south green link to connect to the country park and countryside to the north.
- What is the country park? What will it contain by way of facilities/ what is its roe and how will it be managed?
- It is clear that the land to the north is a bonus in providing scope to deliver a country park – promoters need to develop the idea further and welcome suggestions. Current thinking is that it is likely to be publicly accessible; and managed to balance public access with biodiversity.
- Council would wish to see community involvement before the nature and design of the country park is fixed; also will need to consider the need for sports pitches; allotments and possibly a community orchard – so a diversity of uses would be possible. Would want community engagement to agree a strategy for the facility. The proposed site allocation will not be popular with existing residents in Wolverhampton, so mitigating factors, such as access to a country park and providing meaningful access into a semi-rural environment may be a selling point. There is a shortage of public open space in the local established residential area – a strip of green space between Ashmore Park and the boundary with Walsall is very well used and could link into a park proposed for the new site. Also the canal runs through the area, and it would be good to link to that.
- GI on site – want to understand how the hierarchy of green spaces on site links to and supports active travel to provide access to key facilities. GI could form key movement routes eg by creating a link from SW to NE to get links to the country park. East-west route for SUDS also creating multifunctional GI.
- Ongoing discussions with sport England to agree requirements in terms of sports pitches etc.
- 100 plus properties at flood risk in Ashmore Park/ Linthouse lane – so provision of SUDS running west to east will be good to see and Wolverhampton SUDS team would like to have discussions as the plan develops. Linthouse Lane – there is a water escape point there, needs attention/ discussion.
- Any active travel routes to the south need to cross the canal – limited crossing points. Potential for a new crossing.. or limited to the exisiting ones.

Built form and character:

- A character area study would be useful to help define and inform the character areas for the new development – looking at wider precedent and examples beyond the immediate urban area.

- The site, in some respects is relatively featureless; but presents an opportunity to create something quite different. What do we use as the key drivers for that design and strong sense of identity and place?
- A landscape-led approach is a good one; opportunity to create green routes throughout the site; like the Derwentthorpe examples.. response to rural and suburban surrounding context. Opportunity to use innovative designs and patterns of development. Promoters agree and willing to be more contemporary in terms of the character at the heart of the site, whilst still respecting the edge.

Services and facilities:

- **Education** – land required for a 2FE primary, to provide for the whole site over the total build out period. Location? Need to consider phasing and timing of when houses come forward as will need primary infrastructure to be in place and access routes for the school to be able to build it.
- Have had discussions with Wolverhampton City about schools provision.Walsall very close on the western side. Staffordshire Education team have looked at all surrounding provision and are content that the proposed primary school will mitigate the need arising the new development.
- Secondary schools – transport will be needed to get to Cheslyn Hay High School. Parental choice may mean that some pupils head into Wolverhampton secondary schools.
- When would the school be needed? Initial demand could be met by capacity at St John's school in Essington, but there is a transport issue (the council would need to provide transport to get pupils there from the new development), depending on when and where development starts on site. It would also be possible to provide temporary places on a potential school site.
- There are also schools within walking distance of the site but in Wolverhampton City. The City Council would be concerned to ensure that any new capacity provided in Wolverhampton isn't swallowed up by new residents from Linthouse Lane site, before Wolverhampton development schemes are delivered. Further discussion needed with education to establish phasing and location.
- **Community hub** – what's needed; what's missing from the local area? Will the development contribute to the facilities serving the wider area?
- Health – Black Country and Staffs CCGs looking for off-site provision;
- Retail – nearest parades of shops to the site are all car dominated. Chance to do something here, as long as doesn't conflict too much with the surrounding area.
- Likely to be looking at convenience retail (smaller than medium sized supermarket); maybe health; community meeting room..
- The development needs a heart and focal points
- The eastern end of the site is close enough to Ashmore Park to be accessible to those facilities. So the western end of the site needs access to retail. The Country Park may benefit from a pub/ café there or close by for visitors.

Access and movement

- Street hierarchy plan should correspond to the character areas
- Revise the Primary Route to downgrade in parts, particularly where closer to the countryside/park to the north.
- Potential for the greenways to create an active travel network – sustainable and well connected to the surrounding areas.

- Consider the treatment of the access points/gateways to the site – are three vehicular access points required? Not convinced whether the one onto Kitchen lane is required? Wolverhampton officers previously raised concern with the access on to Kitchen lane due to capacity issues.
- Looking for low speed roads
- Bus access through the site? School buses will need to take pupils up to Cheslyn Hay high school – does that make the access onto Kitchen Lane access essential? – will need to look at this?
- Sense in having a north-south corridor.
- Access points – further discussion needed with Wolverhampton highways
- Concern with the alignment of the green routes and the primary routes – give more thought to the alignment. Would prefer to prioritise access to the south and east.
- Anything that can be done to encourage bus access to the site would be good – to reap the potential for bus access to employment opportunities in Wolverhampton.

Summary

- More thought needed around the street hierarchy and how it responds to different parts of the Site.
- Opportunity to create a distinctively different, sustainable neighbourhood – strong countryside edge
- Need more thought on greenways and how they will function and be used and can inform the character of the overall place.
- Need to clarify location of the 'village centre' and what it contains. Consider creating a 'heart' to the development through attention to character of built environment; street hierarchy and location of key facilities
- Character areas need to be defined by a character assessment and their areas to reflect the site and its surroundings.

Local issues:

- Role of and access to the country park – community input into the proposal
- Relationship to established residential areas and facilities in Wolverhampton
- Character and design of built form – relationship to existing residential character and to the open countryside to the north
- Need for facilities and services to serve the new development? what's required?

Appendix 27 – Transport Documents

29.11.2018 – Highways England response to SSDC Issues & Options Consultation

highways england-

Our ref: SHARE/ Your ref:

Planning and Strategic Services
South Staffordshire Council
Via Email: localplanreview@sstaffs.gov.uk

Operations Directorate
The Cube
199 Whartside Street
Birmingham
B11AN
www.highways.gov.uk

Direct Line: 0300 470 3045

29 November 2018

Dear Sir/Madam,

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

Thank you for the opportunity to comment on the emerging Local Plan Review in South Staffordshire. We have made a separate response to the consultation on the revised Infrastructure Delivery Plan.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SAN).

The SAN is a national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The SAN in South Staffordshire comprises sections of the AS and A449 trunk roads together with sections of the MS and M54 motorways.

General Comments

As you will recall we contributed to the development of the SAD which was adopted in early 2018. We note that the Local Plan Review considers further issues that are both local and strategic in

nature. The issues and options stage provides for developing the themes that will need to be addressed by the final Plan.

Highways England's policy in terms of local plan development is set out in DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development".

> *"To make most efficient use of the limited available capacity on the strategic road network, and because additional physical capacity is difficult, costly and takes time to provide, the Highways Agency* (now Highways England] *will engage in the Local Plan process to reduce the potential for creating congestion on the strategic road network."*

> *"In framing its contribution to the development of Local Plans, the Highways Agency's* [now Highways England's] *aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network.,,*

We are supportive of the general vision of the Plan in terms of transport which *"supports the development of a sustainable transport network including ensuring that where possible existing and new development is well served by various public transport modes".*

We are also supportive of the statement that the Plan aims to *"ensure that new development is serviced by appropriate physical infrastructure including road improvement where robust evidence demonstrates network capacity issues".*

The development of the supporting Infrastructure Delivery Plan (IDP) is welcomed as this provides clarity on the means of supporting the delivery of the transport vision for the plan. Our separate response relating to the IDP proviqes details on matters we suggest require revision or updating.

Overall, therefore we welcome the commentary in the emerging Plan on transport matters. This commentary should make reference to the need for a robust transport evidence base to provide the basis for (i) selection of growth options and (ii) assessing the impacts and necessary mitigation for the preferred spatial option taken forward.

We look forward to receiving t e Council's commitment to the development of such an evidence base which of necessity should include the SRN roads and junctions within the District and immediately nearby with the plan's effects assessed on a site specific and cumulative basis. We expect that transport matters, and SRN capacity in particular, will be a key factor in the screening of sites proposed for development.

Any proposals for new SRN junctions or significant amendments to the SRN required by the Plan should identified through the local plan making process and reflected in the supporting evidence.

Housing

As a starting point we note the need for the emerging Plan to reflect the requirement to accommodate housing allocations from adjoining authorities. We are also aware of the need for the Plan to be in alignment with the Greater Birmingham and Black Country Housing Market Area (GBBCHMA} Housing Need and Housing Land Supply Position Statement dated September 2018 which provides clarity on HMA-wide housing supply.

Whilst the detail of the housing need and supply is essentially a matter for the Council, we have observations on the distribution of development that may affect the 'site availability' context to these calculations. The options proposed include options for new / significantly enlarged settlements or dispersed housing growth. Highways England is supportive of options which include

a critical mass of development being provided at a small number of locations to ensure that traffic implications can be clearly identified and fully mitigated whilst also maximising the potential for sustainable and public transport to provide mitigation of traffic impacts.

In particular, we observe that the potential 'north of Penkridge' allocation is likely to require mitigation at M6 junction 13 and at the A449/A5 Gailey Roundabout. We seek further clarity on the potential housing allocation at or near i54 and how this relates to the existing i54 employment site and the existing outline planning consent for employment.

EmQ!Qyment Land

We note the continued reliance on further expansion of the i54 site and the proposed RoF Featherstone allocation to meet the majority of employment land needs going forward. The revised status of the proposed M54 to M6 link road discussed in more detail below changes the transport context within which both sites have operated to date; this should b reviewed as part of the evidence on transport matters.

In particulart we are of the view that the previous position regarding access to the RoF Featherstone site as set out in the SAD 2018 should be updated to reflect the M54 to M6 link road preferred route announcement and its effect on the choices of access proposed at that time. We also note that mitigation may be required if the employment land proposed at i54 goes beyond that set out in the existing outline consent and planning policies.

West Midlands Interchange

The West Midlands Interchange application for a Development Consent Order (DCO) currently sits out with the Local Plan making process. Highways England has engaged in the statutory consultation processes prior to the DCO application being made and has resolved the majority of transport matters that affect the SAN with the applicant. A small number of matters remain outstanding which are the subject of ongoing engagement with the applicant, the local highway authority and the examining authority. We note that the DCO decision may cause issues for the Local Plan development process in terms of its timing but we are of the view that the emerging Plan should acknowledge the presence of the DCO application. From the Highways England perspective, the proposed new roundabout junctions on the A449 and A5 trunk roads and associated works would, if the DCO is granted, have implications for SAN traffic flows in the area which the emerging Plan should reflect upon.

M54 / M6 Link Road

The M54 to M6 link road is a long-standing project that was conceived at the time of the M6 Toll (then the Birmingham Northern Relief Road) being delivered. The scheme has enjoyed continu d "in principle" support from regional and national transport bodies over recent years. On 2 October 2018 the preferred ro ute announcement for the scheme was made by Highways England; this includes a roundabout connected link between the M54 and M6 but no direct connection to the M6 toll. Whilst a clear timescale for delivery or final form of the link cannot be confirmed due the necessary future DCO process, the preferred route should be considered in the development of the transport evidence base particularly at the end of plan year.

Natural and Built Environment

We have certain statutory responsibilities with regards to matters of air quality and noise as these relate to SAN. The assessment of these matters should take into account the requirements of Highways England which, at the site specific level, are set out in general terms at Paragraphs 45 to 48 of the Circular.

Matters related to site boundaries will also need to be considered through the site selection process; where possible mitigation measures lie within the SAN boundaries these should be considered against the general principles outlined in Paragraphs 45 to 50 and Annex A1 of the Circular.

Planning Gain

We are supportive of the need to collect planning gain to make developments acceptable in planning terms. Our initial preference is for section 278 agreements to provide for necessary highway mitigation after sustainable and public transport solutions have been exploited. We are also supportive of the need for Section 106 agreements to fund highway schemes but note the issues with pooling of contributions, especially where a number of developments rely on major infrastructure proposals. Highways England is in receipt of section 106 monies from large developments in the area that are contributing to proposed works on the A449 corridor which demonstrate the need for such an approach. Should the Council move towards the adoption of the CIL we would wish to comment during the process and be involved in the setting of the Regulation 123 list of CIL funded schemes.

Next SteQs

We look forward to continue to work with you as the Plan develops, in particular in relation to the transport evidence base. Please contact me should any queries arise.

Yours sincerely

Nell Hansen OD Midlands
Email: [REDACTED]@highwaysengland.co.uk

30.11.2018 – SCC response to SSDC Issues & Options Consultation in Appendix 28

19.12.2018 – CWC response to SSDC Issues & Options Consultation

CITY OF WOLVERHAMPTON COUNCIL

19 December 2018

Strategic Planning Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Issues and Options Consultation

Thank you for the opportunity to comment on the Local Plan Review Issues and Options Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 12 December 2018.

The following principles underpin our response:

1. Support for the preferred housing growth option of local housing need plus 4,000 homes of Greater Birmingham and Black Country Housing Market Area need;

2. 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 Greater Birmingham and Black Country Housing Market Area Strategic Growth Study areas of search, subject to the findings of the joint South Staffordshire and Black Country Green Belt Review and other evidence;

3. Support for the sites submitted by CWC to South Staffordshire as part of the "Call for Sites", as approved by Cabinet Resources Panel on 2 October 2018;

4. Support for the employment growth option to allocate additional employment land to help address unmet cross boundary employment land needs for the Black Country, in locations which are the most accessible by a choice of means of transport to the Wolverhampton workforce;

5. Request for acknowledgement that, if approved, the West Midlands Interchange application would contribute towards unmet Black Country need for employment land and logistics provision;

6. Support for the existing Brinsford Strategic Park and Ride site allocation and request

that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;

7. Request that the impact of developments on the wider transport network is assessed, and that developments minimise trip generation through all available mechanisms;

8. Request that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links;

9. Request that any development on the edge of Wolverhampton take into consideration any health, education and environmental implications.

The detailed response to specific consultation questions is attached to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

Lead Planning Manager (Sub-Regional Strategy)

Direct: [redacted]
Email: [redacted]@wolverhampton.gov.uk

29.11.2019 – Highways England response to SSDC SHSID Consultation



highways
england-

Our ref: SHARE/ Your ref:

Planning and Strategic Services
South Staffordshire Council
Via Email: localplanreview@sstaffs.gov.uk

Patrick Thomas
Spatial Planner
The Cube
199 Whartside Street
Birmingham
B11AN
www.highways.gov.uk

29/11/2019

Dear Sir/Madam,

SOUTH STAFFORDSHIRE LOCAL PLAN-SPATIAL HOUSING STRATEGY

Thank you for the opportunity to comment on the emerging Spatial Housing Strategy in relation to the Local Plan Review in South Staffordshire. We have made a separate response to the consultation on the revised Infrastructure Delivery Plan.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SAN).

The SAN is a national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The SAN in South Staffordshire comprises sections of the A5 and A449 trunk roads togeth_er with sections of the M6 and M54 motorways.

The documentation sets out that employment growth options, and the meeting of the needs of the Gypsy and Traveller Community will be set out at the next stage of consultation in summer 2020.

Housing Spatial Options

It is noted that the council have now developed seven new Spatial Housing Options which are

designed to consider key housing issues facing the district. It is appreciated that specific sites have not been identified at this time.

The housing options proposed include options for new / significantly. enlarged settlements or dispersed housing growth. Highways England is supportive of options which include a critical mass of development being provided at a small number of locations to ensure that traffic implications can be clearly identified and fully mitigated whilst also maximising the potential for sustainable and public transport to provide mitigation of traffic impacts.

It is noted that the council have identified a preferred approach - option G, which is *"Infrastructure-led development with a garden village area of search beyond the plan period"*. This option is described as *"member led"* and includes an area for a new settlement to be delivered beyond the plan period along the A449 corridor. We observe that such an allocation is likely to require mitigation at M6 junction 13 and at the A449/A5 Gailey Roundabout.

TransQort Evidence Base

The council's commitment to consider transport infrastructure is welcomed. There is a need for a robust transport evidence base to provide the basis for assessing the impacts on the SRN and necessary mitigation for the preferred spatial option taken forward as part of the Preferred Options Plan. The preferred spatial option is expected to be consulted on in Summer 2020.

Preliminary discussions have already been held between the council, Highways England and the local highway authority with regards to the required transport evidence base. Whilst discussions are at an early stage, this collaborative approach is welcomed, and Highways England is committed to continued engagement in this process.

By necessity, the forthcoming transport evidence base should include the SRN roads and junctions within the District and immediately nearby with the plan's effects assessed on a site specific and cumulative basis. This will be instrumental in identifying the need for and form of any highway mitigation required. Any proposals for new SAN junctions or significant amendments to the SRN required by the Plan should identified through the local plan making process and reflected in the supporting evidence.

The development of the supporting Infrastructure Delivery Plan (IDP) is welcomed as this provides clarity on the means of supporting the delivery of the transport vision for the plan. Our separate response relating to the IDP provides details on matters we suggest require revision or updating.

West Midlands Interchange

The West Midlands Interchange application for a Development Consent Order (DCO) currently sits outside of the Local Plan making process. Highways England has engaged in the DCO process. We note that the DCO decision may cause issues for the Local Plan development process in terms of its timing, but we are of the view that the emerging Plan should acknowledge the presence of the DCO application. From the Highways England perspective, the proposed new roundabout junctions on the A449 and AS trunk roads and associated works would, if the DCO is granted, have implications for SAN traffic flows in the area which the emerging Plan should reflect upon.

M54/ M6 Link Road

The M54 to M6 link road is a long-standing project that was conceived at the time of the M6 Toll

(then the Birmingham Northern Relief Road) being delivered. The scheme has enjoyed continued "in principle" support from regional and national transport bodies over recent years. On 2 October 2018 the preferred route announcement for the scheme was made by Highways England; this includes a roundabout connected link between the M54 and M6 but no direct connection to the M6 toll. It is expected that the DCO application is to be submitted in 2020. The preferred route should be considered in the development of the transport evidence base particularly at the end of plan year.

Next Stegs

We look forward to continue to work with you as the Plan develops, in particular in relation to the transport evidence base. Please contact me should any queries arise.

Yours sincerely

[redacted]

Patrick Thomas
Spatial Planner
Operations
Directorate

Email: [REDACTED]s@highwaysengland.co.uk

CITY OF WOLVERHAMPTON COUNCIL

28 January 2020

Strategic Planning Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Spatial Housing Strategy Consultation

Thank you for the opportunity to comment on the Local Plan Review Spatial Housing Strategy Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 22 January 2020.

The following principles underpin our response, with more detailed comments provided in italics:

a. Support for the preferred housing growth option of local housing need plus 4,000 homes to meet wider Black Country and Birmingham Housing Market Area need;

b. Provision of detailed evidence to support the case that the Black Country is unlikely to be able to meet its own housing need up to 2038, and that the full 4,000 homes should be specifically allocated to meet Black Country needs;

Given the close proximity of the Black Country to South Staffordshire, the location of a number of potential growth sites forming part of preferred spatial housing option G on or close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country, we feel it is reasonable that all of these additional 4,000 homes should be allocated towards meeting Black Country housing needs, rather than housing needs from other parts of the HMA. We request that this allocation is clearly referenced in the Local Plan.

c. Recognition of the approach used in the selection of the preferred spatial housing option G and the benefits of developing a draft Infrastructure Delivery Plan for this option. It is important that the spatial housing option selected:

i. makes full use of brownfield and urban site options to minimise green belt release;

ii. ensures that sites selected for development are carefully located and planned to avoid areas of greatest environmental sensitivity and green belt harm, and to minimise impacts on infrastructure;

ensures that any urban extensions are subject to an integrated health impact

assessment; provide all necessary local shops, community and health facilities and primary school places on-site; provide secondary school places in appropriate locations; and address wider health service implications, to meet the needs of new residents and avoid impacts on infrastructure in neighbouring authorities;

iii. ensures that the infrastructure needs of smaller sites on the South Staffordshire boundary can be met without putting additional pressure on infrastructure in neighbouring authorities.

d. Request that the impact of developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, and that developments minimise trip generation through all available mechanisms;

e. Support for use of the very high green belt harm rating to prioritise site selection, whilst also suggesting that consideration is given to making use of landscape sensitivity ratings;

In terms of the site selection process, we support the use of the jointly prepared South Staffordshire and Black Country Green Belt and Landscape Sensitivity Studies to prioritise sites for selection. However, we suggest that the appropriate threshold should be a combination of 'very high' green belt harm and 'moderate to high' or 'high' landscape sensitivity, rather than use of 'very high' green belt harm alone. This would make full use of the findings of the two studies and facilitate a consistent cross-boundary approach.

f. Support for the existing Brinsford Strategic Park and Ride site allocation and request that this project and other supporting infrastructure which increases access to the rail network should be promoted in the new Plan;

g. Support for the sites submitted by the Council to South Staffordshire as part of the "Call for Sites", as approved by Cabinet (Resources) Panel on 2 October 2018;

h. Acknowledgment that the Council and South Staffordshire Council have been working together constructively on planning issues of mutual interest and request that close joint working on all relevant planning issues, particularly development proposals and infrastructure and delivery, continues throughout the Plan preparation process and is strengthened through the creation of a formal liaison group to regularly consider emerging proposals and their cross-boundary implications.

The detailed response to specific consultation questions is attached to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely

Michele Ross

Lead Planning Manager (Sub-Regional Strategy)

Direct: [REDACTED]
Email: [REDACTED]@wolverhampton.gov.uk

21.04.2021 – duty to co-operate meeting minutes

Duty to Co-operate cross-boundary highways meeting (Staffordshire County Council, South Staffordshire District Council, Wolverhampton City Council)

Present

Staffordshire County Council - James Chadwick, Annabel Chell, Nick Dawson
South Staffordshire District Council - Ed Fox, Kelly Harris, Patrick Walker
Wolverhampton City Council - Michelle Ross, Marianne Page

Highways modelling

- Staffordshire County Council obtaining access to existing highways model from Highways England to address body's concerns re. cumulative impacts
- Awaiting written confirmation from Highways England to confirm approach, but SCC confident this is proportionate and will be acceptable to HE.
- Model will give high level advice to identify distribution of trips from new development to junctions in surrounding area, but will not consider mitigation measures
- Developer-led Transport Assessments from preferred sites then need to identify mitigation to address issues raised and be considered by SCC and CWC highways – iterative process
- COVID impacts means realistically developers won't be able to survey until September at earliest
- If developers instructed to do TAs promptly, this should allow for mitigation to be identified in Black Country/South Staffordshire Publication Plans in summer 2022

Agreed;
- general approach of preparing/using model and TAs to inform mitigation supported by SSDC/WCC/SCC officers
- WCC/SSDC officers would be engaged by SCC to identify key parameters for sites (e.g. access/through routes) prior to running cumulative model

Public transport/walking/cycling improvements to support sites

- Staffordshire County Council preparing short note/policy framework for South Staffordshire sites
- WCC indicated A449 a key focus for future and existing public transport/active travel improvements, including rapid link to i54 and rail link to potential housing site adjacent to ROF Featherstone
- Black Country LCWIP being prepared; will look at measures to support proposed housing sites, including those directly adjacent in South Staffordshire
- Recognition of need to write in LTN120 to any future design codes
- SCC indicated Cheslyn Hay/Great Wyrley & Bilbrook/Codsall more likely to be focuses of future funding bids than Penkridge, but high level evidence could still be prepared to secure money from Penkridge developers

Agreed;
- SCC/SSDC officers to be engaged by WCC in preparation of Black Country LCWIP to support proposed sites
- LTN120 and good quality links to nearby/adjacent cycle routes likely to form key requirement of future site design codes

Next steps/Statements of Common Ground (SoCG)
- Highways is separate DtC matter from housing/employment; likely to need SoCG to agree approach to cross boundary sites
- Important that points from SoCG are also reflected in key policy requirements; otherwise may be

missed at application stage
- SCC likely to need future discussion re. who is responsible for bus provision at Linthouse Lane

Agreed;

- Following cumulative highways modelling exercise; draft SoCG to be prepared between SSDC/SCC/WCC to set out cross-boundary process for highways/sustainable transport mitigation

21.04.2021 – email from SCC following meeting

From: Jarvis, Jon (E,I&S)

To: Thomas, Patrick

Cc: JONES Derek; Kelly Harris; Patrick Walker; Edward Fox; Phillips, Nick; Elliott, David; Dawson, Nick (E,I&S) **Subject:** South Staffordshire Local Plan - Preferred Options Cumulative Assessments using HE"s M54-M6 traffic model **Date:** 21 April 2021 12:47:13

Attachments: JJ - Confidential Scoping Note for M54 M6 model acquisition (Final).docx

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CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Patrick

Further to our meeting on 1st April 2021 to discuss the use of the M54-M6 traffic model to assess the cumulative impact of South Staffordshire's Local Plan Preferred Option proposals, please find enclosed Scoping Note setting out a proposed methodology. This is in line with discussions held at the meeting.

HE said they would like to jointly agree various input parameters and the methodology so that they can also make use of the model outputs to inform their response to the Local Plan. I would therefore be grateful if you would review the Scoping Note and pass any thoughts and comments back to me.

Could you also please confirm that the model will be made available for SCC to undertake the work, and subject to agreeing the various input parameters and methodology, when the model will be available? As discussed, we are happy to provide an email confirming that we will only use the model for the purpose of assessing Staffordshire Local Plans.

Kind regards Jon

Jon Jarvis

Senior Strategy Officer

Connected and Sustainable County Staffordshire
County Council

Email: [REDACTED]

Tel: [REDACTED]

Office Location: Floor 3, No. 1 Staffordshire Place, Tipping Street, Stafford ST16 2DH

Postal Address: No. 2 Staffordshire Place, Tipping Street, Stafford ST16 2DH

CONFIDENTIAL

Scoping Note

South Staffordshire Council's Local Plan – Cumulative Transport Assessment of Preferred Option Housing Sites and the Potential Use of the M54-M6 SATURN Model

Background

South Staffordshire Council (SSC) are moving towards the Preferred Option stage of their Local Plan review, which covers the period to 2038. Consultation on the Preferred Option will take place in the summer of 2021. The Preferred Option could contain four substantial housing sites – north of Penkridge, Codsall / Bilbrook, around Coven Heath/west of ROF Featherstone and land to the south-west of Essington (on the Wolverhampton border). SSC have requested that Staffordshire County Council (SCC) and Highways England (HE) provide a cumulative assessment of the trips generated from these sites so that they can understand the likely traffic impact on the road network.

Available Assessment Methodologies

SCC have considered this request and the methods available to it to undertake such a task. The main approaches taken forward for consideration were:

- Option 1. Manual assessment using the 2011 JTW Census data and Google routes to map the projected new peak hour development trips to suitable roads.
- Option 2. Use of an available traffic model to assign projected new peak hour development trips to suitable roads. The most recent and appropriate model covering this area was considered to be the M54-M6 SATURN model, produced by Aecom on behalf HE to support the case for the new M54-M6 link. This model was an update the HE's Midlands Regional Traffic Model (MRTM).

Of these two options, Option 2 was considered to be the most effective and efficient way of undertaking an assessment. Option 1 (Manual Assessment) would be based on 2011 Census data, whereas Option 2 has the benefit of more recent 2015 dataset (mobile phone data) which was used to build the model trip matrices. Option 1 would require a time-consuming analysis of the Census data for each of the four housing sites, followed by a fairly subjective selection of most likely traffic routes to given destinations through Google maps. This routing selection would not include any new roads that would be available by the end of the Local Plan period, critically the M54-M6 link which should be open by 2024. Option 2 would utilise existing survey data within the traffic model to estimate the likely trip distributions from the new housing areas and then benefit from the model assignment procedure to route the trips on the best routes. This would include any new roads that will be constructed by the end of the Local Plan period.

Use of the M54-M6 SATURN Model

Some of the benefits of using the recent M54-M6 SATURN model were outlined above.

A better understanding of the availability and suitability of this model was required, and how it may be utilised to provide the information required to undertake an assessment of the cumulative impacts of the potential Preferred Option housing sites. Discussions were held with HE and their consultants Aecom and Systra via email and a Teams meeting on the 1st April 2021.

It is understood that the MRTM was only partially updated to produce the M54-M6 model. The model covers a vast area and only a proportionate approach to the calibration and validation of the M54-M6 model update was undertaken. This meant that the matrix and validation for areas beyond the parts of the road network that would be impacted by the M54-M6 link were not updated. Aecom were

concerned that some of the model traffic flows required for the assessment of the potential Preferred Option sites could be beyond the validated model area and thus be more unreliable than those within the updated model area.

To overcome this potential issue SCC described how they thought a lower level application of the model could be undertaken, which does not rely on the full trip matrix from the model. This alternative method is considered to be a proportionate approach to providing data which allows a high-level assessment of the potential sites to be undertaken. The proposed approach is:

1. Extract trip distributions from the existing M54-M6 forecast year trip matrices to provide an estimate of the likely OD movements for the new housing developments. These would be from similar zones adjacent to each of the proposed sites.
2. The distributions would be factored by a suitable trip rate. It is proposed that a 2016 trip rate survey of Perton (within Staffordshire, but on the edge of the Wolverhampton boundary, is used. These are AM 0.097 In / 0.253 Out = 0.350; PM 0.305 / 0.147 = 0.451. (N.B. 0730 – 0830 time period has previously been used in analysis of junctions near to this site, however, that was mainly due to those nearby junctions having earlier peak hours. This was 0.090/0.298=0.379).
3. The new developments would then be assigned a new zone within the matrix and all other trips from existing zones would be removed, just leaving trips from the new developments in the matrix.
4. The new trip matrix would then be assigned within SATURN to the latest future year M54-M6 model network which contains new and future road schemes.
5. Traffic flows for the required study area would then be extracted and annotated on a mapping background to provide information on the cumulative level of trip making from the four potential Preferred Option sites. Impact at key junctions would be identified.
6. Initial thoughts on the extent of the road network which needs to be assessed are displayed on the plan below.

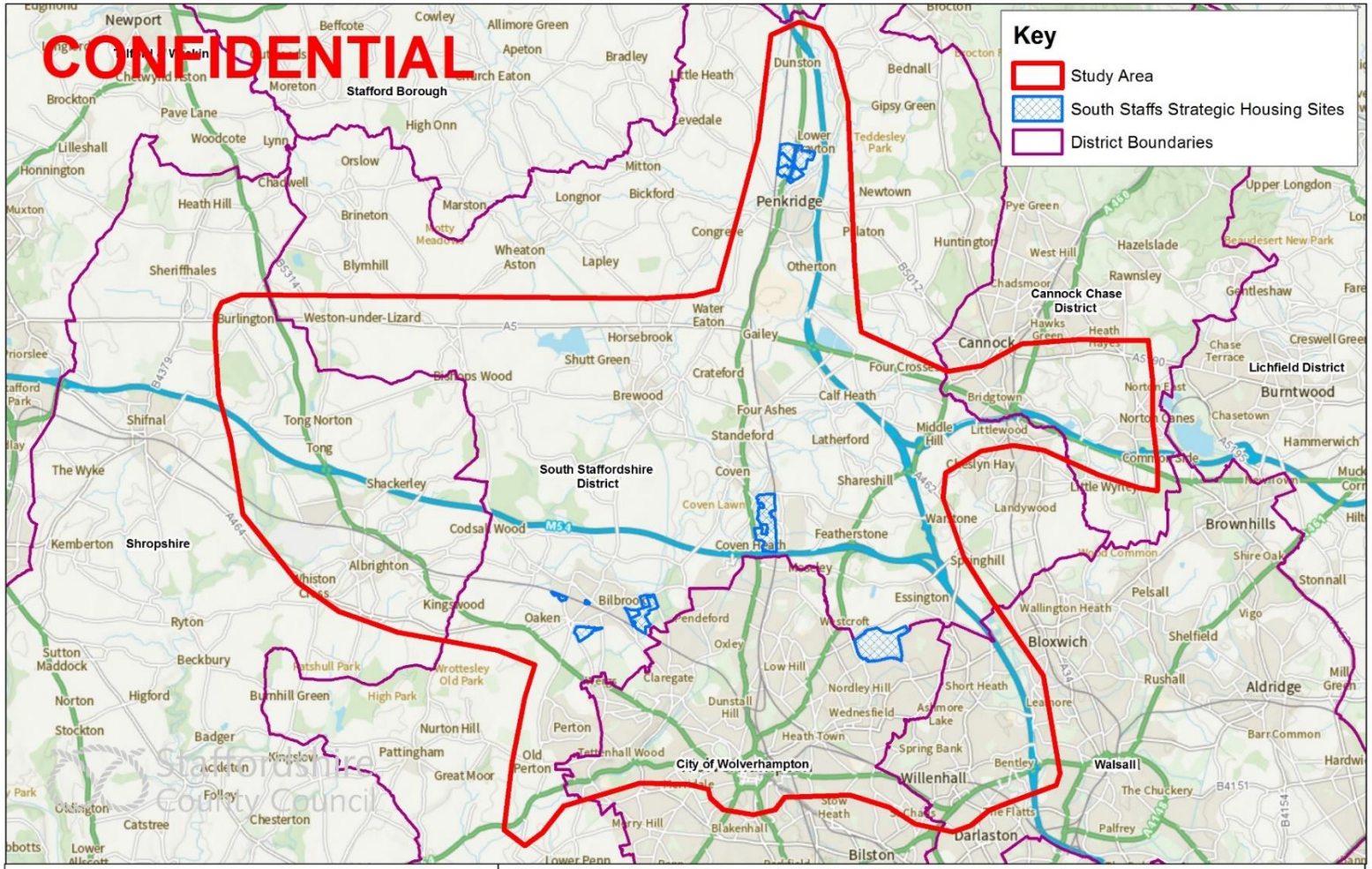
Agreement of Methodology and Parameters with HE

At the meeting HE (via Systra) indicated that given they also need to consider the impact on their network it would be beneficial for them to use the outputs from this exercise. On that basis they asked that all parameters were agreed with them so that SCC and HE are aligned.

It appeared at the meeting that there was general consensus that the Option 2 approach outlined above was the best approach given the suitability of the M54-M6 models. The parameters informing the application of this model which need to be agreed between SCC and HE are:

- Trip Rates – SCC has outlined a set of trip rates from 2016 surveys of Perton for discussion with HE
- Trip Distribution – Discussion with HE and Aecom will be required to determine which adjacent zones are chosen to produce a realistic distribution for the potential Preferred Option sites.
- Extent of modelled network required – is HE satisfied with the extent of the network provided in the plan?

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Strategic Housing Site Allocations

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N

21.09.2021 – highways modelling meeting notes

Highways modelling cross boundary meeting with Wolverhampton

WCC (John Charles, Marianne Page), SCC (Nick Dawson, Jon Jarvis), SSDC (Kelly Harris, Patrick Walker)

ND – context is cumulative highways modelling requested by Highways England; got access to M54/M6 Saturn Model and input 4 strategic sites and some others

JJ – Linthouse, Brinsford and Codsall/Bilbrook are primary areas with impacts upon the Wolverhampton network. Trip rates reflect those surveyed in Perton area and previously shared with WCC. Model shows AM & PM peaks. Developments of 100 vehicles over/out period as cut off.

Key impacts (PM peak):
- Going south from Linthouse Lane
- A41 and Wodbaston
- Cat and Kittens Lane
- A449
- Bognop Road

Key Impacts (AM peak):
- A449
- Wodbaston Road
- Going south from Linthouse Lane (Wednesfield road – into town centre)
- Cat and Kittens

JC – Broadly happy with 100 vehicle cut off. Wodbaston Road, Wednesfield Road are the major concerns based upon existing concerns and significant new cycle highway.

MP – Linthouse Lane impacts are as expected and considerable. ROF Featherstone: included in link road?

JJ – HE say they have.

MP – Cat and kittens lane likely to be mitigated by ROF and have already commented. Wednesfield Road/Linthouse is where there may be more of an issue; roundabout and link signal junction.

JC- PM peak around Wodbaston Road is also an issue but can be an issue with exit times of businesses of Wodbaston Road; unlikely to be mitigable through signal timings.

MP – Wednesfield Road and capacity restrictions in that area likely to cause issue and will also affect local roads in immediate vicinity of site.

JC – Wood end road (west of Linthouse) likely to cause an issue to that

ND – Can provide this to you, get WCC agreement and then feed this to promoters alongside WCC hotspots. Then propose to request site promoters use this to prepare TAs (inform geographical scope of TAs).

MP – agree with approach, can't go too far via mitigation, but helpful to set scope of TA to inform development control process. Sustainable transport key to mitigation. LCWIP for BC commissioned with consultant appointed; will highlight key corridors to inform BC plan work.

JC – would like to see some more detail on Wodbaston Road corridor if possible to test specific junctions is possible. Also would help to have more detailed data on Wednesfield area junctions to inform judgements.

KH – need some idea of broad mitigation costs to

MP – need to have some broad mitigation and area of impact.

JC – ¾ weeks minimum

MP – Wodbaston Road; cumulative sites impact?

JJ – Combination of Brinsford and Codsall/Bilbrook

MP – Challenging as it's not a direct TA with one developer

KH – Linthouse Lane and Cross Green and East of Bilbrook represented by same agent, hoping to use same consultant for all sites to allow cumulative consideration (Vectos consultants)

MP – Can set scope for TA, difficulty will be setting proportionate split but can give a rough indication of mitigation and rough costs

KH – also need to agree appropriate windows for highways survey periods

JC – Re. political fallout

MP – Personally don't think detailed modelling/survey work is required pre-submission, just a high level enough set of info to ensure there's a sense of whether or not mitigation is required and roughly what that might entail. WCC would then expect involvement in detailed TA on strategic sites through Pre-app process following plan adoption.

Next steps:

Timescales for agreeing key findings of model

21.10.2021 – duty to co-operate meeting minutes

Minutes of Black Country, South Staffordshire and Staffordshire Duty to Cooperate Meeting

Date – 21st October 2021
Venue – Teams

Attendees:
Ian Culley (Chair, Black Country Planning Leads)
Carl Mellor (Planning Manager, Dudley MBC & BCPlan Site Assessment lead)
Vicki Popplewell (Principal Planning Officer, Dudley MBC & BCPlan consultation lead)
Neville Ball (Principal Planning Policy Officer, Walsall MBC)
John Raine (Principal Planning Policy Officer, Walsall MBC & BCPlan Infrastructure Lead)
Andy Miller (Strategic Planning & Transportation Manager, Sandwell MBC & BCPlan Transportation lead)
Marianne Page (Service Manager – Transport Strategy, City of Wolverhampton)
Michele Ross (Lead Planning Manager, City of Wolverhampton & BCPlan Housing lead)
Kelly Harris (Lead Planning Manager, South Staffordshire Council)
Ed Fox (Strategic Planning Team Manager, South Staffordshire Council)
Patrick Walker (Senior Planner, South Staffordshire Council)
Mark Parkinson (Head of Planning Policy and Enabling, Staffordshire County Council)
James Chadwick (Principal Planning Policy Officer, Staffordshire County Council)

Issue	Key issues and actions
Levels of Growth and Spatial Strategies – Black Country Plan	
Plan status	Reg 18 Plan published for consultation September 2021.
Levels of Growth	Target of over 76,000 homes and 565ha of employment land.
Strategy	Strategy is an iteration of existing Core Strategy with the majority of development within the BC on brownfield land within the urban area. BC urban capacity of 41,000 homes and 306ha of employment land. This shortfall means the BCPlan has had to test capacity in the green belt. It allocates green belt sites which can provide 7,700 homes within the Plan period and further capacity beyond the Plan period for those sites which will be built out beyond 2029. The Plan also identifies 48ha of employment land on sites within the green belt. Strategy focusses urban development on the four strategic centres and the corridors which link them. A number of the green belt sites are close to the South Staffordshire boundary. This means there is a gap of around 28,0000 homes and 210ha of employment land which cannot be met within the BC. This has informed DtC with neighbouring local authorities.
DtC	DtC contributions currently 'on the table' provide around 8,000 homes and 102-126ha of employment land. These contributions are at different stages and expressed in different ways – some to the HMA as a whole and some specifically to the BC. But a shortfall of around 20,000 homes after taking into account the current DtC 'offers' remains.

Issue	Key issues and actions
	Across the HMA the current shortfall is calculated to 2031 and is around 3,000 homes. This may increase in the light of evidence informing the preparation of the Birmingham Development Plan when this is published later this year.
Levels of Growth and Spatial Strategies – South Staffordshire Local Plan	
Plan status	Consultation to run to 13th December 2021. Plan covers the period to 2038.
Levels of growth	Housing requirement of just under 9,000 homes made up of local need and 4,000 contribution to the wider HMA.
Strategy	Vast majority of growth directed to larger Tier 1 villages in the most sustainable locations close to transport infrastructure, plus locations on the urban edge of the BC. Four strategic housing allocations adjoining the BC – Cross Green (RoF site)(1,200 homes), Linthouse Lane (1,200 homes within Plan period), Bilbrook (848 homes) and Langley Rd (390 homes). Employment land supply is made up of the four existing strategic sites and the more recently consented WMI. The employment land evidence is being reviewed and due to be published in February. This will inform whether SStaffs can make a contribution to meeting unmet employment needs arising in the BC.
Infrastructure evidence – Black Country	
Transportation	The two key pieces of work are the Transport Modelling work and Accessibility Work. Accessibility work completed to inform the draft plan and mainly focussed on local accessibility. Transport modelling work has just been commissioned jointly between the BCAs and TfWM. Starting point is the existing LTP and will be based on three scenarios – 2039, 2032 (LTP refresh) and baseline (2024). National Highways will be involved in this work going forward. Key current issue for the work is to confirm which infrastructure projects should be assumed to be delivered for each of the three scenarios. Current assumptions are: • By 2024 key projects delivered are M6 J10 and M54/M6 link. • By 2032 key projects delivered are Walsall to Aldridge Railway extension and associated new stations, Brinsford Parkway, Wolverhampton to New Cross Rapid Transit and A449 Corridor. • By 2039 anticipate extension of BC rapid transit, electrification of Wolverhampton to Shrewsbury. TfWM are currently considering changes to the frequency of services on this line and whether this will happen prior to electrification. The modelling work should be completed in February to inform the Publication version of the Plan – identifying any constraints associated with the development proposals and required mitigation. Staffs Highways team are involved in the transport modelling work as there are a number of sensitive locations in southern Staffordshire which may be affected by development. JD requested further liaison with Nick Dawson and John Jarvis to

Issue	Key issues and actions
	understand these wider impacts on other southern Staffordshire districts. This to ensure consistency between the BC Transport model and the Staffs Transport model. MP advises that Brinsford Parkway should be delivered by 2028 and therefore in line with the 2032 date for the purposes of the modelling. Tettenhall Station is also being promoted by TfWM and will need to be considered in the model. Third piece of transport work is the Car Park Study. First stage complete and next stage to inform the Publication Plan. **Action – AM to share schedule of infrastructure Projects with SStaffs and Staffs to confirm that the assumptions on project delivery are accurate.** **Action – Staffs County Highways team to be invited to next Transport modelling meeting.**
Education	Draft BCPlan includes a new policy to secure funding from residential development for new education infrastructure given the scale and location of new housing proposed in the Plan. For the sites allocated in the Plan we have tested whether any should provide new schools within the site given their scale and capacity of existing provision. The Wolverhampton LEA team have advised the need for one new Primary School in the NE of the City. In Walsall there are a number of sites where new primary schools may be required and this is being confirmed with LEA colleagues to inform the Publication Plan. There is unlikely to be a need for new secondary school in Walsall but this to be confirmed at Publication stage. There have been ongoing discussions with Staffs and SStaffs over cross-boundary education provision over the last two years given anticipated scale and location of growth. At this stage it is understood that each LEA can provide for school place needs within their local authority area. IDP is in preparation and will be completed for the Publication Plan. This will confirm education and school infrastructure needs and how they will be met. In summary, it is understood that both Local Plans are likely to be able to accommodate their own demand for education infrastructure without the need for cross-boundary funding mechanisms to deliver infrastructure in another local authority area. The Linthouse Lane site will provide a new primary school which will accommodate demand from Staffordshire. Moving forward, it is critical that the timing of the delivery of new schools is coordinated on a cross-boundary basis to ensure that there is no excess capacity in new schools which may affect attendance at existing schools as best we can. This commitment to ongoing dialogue and joint-working to confirm the trajectory for new school opening should be the key element of the SoCG. **Action – JR to share IDP with Staffs and South Staffs colleagues.**

Issue	Key issues and actions
IDP	Utilities Infrastructure Study prepared by Stantec and considered gas, electricity, sewerage, communications and the findings of the Water Cycle Study. It identified some issues in relation to electricity and gas supply. The subsequent Infrastructure paper also produced by Stantec was tasked with understanding whether there were any critical infrastructure constraints associated with the scale and location of growth proposed in the Reg 18 Plan. It advised that there are no significant infrastructure strategic constraints subject to the findings of the Transport Modelling work. The IDP is well-progressed but needs to be updated in the light of the findings of the Transport Modelling work and ongoing dialogue with the LEAs particularly in Walsall. CCGs and NHS bodies have been engaged as part of the preparation of the draft Plan and they have not identified any specific infrastructure that will be required to support the delivery of the Plan. The plan does include a Policy that can secure funding for health infrastructure associated with specific development proposals where a need can be evidenced.
Infrastructure evidence – South Staffordshire	
IDP	Draft IDP will be published as part of the Preferred Options consultation. This to be updated for Publication Stage in the light of responses to the PO consultation and ongoing evidence.
Highways	Staffs CC are undertaking highway modelling work using the SATURN model as the starting point to test the impact of development proposed in the Local Plan. This work will inform identification of a package of mitigation to address impacts and high-level indicative costs. This package of projects is being informed by discussions with BC Transport colleagues. For Wolverhampton, the main outstanding issue for this modelling is around the Linthouse Lane development proposal and the access arrangements.
Education	Strategic sites are anticipated to require new primary school provision. No anticipated need for new secondary schools.
Health	Discussions with CCGs and NHS Trusts. SStaffs also considering a Policy mechanism to secure funding for new health infrastructure and this will be reflected in the viability study. MR suggested the Linthouse lane site could accommodate a new heathcare facility but the evidence for this from the CCGs is unclear at this stage.
SFRA and Water Cycle Study	SFRA completed. Scope of detailed Level 2 SFRAs will be confirmed in the light of responses to the PO consultation. Water Cycle Study completed and ongoing discussions with Severn Trent but no showstoppers identified. May be some local site-specific mitigation. Lead local flood authority have been engaged in site selection in relation to surface water flooding. **Action – SStaffs to convene joint meeting with Black Country and Severn Trent to discuss any cross-boundary constraints in relation to sewerage capacity. MR to email SStaffs to set out potential cumulative impacts.**
Summary	

Issue	Key issues and actions
Summary	There is a strong level of joint working and cooperation on cross-boundary infrastructure issues. There are no major areas of concern between the three parties in terms of any gaps in the existing evidence or the scope of emerging evidence. There are no proposals at this stage which raise significant cross-boundary concerns not being addressed by this evidence.

08.11.2021 – Local Plan sites transport modelling email chain

From: Marianne Page

To: Edward Fox; John Charles; Nick Broomhall

Cc: Kelly Harris; Patrick Walker; Dawson, Nick (E,I&S); Michele Ross; John Roseblade

Subject: RE: Local Plan Sites - Transport Modelling

Date: 08 November 2021 10:14:55

Attachments:

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Hi Ed,

I have sent a reminder to colleagues on cost estimates, apologies I don't know when they will come back to me.

If Nick is happy that appropriate assessments have been undertaken for Linthouse Lane for the purposes of the evidence base for your plan at this stage, then that is fine for me. We can discuss the detail at the next stages.

On Langley Road I include my colleagues @John Charles and @Nick Broomhall to take a view on what further work they may or may not feel is needed at this stage from a Network Management and Road Safety perspective. I will let Nick know if there is further work we think might be needed, noting the March 2022 completion date.

Thanks
Marianne

Marianne Page

Service Manager – Transport Strategy Tel:
01902 551798

Mob: [REDACTED]

E-mail: [REDACTED]@wolverhampton.gov.uk City of
Wolverhampton Council

From: Edward Fox <E.Fox@sstaffs.gov.uk>

Sent: 05 November 2021 15:13

To: Marianne Page <[REDACTED]@wolverhampton.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; Patrick Walker <P.Walker@sstaffs.gov.uk>; Dawson, Nick (E,I&S)

<[REDACTED]@staffordshire.gov.uk>

Subject: RE: Local Plan Sites - Transport Modelling

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Hi Marianne,

Many thanks for forwarding my request for indicative costs to colleagues. That's really helpful - do you have any indication on timescales for this?

Regarding the other points in the email you raise I have liaised with Nick Dawson on these. Regarding Linthouse Lane, he has confirmed our suspicions that there will need to be multiple accesses given the scale of the development and doesn't see the value in an all or nothing sensitivity test. What is still open to consideration (through the masterplanning process) is where exactly the site accesses will be and where these connect through the site (e.g. the Kitchen Lane issue).

For Langley Road, SCC haven't got model coverage for the network in CWC area, nor have JTW information to estimate trip distribution, although they would expect trips to be relatively small. Nick view was that you would be better placed to say which junctions in your area would likely be impacted and suggested you could worst case sensitivity test on the Merry Hill junction. We could then get the site promoter to assess the impact here and satisfy you regarding mitigation. Please let us/Nick know your thoughts on the way forward for this as soon as possible as ultimately any mitigation will need to be fed into our viability work which we need to finalise in March 2022.

It may be if there are any technical difficulties with this approach that you liaise directly with Nick, as I think our input may be limited with us not being the highways authority. That said, we are still very happy to be involved in any discussions.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: Marianne Page < >

Sent: 21 October 2021 12:12

To: Edward Fox <E.Fox@sstaffs.gov.uk>; Jarvis, Jon (E,I&S) REDACTED; Dawson, Nick (E,I&S)

REDACTED<REDACTED>; Patrick Walker <P.Walker@sstaffs.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; John Charles <John.Charles@wolverhampton.gov.uk>; Michele Ross

REDACTED<REDACTED>; Tim Philpot <REDACTED>; Gerwyn Owen

<REDACTED>; Nick Broomhall <REDACTED>; John Roseblade

<REDACTED>

Subject: RE: Local Plan Sites - Transport Modelling

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Hi Ed,

I have forwarded the colleagues the request to see if they are able to facilitate some headline cost estimates.

Following the presentation to Cllrs on Tuesday, there were a lot of questions relating to the Langley Road development. Whilst this is a modest proposal, there is a significant nervousness about the network and road safety impact around the nearest junction in Wolverhampton which has local amenities surrounding. @Jarvis, Jon (E,I&S) do the modelled Saturn flows cover the area around the proposal, are there screenshots with indicative numbers which we could take a look at?

As mentioned in the previous email, we think involvement in the master plan work and identifying the sustainable transport links to the site will be key to explore at a later stage, should the allocation proceed for the site. However, given the level of concern currently being expressed, it might be advisable to undertake an independent evaluation of the trip distribution anticipated from the housing proposal and estimate impacts upon the junction at Merry Hill at this stage. I would usually expect this to form part of a TA scope but I think it could be beneficial to undertake an early exercise, there will be a number of questions from Councillors and residents on the expected highway impacts.

As discussed in the meeting earlier today, I have double checked and the assumption for Linthouse Lane site is that the traffic **does** split between access points, apologies for my confusion. Slightly different but related question though would just be to clarify that you don't think sensitivity tests running all or nothing scenarios on each access option are required at this stage to satisfy the planning piece? From a Wolverhampton perspective, I think having looked again you have taken a realistic middle ground which is sufficient from a technical perspective, and the detail modelling for the TA will be key at a later stage. This element may come under considerable scrutiny though so just want to be clear.

Happy to discuss any of the above.

Thanks
Marianne

Marianne Page

Service Manager – Transport Strategy Tel:
01902 551798

Mob: [REDACTED]

E-mail: [REDACTED] City of Wolverhampton Council

From: Edward Fox <E.Fox@sstaffs.gov.uk>

Sent: 20 October 2021 09:14

To: Marianne Page ; Jarvis, Jon (E,I&S); Dawson, Nick (E,I&S) ; Patrick Walker <P.Walker@sstaffs.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; John Charles; Michele Ross

; Tim Philpot; Gerwyn Owen

>

Subject: RE: Local Plan Sites - Transport Modelling

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Hi Marianne,

Many thanks for your email which is really helpful in setting out what will need to be considered. The indicative cost of £100,000 for Linthouse Lane improvement is very useful. Is it also

possible to provide similar indicative costs for the walking/cycling into the CWC network at Linthouse and the localised network management/road safety and walking/cycling improvements in your boundary along the Wobaston Road that you highlight?

We appreciate that any costs are very indicative at this stage and could be completely superseded once we see a detailed TA, but even very rough cost allowances for these works could be critical to showing we've scoped in some headroom for highways improvements on these sites in our emerging Local Plan viability study.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

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From: Marianne Page < >

Sent: 14 October 2021 15:44

To: Jarvis, Jon (E,I&S) < >; Dawson, Nick (E,I&S) <; Patrick Walker <P.Walker@sstaffs.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>

Cc: Kelly Harris <k.harris@sstaffs.gov.uk>; John Charles < >; Michele Ross

< >; Tim Philpot < >; Gerwyn Owen

< >

Subject: Local Plan Sites - Transport Modelling

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Hi All,

Jon - Thank you for sending though the modelling outputs, colleagues in Network Management have now had opportunity to do a high level review of the anticipated local impacts.

As discussed at the meeting a few weeks ago we have pulled together an indicative response on locations of concern, Likely TA scope and potential mitigation. All comments below are made without prejudice to the determination of future planning applications and are intended to inform discussions, they do not currently represent the formally endorsed position of CWC in response to the Local Plan consultation. That will be consolidated in due course by planning colleagues.

From a network impact perspective, the main area of concern relates to the Linthouse Lane proposals (as expected) and is showing some significant concern at junctions in the surrounding area.

- The Transport Assessment for any future planning application should include a scope for network modelling on the Wolverhampton side which extends beyond the site to a number of key junctions, including Lakefield Road.
- we would expect appropriate mitigation to take the form of Network Management improvements to a number of surrounding junctions (upgrades for efficiency, ITS to facilitate SMART management of the network and minor highway improvements to manage local routes and influence route choice) these will be determined using the TA model at the appropriate time. Best guess at this time would be up to £100,000, this is very much dependent on TA detailed outcomes and wider measures to reduce car ownership / dependency and sustainable modes of access to the site.
- As the impact relates to the distribution of vehicular movements, we would also expect the development to provide whatever infrastructure possible to reduce car dependency for future residents, so provide appropriate walking and cycling routes to connect in to existing / planned CWC infrastructure in the local area, and have appropriate routes identified to public transport services and local centres / services. The cost of infrastructure beyond the site itself is difficult to quantify and is something we have committed to looking at in partnership through the development of the Black Country LCWIP – I would not expect the contribution to be significant as there is a lot of appropriate infrastructure within the wider CWC area to connect in to.

The strategic modelling of Wobaston Road is currently showing that the network suffers from some degradation in performance with slight increase in delays and queuing and we maintain concerns that the intense periods of exiting traffic at key employment site may be exacerbated. As such we would still want to be included within the Transport Assessment scoping for the main sites which contributed to the trip number uplift on this section of highway, and would want to understand each sites impact in more detail as it came forward to planning application stage.

- At this point there is no significant anticipated mitigation required associated with these sites, but the TA process may indicate some localised network management or road safety improvements of a minimal cost which we would not want to discount at this stage.
- Again appropriate connecting infrastructure for sustainable journeys to local centres and amenities, including those in Wolverhampton, should be considered as part of the site proposals, should be identified within the TA and delivered by the developer.

As an overview, all sites adjacent to the boundary should have due consideration to connecting infrastructure for safe and convenient walking and cycling to local centres, and access to public transport services. The assessment of this should be within the TA for any planning application and for any of the identified sites where this would include access in to Wolverhampton as the most convenient or direct, we would want to be included in the discussions regarding on and off site design and mitigation.

I hope the above is useful and what you need, but please come back to me if you wish to

discuss further. Thanks
Marianne

Marianne Page

Service Manager – Transport Strategy Tel:
01902 551798

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E-mail: [REDACTED]

City of Wolverhampton Council

13.12.2021 – SCC response to SSDC Preferred Options Consultation in Appendix 29

13.12.2021 – CWC response to SSDC Preferred Options Consultation in Appendix 30

13.12.2021 – Highways England response to SSDC Preferred Options Consultation

highways england-

Our ref: SHARE/ 98483465

Your ref:

Planning and Strategic Services
South Staffordshire Council
Via Email:
localplanreview@sstaffs.gov.uk

Patrick Thomas
Spatial Planner
The Cube
199 Whartside Street
Birmingham
B11AN
www.highways.gov.uk

13th December 2021

Dear Sir/Madam,

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS CONSULTATION

Thank you for the opportunity to comment on the Local Plan Preferred Options Consultation in South Staffordshire.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

The SRN is a national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The SRN in South Staffordshire comprises sections of the A5 and A449 trunk roads together with

sections of the M6, M54 and M6T motorways.

Please note that all references in the Local Plan documentation to 'Highways England' need to be changed to 'National Highways'.

We have reviewed the key consultation documents; 'Local Plan Preferred Options' November 2021 and 'Infrastructure Delivery Plan' September 2021.

Employment Allocations

In terms of employment sites, we observe that the existing supply of employment land over the plan period (2018 to 2038) is sufficient to meet demand.

The West Midlands Interchange site has now been formally allocated. However, this site is already consented through the Development Consent Order process, including the requisite mitigation measures pertaining to the SRN. Similarly, the ROF Featherstone site is also consented, and mitigation pertaining to the A449 agreed.

The preferred options identify no additional employment sites above the existing supply. Therefore, a transport evidence base for employment sites is not required as part of the Local Plans Preferred Options process.

Residential Allocations

Policies SA1 to SA4 inclusive set out four strategic residential sites:

- Policy SA1 – Strategic development location: Land East of Bilbrook – A minimum of 848 homes; principal impacts on the SRN likely to be on the M54 Junctions 2 and 3 and on the A449 north of M54 Junction 2
- Policy SA2 – Strategic development location: Land at Cross Green – A minimum of 1200 homes split across two parcels of land; one to the immediate north of M54 Junction 2 and a separate site further north. This allocation will directly impact on the A449 and M54 Junction 2. This allocation includes 'safeguarded land for a parkway station'. The southern parcel of land abuts the M54.
- Policy SA3 – Strategic development location: Land North of Linthouse Lane – a minimum of 1200 homes, main traffic impacts likely to be at M54 Junction 1
- Policy SA4 – Strategic development location: Land North of Penkridge: this allocation is spread across 5 parcels of land, although the development quantum has not been stated; this will need to be confirmed. Greatest traffic impacts likely to be at M6 J13 and A5/A449 Gailey roundabout. The site abuts the A449, although the A449 is not a trunk road at this point. Whilst the site itself does not abut the M6, a portion of land to the immediate east of the site identified as 'green infrastructure, in part, does abut the M6.

Policy SA5 – housing allocations, sets out circa 40 smaller scale sites which are additions to existing settlements.

Policy SA6 - gypsy and traveller allocations, sets out a limited number of small-scale sites.

A suitable transport evidence base is required with the goal of identifying the need for and form of any highway mitigation works on the SRN arising from the local plan residential allocations.

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.

Paragraph 5.22 of the IDP cites the discussions held between us and SCC with regards to the transport evidence base. It is also stated that this approach has been agreed between the two parties. Whilst the *principle* of the approach has been agreed, there remain technical details to discuss and agree. We are committed to ongoing engagement with South Staffordshire Council and the local highways authority in order to finalise the technical details of this methodology.

Policy SA2 includes 'safeguarded land for a parkway station'. Should such a proposal come forward in future, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT 02/2013 and the Design Manual for Roads and Bridges. This is to identify the need for and form of any mitigation required for the SRN.

We also offer the following further comments in regards to the specific strategic allocation sites which abut SRN:

SA2 Land at Cross Green

The northern part of this Housing Allocation (646a) is separated from the southern part by "green infrastructure". This suggests that the traffic associated with this area of the site will use the existing Local Road network and A449 Trunk Road junctions (i.e., Brewood Road from the southern Coven roundabout and Old Stafford Road approximately 500 metres to the south). These junctions will need to be assessed for safety and capacity, with appropriate improvements identified as necessary within existing Highway limits along with any Departures from Standard. In addition, the need for land within this Housing Allocation site for environmental mitigation measures, for example noise attenuation, will need to be considered in accordance with paragraphs 45 – 48 and Annex A paragraph A1 of the Department for Transport Circular 02/2013.

The southern edge of this Housing Allocation site (646b) has a boundary with the M54 motorway (eastbound on-slip road). Similarly, land considerations for traffic capacity improvements will need to be considered along with land for environmental mitigation, for example, noise attenuation. It is noted that National Highways surface water drainage assets exist close to the site boundary at the foot of the structural embankment (northern side). The site proposals will need to demonstrate that these assets are protected from site surface water discharge in accordance with paragraph 50 of the Department for Transport Circular 02/2013.

SA4 Land North of Penkridge

These Housing Allocation sites are separated from the boundary of the M6 motorway by an area of "green infrastructure" and the River Penk. In terms of the design of this green infrastructure, it will be necessary to consider the need for inclusion of any environmental mitigation measures, for example noise attenuation to meet the requirements of paragraph 45 of the Department for Transport Circular 02/2013. It is also noted that the green infrastructure boundary is close to an Air Quality Management Area (AQMA 1 Woodbank) declared by South Staffordshire Council in 2006.

Policy SA5 - housing allocations, sets out a series of other smaller scale additions to existing settlements and **Policy SA6** relates to gypsy and traveller allocations. At such time these sites come through the planning application process, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT 02/2013 and the Design Manual for Roads and Bridges (DMRB). This is to identify the need for and form of any mitigation required for the SRN.

Details on these smaller sites will be required in terms of the proposed boundary treatments to SRN including any necessary environmental mitigation, for example noise attenuation and surface water drainage which to demonstrate compliance with the DfT Circular 02/2013.

The formation of any new junction on the SRN will need to comply with paragraph 11 of the DfT Circular 02/2013 and comply with DMRB standards. Similarly, where existing site access arrangements which interface with the SRN are identified for use, any existing non-DMRB compliant features which cannot be improved to current DMRB standards will need to be the subject of appropriate Departures from Standard and DfT Circular 02/2013

Area of Search for New Settlement

We note the criteria-based policy DS4 detailing the broad parameters for a new settlement to come forward *after* the Local Plan period which ends in 2038. This includes an area of search, in broad terms, mirroring the West Coast mainline/A449 between the M6 and M54 motorways.

Given the location, it can reasonably be expected that such a new settlement would result in material implications for our network. This in terms of traffic, site access arrangements and possible abutment.

At such time further details emerge in relation to this proposal, we will need to be consulted at an early stage to ensure appropriate assessments are carried out in accordance with DfT 02/2013 and the Design Manual for Roads and Bridges. This is to identify the need for and form of any mitigation required for the SRN.

Sustainable Transport

> For the four strategic residential sites, the following infrastructure and design requirements are cited *'Highways, sustainable transport and active travel infrastructure, including links to infrastructure in the wider area'*. More generally, policy HC19 refers to the requirements for green infrastructure, including for active travel. Policy EC 11 'Sustainable Transport' sets out a number of broad policy measures.

The commitment to sustainable transport and active travel is welcomed; although further detail will be required for our review as proposals are developed further.

Additional IDP Comments

The IDP refers to the decision from the Secretary of State regarding the M54-M6 link road proposal being expected in October 2021. This is no longer the case; the decision is now expected in April 2022. The IDP will need to be amended to reflect this.

In terms of any mitigation identified as being necessary to maintain the free flow and safety of the SRN, we will seek to enter into Section 278 agreements with developers to deliver specific improvement schemes on the SRN where they are found to be necessary. This provides certainty to delivery.

Next Steps

We look forward to continue to work with you as the Plan develops, in particular in relation to

the transport evidence base. Please contact me should any queries arise.

Yours sincerely

[REDACTED]

Patrick Thomas Spatial
Planner Operations
Directorate

Email:[REDACTED]

14.01.2022 – Highways evidence base (land north of Penkridge) email chain

From: Edward Fox

To: Patrick Walker

Subject: FW: Highways evidence base - Land north of Penkridge

Date: 14 January 2022 11:51:19

Attachments: ~WRD0623.jpg

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: Rebecca Birch [REDACTED]

Sent: 08 December 2021 14:31

To: [REDACTED]

Subject: RE: Highways evidence base - Land north of Penkridge

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Edward,

Thanks for your email.

Both ourselves and Bloor have undertaken some preliminary modelling & traffic impact work for our respective sites, including an initial assessment of the motorway junctions and some high level discussions with National Highways.

We are in the process of jointly appointing a consultant to progress this work for the wider allocation with a view to setting up a scoping meeting with SSC early in the new year. Once this has

been arranged we will extend the invite to yourself and your colleagues so that you have the option to attend.

Regards

Rebecca Birch

[REDACTED]

From: Edward Fox <E.Fox@sstaffs.gov.uk>

Sent: 03 December 2021 15:47

To: [REDACTED]

Subject: Highways evidence base - Land north of Penkridge

Dear all,

As you are aware, Land north of Penkridge is one of our preferred strategic housing allocations in our emerging Local Plan. As previously discussed we are very keen to start the masterplanning process for this strategic site as soon as possible and as part of this need to bottom out the sites infrastructure requirements and the mitigation measures required. **We need this work to be completed prior to running our Publication Plan consultation in summer next year so would welcome your urgent attention on the below matters.**

A critical aspect of this is around highways mitigation as we need to be comfortable that the site will be supported by a robust highways evidence base that is sufficient for a site of this scale. Colleagues at Staffordshire County Council (SCC) have used National Highways M54/M6 highways model to identify junctions of concern and have now indicated to us that a site specific strategic TA will be required for your site in order to identify the mitigation requirements at these junctions and the surrounding network as appropriate. We will also need to understand indicative costs of these mitigation measures to feed into our Local Plan viability study that will need to be finalised for our Regulation 19 consultation that is earmarked for summer 2022. In addition to your site specific strategic TA, SCC have indicated that a cumulative TA across the four strategic site allocations will also be required. If would be useful if you are able to indicate what highways/sustainable transport evidence you have prepared for the site, if anything, to date?

SCC will be responding to our Preferred Options consultation on the points above, but in the meantime, it is suggested that you contact Nick Dawson (cc'd) at SCC to discuss the scope of this work and so it can be set in train as soon as possible. Assuming a meeting is set up to go over this, either Kelly, Patrick or I can make ourselves available to attend. SCCs representation will also cover sustainable transport/active travel requirements so it is suggested these are discussed as well.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

14.01.2022 - Highways evidence base (land east of Bilbrook) email chain

From: Edward Fox

To: Patrick Walker

Subject: FW: Highways evidence base - Land east of Bilbrook

Date: 14 January 2022 13:51:48

Attachments:

See below for the folder.

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

www.sstaffs.gov.uk

From: Edward Fox

Sent: 14 January 2022 13:51

To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Highways evidence base - Land east of Bilbrook

Hi Max,

Thanks for coming back to me and confirming and I will await any further comments on the brief from you next week.

For Sean's benefit, it may be worth involving Marianne Page – [REDACTED] from

the highways team at City of Wolverhampton Council in any meeting given the

proxity of the site to the city boundary. Kind regards

Ed

Edward Fox

Strategic Planning Team Manager

Strategic Planning

South Staffordshire Council

Tel: 01902696418

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From: Max Whitehead <[REDACTED] >
Sent: 14 January 2022 13:39

To: Edward Fox <E.Fox@sstaffs.gov.uk>
Cc: Sean McGregor <[REDACTED] >; Neil Cox <[REDACTED] >
Subject: RE: Highways evidence base - Land east of Bilbrook

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Ed, yes Sean McGregor at Capricorn is instructed and is trying to set up a meeting with SCC and EH next week – we'll send you an invite when it has been confirmed.

Thanks for the earlier email on the brief, we are not far

apart on the points at all. I just need to confirm the fees

situation with TW and St P next week when Rebecca is

back from holiday. Kind regards

Max

Max Whitehead

Planning Director

Bloor Homes Midlands

7 Calico Business Park, Sandy Way, Amington, Tamworth, Staffordshire, B77 4BF

[REDACTED]

From: Edward Fox [mailto:E.Fox@sstaffs.gov.uk]
Sent: 14 January 2022 13:31

To: Max Whitehead <[REDACTED] >
Subject: RE: Highways evidence base - Land east of Bilbrook

Hi Max,

Related on my previous email on the masterplanning work, can I just check if you have been able to appoint a transport consultant for your Bilbrook site yet? SCC have indicated to us that March is a neutral month for traffic counts so think we would need the TA consultants to hit the ground running with these in March.

Thanks
Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

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From: Max Whitehead <[REDACTED] >
Sent: 08 December 2021 11:42

To: Edward Fox <E.Fox@sstaffs.gov.uk>; Neil Cox <[REDACTED] >
Cc: [REDACTED]
Subject: RE: Highways evidence base - Land east of Bilbrook

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Ed, thanks for the email.

We have undertaken preliminary access and traffic impact work for this site but it is several years old now.

We will need to appoint a new transport planning

consultant going forward for this site, I will aim to sort that

before Christmas and we can progress matters with SCC

and yourselves in the New Year. Kind regards

Max

Max Whitehead

Planning Director

Bloor Homes Midlands

7 Calico Business Park, Sandy Way, Amington, Tamworth, Staffordshire, B77 4BF

From: Edward Fox [mailto:E.Fox@sstaffs.gov.uk]
Sent: 03 December 2021 15:42

To: [REDACTED]
Cc: [REDACTED]
Subject: Highways evidence base - Land east of Bilbrook

Dear Neil and Max,

As you are aware, Land east of Bilbrook is one of our preferred strategic housing allocations in our emerging Local Plan. As previously discussed we are very keen to start the masterplanning process for this strategic site as soon as possible and as part of this need to bottom out the sites infrastructure requirements and the mitigation measures required. **We need this work to be completed prior to running our Publication Plan consultation in summer next year so would welcome your urgent attention on the below matters.**

A critical aspect of this is around highways mitigation as we need to be comfortable that the site will be supported by a robust highways evidence base that is sufficient for a site of this scale. Colleagues at Staffordshire County Council (SCC) have used National Highways M54/M6 highways model to identify junctions of concern and have now indicated to us that a site specific strategic TA will be required for your site in order to identify the mitigation requirements at these junctions and the surrounding network as appropriate. We will also need to understand indicative costs of these mitigation measures to feed into our Local Plan viability study that will need to be finalised for our Regulation 19 consultation that is earmarked for summer 2022. In addition to your site specific strategic TA, SCC have indicated that a cumulative TA across the four strategic site allocations will also be required. If would be useful if you are able to indicate what highways/sustainable transport evidence you have prepared for the site, if anything, to date? SCC will be responding to our Preferred Options consultation on the points above, but in the meantime, it is suggested that you contact Nick Dawson (cc'd) at SCC to discuss the scope of this work and so it can be set in train as soon as possible. Assuming a meeting is set up to go over this, either Kelly, Patrick or I can make ourselves available to attend. SCCs representation will also cover sustainable transport/active travel requirements so it is suggested these are discussed as well.

Kind regards
Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902696418

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18.01.2022 – email chain regarding land at Pendeford Mill Lane, Bilbrook

From:	Sean McGregor
To:	Patrick Walker;[REDACTED]
Cc:	Edward Fox; Kelly Harris
Subject:	RE: Land at Pendeford Mill Lane, Bilbrook
Date:	18 January 2022 14:20:16

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Hi Patrick,

Many thanks, that's a helpful summary. In addition, the following agreed actions are worth noting:

- CTP to send results of June 2021 surveys to SCC.
- SCC to advise whether they hold any comparative data that could be used to cross-check the June 2021 data.
- SCC to provide the Perton trip generation rates used in their assessment, which can be adopted in the TA subject to checking.
- CTP to identify any additional traffic survey requirements based on an estimated distribution of development traffic.
- List of surveys to be agreed with SCC (but likely to include Histons Hill/Wolverhampton Rd and repeat of June '21 ATCs for cross-checking).
- Keepers Lane site to be treated as a committed development and cumulative impact assessment alongside Bilbrook to be considered.
- SCC to consult internal passenger transport team on scope for diversion of existing bus services to serve the development.
- SCC to provide details of draft walk/cycle strategy to CTP.

As discussed, we will seek to agree all key inputs to the TA with Wolverhampton CC and NH as part of the scoping process.

Happy to discuss further as required.

Best regards,

Sean McGregor
Director

Capricorn Transport Planning

Transport Planning | Traffic Enginering | Sustainable Travel | Road Safety

19 Graystones Close, West Bridgford, Nottingham NG2 6QU

[REDACTED]

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From: Patrick Walker <P.Walker@sstaffs.gov.uk>

Sent: 18 January 2022 13:44

To: [REDACTED]

Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>

Subject: RE: Land at Pendeford Mill Lane, Bilbrook

Hi all,

Thanks for taking the time to discuss this with us earlier. Please see below for what we understand to be the key agreed follow-on actions from today's meeting – if I've missed anything important then please let us know:

- Any further local survey work would needs to be undertaken in March, with **May** deadline for preparation of TA and indicatively costed mitigation measures to ensure plan progress
- TA consultants to prepare scoping note to all Highways Authorities (including NH) with survey locations, trip generation/distributions & strategic consideration of sustainable transport/active travel mitigation measures
- SSDC to provide clarification on committed developments on request for TA consultants
- SCC highways to clarify catchment for education facility and FE size with education colleagues

- Bloor to approach Taylor Wimpey sites to ensure consistent approach to SRN mitigation to address National Highways concerns (and joint impacts on local roads if flagged by highways authorities)

Kind regards
Patrick Walker

Senior Planner (Urban Design/Landscape Planning) Strategic Planning

South Staffordshire Council

Tel: 07970 433618

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21.01.2022 – highways scoping note for North of Penkridge

From:	Beth Street
To:	Rebecca Birch; Rebecca Birch; Jarvis, Jon (E,I&S); Hawe, Simon (E,I&S); Thomas, Patrick; Morris, Chris; Edward Fox; Patrick Walker
Cc:	Steve Bates
Subject:	Land North of Penkridge - Highways Scoping
Date:	21 January 2022 16:47:32
Attachments:	

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Hi all,

Thank you for your attendance at the scoping meeting on Wednesday in relation to Land North of Penkridge. Please find below a summary of the key points and actions as discussed.

Key Points

- Purpose of this work to understand the impact of the site allocation and any possible mitigation measures, and likely costs.
- Timescales – South Staffs need to understand possible mitigation by May to inform their viability assessment.
- SCC have updated a cordon model of the M6/M54 Link Road SATURN model to include the allocations.
- Given timescales, it is preferable to use the outputs of this model (can be provided by SCC) for assessment. NH require confirmation of the modelling parameters before confirming acceptance of this model.
- Development quantum c.1050 dwellings and 2FE primary school, but is subject to change. This does not include the consented 200 dwellings (Bloor Phase 1) scheme.
- Access has previously been designed to comprise two new four arm roundabouts and are in line with the relevant standards.
- It would be proposed to extend the 30mph speed limit along the A449 to the edge of the site. This has already been extended for the Bloor Phase 1 scheme.
- SCC updates to SATURN model include:
  - Cordon of M6/M54 Link Road SATURN taken
  - Four strategic allocations added (this site input as 1129 dwellings)
  - Committed Bloor Phase 1 scheme added
  - Trip rates based on average of agreed trip rates and surveys of existing sites
  - Distribution based on adjacent zone within model – these may be quite generalised.

- SCC confirmed acceptance of using the SATURN model flows within the assessment, although NH would like more information before confirming acceptance.
    - PJA to review LMVR for SATURN model and issue to NH for confirmation.
- Local junction modelling – agreed scope of local junctions same as those listed within the Bloors Scoping Response, and inclusion of M6 J12.

    J1: A449/Stone Cross/Pinfold Lane/Crown Bridge staggered priority junction.
    J2: A449 Wolverhampton Road/New Road priority junction. ◦ J3:
    B5012 Cannock Road/ Wolgarston Way mini roundabout. ◦ J4:
    A449/B5012 Boscomoor Lane roundabout.
    J5: M6 Junction 13 roundabout. ◦
    J6: A5/A449 Gailey roundabout. ◦
    Additional Junction – M6 J12.

    - SCC not aware of any local data available – potential to undertake new surveys in March.
    - Neither of the M6 junctions are identified for improvement within RIS.
    - Need to provide a pedestrian/cycle audit review of key routes;
    - High level public transport strategy to be produced. Assess suitability of buses routing into the site – may need to discuss with operators.

    Actions
    - EF to send SCC Local Plan response to PJA
    - JJ to share outputs from updated model directly.
- PJA to review SATURN LMVR and confirm model parameters – i.e. committed development, traffic growth. PT may be able to provide contact information for person at Aecom responsible for the model.
- PJA to provide details on committed development etc within the SATURN model to NH for approval.
    - PT to investigate historic model of M6 J13.
    -
- PJA to capture the above in a scoping note, including travel demand, distribution, trip impact at all junctions.

Given the timescales involved, the potential for monthly catch-up meetings were discussed. I'll schedule placeholder sessions and send across teams invites shortly. I'd anticipate these to be the following weeks, but let me know if there are any problems. If nearer the time the meeting is not considered necessary, we can always cancel or reschedule as appropriate.

- w/c 7th February
- w/c 7th March
- w/c 11th April
- w/c 9th May

Let me know if you have any questions.

Beth Street

Senior Consultant

T. [REDACTED]

28.01.2022 – Linthouse Land and Cross Green meeting minutes

Meeting Minutes

Land North of Linthouse Lane and Land at Cross Green

28th January 2022 @ 2PM

Present:

Tom Mais, DTA Simon
Tucker, DTA
Zoe Curnow, Taylor Wimpey
Neil Cox, Evolve Planning + Design
Edward Fox, South Staffordshire District Council
Patrick Walker, South Staffordshire District Council Jon
Jarvis, Staffordshire County Council
Tim Philpot, City of Wolverhampton Council

Apologies:

Stephen Swinscoe, Taylor Wimpey
Marianne Page, City of Wolverhampton Council John
Charles, City of Wolverhampton Council

No.	Notes	Action
1.0	**Current Planning Context/ Local Plan Timescales**	
1.1	The Reg 18 consultation was completed at the end of last year on four strategic housing allocations. The Reg 19 consultation is scheduled to start in the summer/ early Autumn.	
1.2	Ahead of the Reg 19 consultation, SSC needs to understand the infrastructure requirements for the strategic sites, including site specific infrastructure to demonstrate deliverability.	
1.3	It has been agreed in meetings on the other sites that traffic surveys will be undertaken after the February half term, with the aim of identifying initial mitigation measures in May including indicative costs.	
1.4	DTA confirmed that there is already significant traffic survey data for the local area available and that this could be reviewed as well.	
1.5	Initial master-planning work is to be undertaken and the highways work will be progressed in tandem with that.	
1.6	DTA questioned whether the TA work being requested was essentially the evidence base for the emerging Local Plan and if the TAs needed to be 'Staffordshire CC' reports. It was confirmed by SCC and SCC that they are happy for the reports to be in the consultants' names.	

1.7	The need for consistency in approach between the various TAs was identified, and the scope of the TA's is to be agreed between the relevant parties.	
1.8	It was confirmed that there would be a Statement of Common Ground and an Executive Summary setting out what had been agreed.	

2.0	**Strategic Transport Assessments**	
2.1	A high level assessment of the impacts of the sites has been undertaken by SCC using the SATURN model provided by NH. There was agreement with CWC on the parameters but the detail was not agreed with NH.	
2.2	SCC confirmed that the model was coarse in areas but useful in providing a guide to where there are likely to be impacts.	
2.3	It was agreed that DTA would provide CWC with outputs from the SATURN model with assistance from SCC.	**DTA/ SCC**
2.4	It was agreed that DTA would need to undertake a separate exercise reviewing distribution/ assignment based on Census data, which would form part of the transport scoping exercise.	
2.5	It was identified that the TAs should be based on an end of Local Plan assessment year i.e. 2038.	
2.6	It was agreed that any committed developments would need to be taken into account in the assessment should be agreed with SCC, CWC and NH in due course.	**DTA/SCC/ CWC/ NH**
2.7	SCC confirmed that they are treating the new road to the ROF Featherstone employment site and the link road connecting M54 to M6 as committed development. However, an assessment of the operation of the A460/ New Road junction would still be required.	
2.8	DTA will review TEMPRO in relation to general background growth associated with the Black Country and South Staffordshire Local Plans.	**DTA**
2.9	With regard to cumulative impact associated with the four strategic allocations, SCC confirmed that they would need to review the interaction between the sites at the appropriate stage.	**SCC**
2.10	It was agreed that the TAs would need to consider sustainable transport infrastructure, including foot/ cycleway improvements and buses. CWC confirmed that they expect LTN 1/20 to be applied.	
2.11	It was confirmed that Tim Philpot was the best point of contact in CWC to discuss the sustainable transport strategy. SCC confirmed that they will provide input on the sustainable transport strategy for both sites, whilst recognising that the emphasis will be on CWC's network.	
2.12	SCC identified that for Cross Green the TA will need to consider the Park and Ride scheme. SCC agreed to share data from the outline business case to inform this, which SCC had used in their reps.	**SCC**
3.0	**Cumulative Transport Assessment**	
3.1	It was agreed that there was no need for a separate cumulative TA to be prepared and that consideration of the interaction between the strategic sites would need to be considered where appropriate within the respective TAs.	
4.0	**Engagement with National Highways**	

4.1	DTA is to set up a meeting with NH to talk through their requirements in relation to the Strategic TAs. It was agreed that DTA would invite SSC to that meeting.	**DTA**
4.2	SSC identified that NH will want the TAs to consider impact on the AA49 up to Gailey Roundabout including the Coven/ Brewood Road junctions, and also M54 junctions 1 and 2.	

5.0	**Next Steps and Timescales**	
5.1	DTA is to prepare transport scoping notes to go to SCC, CWC and NH in around three weeks on trip rates, trip distribution/ assignment, and proposed scope of assessment.	**DTA**
5.2	SSC agreed to undertake some select link analysis from the SATURN model to inform this work for which there may be a small fee.	**SCC**
5.3	It is proposed the SCC, CWC and NH would respond 7-10 days to the transport scoping notes once submitted.	**SCC/ CWC/ NH**

15.09.2022 – National Highways meeting minutes

Minutes – National Highways and SSDC meeting 15.09.2022

Attendees:

Patrick Thomas (PT) – National Highways

Ben Simm (BS) – National Highways

Annette Roberts (AR) – SSDC

Kelly Harris (KH) – SSDC

Ed Fox (EF) – SSDC

Patrick Walker (PW) - SSDC

Introduction

KH – purpose of meeting is to discuss evidence base (4 STAs and cumulative note) and matters for statement of common ground

Background matters on evidence base

KH – Still awaiting NH response on four strategic sites' cumulative note, need this response urgently for consultation. County and CWC have responded on four STAs, some remaining questions on Penkridge site STA's mitigation package but otherwise no significant concerns on these. Hoping that cumulative work is ok; highways authorities have been supportive but need clarity on NH view.

PT – will circulate cumulative note response shortly

KH – SSDC have viewed the statement of common ground examples circulated, but would be helpful to have a discussion on areas of agreement, further work & disagreement. Would welcome NH views on this to inform drafting.

Potential areas of agreement for SoCG

BS – Agreed methodology to inform 4 STAs for strategic sites, agreed need for cumulative impact assessment with SSDC and highways authorities. Comments provided back on all STAs, clarifying NH requirements for sites to come forward. Requested any mitigation goes into IDP to support plan delivery. Would like to understand if specific mitigation can be linked to specific sites in policy text/supporting text but not sure there is sufficient certainty to allow this yet.

PW – Assume from work to date we can agree ongoing constructive engagement has happened and that procedure of DtC have been met.

BS – Also agree that SSDC and NH will actively support active travel and sustainable transport mitigation measures over measures to facilitate car trips.

Potential areas for further work/ongoing discussions

KH – Further work to support planning applications?

BS – Details of exact mitigation schemes yet to be finalised. Will work collaboratively with LPA, SCC and applicant to bring forward mitigation as required by local plan and IDP. Wouldn't advise tying selves down to exact mitigation schemes in IDP whilst mitigation may be subject to change. Can highlight junctions that needed further consideration in future planning application

TAs identified through local plan modelling, but would keep it high level in IDP on understanding that it's a live document that will evolve over time.

PT – Can reflect key pressure points on network where collaborative work to find solutions in SoCG: A449 Stafford road Brewood roundabouts, M54 Jct 2 etc. and others. Can add in specific details of junctions to draft SoCG when circulated.

BS – Ongoing work on sustainable transport will be required to inform mitigation for strategic sites.

PW – Will reflect ongoing sustainable and active travel mitigation measures engagement up to planning app to inform final mitigation strategy as an ongoing area of future work.

PW – How should cumulative work be treated in SoCG?

PT – Need to be an agreed list of committed developments (missing from Cross Green, Linthouse, and one other). Still need to understand distribution details also. SoCG might need to be more high level on this issue at this stage.

PW – Once first draft is prepared will circulate for comments

BS – By time of examination hoping NH queries with cumulative work will be addressed.

<u>Potential areas of disagreement</u>

PT – only difficulty is appropriate amount of detail and what stage that should be prepared at. Most differences to date have been what is the appropriate amount of evidence at appropriate stage.

BS – Methodology for work has been agreed, no fundamentally differences in absolute conclusions at this stage, all issues are matters to be resolved through ongoing work, not outright areas of disagreement.

<u>Other background information to provide for SoCG introduction</u>

BS – probably should mention Aecom model/County work on this as part of wider evidence base, separate from 4 STAs and cumulative notes which has since followed. Also mention that you've engaged with NH at appropriate stages.

PW – South Staffordshire will begin work on SoCG within next month on the basis of this meeting and circulate it to NH for comments and amendments when drafted - **Agreed**

02.11.2022 – email containing SoCG

From:	Edward Fox
To:	Chell, Annabel (E,I&S); Jarvis, Jon (E,I&S); Simm, Ben; Thomas, Patrick; Marianne Page; Tim Philpot
Cc:	Kelly Harris; Patrick Walker; Annette Roberts
Subject:	Transport SoCG
Date:	02 November 2022 10:01:00
Attachments:	SoCG Transport South Staffs NH SCC CWC.docx

Dear all,

Please find attached a first draft Statement of Common Ground between South Staffordshire Council and relevant highways authorities in relation to our emerging Local Plan. This is an initial draft that reflects the position at this current time as we understand it.

Please update/clarify any sections of the draft as you see necessary as track changes, and when providing comments please respond to everyone party to the SoCG on this email. Please could I ask that you send me comments/track changes by 16th November please?

Any queries, then please get in touch. Kind

regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Tel: 07970 643301

07.11.2022 – email chase to National Highways

From:	Annette Roberts
To:	Thomas, Patrick; Simm, Ben
Cc:	Edward Fox; Kelly Harris; Patrick Walker
Subject:	National Highways/SSDC
Date:	07 November 2022 13:41:55
Attachments:	Transport SoCG.msg

Dear Ben and Patrick,

I understand that we have had no response from you to Ed's emails below of 24th and 31st October. Given this, we are now unable to make changes to our draft Regulation 19 IDP to reference specific junctions as requested at our previous meeting on 15.09.22. The IDP will however be a 'live document' so there will be chance to add in more detail through future iterations.

Separate to this, you will also see that we have sent you a draft Statement of Common Ground (email 02.11.22) for your consideration and are asking for comments by 16th November. Please do get in touch with Kelly, Ed or Patrick if there is any element of the draft that you wish to discuss prior to sending your comments.

Kind regards

Annette

Annette Roberts

Corporate Director Infrastructure and Business Growth
Corporate Leadership Team

South Staffordshire Council

Tel: 07939 552286

23.11.2022 – emails from SCC and NH regarding SoCG

From: Edward Fox

To: Simm, Ben; Jarvis, Jon (E,I&S); Marianne Page; Chell, Annabel (E,I&S); Thomas, Patrick; Tim Philpot

Cc: Kelly Harris; Patrick Walker; Annette Roberts; Michele Ross; Ian Culley; Ric Bravery; Parkinson, Mark (E,I&S); Croshaw, Laura (E,I&S)

Subject: RE: Transport SoCG

Date: 23 November 2022 17:19:00

Attachments:

SoCG Transport South Staffs NH SCC CWC v2.docx

Hi all,

Many thanks for providing comments on the draft transport SoCG. We are comfortable with the changes/additions made and so have accepted all the suggested track changes, reflected in the clean version attached.

Please let me know if you have any final comments on the SoCG by 2nd December. Otherwise we will assume that all parties are happy with it as drafted and will start to take it through our Member agreement processes for sign off. It would also be helpful to understand others process/timescales for signing it too please?

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

From: Simm, Ben

Sent: 22 November 2022 11:23

To:[REDACTED]

Subject: RE: Transport SoCG

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Good morning Ed / Kelly

Please find attached the updated version of the SOCG using the version Jon Jarvis had updated.

There are a few amendments and comments, there is one additional comment under areas of agreement regarding a sustainable transport first approach which needs to be checked by SCC and CWC to see if they support and add their names to it.

However overall I am content with the document.

Happy to discuss further as required.

Thanks Ben

Ben Simm MPlan MRTPI MTPS **Spatial Planning Manager – Midlands Operations Directorate**

National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN
Tel: +44 (0) 300 4708152
Web: www.nationalhighways.co.uk

From: Jarvis, Jon (E,I&S)

Sent: 14 November 2022 12:05

To: [REDACTED]

Subject: RE: Transport SoCG

Hi Ed

Please find attached SCC's comments and suggested changes to the SoCG. This file also contains Michele Ross' (CWC) comments which were previously sent to you.

Kind regards Jon

Jon Jarvis | Principal Transport Strategy Officer Connectivity and Sustainability

Economy, Infrastructure and Skills Third Floor, Staffordshire Place 1 Tipping Street, Stafford, ST16 2DH Tel: **[REDACTED]**

E-mail: **www.staffordshire.gov.uk**

From: Marianne Page

Sent: 07 November 2022 12:15

To: Edward Fox <E.Fox@sstaffs.gov.uk>; [REDACTED]

Subject: RE: Transport SoCG

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Sensitivity: NOT PROTECTIVELY MARKED

Hi Ed,

I gather Planning colleagues have been consulted separately on the wider suite of documents, their proposed amendments for transport are incorporated into the attached.

Thanks
Marianne

Marianne Page

Service Manager – Transport Strategy Tel: 01902 551798

Mob:[REDACTED]

10.10.2024 – NH response to email containing SoCG and further chase emails

From:	Kathryn Simmonite
To:	Kelly Harris; David Pyner
Cc:	Edward Fox; Alex Evans; Chris Morris
Subject:	RE: South Staffordshire Local Plan - Highways SoCG
Date:	10 October 2024 13:19:53
Attachments:	

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Hi Kelly
Apologies for the delay, I've now had the opportunity to discuss the issue with my predecessor and familiarise myself with our response to your reg 19 consultation from May this year and the existing SOCG.
In terms of a cumulative impact assessment for the key strategic sites I understand that we have provided our SATURN model for the M54 to M6 link road scheme to support this but haven't seen any outputs from this as yet.
I also aware that there are already planning applications in for several of the draft allocation housing sites and that we are awaiting the provision of supporting transport modelling information for these.
Given the above I am concerned that were the sites to be formally allocated with Local Plan without a cumulative impact assessment it may place an onus on us to accept the principle of the development without understanding their likely impact on the SRN. A cumulative impact assessment is a key principle for National Highways in determining transport impacts on the SRN and informs us if any transport interventions may be required on the network to deliver plan growth.
Obviously, we are keen to support you in your local plan growth aspirations, I'll talk to our consultants Aecom about how we might be able to do this and will provide detailed comments on the draft revised SOCG as soon as possible.
Kind regards

Kathryn Simmonite, Spatial Planner
Operations Directorate (Midlands)

National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN
Mobile: [REDACTED]

Web: www.nationalhighways.co.uk

From: Kelly Harris

Sent: Tuesday, October 8, 2024 6:47 PM **To:** Kathryn Simmonite ; David Pyner **Cc:** Edward Fox ; Alex Evans

Subject: RE: South Staffordshire Local Plan - Highways SoCG Thanks Kathryn, very much appreciated.

Kelly Harris
Lead Planning Manager Planning

South Staffordshire Council

From: Kathryn Simmonite <

Sent: Tuesday, October 8, 2024 6:28 PM

To: Kelly Harris <k.harris@sstaffs.gov.uk>; David Pyner

Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Alex Evans <A.Evans@sstaffs.gov.uk>

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Hi Kelly
Just to confirm I'm looking at this – I'll speak to my colleague who I've taken over from and will get back to you asap.
Thanks

Kathryn Simmonite, Spatial Planner
Operations Directorate (Midlands)

National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN
Mobile: [REDACTED]

Web: www.nationalhighways.co.uk

From: Kelly Harris <k.harris@sstaffs.gov.uk>

Sent: Monday, October 7, 2024 11:37 AM

To: Kathryn Simmonite < David Pyner

Cc: Edward Fox <E.Fox@sstaffs.gov.uk>; Alex Evans <A.Evans@sstaffs.gov.uk>

Subject: FW: South Staffordshire Local Plan - Highways SoCG Dear Kathryn/David

I'm sorry to step in on this, but time is really of the essence for us as we are aiming to submit the Local Plan in the next 2 months. We are keen to try and resolve all outstanding matters as soon as possible.

Could I ask that you review the email below, and the attached, and let us have your comments by Thursday 10th October please?

Regards,

Kelly Harris

Lead Planning Manager Planning

South Staffordshire Council

Tel: 07966 255463

www.sstaffs.gov.uk

From: Alex Evans

Sent: Tuesday, October 1, 2024 3:01 PM

To: Kathryn Simmonite <

Cc: David Pyner; Edward Fox

<E.Fox@sstaffs.gov.uk>; Kelly Harris
<k.harris@sstaffs.gov.uk> **Subject:** FW: South Staffordshire
Local Plan - Highways SoCG

Hi Kathryn,

As discussed, please find attached an updated tracked change SoCG which was previously agreed between National Highways (NH), Staffordshire County Council (SCC), City of Wolverhampton Council (CWC) and South Staffordshire District Council for the previous Regulation 19 Plan.

As you will see from the tracked changes, we have updated the SoCG to reflect the new Regulation 19 Plan and other changes which have taken place. We would also like to remove the following bulletpoints from the previous SoCG if possible:

- There is a need for cumulative impact assessment of the strategic housing sites on the Strategic Road Network
- NH require further work to assess cumulative impacts before mitigation proposals can be finalised – this will be progressed alongside the local plan and will be finalised at the planning application stage

This is because the latest Regulation 19 Plan includes a reduced number of housing allocations including removing 2 of the 4 strategic sites. We therefore feel that further

work to assess cumulative impacts is no longer required and can be adequately addressed through the development management process.

If you are able to review the proposed changes and come back with any comments that would be much appreciated. We are still happy to organise a meeting to discuss if that would be beneficial?

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

From: Alex Evans

Sent: Thursday, September 26, 2024 11:48 AM

To: Kathryn Simmonite <

Cc: David Pyner <; Edward Fox

<E.Fox@sstaffs.gov.uk>; Kelly Harris
<k.harris@sstaffs.gov.uk> **Subject:** RE: South Staffordshire Local Plan - Highways SoCG

Hi Kathryn,

Many thanks for letting me know and agreeing to meet to discuss the SoCG. I look forward to receiving some dates from you when you're back.
Best wishes

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

From: Kathryn Simmonite < >

Sent: Tuesday, September 24, 2024 4:06 PM

To: Alex Evans <A.Evans@sstaffs.gov.uk>

Cc: David Pyner < >; Edward Fox

<E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>

Subject: RE: South Staffordshire Local Plan - Highways SoCG

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Hi Alex

Thanks for the email, more than happy to meet to discuss the SoCG. I'm about to go on leave for a few days but I'll make sure to provide you with some dates as soon as I'm back.

Kind regards

Kathryn Simmonite, Midlands Spatial Planning Team

National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN

Tel: +44 (0) 300 4703357 | **Mobile**: + [REDACTED]

Web: https://highwaysengland.co.uk

GTN: 0300 470 3357

From: Alex Evans <A.Evans@sstaffs.gov.uk>

Sent: Thursday, September 19, 2024 10:02 AM

To: Kathryn Simmonite <

Cc: David Pyner < >; Edward Fox

<E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk> **Subject:** South Staffordshire Local Plan - Highways SoCG

Good morning Kathryn,

I hope this email finds you well.

Following on from the latest South Staffordshire Local Plan Regulation 19 consultation we are keen to agree an updated SoCG with yourselves prior to submission of the Local Plan later this year to the Planning Inspectorate.

Do you have any availability over the next couple of weeks to meet to discuss the SoCG please?

I have attached the previous SoCG dated December 2022 and also National Highways response to our latest Regulation 19 consultation.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 696421

www.sstaffs.gov.uk

10.10.2024 – email to SCC regarding SoCG

From: Jarvis, Jon (E,I&S)

To: Edward Fox

Cc: Kelly Harris; Alex Evans; Chell, Annabel (E,I&S)

Subject: RE: Transport SoCG

Date: 10 October 2024 12:43:53

Attachments: image001.png

SoCG Transport South Staffs NH SCC CWC Sept 2024 (002) - SCC COMMENTS.docx

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Hi Ed
Please find attached our comments. Happy to discuss further if required.
Kind regards Jon

Jon Jarvis | Principal Transport Strategy Officer
Connectivity and Sustainability

Economy, Infrastructure and Skills
Third Floor, Staffordshire Place 1
Tipping Street, Stafford, ST16 2DH
Tel:

E-mail:

From: Edward Fox <E.Fox@sstaffs.gov.uk>

Sent: 01 October 2024 11:28

To: Chell, Annabel (E,I&S)

Cc: Jarvis, Jon (E,I&S)

>; Kelly Harris <k.harris@sstaffs.gov.uk>; Alex Evans <A.Evans@sstaffs.gov.uk>

Subject: Transport SoCG

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Hi Annabel,
I hope you are well.
You will recall that a Transport Statement of Common Ground (SoCG) was agreed between SSDC, Staffs County and City of Wolverhampton Council's in 2022 to support our final draft Local Plan. Since then, we have undertaken a further round of public

consultation in April 2024 and so will need to update the SoCG and have the final signed version ready for submission of our Local Plan in December.
I have therefore updated the SoCG with track changes (attached). Given the time constraints, we are hoping to agree these over email, so please can you review the attached and sign if you are OK with the changes. If you can get back to me by the **end of next week** on this then that would be appreciated.
Please let me know if you wish to discuss any aspect of the SoCG, as happy to have a Teams meeting to go over if required.
Kind regards Ed
Edward Fox

Strategic Planning Team Manager

Strategic Planning

South Staffordshire Council

23.10.2024 – NH emails regarding SoCG

From: Kathryn Simmonite

To: Kelly Harris

Cc: David Pyner; Chris Morris; Edward Fox; Alex Evans

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Date: 23 October 2024 14:09:52

Attachments:

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Hi Kelly
Apologies for the delay in our response on this issue, I've now had the opportunity to discuss the matter with my predecessor and our advisors Aecom.
It is our view that the requirement for a cumulative traffic impact assessment should be retained within the Statement of Common Ground (SoCG) as it is a key tool for evaluating the combined effects of multiple developments rather than considering projects in isolation. This process helps prevent a fragmented approach and ensures a comprehensive understanding of network-wide impacts. Without a cumulative assessment the combined impact of the lesser individual impacts cannot be defined. When tested individually individual applications may not trigger a severe impact on the SRN. Given that the strategic road network (SRN) is a focal point where traffic combines to travel strategically the cumulative impact of many smaller sites can potentially when combined trigger a severe impact. Without a cumulative impact assessment there is a risk that the combined impact is not defined, and a potential severe impact on the SRN is missed. The cumulative impact assessment is vital to understand the level of the combined impact and define if there is a need for mitigation. Given the cumulative assessment, any such mitigation can be attributed to a combination of applications. This enables the cost for the improvement works to be spread, which in turn helps to ensure that level of contribution for each application meets the key NPPF tests and remains financially viable.
However, we also appreciate your desire to see progress in the run up to the submission of your plan, to support this we suggest including a statement in the SoCG noting that while cumulative impacts do not need to be finalised before the Examination in Public, we will continue to work collaboratively with the council and developers to complete the assessment. This approach ensures that the Local Plan programme can proceed without delay while committing to the necessary evaluations.
May I suggest the following is added to the Areas of on-going work section "While the cumulative traffic impacts do not need to be fully resolved prior to the Examination in Public (EIP), National Highways commit to ongoing collaboration with the local council and developers to complete the cumulative assessment as part of the plan-making process."

I trust this is helpful.
Kind regards
Kate

Kathryn Simmonite, Spatial Planner Operations Directorate (Midlands)
National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN
Mobile: [REDACTED]

Web: www.nationalhighways.co.uk

From: Kathryn Simmonite

Sent: 17 October 2024 14:49

To: Kelly Harris <k.harris@sstaffs.gov.uk>

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Hi Kelly
No need to apologise, I appreciate your position.
Given that I'm new to my post I've asked our consultants Aecom to advise me on the history and modelling position and will have response with you next week, Kind regards
Kate

From: Kelly Harris <k.harris@sstaffs.gov.uk>

Sent: Thursday, October 17, 2024 2:36 PM

To: Kathryn Simmonite

Cc: [REDACTED]

Subject: FW: South Staffordshire Local Plan - Highways SoCG

Hi Kathyrn,

So sorry to chase, but I'm sure you will appreciate we are really keen to resolve this matter with you in order to submit our Local Plan. Have you had chance to consider my email below please?

Best wishes,

Kelly Harris

Lead Planning Manager Planning

South Staffordshire Council

Tel: 07966 255463

From: Kelly Harris

Sent: 11 October 2024 10:10

To: Kathryn Simmonite <; David Pyner

< >

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Dear Kathryn,

Many thanks for coming back to me.

Regarding the SATURN model, this has been used by the highways authority (Staffordshire County Council) to inform their representation to an earlier version of the plan (see attached). However, I understand that this was only ever intended to provide a high level analysis that could then inform site promoters' STAs for our strategic housing allocations. Accordingly, these STAs were prepared in 2022 for our then proposed 4 strategic housing allocations in the lead up to publication of our 2022 Regulation 19 plan (see attached).

Alongside this, it was agreed that a cumulative assessment should incorporate these 4 strategic housing sites (see assessment attached).

Since then, we have revisited the plan which now only includes two strategic housing allocations (East of Bilbrook and North of Penkridge), plus an employment proposal south of Junction 13, M6 has been added to the plan. In principle, are you therefore ok with the scope of the cumulative assessment to incorporate these 3 sites and for the cumulative impacts to be considered through the ongoing TA work for their live planning applications? We are happy to have a meeting to discuss if this would be helpful.

Kind regards

Kelly Harris

Lead Planning Manager Planning

South Staffordshire Council

27.11.2024 – NH email chain regarding Local Plan

From: Kathryn Simmonite

To: Edward Fox

Cc: David Pyner; Searle, Jen; Chris Morris; Kelly Harris; Alex Evans; Annette Roberts; Grant Mitchell

Subject: RE: South Staffordshire Local Plan - cumulative assessment

Date: 27 November 2024 15:29:09

Attachments:

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Hi Ed
Thank you for the call on Thursday to discuss progress of your Local Plan. In relation to the Local Plan evidence base and considering the timescales involved, National Highways are open to agreeing a pragmatic approach to the required transport evidence.
Specifically, if your consultants are able to undertake modelling that encompasses not only the key strategic sites but also the smaller sites, this would help to ensure a comprehensive and efficient assessment of cumulative impacts on the Strategic Road Network (SRN).
This approach would allow us to collaboratively identify any necessary mitigation measures to address both localised and network-wide impacts, ensuring alignment with the principles agreed in the earlier discussions. Please let us know if you would like to explore this approach further or if additional support is required to facilitate the modelling work. We remain committed to working with you to ensure the Local Plan progresses effectively and robustly.
Your 2024 IDP states the following at paragraph 5.6:

"In June 2019, officers also met with National Highways (NH) to discuss the evidence base that is needed to assess the impact on the Strategic Road Network, for which they are responsible. NH revealed that traffic modelling will be required for the northern part of the district around the A449/M54 corridors."

"The approach proposed was to use a version of NH's M54 – M6 SATURN model that was developed for the M54/M6 link road DCO. In June 2021 a methodology for its use was agreed in principle between NH and SCC that would forecast routes taken by traffic generated from the proposed South Staffordshire allocation sites and the estimated quantity of traffic within the periods modelled. Engagement with City of Wolverhampton Council took place in developing the approach, with the output being used to identify distribution of trips from new development to junctions in the surrounding (including cross boundary) in order to inform where specific junctions may require upgrades/mitigation as a result of the new development. SCC's high-level analysis of traffic impacts of the large strategic housing allocations using the SATURN model was set out in their representation to the Council's Preferred Options consultation in December 2021."

Are you able to provide us with this evidence and any previous response from National Highways please? This work may prove a useful jumping off point for the development of the

cumulative impact assessment.
As discussed on the call, we said we would provide guidance on the information we would typically require within an evidence base for a Local Plan. This is set out below.
We would expect to see all allocated sites included in the cumulative assessment. the point of this is so we fully understand the impacts on the SRN. it does not mean all sites will have to provide mitigation, but it allows National Highways the ability to understand the future operation of the network, trigger points of when any necessary mitigation schemes will need to be in place and crucially who will be providing those schemes.
Sometimes the evidence base does not have to be a big strategic model, it can be spreadsheet based or we can take a pragmatic review on trips on the SRN. this would be a discussion with any of the consultants you were planning on speaking to.
However, as promised, I have set out below what we would typically expect to see in the LP in relation to the Strategic Road Network.

1. **Inclusion of allocated Sites:**
    - It should provide a list of all sites, and it should clarify which ones have been omitted and why. It would be unusual to not include all sites as without each site's impact being known, it is difficult for NH at a later stage to say to a developer that mitigation is required if it was not highlighted in the LP documents. However, in the interest of timescales, if you can show sites which are not close to the SRN and the trip generation and distribution would not impact the SRN using a spreadsheet base model (logit model) we would accept this for the LP only. We would still expect TAs and Impact assessments for each application to be presented during the planning application stage.
2. **Assessment of Impacts on the SRN:**
    - Evidence should include a detailed analysis of how proposed growth within the Local Plan will impact the SRN, both directly and indirectly. What junctions is it likely to impacted etc? Then we can agree if/what type of assessment is required. This analysis should assess traffic flows, potential congestion hotspots, and forecasted operational challenges across relevant time horizons. As a minimum an assessment year which is the end of the local plan period should be assessed, with and without any mitigation proposed.
3. **Cumulative Impact Assessment:**
    - The evidence should consider the cumulative effects of planned development, accounting for growth from adjacent Local Plans, major infrastructure projects, and other committed developments.
    - This approach ensures a holistic view of the pressures on the SRN and helps identify where collaborative mitigation measures may be required.
    - It is also to be noted that the cumulative impact of any proposed site allocations needs to be undertaken in line with the DfT's Circular 12/2022 for understanding the likely traffic impacts on the SRN in the area in terms of capacity and safety and identifying any possible mitigation measures (if required). We can discuss this once we know the answer to 1 and 2.
4. **Transport Modelling and Scenario Testing:**
    - A comprehensive transport model should underpin the evidence base, testing a range of scenarios that reflect differing growth and infrastructure assumptions.
    - The model should align with the latest national guidance and incorporate observed data to enhance its accuracy and reliability. However not every LP has to have a strategic transport model, if you can provide suitable reasoning to a

smaller model or multiple models/spreadsheet models to be used we will take a pragmatic view for this stage. As stated above, we would expect to see an assessment future year of the end of the plan period with and without mitigation.

5. **Mitigation Strategy:**
    - Where/ if significant impacts on the SRN are identified, the evidence base should propose feasible and deliverable mitigation measures. These should align with National Highways' priorities and funding mechanisms.
    - Potential funding sources and implementation responsibilities should also be explored.
    - Due to time constraints, if you are to submit in current timescales, NH would be obliged to advise that no funding for any potential mitigation has been agreed. Unidentified mitigation and unidentified funding present a potential risk to the delivery of allocated sites and the wider plan as there is a risk that an allocated site cannot be developed without mitigation.
6. **Alignment with National Policies:**
    - The evidence should demonstrate alignment with the principles set out in relevant national policies and frameworks, including the National Policy Statement for National Networks and the Design Manual for Roads and Bridges (DMRB).

We are happy to provide further guidance or discuss specific aspects of this evidence base in more detail to support your Local Plan preparation. I trust this is helpful.

Kind regards

Kathryn Simmonite, Spatial Planner
Operations Directorate (Midlands)

National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN
Mobile: [REDACTED]

Web: www.nationalhighways.co.uk

From: Edward Fox <E.Fox@sstaffs.gov.uk> **Sent:** 27 November 2024 15:05

To: Kathryn Simmonite <>

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - cumulative assessment

Hi Kathryn,

Please can you update me on your response to my email below?

When we spoke yesterday you indicated your response was largely drafted and that you would send the response this morning.

As you are aware, we really do need to engage transport consultants asap on this.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

From: Edward Fox

Sent: 22 November 2024 10:27

To: [REDACTED]

Subject: South Staffordshire Local Plan - cumulative assessment

Hi Kathryn,
Thank you again for taking the time to meet us yesterday.
As we relayed at the meeting, it is essential that we submit our Local Plan in mid-December, so I am sure you will appreciate that understanding the scope of what exactly is required for a cumulative assessment of the SRN, in terms of a Local Plan evidence base, is time critical in order for us to speak to transport specialists asap.
We have acted in good faith as we have progressed our Local Plan and were under the impression from you that working with the site promoters of our key sites for them to develop their STA/cumulative impact work was an appropriate approach. We previously agreed an approach with NH that cumulative assessment work could be progressed alongside the EiP and finalised at the planning application stage (see signed December 2022 SoCG). We understand that this approach is no longer acceptable to you, and I understand that this change may be a result of a change in personnel at NH. You will appreciate however that this makes it challenging for us to understand what you require of us, at an already very pressured time for the Council.

Given this situation, please can I ask you to confirm the following to us by the **end of Tuesday (26th November)**:

1. Can you confirm that the sites/junctions that you wish to have assessed through the Local Plan cumulative assessment are those set out in the table in your April 2024 Reg 19 representation (see attached, p.4)? Can you confirm if it is the sites/junctions in the 'traffic impacts' column only? As I'm sure you will appreciate, the need for clarity and certainty from you is critical for us at this late stage. During the meeting, you mentioned additional sites that may need to be scoped that haven't been cited by you previously at any stage of the local plan consultation process. For the avoidance of doubt then, can you confirm that your formal representation to the Council's April 2024 Reg 19 consultation is NH's final position on site inclusion, as per the table on p.4?
2. At the meeting you suggested that the scope of what is considered through a cumulative assessment for a Local Plan may vary from what is considered through individual TAs (e.g end date of the assessment). Please could I therefore ask that you provide details of the scope of what you would want the cumulative assessment to consider, in as much detail as possible.

We are determined to find a solution to this issue that is acceptable to both parties, but time is very much against us, so we really appreciate you providing this steer by the end of next Tuesday.
If you could also arrange for the SoCG I have issued to be signed, ideally also by Tuesday, then that would be much appreciated.
Thanks again for your assistance.
Kind regards
Ed
Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

From: Edward Fox

Sent: 05 November 2024 11:27

To: 'Kathryn Simmonite' <; Kelly Harris

<k.harris@sstaffs.gov.uk>

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Hi Kathryn,
Many thanks for coming back to me and thank you for the update on the SoCG – please advise of the situation once you've had an opportunity to speak to your team leader.
Regarding the cumulative assessment, we are assuming that it only includes sites with potential traffic impacts, so excludes sites 3 and 4 which involve a boundary impact?
As you will be aware, the residential sites that you reference East of Bilbrook and North of Penkridge both have live planning applications, as does the proposed employment allocation at Junction 13. Given that we could be in a situation where sites are being consented in advance of the Local Plan being adopted, in our view it is logical to build upon the ongoing TA work that is being done for these applications, as opposed to undertaking a Local Plan cumulative assessment afresh at this very late stage.
For the Junction 13 employment outline application, their TA prepared by PGA has assessed the relevant junctions referenced in you representation (M6 J13 and A5/A449 Gailey Island roundabout) and have scoped in the Land North of Penkridge into their 'committed developments' alongside other large committed developments (e.g, Land East of Bilbrook and West Midlands Interchange), so that their cumulative impact on the relevant junctions is considered.
Similarly, for the East of Bilbrook outline application, their TA prepared by Capricorn Transport Planning has assessed the relevant junctions referenced in you representation (M54 J2 and M54 J3) and have scoped in developments included in the approved TA for

Logic 54, Featherstone (app ref 20/01131/OUT) into their 'committed developments' - which includes the i54 Western Extension - so that their cumulative impact on the relevant junctions is considered.
It therefore seems that between these two TAs, the cumulative impact of the sites identified in your rep on the relevant junctions has been considered. Although we're conscious that this information may need 'repackaging' in the form of a Local Plans evidence base. We're also aware that the TAs are yet to be agreed with yourselves, but we understand from the case officers that the applicants are proactively seeking to address the points raised in a timely manner. Notwithstanding this, are you able to confirm that, in principle, you are happy for us to utilise this information from the two TAs once they have been agreed with yourselves to consider cumulative impacts?
Kind regards
Ed
Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

From: Kathryn Simmonite < >

Sent: 30 October 2024 16:12

To: Edward Fox <E.Fox@sstaffs.gov.uk>; Kelly Harris <k.harris@sstaffs.gov.uk>

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - Highways SoCG

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Ed
In terms of the SoCG, at NH these have historically been signed at team leader level, we have a new team leader in post Kate Stephen, she's been off for half term but I'll have a chat with her to make sure that she's happy for her name to be put on as the NH signatory. In terms of the content of SoCG itself from my perspective it looks fine thank you.
As regards the specific sites to be included in the cumulative impact assessment and their point of impact please see the table below extracted from our Reg 19 consultation response.

S. No	Type of Allocation	Policy Number	Location	Quantum of Development	Boundary Impacts (Landscape, air, noise, drainage, etc.)	Traffic Impacts
1	Housing allocation	SA1	Land East of Bilbrook	750 Dwellings		M54 J2 and J3
2	Housing allocation	SA2	Land North of Penkridge	1029 Dwellings		M6 J13 and A5/A449 Gailey Island roundabout
3	Housing allocation	SA3	Land at Cherry Brook	88 dwellings	M6	
4	Housing allocation	SA3	Land between A449 Stafford Rd	48 dwellings	A449	
5	Employment allocation	SA5	I54 Western Extension	40 ha	M54	M54 J2
6	Employment allocation	SA5	M6 Junction 13, Dunston	17.6 ha	M6	M6 J13

I hope this helps
Kind regards
Kate

From: Edward Fox <E.Fox@sstaffs.gov.uk>

Sent: 30 October 2024 14:18

To: Kathryn Simmonite < >; Kelly Harris <k.harris@sstaffs.gov.uk>

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Hi Kathryn,

Sorry to chase so soon, but I was wondering if you have had chance to review my email below?
I'm just mindful that for the SoCG, some LPAs may need to take it through their Member agreement process for sign off, so therefore we are keen to get this finalised asap.
Kind regards
Ed
Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

From: Edward Fox

Sent: 24 October 2024 15:19

To: 'Kathryn Simmonite' < >; Kelly Harris

<k.harris@sstaffs.gov.uk>

Cc: [REDACTED]

Subject: RE: South Staffordshire Local Plan - Highways SoCG

Dear Kathryn,
Kelly is on leave from today for a week so has asked me to pick this up in her absence. Firstly, given our very tight timescales, thank you for taking the time to speak to Aecom and your predecessor to get to a position asap. We do appreciate that.
We do understand your position with regards to a cumulative assessment and am happy to put in your suggested wording to the SoCG. I have now done this for the attached, so can you please confirm this is now acceptable to you? Once confirmed, I can arrange for all parties to sign.
In terms of progressing the cumulative assessment, clearly, we need this to start ASAP so are you able to confirm the following:

- what you consider the scope of the cumulative assessment to be. Is it to include our strategic housing allocations (East of Bilbrook and North of Penkridge) and our new employment proposal south of Junction 13? Should any further sites be included?
- which junctions you would want considering through this assessment?
- does it need to be one assessment including all sites or could this be split up depending on the junctions that could be impacted? So for example, are we able to say that North of Penkridge and the employment site at J13 can be considered cumulatively together given they are likely to impact the same junctions, and other sites cumulative impact can then be looked at separately (e.g sites likely to impact M54 J2)?

Any advice you can offer on this would be much appreciated. I look forward to hearing from you.
Kind regards
Ed
Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

Staffordshire County Council

James Chadwick
Economic Development and Planning Policy
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Local Plans Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 IPX

Via Email only

30th November 2018

Dear Kelly

Re: Local Plan Review – Issues and Options Consultation

Thank you for consulting Staffordshire County Council on your Local Plan Review Issues and Options document. We acknowledge that the Site Allocations Plan commits South Staffordshire to undertake a full Local Plan review and submit a new Local Plan for examination by 2021. It is acknowledged that because of recent changes to the planning system there is a requirement to consider the unmet needs of neighbouring authorities. The Plan is clear on this point and seeks to address the challenges that present as a consequence, which is to be commended.

This Issues and Options stage represents the first step in the process and we would wish to work alongside you throughout the process to help understand the issues; shape solutions; and the delivery of a sound plan. This process of engagement has already begun in relation to the Duty to Co-operate. We have discussed the high-level implications for the Plan across County Council functions and infrastructure. We hope and expect this co-working to continue throughout the Plan making process and therefore just summarise the key points at this juncture.

We have also extended co-operation across borders into the Black Country to understand the possible implications of growth on school places. As spatial

directions of growth begin to emerge we may also need to extend cross border consideration to other types of infrastructure.

Section Three of the Plan begins by setting out the issues that the Plan will need to address. We agree that these broadly cover all the relevant areas of interest.

We acknowledge that the issue of housing the ageing population of South Staffordshire and providing suitable specialist homes for other groups such as those with disabilities, which will be important. We have advised you that we have undertaken a Staffordshire wide assessment of the supply and demand for housing with care (Care homes and Extracare) and have committed to undertaking a locality analysis of existing provision in South Staffordshire alongside locations of GP surgeries, supermarkets, public transport links etc that help to provide for independent living. These two pieces of work alongside your SHMA should help inform and shape the provision of appropriate accommodation needs for an ageing population, whose needs can be quite diverse.

As noted earlier assessment of education infrastructure will be important in considering the spatial distribution and scale of growth in housing across the district. We will work closely with you and neighbouring authorities where relevant to ensure suitable provision is or can be made available for existing and new populations.

It is acknowledged that the Plan makes reference to understanding the implications of the West Midlands Interchange proposal if permitted. In accordance with the timeframes for assessment of Nationally Significant Infrastructure Projects a decision is expected within 12 months of the formal start of the examination. Whilst no date has been set yet it is anticipated that the examination will being during Quarter One of 2019 and therefore follows a decision being issued in Quarter One of 2020, which is just before the scheduled publication of your draft Plan.

The vision for the Plan is supported as are the main objectives, subject to minor points raised in the thematic sections below.

The proposed Evidence Base covers most of the relevant areas, though there will be a need to consider Education Impacts with the County given the scale of growth being considered.

Section 4 sets out the levels of growth proposed for the District. It is acknowledged that the District is seeking, through this plan, to meet some of the unmet needs arising out of the Greater Birmingham and Black Country Housing Market Area (HMA). Based on the evidence and current position across the HMA we would agree with South Staffordshire that Option C represents a proportionate and appropriate housing target of a minimum of 9,130 units for the District over the Plan period. It will be important as the Plan progresses for this target to not fluctuate significantly as this will affect infrastructure evidence and requirements that could consequently have implications for directions of growth.

The Plan period of 2018-2037 aligns appropriately with National Policy recommendations for strategic policies to extend over a period of 15 years from the point of adoption.

On the matter of safeguarded land this in the past has caused complications in relation to how and when it should be considered in regard to infrastructure delivery. With Government now requiring Local Plans to be reviewed every five years it would seem to make more sense to not include smaller parcels of safeguarded land as these could be picked up during a review and provide greater flexibility to address the issues at the time. In contrast if a large strategic site, because of its size, may be delivered over two plan periods in which case it may be prudent to consider safeguarding the proportion that will not come forward with in the current Plan period. This would provide longer term clarity on direction for growth and infrastructure requirements.

Section 5 sets out the locations for growth. Given the number of options and scale of County Council functions we will not comment on each in details at this stage but would seek to work with you as you refine the options to preferred locations for growth. We would note however that dispersed growth over a wide area will complicate the planning and subsequent delivery of the infrastructure required to support the level of growth proposed.

Set out below are comments on a thematic basis answering the consultation questions where relevant.

Economy

<u>Employment – level of growth</u>
<u>Economic Development Needs Assessment (EDNA)</u>

Question 13: Which of the above option(s) do you think should be pursued? Are there any other options to consider?

The only option that would appear to deliver a sound local plan is option C. The local plan will need to consider the likely undersupply of employment land in parts of the Functional Economic Market Area (FEMA) and consider this accordingly.

We believe that the amount of employment land allocated will need to consider the levels of distribution of housing growth. It does seem counterintuitive that the preferred option for housing need is far in excess of the current Core Strategy, whilst there is deemed to be a current oversupply of employment land. Of course, this is at least partly due to meeting the housing need of the GBBCHMA, whilst potentially allocating more employment land to meet the need across the FEMA will provide a closer match between housing and employment growth across the District. The distribution of housing will be a key consideration as we would expect the development of new settlements to include an element of employment provision, depending on their scale.

Question 14: Do you agree that the EDNA (stage 1) has been undertaken in line with national guidance and is a robust starting point for planning for future employment needs?

Agreed

Question 15: If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?

Through the development of the Employment, Skills and Training Plan (ESTP) for the SRFI proposal we expect the site developers to maximise the benefits of the scheme for residents within the locality. This includes employment support to target the long-term unemployed and economically inactive. The ultimate success of the ESTP, and the pace of build-out and occupation of the site, may influence the need for further housing within the area. There may be a need consider the SFRI, but this is likely to be in the medium to longer-term of the plan period.

Question 20: Which of the above option(s) do you think should be pursued? Are there any other options to consider, including a strategy which aims to provide a mixture of the spatial options set out above?

As per our response to Q13 we believe that the best spatial distribution of employment land will be very much dependent on the distribution of housing. A mixture of the spatial options is therefore likely to be the most appropriate strategy. The County Council continues to support the development of the freestanding employment sites and these have largely been very successful in creating high-value jobs within the area. These types of large employment sites continue to be vital in taking advantage of large-scale inward investment opportunities. The delivery of new settlements and/or urban extensions will also likely require an element of employment developments to maximise sustainability where possible.

Question 21: If it is appropriate for the Council to consider the delivery of new freestanding strategic employment sites, what criteria should be used in identifying new strategic sites for employment growth?

Deliverability will be vital, and we would therefore suggest the following criteria:

- Ownership
- Market interest
- Access
- Availability of utilities
    - Mains water supply
    - Mains sewerage
    - Electrical supply
    - Gas supply
    - Public highway
    - Landline telephone / broadband internet
    - Public Transport
- Suitability issues
    - Land in other ownership must be acquired to develop the site
    - Restrictive covenants exist
    - Current use needs to be relocated
    - Physical constraints (topography, trees, other)
    - Public Rights of Way cross or adjoin the site
    - Contamination / land stability
    - Conservation area / listed buildings
    - Nature conservation / ecology
    - Utilities (high pressure gas pipeline / electricity pylons / water infrastructure)
    - Green Belt
    - Flood plain
- Timescale for availability

Question 52: Should we allocate new sites for specific employment use classes? What should the breakdown between the B1, B2 and B8 class uses be? Please provide evidence to support your response.

We would expect the allocation of employment land to consider the need for specific use classes. This should be considered through the EDNA and review of relevant strategies. However, the need for B1 is likely to be minimal given office developments tend to be best placed with cities and larger towns, as acknowledged within the issues and options document, although it may be beneficial to consider another well-positioned office site development similar to Dunston Business Village elsewhere within the District.

Given the SFRI proposal, the delivery of land for B8 will also need to be considered in this context. If permission for the proposal is granted, it is very unlikely that there will be a need to allocate any further land for large logistics operations within the District, although smaller B8 developments may still need to be considered.

Question 53: If we continue with a criteria-based policy that safeguards employment land for that use unless specific criteria can be met, are the criteria in the existing Core Strategy Policy EV1 still appropriate or should they be revised?

The deliverability of employment sites needs to be considered if they are not coming forward and being developed. We believe that there should be a policy that reviews sites that do not come forward within a certain time-period and where there is no realistic prospect of a site progressing then it should be deallocated or reallocated for an alternative use.

Question 54: Should we be looking to allocate office (B1a) use given their status as a town centre use and the lack of main towns in the district?

See response to Q52.

Question 55: Should the current approach of relying on neighbouring urban town and cities to meet our higher order office needs continue?

See response to Q52.

Education

Staffordshire County Council has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas when considering school place planning; Cheslyn Hay & Great Wyrley, Kinver & Wombourne, Codsall & Perton and Penkridge.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

For the purpose of school place planning the district is broken down into smaller planning areas which are used to plan the number of school places required. These have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas.

Cheslyn Hay & Great Wyrley contains eight primary schools and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Kinver & Wombourne contains eight primary schools plus one infant and one junior school and two high schools which are divided into 2 primary school planning areas and 1 high school planning area.

Codsall & Perton contains six first schools, one catholic primary school, three middle schools and one high school which are divided into 2 first school, 1 middle school and 1 high school planning area.

Penkridge contains eight first schools, one catholic primary school, two middle schools and one high school which are divided into 2 first school planning areas, 2 middle school planning areas and 1 high school planning area.

St Leonards CE (VC) First School at Dunston is its own planning area.

In addition, The Rural Enterprise Academy operates as a standalone education provider for year 9 to year 11 pupils.

Sixth form provision is offered on site at all secondary and high schools within the district. In addition, South Staffordshire College is a standalone higher education provider. With regards to Q49 - There is no requirement for a specific policy for South Staffordshire College as it is not the only provider of higher education within the district. (Q49 of Issues and Options consultation)

An initial desktop analysis has been completed for all school sites in South Staffordshire, in terms of potential expansion using the Department for Education Area Guidelines for Mainstream Schools Building Bulletin 103 (2014). This could help inform infrastructure options for testing any spatial distributions of growth. However, an extensive feasibility study and cost analysis would need to be undertaken to determine fully whether a school can be expanded to the size indicated on the desktop analyses.

There are many different options and scenarios being considered as part of Plan Issues and Options Consultation. It is noted that the preferred option is to deliver 9,130 houses. This number would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Plan should help to ensure that there is sufficient education infrastructure available to meet the needs of the homes that are proposed to be delivered in a specific area. This could mean that land is allocated for educational infrastructure when considering areas for development. When considering provision of land that could be land a that is adjacent to existing schools that facilitates their growth or land within a large proposed development that could provide a new facility.

For clarity a development or a cluster of small developments of 750 dwellings may trigger the need for a new first/primary school; around 4,000 dwellings for a new middle school; and 5,000 dwellings for a new high/secondary school.

It should be made clear to prospective developers that large residential sites of 750 plus dwellings would likely be required to provide land for school site(s) in addition to education contributions to mitigate the development. Where development is proposed over several small to medium sized sites in an area that totalled 750+ dwellings it may be the case that land would be required for education provision. In such circumstances the Plan should be clear on the land to be allocated and how it would be provided and funded by development.

The preferred housing growth Option C of 9,132 dwellings is likely to yield a total of 1,370 first school places, 1,096 middle school places, 822 high school places and 274 post-16 places if all the dwellings were in the three-tier areas. If all the dwellings were in the two-tier areas a total of 1,918 primary school places and 1,370 secondary school places and 274 post-16 places would be required. It should be noted that if the developments are spread across the whole SSDC area then a combination of provision would be needed of three-tier and two-tier. This level of detail cannot be provided at this stage, where the location of all dwellings in not known. We are happy to work with the District Council during the sites selection process to help inform the process. It should be noted that these numbers do not include additional Nursery provision.

Any new first schools would need to be at least 1 Form Entry (FE) (150 places) and would require land of 7,635m2 to be allocated to facilitate this. To deliver a new 1FE First (150 places + nursery provision) would cost in the region of £3.8 million (as at Q2-2018).

Any new primary schools would need to be at least 1FE (210 places) and require land of 11,415m2 to be allocated to facilitate this. To deliver a new 1FE Primary (210 places+ nursery provision) would cost in the region of £4.9 million (as at Q2-2018).

Any new secondary schools would need to be at least 5FE (750 places) and require land to be allocated to facilitate this. (70,136m2- 86,076m2). To deliver a new secondary school of 5FE would cost in the region of £20 million plus.

A new school site would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school. It would also need to be provided drained, free from contamination and other adverse ground conditions, serviced and suitable for the phase of education proposed.

There would need to be a vehicular access route from the adopted highway to the school site at least sufficient and suitable for construction vehicles and vehicles for the delivery of materials for the construction of the school on the school site until the school opens at which point the vehicular access needs to be of an adoptable standard.

Additional land adjacent to any new school may also need to be earmarked as education land to safeguard future growth.

As noted above we would wish to continue to work alongside the District Council whilst decisions are made as to the spatial direction of growth to ensure that there is adequate provision for education infrastructure. As the housing allocations are being considered, the school organisation team can consider the appropriate education infrastructure solutions required to mitigate the impact of the proposed new residential development, ensuring the best solution is found through continued liaison. For areas where there are pressure points consideration would be given for potential expansion of existing school sites and in the more rural areas we would also look to consider the implications on school transport.
We will continue to work alongside neighbouring Local Authorities to establish the impact of the Local Plan housing in South Staffordshire and their own Housing requirements on the potential impact on cross border pupil movement.

For accuracy, with regards to Bilbrook/Codsall the Plan states:
"there is limited capacity to expand in Codsall school planning area It is confirmed that the safeguarded land coming forward in these areas will trigger the need for a new primary school".
Please note that this is a three-tier system, and should a new school be required this would be a first school, not primary. The allocated safeguarded land does not on its own trigger the need for a new first school as the total number of safeguarded houses is 576. This can be discussed further as part of our ongoing discussions.

Transport

What does the Local Plan need to consider?

Question 3: Do you have any comments on the vision, and objectives to deliver the vision set out above? If yes, then please provide details.

As well as supporting sustainable transport provision and highway infrastructure, the objectives should acknowledge the growing role of telecommunications in reducing the need to travel and the use of more energy efficient vehicles, including electric vehicles. The Department for Digital, Culture, Media and Sport is currently consulting on proposals to mandate that new build homes are able to access gigabit-capable connections. This consultation closes on 21 December 2018 and it will be necessary to consider the outcomes of this consultation and Government policy in shaping any future policy on Telecommunications.

Question 4: Do you think that the key evidence set out in Table 3 is sufficient to support the preparation of the Local Plan review? If not, what additional evidence is required?

It is recommended that the South Staffordshire District Integrated Transport Strategy, published October 2017 is included in the list of evidence. It informs the Infrastructure Delivery Plan and will be updated as necessary as part of the local plan process.

Level of Growth

Question 15: If granted approval, what implications will the SRFI proposal at Four Ashes have for the Local Plan review?

The potential impact of the SRFI from a transport perspective is summarised in the District Integrated Transport Strategy. Due to its likely significant impact on traffic volumes on the local and strategic highway network, the implications of the SRFI need to be considered when appraising the cumulative traffic impact of housing and employment growth options.

Methodology - preferred spatial distribution and sites for development

The County Council will provide appropriate evidence to the District Council to help identify the potential highway and accessibility impact of strategic housing development locations set out in the Housing Market Area (HMA) Strategic Growth Study, together with any additional strategic locations within the six spatial options presented. Key considerations will include:

- Levels of sustainable transport accessibility, taking into account the requirements proposed in paragraph 5.18 of the District Integrated Transport Strategy. It will be essential that new developments are served by high quality rail and/or bus connections to new and existing jobs, education and services and, where possible, residents should be able to walk or cycle to local facilities. Assessments need to reflect the very limited funding available to support socially necessary bus services.

- 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.

Cross-boundary discussions will be required to identify potential highway capacity issues in neighbouring authorities such as Stafford Borough and in the West Midlands conurbation, considering potential future travel to work patterns.

Homes and Communities

Parking provision

The County Council's priorities for car parking in South Staffordshire are outlined in the District Integrated Transport Strategy and the need for HGV parking is recognised in the Freight Strategy for the County of Staffordshire, due to be published in 2018.

Question 43: Should we allocate new HGV parking and if so what evidence would need to be prepared to inform this? If a need for additional facilities were identified, should there be a focus on extending existing facilities, or should wholly new facilities be identified?

There is an existing shortage of lorry parking in Staffordshire as identified by the DfT National Survey of Lorry Parking 2017, with existing facilities concentrated around the A5 and M6. The West Midlands region also has critically high usage of lorry parking facilities, so the County Council would support the provision of new facilities. It is also recommended that new development that will increase road based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles.

Travel to Education

The most sustainable housing developments will enable walking and cycling access to both primary and secondary school, however for many villages in South Staffordshire, walking access to a secondary school may not be possible. Children making journeys to education of beyond two miles for primary and three miles for secondary to their nearest or catchment school are eligible for free school transport generally. Also journeys that are not safe to walk are similarly eligible. This will create additional budgetary pressures for Staffordshire County Council and consideration should be given to the requirement for developers to contribute to school transport to offset this additional cost.

Developers of new housing sites that will generate school trips could also consider contributing to sustainable travel initiatives and road safety education and training in schools as part of their Travel Plan.

Economic Vibrancy

Employment Sites

The transport implications of currently proposed strategic employment sites are highlighted in the District Integrated Transport Strategy. The agreed access solution for the ROF Featherstone site will depend upon the land use mix for the site that emerges through the local plan process. The potential for the site to be served by a new rail station on the West Coast Mainline is being considered by Midlands Connect, and the County Council and Network Rail will be engaged in this feasibility work.

Public transport and the highway network

Question 66: Are there any areas where highway capacity is a concern where:
a) Development should be restricted; or
b) Where new development could facilitate road infrastructure improvements

The potential mitigation of current highway capacity issues in South Staffordshire are discussed in the District Integrated Transport Strategy, including strategic highway infrastructure, local junction improvements and traffic management measures required to deliver the adopted Core Strategy. The County Council will work with the District Council to identify further highway improvements required to inform the spatial distribution of development in the emerging local plan. The assessment will assume completion of committed highway schemes such as the M54/M6 Link Road.

A priority will be to locate development within easy access to the rail network. The District Integrated Transport Strategy identifies the improvements to rail services and facilities that are considered necessary by the County Council. Further improvements may be required to accommodate growth in rail patronage that may result from the preferred spatial distribution of development.

Question 67: Should the Local Plan include a policy that requires development to incorporate electric charging points? Should there be a threshold for the number of new dwellings on a new development where this would be required?

Developers should be encouraged to install infrastructure to facilitate electric vehicle charging at employment locations and for designated parking spaces within residential developments. The County Council is planning to commission a study to consider the future need to develop a network of electric vehicle charging points and the outcome of the study will be shared with the District Council.

Electronic communications

Question 69: Should the new Local Plan include a policy that requires all new housing and employment developments to have a connection to fibre optic broadband?

See comments in relation to Q3 above. In addition to encouraging sustainable travel, the provision of superfast broadband by developers will reduce the need to travel by car, making developments more sustainable. As stated in the District Integrated Transport Strategy, developers need to be strongly encouraged to make the necessary arrangements with the commercial providers for the provision of superfast broadband services.

Ecology

Local Plan Review Issues and Options paper

Question 71: What compensatory improvements (to offset removing land from the Green Belt) to the environmental quality and accessibility of remaining Green Belt land should be considered and how should they be implemented?

Compensatory improvements to offset removing land from the Green Belt should include habitat creation and creation of accessible natural greenspace. However most of this land is in private ownership and so in order to achieve this the cost of acquiring and / or taking lands out of mainstream production needs to be factored in. It is also important to acknowledge that a high proportion of green belt away from footpaths is currently inaccessible.

Question 72: Which of the option(s) do you think should be pursued? Are there any other options to consider?

Option 1 offers greater opportunities to include ecological features and connecting networks, however these would probably best be included in a separate policy covering all areas not only open countryside.

Question 74: Which of the option(s) do you think should be pursued? Are there any other options to consider?

Option B would better reflect the current aims of NPPF. It is important to retain a policy that protects the hierarchy of designated and local sites. These sites should be protected, but also be seen as building blocks for the development of ecological networks. The inclusion of an additional policy that paves the way for the development of ecological networks will be key to ensuring that these networks are recognised and developed.

Paragraphs 9.24 – 9.28 seem to switch between discussion of the Cannock Chase AONB as a landscape designation and the Cannock Chase and Mottey Meadows SACs. It would be helpful to have a clear separation of these considerations

Question 75: We believe that Core Strategy Policy EQ2 should be updated to accord with the emerging evidence for the SAC set out above; do you agree with this approach and are there any other options to consider?

It is agreed that Policy EQ2 should be updated to reflect emerging evidence base.

Question 76: What are your views on the level and variety of open space provision in the district? Should there be a greater emphasis on a particular type of open space (e.g. incorporating natural and semi natural elements)?

There needs to be a strong emphasis on provision of large areas of natural greenspace because of the need to provide alternatives to protect Cannock Chase SAC and potentially other sites. While the original Accessible Natural Greenspace standard (English Nature 2003) may be difficult to achieve in some areas it would be worth revisiting the principles it outlines (defining sizes of greenspace and how close they should be to numbers of population) and how these might be defined for the District.

Paragraph 9.30 states that:
'It has generally been considered that the rural nature of the district combined with an extensive network of public rights of way which connect settlements with the Open Countryside affords a good level of access to natural and semi natural spaces.'
While many settlements do have good networks of paths, some do not, and most settlements are surrounded by arable land that cannot be described as natural or even semi-natural. The District's rivers are mainly steep-sided channels which lie well below the floodplain and have become largely invisible, while many of the woodlands are keepered for game shooting.

Question 77: Should we review the current Open Space Standards set out in Policy SAD7 of the Site Allocations Document (SAD) to reflect the findings of an updated Open Space Audit?

The current Open Space Standards should be reviewed to reflect the findings of an updated Open Space Audit

<u>Habitats Regulations Assessment</u>

Para 2.7 Should more appropriately read: South Staffordshire is situated on a watershed between the River Trent and River Severn Catchments and therefore the following European sites are included

Mottey Meadows – recreational pressure should perhaps be included if local housing numbers are likely to rise significantly. The site is connected to Wheaton Aston by footpaths.

Pasturefields Salt Marsh – the qualifying feature is listed incorrectly as Great Crested Newt. The qualifying feature is actually:

1340 Inland salt meadows * Priority feature

Sections 4 and 5 appear to confuse / join the Humber SAC and Severn SAC and their separate designations as 'Humber and Severn Trent SAC/SPA/Ramsar'

LPR SA Scoping Report

References to NPPF are now out of date, and therefore underplay the role of net gain for biodiversity or importance of ecological networks. Paragraphs 5.1.4 and 5.2.11 refer.

5.2.10 would best be amended to read: Local Wildlife Sites (LWSs) are non-statutory designated sites, identified by local authorities in partnership with nature conservation charities, statutory agencies and ecologists, although they are mostly privately owned. In South Staffordshire, LWSs are comprised of Sites of Biological Important (SBIs) and Natural Heritage Sites Biodiversity Alert Sites. Grade 1 SBIs are of a greater ecological value than Grade 2 SBIs BASs. There are a total of 69 LWSs spread throughout South Staffordshire.

Historic Environment

Local Plan Review Issues and Options paper

In relation to Table 3 Evidence Base. It is noted that the table includes the Extensive Urban Surveys, Conservation Area Appraisals and Conservation Area Management Plans, in addition there is also the Historic Environment Site Assessment (HESA). These documents are considered sufficient providing that the HESA in particular is up-to-date and has addressed all of the sites which are to be considered.

Question 81: Which of the option(s) do you think should be pursued? Are there any other options to consider?

Option B, which retains the current policy focus on the conservation and enhancement of heritage assets, including non-designated archaeological sites and monuments, with an SPD providing greater detail on achieving the aims of the policy is to be welcomed. Such an SPD would provide guidance to understand existing character and how this can inform new development as well as providing a benchmark for assessing success and, potentially, providing further informing best practice. The SPD could be used to strengthen consideration of the archaeological resource and the appropriate resources for consultation by developers.

LPR SA Scoping Report

Chapter 9 Historic Environment

The report (2017) has not consulted the Staffordshire Historic Environment Record (HER) for information on the non-designated archaeological resource. Paragraph 9.2.7 makes reference to the holdings of the Archaeology Data Service (ADS). It should be noted that the ADS does not provide a comprehensive record of the archaeological resource and should not have been consulted in isolation without consultation with the HER. Consequently, this chapter has failed to understand the full range of the historic environment resource of the District.

Box 9.1 on page 54 – bullet point 2 should more appropriately read “The known and unknown archaeological resource surviving as both below and above ground remains...”.

Box 9.2 on page 54 –Non-statutorily protected and non-designated heritage are included within the National Planning Policy Framework (NPPF) and so are afforded consideration beyond the LPR.

Public Rights of Way

We welcome the inclusion of footpaths as part of the Design Principles set out in the SPD and the suggestions that footpaths should be considered as a necessity to link public areas, as enhancements to the setting of developments and as key connections between urban and rural areas. Footpaths come in many forms – as link routes within housing developments, as permissive footpaths and as public rights of way as described by the Definitive Map of Public Rights of Way.

When future sites are considered for development, some of them will be crossed by public rights of way which will need to be considered in full as part of any proposed development. We have recently published the 4th Review of the Definitive Map and Statement for South Staffordshire and the District Council have been provided with copies of the maps and Statement to indicate the alignment of all recorded routes. We encourage the planning authority to ensure that all public rights of way are protected and, where possible, enhanced in conjunction with any development. If any Public Path Orders are required to enable the development to take place these should be processed alongside the planning application by the District Council.

Many of the sites may be close to existing urban areas and it is likely that there are non-definitive routes across the sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Where development can enhance the existing path network this should this should follow Staffordshire County Council’s Rights of Way Improvement Plan and could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council’s Least Restrictive Principle for path furniture

The County Council expects to be consulted on any future applications in due course that would affect a right of way and is able to provide further advice and guidance as and when required.

Minerals and Waste

Question 22: Has the Council identified the key factors which should inform which of the Spatial Distribution Policy Option(s) is taken forward in the Local Plan review? If not, what other factors should inform the spatial distribution of development?

It is noted that through the Sustainability Appraisal (SA) of policy options there is a reference to mineral safeguarding sites as an indicator for SA Objective 6 (Natural Resources) but in assessing site options for development, consideration should be given to the requirements of paragraph 206 of the NPPF and policy 3 (Safeguarding minerals of local and national importance and important infrastructure) of the Minerals Local Plan for Staffordshire (MLP). As well as assessing the effect on mineral resources, there is also a need to consider the implications of options on permitted and allocated mineral sites (refer to the Policies and Proposal map for the MLP showing safeguarded mineral/ infrastructure sites) to ensure that proposals would not unduly restrict permitted/ proposed mineral operations.

Within South Staffordshire District, there are two allocated sand and gravel sites but one of these sites would be directly affected by the current application for the West Midlands Interchange at Calf Heath. In the Cheslyn Hay area, there are permitted clay extraction operations which provide an important source of clay for a local brick works at Lodge Lane and at clay product works further afield.

The assessment of sites should also consider the requirements of paragraph 8 of the National Planning Policy for Waste; and policy 2.4 (Strategic waste facilities to be safeguarded) and policy 2.5 (the location of development in the vicinity of waste management facilities) of the Staffordshire and Stoke-on-Trent Waste Local Plan (WLP) which aim to safeguard the efficient operation of waste management facilities including the strategic energy recovery facility at Four Ashes. The broad location of waste management facilities is shown on the policy map for the WLP but more detailed information on the location of facilities can be provided by the Waste Planning Authority.

Flood Risk

On the Flooding and Pollution section of the Issues and Options document it would be useful to add reference to our SuDS Handbook, which should also be considered in policy formation for the Plan in due course.

The impact of development on water quality (section 9.45) can be mitigated through the use of a suitable SuDS management train approach. Whilst the national SuDS standards focus on water quantity (discharge rates and volumes), the SuDS Handbook includes local standards which aim to achieve water quality treatment and amenity value as well.

Housing for Older Persons

Section 7 of the Plan sets out options for the mix of housing required to be provided for. As discussed above provided appropriate accommodation for an ageing population will be a key consideration for the Plan.

Question 28: Which of the above option(s) do you think should be pursued? Are there any other options to consider?

A combination of Options A and C would seem to offer the most coverage and would be suitably informed by the evidence. For some larger scale sites consideration could be given to extracare type development if the location, including surrounding amenities and services are suitable. In order to be viable extracare schemes need to include a minimum number of units so they could be suitable for larger scale sites. As discussed above the work we are preparing coupled with the SHMA should help inform decision making on sites and policy formation.

Question 29: Which of the above option(s) do you think should be pursued? Are there any other options to consider?

See response to Q28. In addition to numbers and location criteria homes for older persons need to be aspirational to create the desire/incentive to undertake move from the more traditional 'family home'.

Public Health

We acknowledge that the Plan seeks to address health and wellbeing issues.

Question 46: Which of the above option(s) do you think should be pursued? Are there any other options/design measures to consider?

As Option B supports the 'Health in all Policies' agenda we would support following this approach. Our public health team would be happy to work with you to shape how policy around health and wellbeing evolves.

Yours sincerely

James Chadwick

Digitally signed by James Chadwick
Date: 2018.11.28 09:47:21 Z

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Local Plans Team
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Wolverhampton Road
Codsall
South Staffordshire
WV8 IPX

Date 13 December 2021

Via Email only

Re: Local Plan Review – Preferred Options

Dear Kelly

Thank you for consulting Staffordshire County Council (SCC) on your Local Plan Review Preferred Options Consultation. It is clear from the evolution of the Plan that advice and recommendations given by SCC in previous rounds of consultation and during our regular meetings have been taken on board.

It is acknowledged that sections 1.8 to 1.10 set out the significance of Climate Change for the Local Plan and that climate change measures will be a consistent thread that will run through the plan. However, the Vision for the Plan makes no reference to Climate Change. Given the significance should the Vision also include reference to Climate change mitigation and adaptation.

The Issues and Challenges to be considered by the Plan are well covered and the Strategic Objectives are supported.

It is acknowledged that the Plan makes a significant contribution towards the wider Greater Birmingham Housing Market Area (GBHMA) needs. Early consideration of this has allowed us to assess the associated infrastructure requirements for the planned growth.

The Longer Term Growth Aspirations for a New Settlement will allow for consideration of accommodating further unmet housing need in a Planned manner and informed by the likely infrastructure requirements. In considering the area of search set out in Appendix F it is considered that limiting the search to an independent/freestanding new settlement may limit options. It is therefore suggested that Policy DC4 should also provide for consideration of expanded settlements within the area of search following the same criteria as a new settlement.

Staffordshire County Council

Transport

We have the following comments to make from a Transport Planning perspective.

Pp 15 Question 1 Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan ?

From a transport perspective, the following documents should be considered for inclusion within the evidence base:

1. South Staffordshire District Integrated Transport Strategy, rather than the Staffordshire Local Transport Plan 2011. The District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.
2. Brinsford Parkway Station Strategic Outline Business Case
3. Staffordshire Freight Strategy 2019
4. Transport Impacts (with Staffordshire County Council) 2022 – Note that this document has yet to be completed and published. It will contain transport modelling assessments relating to the impacts of sites covered by policies SA1-SA4, accessibility mapping and connectivity proposals for sites within SA1-SA5.

PP 17 Question 1 b) The South Staffordshire District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.

Pp25 Question 3 a) Yes, but Table 4 could include a reference to the support for new rail-based parkway at Brinsford and this should be echoed in Strategic

Pp 29 Housing
Pp 31 para 4.16 talks about *'limiting new (housing) allocations at Perton to the existing safeguarded land reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Greenbelt Site options from education facilities'*

SCC has undertaken work that demonstrates that additional housing could be accommodated by implementing an identified improvement scheme at the A41/Wrottesley Park Junction. Furthermore, there are options to improve connectivity / provide transport that could make development acceptable from a school transport perspective.

Pp 46 Policy DS3 – The Spatial Strategy

SCC has assisted SSDC by providing the transport evidence to support its Spatial Strategy to 2038, providing high level transport modelling, accessibility and connectivity advice. This will help in identifying and addressing infrastructure issues from housing development with cumulative and cross boundary impacts. SCC supports the provision of a rail-based parkway at land at Cross Green development and is working in partnership with City of Wolverhampton Council and SSDC to assist with delivery. Similarly, SCC have helped with the development of several of the district's freestanding employment sites (e.g. I54, ROF Featherstone Brinsford and Four Ashes)

and following the WMI decision, support their continued development, subject to appropriate mitigation where necessary.

Pp 49 Policy DS4 – Longer Term Growth Aspirations for a New Settlement
Policy DS4 Question 6.
The wording should mention that a range of technical studies will need to be undertaken to justify the proposal and evidence how the new settlement will be delivered in a way that achieves the objectives.

Pp 51 Site Allocations
Housing
For this consultation response, SCC is providing detailed transport comments and observations on each of the four proposed strategic housing allocations included within Policies SA1-SA4 and the smaller housing sites included within Policy SA5. These comments derive from technical work undertaken in partnership with SSDC to help inform plan-making.

SCC commentary covers the following themes:

- Site accessibility
- Connectivity (active modes – walking and cycling and public transport)
- Potential highway Impact

Site accessibility

TRACC analysis has been undertaken by SCC to help identify the most sustainable locations across South Staffordshire and provide a basis for establishing the relative sustainability of settlements based on existing service provision.
TRACC calculates journey times based upon public transport timetable data, road network information and a range of user-defined parameters.
The following calculations have been undertaken:

- PT Access to Employment AM Peak 07:30 to 09:30
- PT Access to Hospitals Wed 08:00 to 10:00
- Bus Access to Supermarkets Wed 10:00 to 13:00
- Bus Access to Supermarkets Sat 10:00 to 13:00
- Walk Access to Middle Schools
- Walk Access to Primary & First Schools
- Walk Access to GP Surgeries

A maximum journey time threshold of 60 minutes was set for the PT and Bus calculations. This includes the initial walk time to the stop, and interchange time plus the final walk from the stop to the destination. The software computes a journey time for every 10-minute interval within the defined time period to the nearest destination point and the shortest journey times are returned. Therefore, the accessibility contour maps represent the best journey time that can be achieved within the defined time period. This is via the road and footpath network, so better simulates an actual journey rather than just a straight line distance from origin to first stop or from the final stop to the destination point. The maximum walk distance to access a public transport stop has been set at 350m.

The bus timetables used are the most up to date including known service changes at the time of calculation (valid to September 2021) but also reflecting the likely provision to key employment sites such as West Midlands Rail Freight Interchange as per the S106 requirements for these sites.

The rail timetable used is valid from January 2020 so prior to the Covid pandemic. The rail services have changed so frequently over the past 18 months it is not possible to know if the service level at present will continue or whether services will increase back to previous levels. Service levels at Landywood and Penkridge stations are at present roughly the same as they were in terms of frequency back in 2020, but at Codsall and Bilbrook stations the frequency is still reduced compared to January 2020 service levels.

The proposed development site plans were geo-referenced in ArcGIS to provide an indicative site layout which was loaded into TRACC to provide a road/footpath layout allowing the demonstration of accessibility where applicable.

For the access to employment calculation, a revised methodology has been used for some of the job numbers, particularly the job totals in town centres where revised numbers have been provided where known from data supplied by the Economic Development team.

Extra locations such as hospitals have been included as destinations in their own right. Where available, job numbers provided by hospital trusts have been used, or splits between hospital sites used where we have information provided directly by the trust. Where hospital trusts operate more than one site (such as New Cross and Cannock Chase Hospitals) and staff numbers cannot be split, a proportion has been used based on the split supplied for County Hospital in Stafford and Royal Stoke University Hospital.

Other locations which could be accessed via the Midland Metro from Wolverhampton such as West Bromwich, Bilston and Wednesbury have also been included. Job numbers for these towns have been sourced via the Black Country Consortium at MSOA level for each town. These provide additional centres where residents of South Staffordshire could be employed and are able to reach within a journey time of 60 minutes.

For some destination types, such as employment, it is not appropriate to calculate accessibility to the nearest destination point; as the nearest point of employment may not be suitable i.e. lack of job choice. For employment destinations a Hansen score was calculated. This combines the number of destinations that can be accessed within a 60-minute journey time with the disbenefits of travel in terms of journey time and the total number of jobs available at the destination. The higher the score, the greater the level of access and choice. Due to the change in job figures, the data is displayed in six bands rather than quartiles as done previously, to help distinguish the difference in access to the range and number of jobs.

For the supermarket calculations, a review of the destinations used in the previous calculation was done and certain supermarkets have been removed and others added in. This has been done to reflect the change over the previous 18 months due to the

Covid pandemic how people have changed their food shopping habits. Some smaller branches of the Co-op have been included where they might not have been previously.

It is not possible to confirm the pedestrian facilities available on each road and in rural areas it is likely that some walking routes particularly between settlements would not be considered safe for pedestrians and children in particular.

For primary school accessibility calculations; it is more appropriate to calculate accessibility on foot as children who live beyond 2 miles to their nearest primary school are entitled to free transport. This calculation uses the road network and applies an average walk speed of 4.8kph.

Accessibility assessments are presented as a separate enclosure and allow a comparison of the merits of each location, to inform later work should the site(s) be allocated within the plan.

Connectivity

Cycling and walking routes are an important element of any new housing development to help avoid over reliance on journeys by car, particularly for shorter trips. It is important that the proposed Preferred Option developments within South Staffordshire's Local Plan provide good well-planned walking and cycling routes to key attractions within settlements such as schools, village centres and public transport hubs. In addition, it is important that new developments create pleasant environments for their residents to live in and the provision of nearby attractive leisure routes can help facilitate this. Any new facilities should, where possible, be designed to LTN1/20 standards although the use of lightly trafficked and low speed roads can be acceptable.

Recommended walking and cycling proposals are presented in the enclosed plans to help make the identified sites acceptable from a connectivity standpoint. These have been informed by site inspections (personal and remote), GIS analysis and professional opinion.

Public transport provision is also very important to ensure all residents have access to services and alternatives to private car travel. In some areas it will also be vital to ensuring children can get to their allocated schools.

Highway Impact (Strategic Housing Site Assessments)

In order to assess the high-level traffic impacts of the large strategic housing sites included within Policies SA1 – SA4, SCC acquired National Highways' (NH), formerly Highways England, SATURN traffic model. This was recently updated to inform their bid for funding for the M54-M6 link and inform scheme design. SCC has further updated this model to include the proposed development at the four strategic housing sites; specifically, **1,329** new homes (including **200** already consented) to the north of Penkridge; **1,200** at Cross Green; **1,200** at Linthouse Lane; and **848** at Bilbrook together with **317** planned for Codsall, making a total of **1,165**. In addition, the proposal for Brinsford Parkway railway station (with around 500 car park spaces) was included in the model, given its close links with the strategic housing site at Cross Green.

In order to represent each development in the model, an existing trip distribution from similar adjacent zones was replicated and factored by the number of peak hour development trips that each development is likely to generate. This trip rate was derived from recent extensive surveys and Transport Assessments in various areas of South Staffordshire, namely Perton (2 no.), Penkridge and Cheslyn Hay. This was considered to provide a representative trip rate for these large strategic site proposals. To put this into perspective, it would be expected that for every 1000 new houses built there would be around 450 to 500 new trips on the road network. Trip distribution and rates for the Parkway Station car park at Brinsford were estimated with the help of data within the Strategic Outline Business Case which has been prepared to demonstrate the need for a station in this area.

It is important to understand the history of the SATURN model and its potential limitations, none of which are considered to affect its appropriateness for the purposes of this exercise which is to provide an overview of highway impacts to determine if there are likely to be any insurmountable problems should the development sites come forward. The original SATURN model is the Midlands Regional Transport Model (MRTM), which was then partially updated to support the bid for funding for the M54-M6 Link Road. SCC were provided with a cordoned version of this model, covering the South Staffordshire and Wolverhampton areas. Due to its strategic nature, some of the network coding is coarse, with some generalisation of the local road network. For example, only one route through Penkridge village, accessed via the A449, is included where there are actually a few route options. In reality, any vehicles on this route are likely to be split over the available routes.

In order to provide cumulative and individual assessments of the likely traffic impacts from all four strategic housing locations across Staffordshire's road network, the updated SATURN model has been interrogated to determine where the introduction of the proposed developments cause a change in traffic of more than 100 2-way trips in the modelled peak hours (0800-0900 hours and 1700-1800 hours). SCC has also provided model results to the City of Wolverhampton Council (CWC) for them to understand the impacts on their network. It is important to note that changes to traffic levels do not only occur due to the proposed development trips loading onto the network; existing trips also re-route as the new trips are accommodated. For example, some existing trips on the A449 (north of Penkridge) appear to switch to the M6 as the A449 becomes more heavily trafficked with 1,329 new homes accessing directly onto it.

Cumulative Assessment of the Highway Impact of the Proposed Strategic Housing Sites

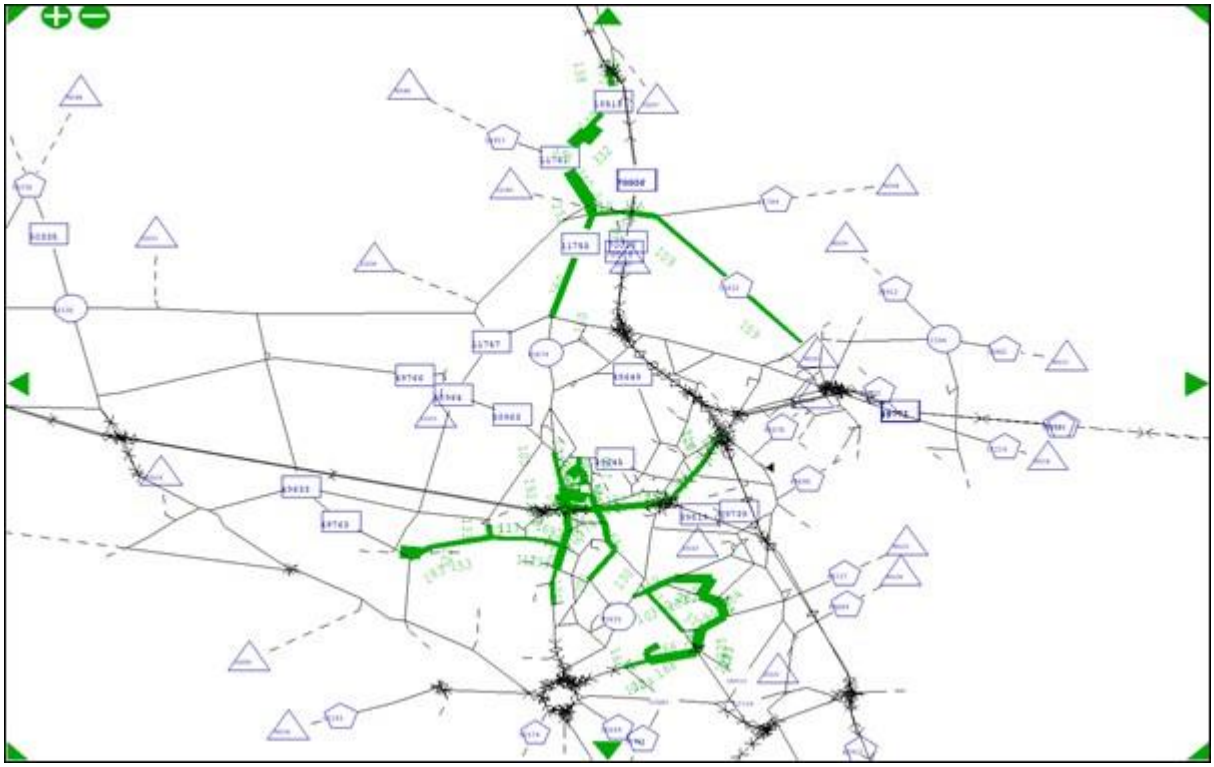
SCC has applied the updated model to provide an overview assessment of the cumulative impact of the four strategic housing sites (1,329 new homes, including the 200 already consented, to the north of Penkridge; 1,200 at Cross Green (plus the 500 space Parkway railway station); 1,200 at Linthouse Lane; and 1,165 in Codsall and Bilbrook.

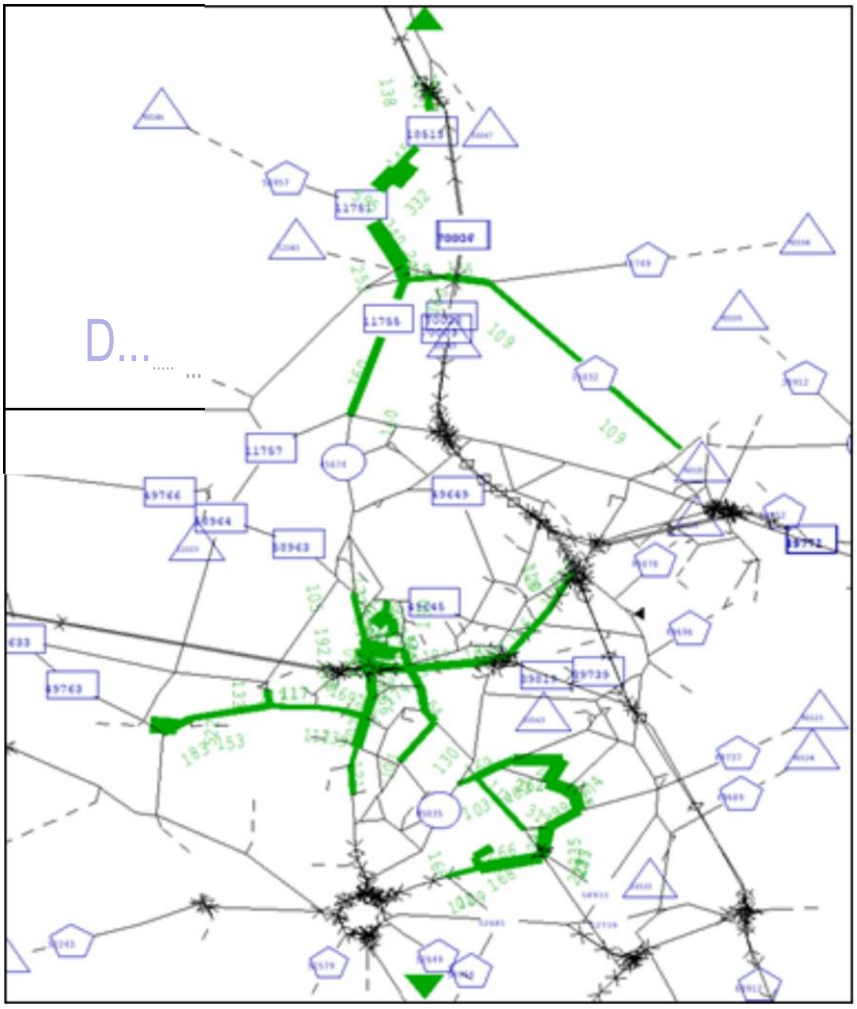
The cumulative assessment shows there are reasonably consistent effects across both the AM and PM peaks. On the whole, changes in traffic levels greater than 100 trips occur in reasonably close proximity to each of the proposed developments, with less impact further away as vehicles disperse through the network. Screenshots from the

model shown below demonstrate this, highlighting the changes in traffic near to Penkridge, Codsall/Bilbrook, Brinsford and Linthouse Lane:

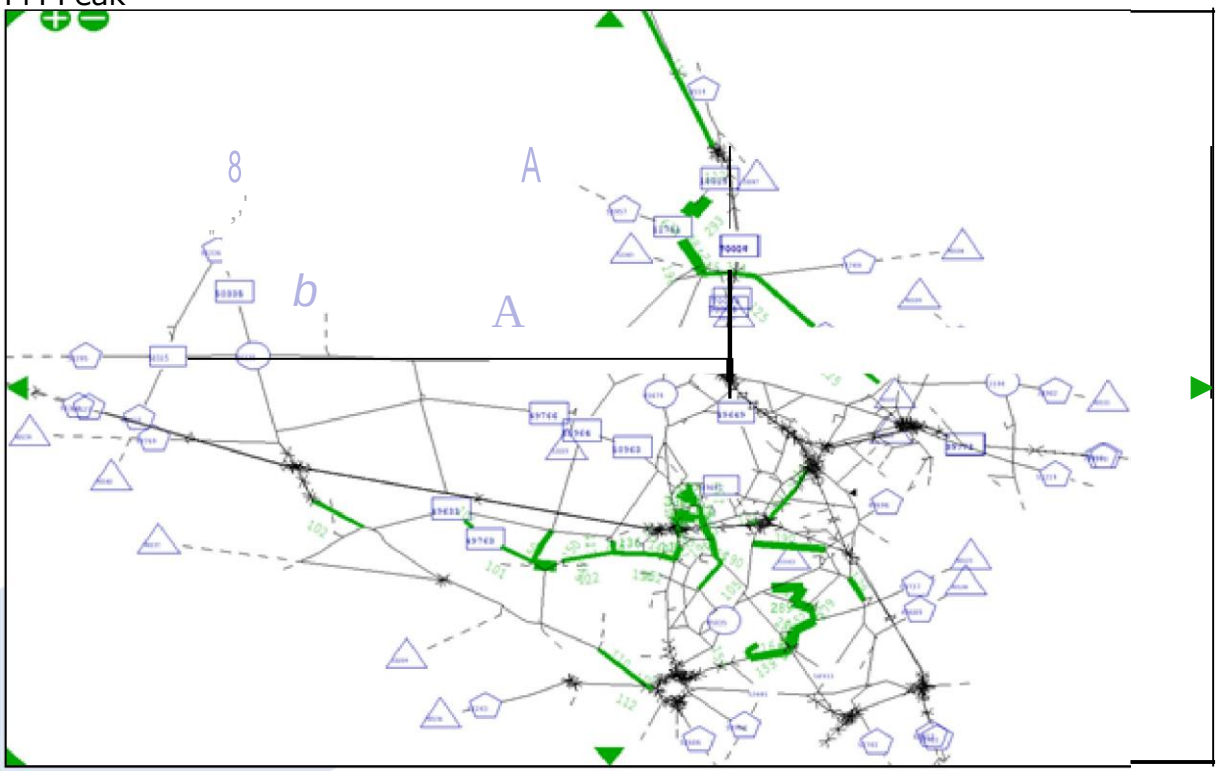
Screenshots Showing Changes in Peak Hour Traffic Levels Along Impacted Routes

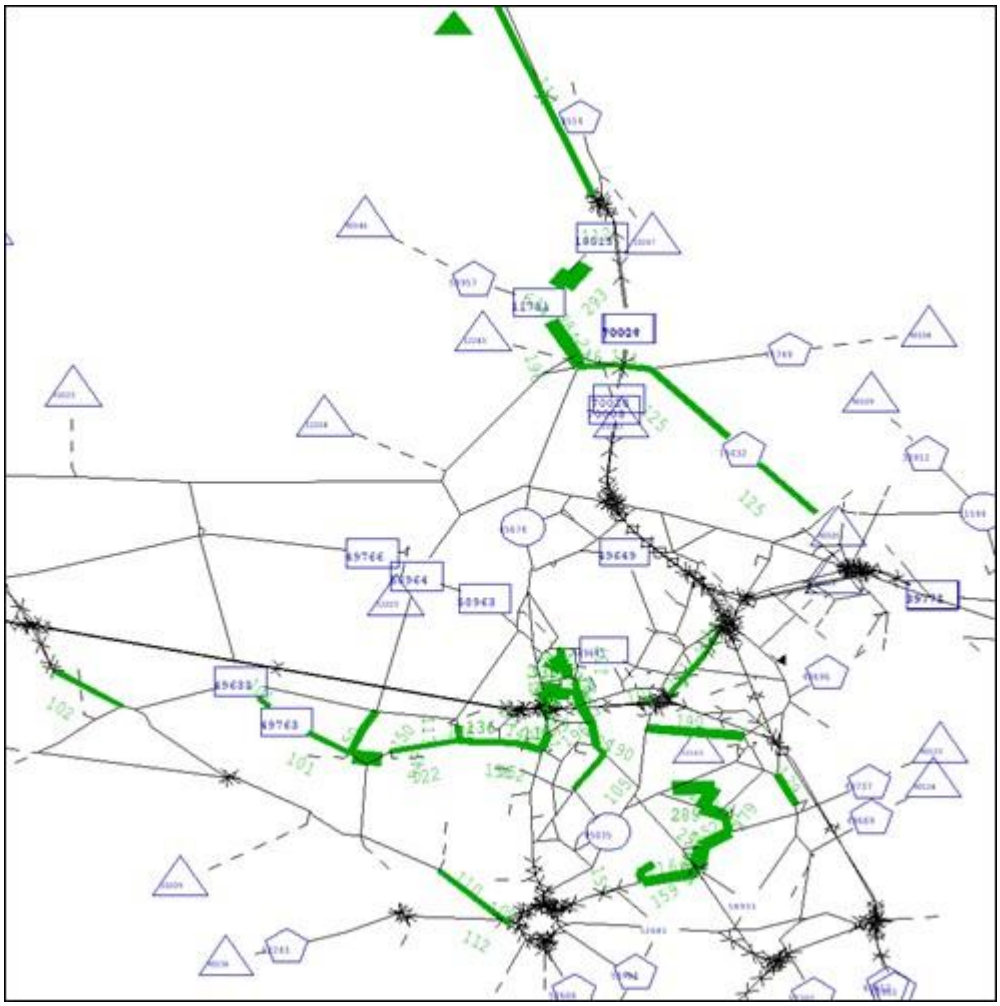
AM Peak





PM Peak





As can be seen, there are significant changes on the following parts of the road network:
AM Peak (0800 – 0900 hours)

- A449 between M6J13 and Gailey;
- Through Penkridge to Cannock via the B5012;
- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road);
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton);
- Wobaston Road and Pendeford Mill Lane (into Bilbrook); and
- Blackhalve Lane, B4484 Long Knowle Lane, Lichfield Road and Wednesfield Way (all within Wolverhampton's boundary).

PM Peak (1700 – 1800 hours)

- M6J13 northbound;
- A449 between M6J13 and Penkridge centre;
- Through Penkridge to Cannock via the B5012;
- A449 between Brinsford and the Wobaston Road area of Wolverhampton;
- Bognop Road (from A460 to Essington village);
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton);

- Wobaston Road and Pendeford Mill Lane (into Bilbrook);
- Wood Road (between Codsall and Codsall Wood);
- Albrighton Bypass (south of M54J3);
- A41 as it approaches Wolverhampton ring road; and
- Blackhalve Lane, Lichfield Road, Wednesfield Way and a small section of A462 to the south of Sneyd Lane to Lichfield Road (all within Wolverhampton's boundary).

Land East of Bilbrook and Land at Keepers Lane and Wergs Hall Road, Codsall (Total of 1,165 dwellings)

Staffordshire County Council has the following comments and observations in response to the strategic site and other proposed allocation(s) in the Bilbrook and Codsall areas. These include 848 new homes on Land East of Bilbrook (covered by Policy SA1)and also 317 homes at Keepers Lane and Wergs Hall Road.

Accessibility

Please refer to the accessibility plans in the enclosures. None of the sites are within 350 metres of an existing bus service or rail station and consequently do not have access to supermarkets, employment or hospitals by public transport. The whole of both sites are within a 20-minute walk of GP services. The Bilbrook site is within a 10-minute walk of a new first school whilst the Codsall site is within 20 minutes of an existing first school. Both sites are within a 20-minute walk of existing middle schools.

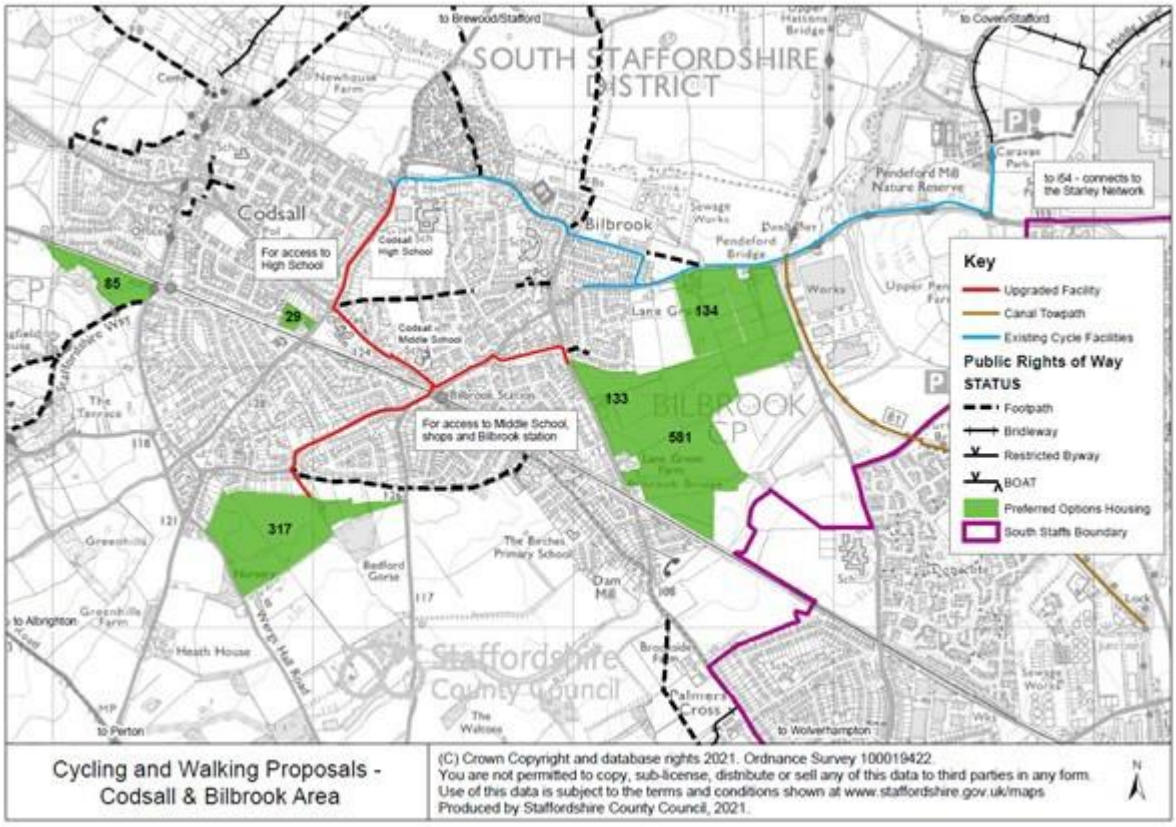
Walking and Cycling Proposals

The Preferred Option development proposals are for 1,165 new homes in the Bilbrook and Codsall area, spread over the two largest sites. The developers will need to ensure that their sites are well connected to key attractions within the vicinity of the developments including the Middle and High schools, the railway stations and village centres. There may also be opportunities to provide or connect into more attractive leisure routes.

The Cycling and Walking Proposals Plan for Codsall and Bilbrook Area shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Provision or enhancement of a cycling and walking facilities from the southern site onto Suckling Green Lane heading in a north-easterly direction onto Keepers Lane and through the double mini roundabout junction to Wolverhampton Road / Duck Lane. Depending on traffic flows, this could require just signage. The route will provide access from the new housing to Bilbrook train station and the local amenities available here. In addition, in conjunction with the routes below, it will also provide access to the middle and high schools.
- Continuing from above, in a north-westerly direction along Wolverhampton Road, passed Codsall Middle School and the council offices, to Histons Hill traffic lights and then northbound to Codsall High School. A suitable crossing facility will be required as the route switches from the north side of the road to the south.

- Continuation of the route to Bilbrook railway station, heading north-easterly along Duck Lane to Brookfield Road, then along Brookfield Road to Lane Green Road and connecting into the northern site in Bilbrook. A suitable standard crossing facility will be required in the vicinity of Duck Lane / Brookfield Road.
- Connections will be required from the northern site into the existing facilities along Pendeford Mill Lane and beyond.



Highway Impact

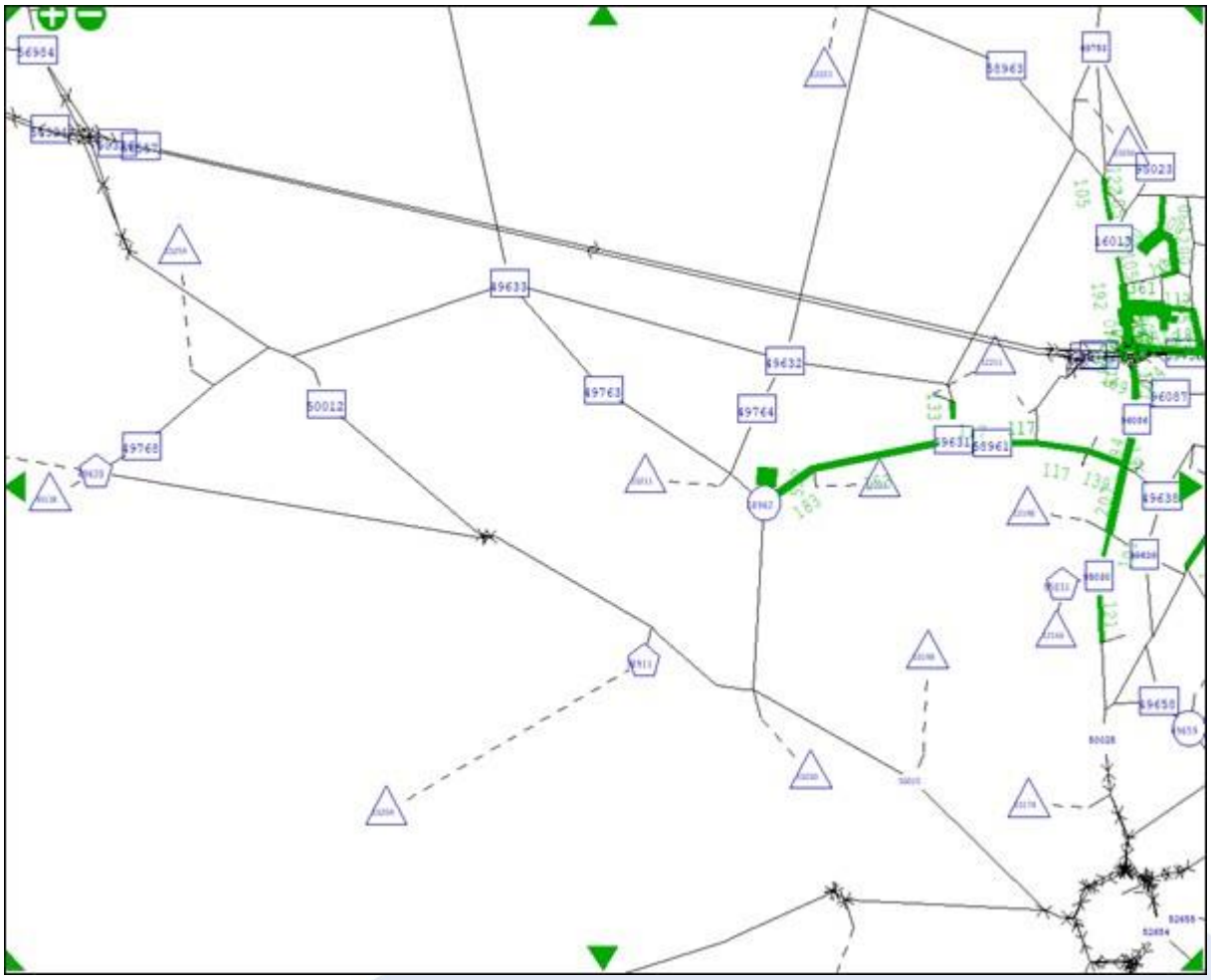
One of the limitations of the SATURN model is that some parts of the network, due to its strategic nature, have been coded 'coarsely' with some generalisation of the local road network. This becomes more prevalent the further away from the A road and Strategic Road Network locations are. As can be seen in the screenshots below, the model network through Codsall and Bilbrook does have a level of coarseness and generalisation. For example, only one route is modelled to the A41, which is intended to represent several potential routes including via Histons Hill, Wergs Hall Road and Keepers Lane. However, the model outputs do give information on the directions of travel that trips from the new developments wish to take so allowances can be made for this. In this case, the impacts on the A41 junctions will be shared rather than accruing at the one place and should therefore be less problematic.

Focussing on the Codsall and Bilbrook areas in more detail, in practice two larger sites make up the majority of the strategic allocation - 848 new homes on Land East of Bilbrook and 317 homes at Keepers Lane and Wergs Hall Road.

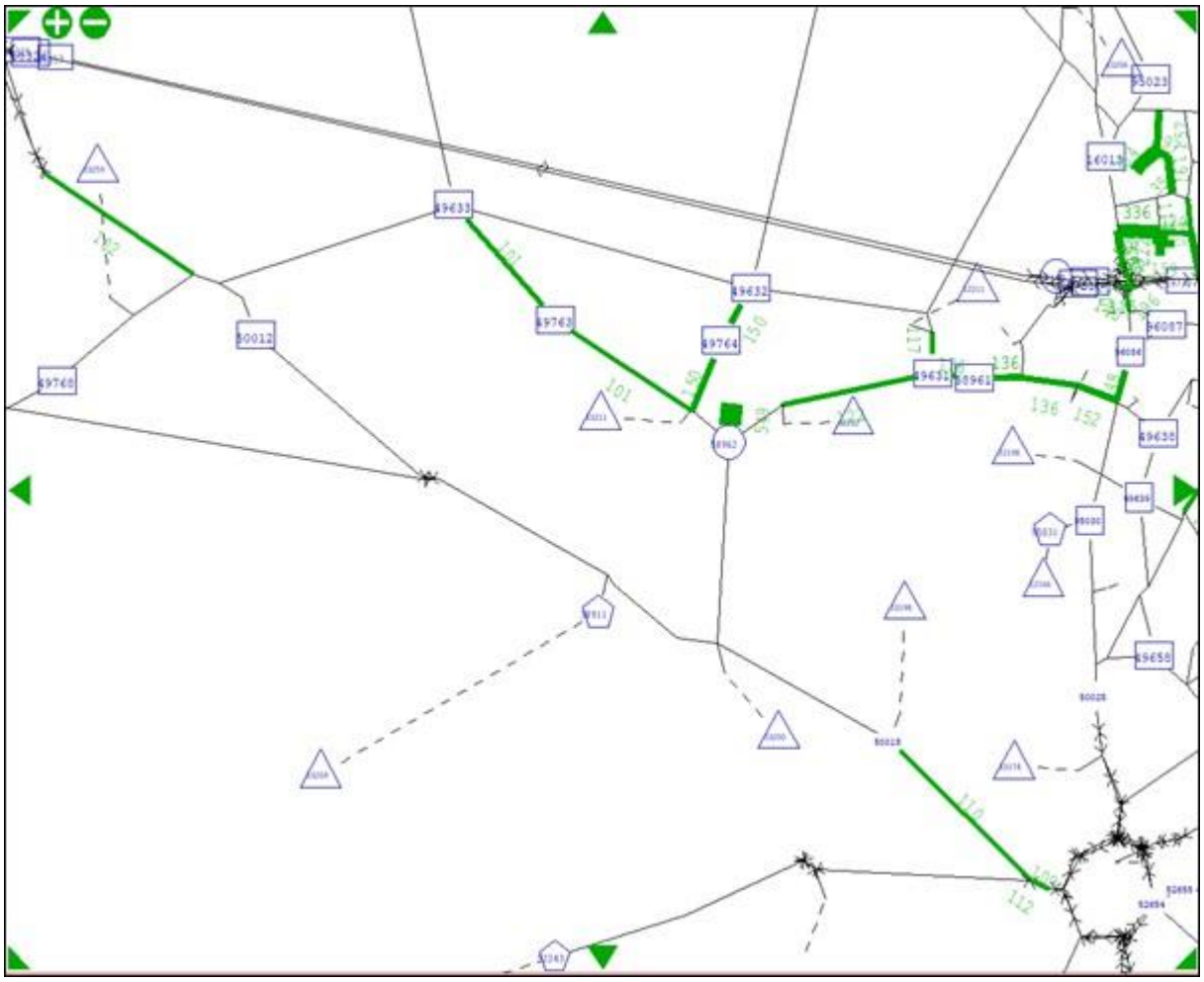
Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations. These are also displayed on the ensuing screenshots:

- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road);
- Wobaston Road and Pendeford Mill Lane (into Bilbrook); and
- Wood Road (between Codsall and Codsall Wood);
- Albrighton Bypass (south of M54J3); and
- A41 as it approaches Wolverhampton ring road.

AM Peak



PM Peak



While the impacts of this development will affect SCC's road network, much of it will be on CWC and NH (National Highways) networks. All three authorities will need to advise on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary.

Increases on the A449 between Wobaston Road and M54 J2, and additional flows on M54 between J2 and the M6 are partly from the sites in Codsall and Bilbrook, but also from Cross Green site and to a lesser extent the Linthouse Lane site.

In terms of Staffordshire's network, it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The developer will need to assess (and mitigate where necessary) the impact of trips at junctions onto the A41, and also several junctions on the route making up Pendeford Mill Lane, Duck Lane, Wolverhampton Road and Histons Hill. Whilst any assessment requirements won't be limited to these, the junctions of Duck Lane / Wolverhampton Road / Keepers Lane / Birches Road and Histons Hill / Elliots Lane / Wolverhampton Road are known to be congested at peak times and are likely to require improvement.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

Land at Cross Green (1,200 dwellings and Proposed Brinsford Parkway Railway Station)

SCC has the following comments and observations in response to the strategic site at Cross Green (circa. 1,200 new homes, with a Parkway railway station).

Accessibility

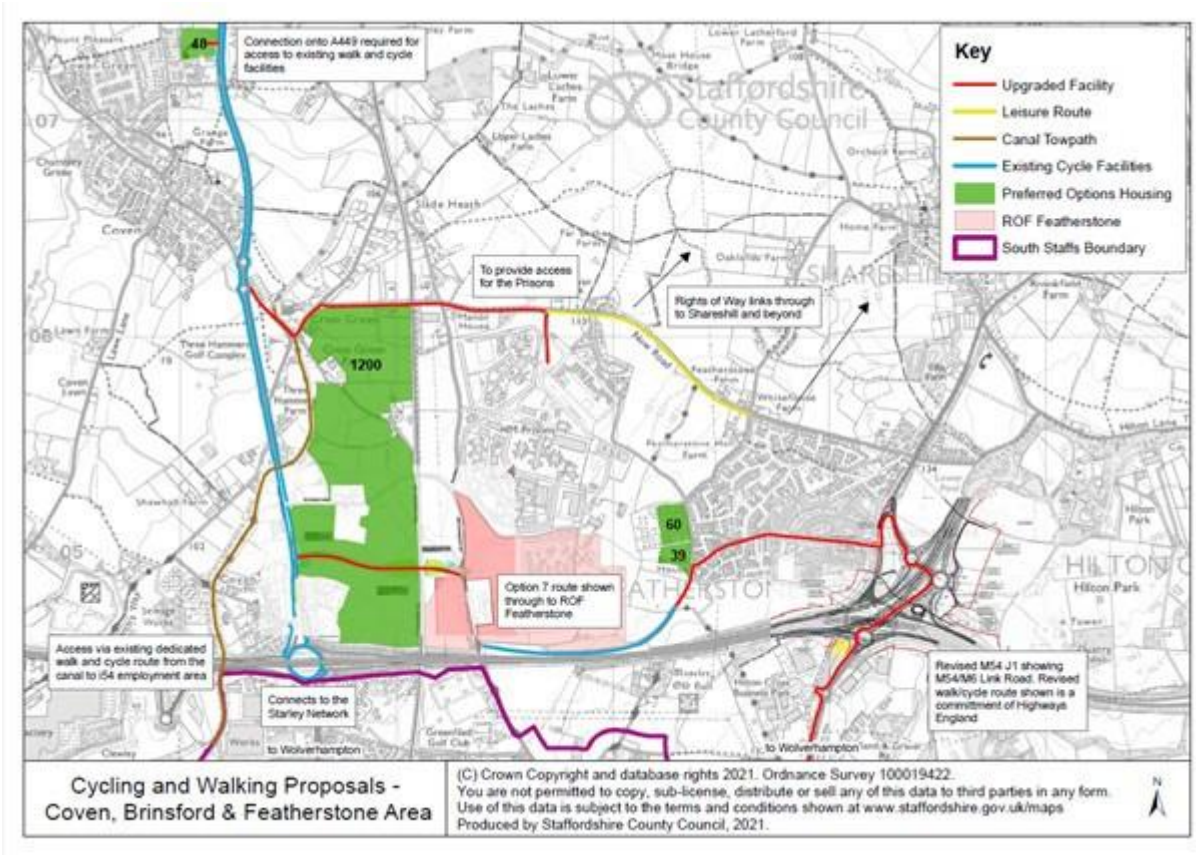
Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. Virtually none of the site is within 350 metres of an existing bus service or rail station and consequently does not have access to supermarkets, employment or hospitals by public transport. The whole site is within a 30-minute walk of GP services. Approximately two thirds of the site is within a 10-minute walk of a new first / primary school whilst the remainder is within 20 minutes. It needs to be established whether two tier or three tier education will be operated.

Walking and Cycling Proposals

The developer will need to ensure that their sites are well connected to key attractions within the vicinity of the development including schools, the railway station and other nearby local amenities. There may also be opportunities to provide and connect into more attractive leisure routes via the canal and existing footpaths and bridleways.

The plan below (Cycling and Walking Proposals - Coven, Brinsford and Featherstone Area) shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Footway / cycleway provision along Brewood Road, connecting into the existing facilities on the A449 with an improved LTN 1/20 standard junction;
- Footway / cycleway provision along New Road, connecting into the existing employment destinations at and near to the prisons at Oaks Drive;
- Continue footway and cycle provision along New Road, between Oaks Drive and Featherstone Lane (approximately 1km) to provide linkages to various leisure routes which can be accessed to the north of New Road in the vicinity of Featherstone Lane. Providing access to leisure routes will help with placemaking and provide a quality living environment for new residents; and
- Improved access to the Canal towpath at the Dark Lane / Old Stafford Road / Brewood Road junction combined with enhancements to the canal towpath (where required) between The Anchor Inn and I54 employment area. providing connectivity to jobs and the conurbation, taking into account environmental constraints.
- The proposed new road linking the A449 to ROF Featherstone and providing the main access to the Cross Green site, is currently designed with a 3.0m shared footway cycleway facility. To comply with LTN 1/20 this should be redesigned and delivered with a segregated facility



Highway Impact

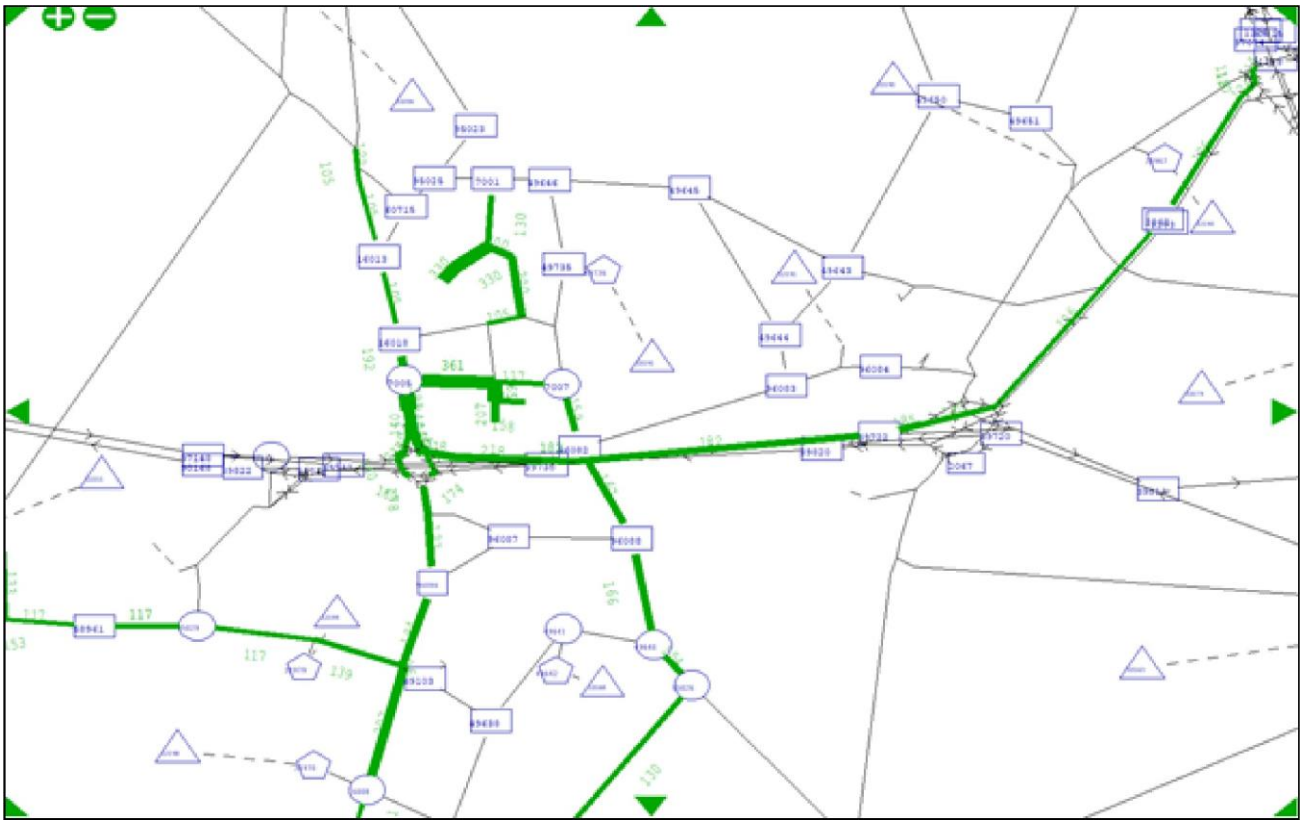
Focussing on the Cross Green area, 1,200 proposed new homes and 500 car park spaces at the Brinsford Parkway station have been included within the SATURN traffic model. Trips from this development will have the choice to access the existing road network via A449, New Road or Cat and Kittens Lane.

There are two new committed road schemes in the area that will affect future route choices and traffic flows. These are a link through this housing proposal from Cat and Kittens Lane to the A449 (to be provided by the developers of ROF Featherstone) and the M54-M6 link, providing relief to the A460 to the east of this development. These are both included within the traffic modelling.

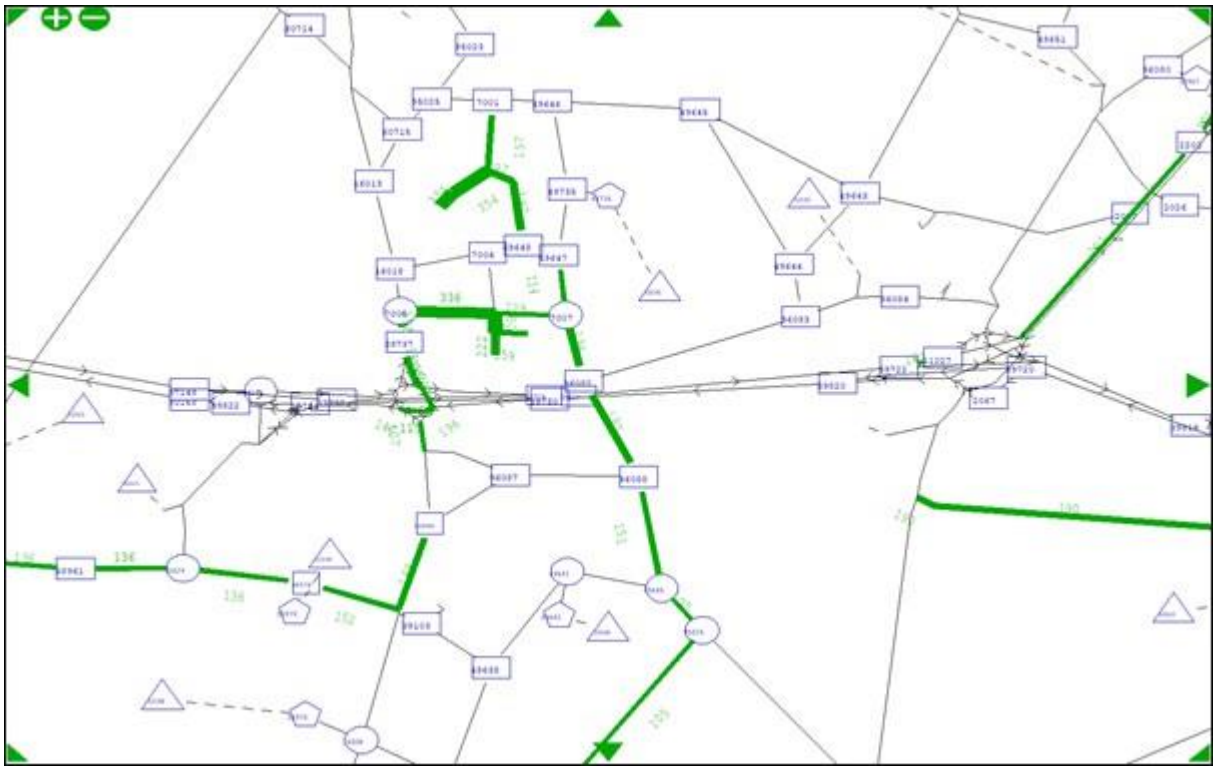
Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations - also displayed on the following screenshots:

- A449 between Coven (double roundabouts) and the Oxley area of Wolverhampton;
- M54J2 to M6 (via new link road); and
- Cat and Kittens Lane and Bushbury Lane (into Wolverhampton).

AM Peak



PM Peak



As well as the locations listed above, the screenshots show impacts on Wobaston Road and Bognop Road. However, further investigation of increases on Wobaston Road and Pendeford Mill Lane (into Bilbrook) have shown that this is mainly due to the strategic sites within Codsall and Bilbrook. Increases on Bognop Road are mainly associated with traffic from the Linthouse Lane strategic site.

Increases on the A449 between Wobaston Road and M54J2, and additional flows on M54 between J2 and the M6 are from this site and the Codsall / Bilbrook sites. There is also a smaller impact on the M54 from the Linthouse Lane site.

While some of the impacts of this development will affect SCC's road network, the majority will be on CWC and NH (National Highways) networks. All three authorities will need to advise on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary. In terms of Staffordshire's network it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

<u>Land off Linthouse Lane (1,200 dwellings)</u>

Staffordshire County Council has the following comments and observations in response to the strategic site off Linthouse Lane.

This site is situated on the edge of the administrative boundary and many of the impacts and proposals may be witnessed in the City of Wolverhampton Council's (CWC) area.

Accessibility

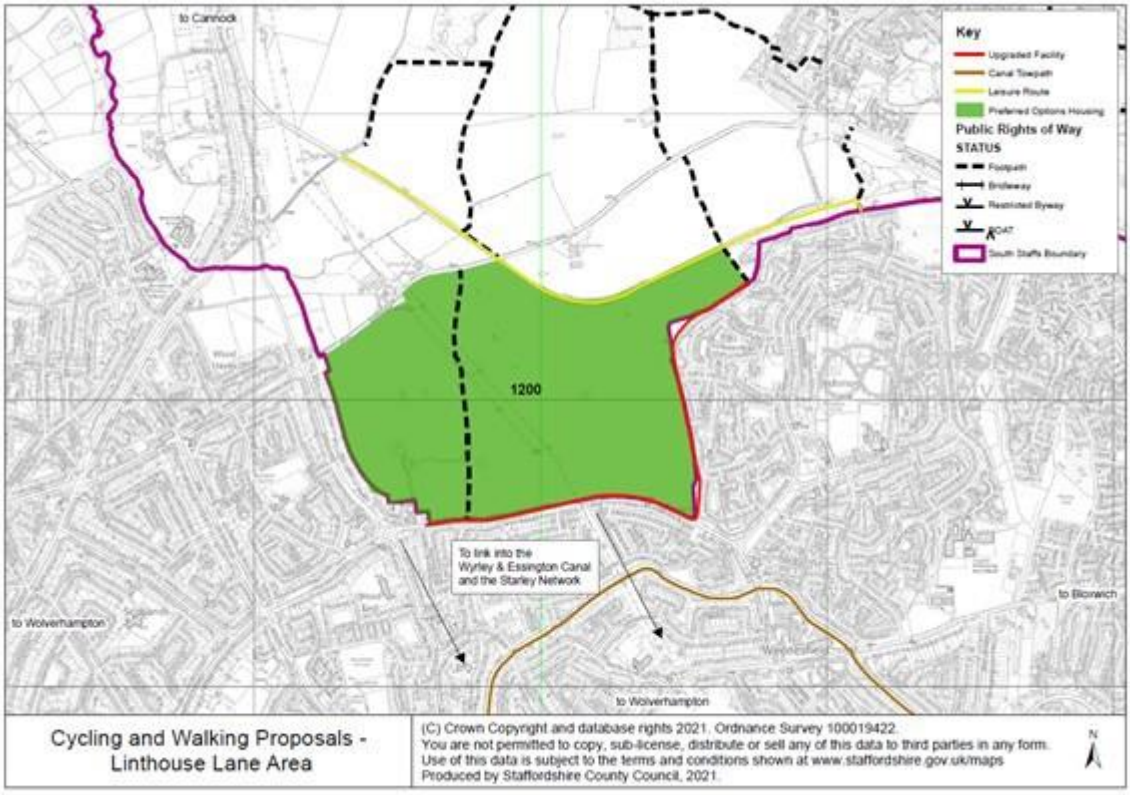
Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. The western and southern edges of the site are within 350 metres of a bus service and hence between 11 and 20 minutes access by bus to supermarkets on a weekday and Saturday; have access to a limited choice of employment via bus; and are within 11 to 30 minutes access to hospital by bus. The remainder of the site has no access. The whole site is within a 20-minute walk of GP services and a 10-minute walk of a new primary school.

Walking and Cycling Proposals

This Preferred Option development proposal is for 1,200 new homes within South Staffordshire but on the edge of Wolverhampton. Most of the impacts of the development will be within the CWC boundary, as will most of the local facilities and amenities used by its residents. The developer will need to ensure that the site is well connected to key attractions within the vicinity of the development and should also consider opportunities to provide or connect into more attractive leisure routes.

Cycling and walking opportunities for this site will largely need to be determined by City of Wolverhampton Council. However, the plan below (Cycling and Walking Proposals – Linthouse Lane Area) shows the active travel routes that SCC thinks should come forward in support of this development. These include:

- Consideration of a segregated cycle/footway on Linthouse Lane and Kitchen Lane and LTN 1/20 crossing provision providing access to residential areas to the west, south and east;
- Good connections to the canal and the Starley Network in the south; and
- Good connections to Staffordshire Railway Walk in the north, taking into account potential land ownership issues.



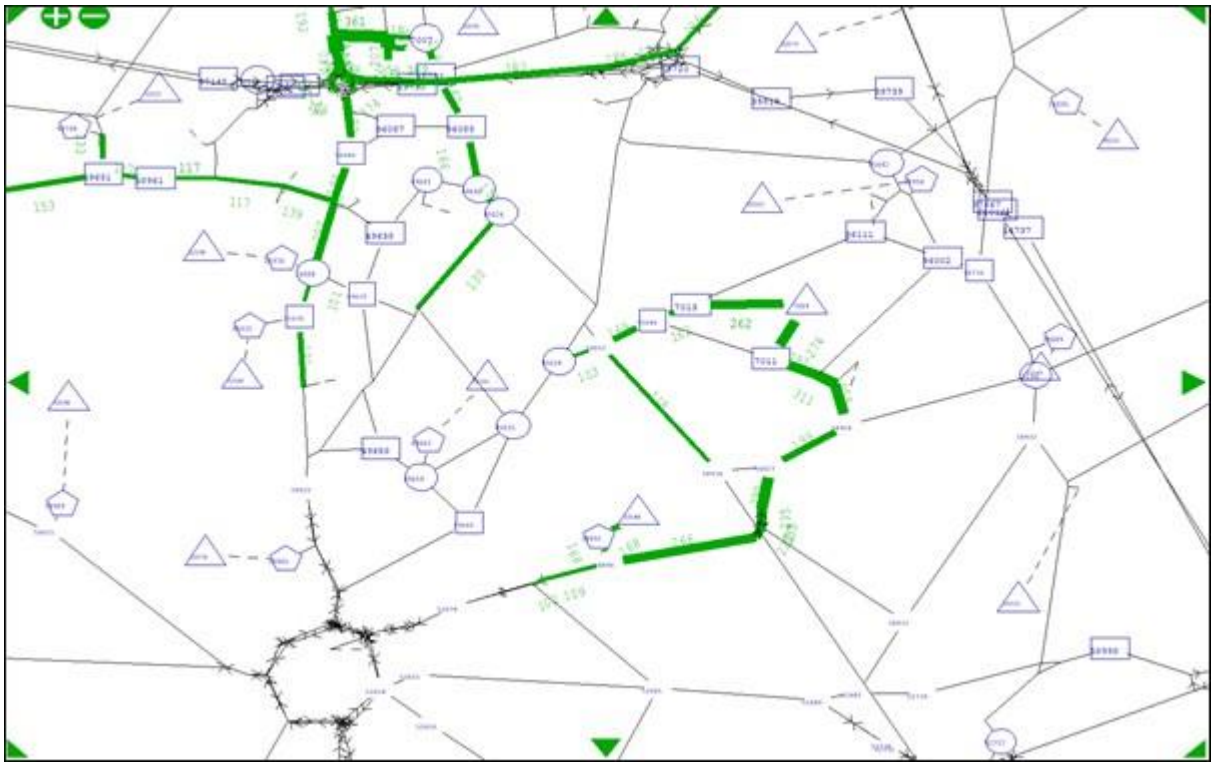
Highway Impact

Focusing on the Linthouse Lane site in more detail, 1,200 new homes were modelled in the SATURN traffic model with access to the existing road network via Blackhalve Lane and Linthouse Lane.

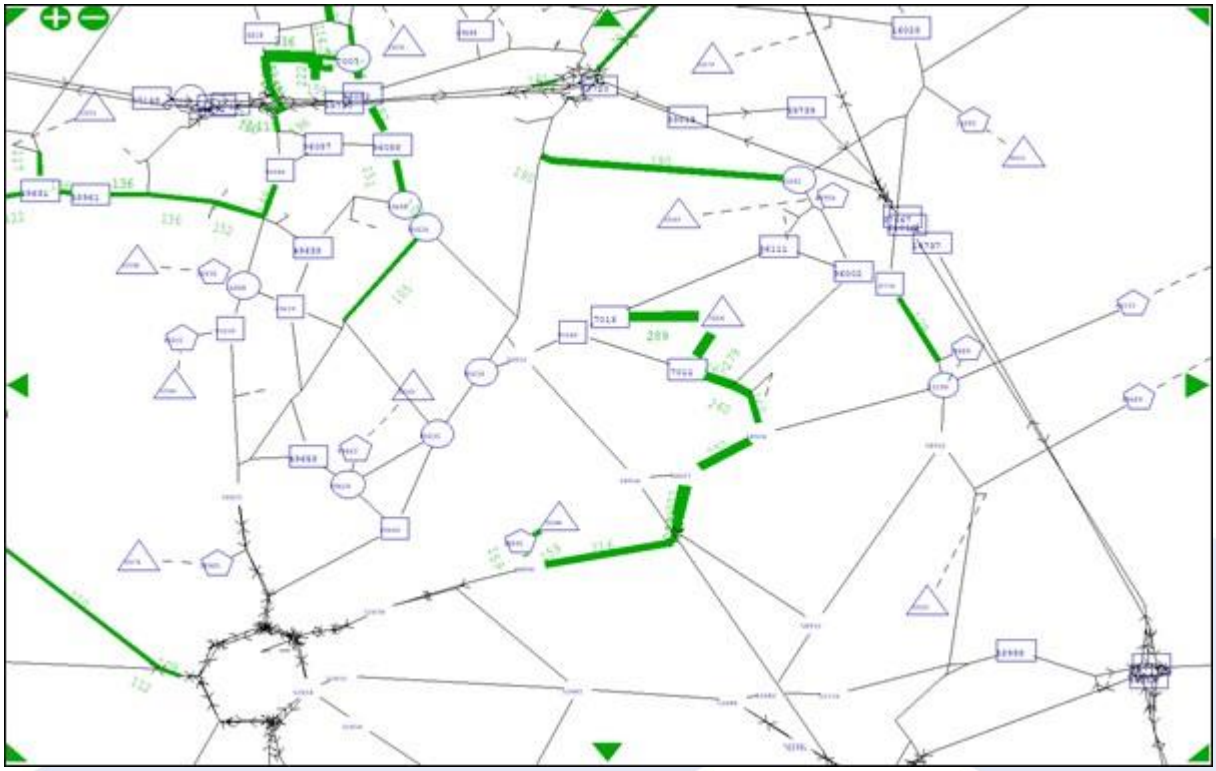
Analysis of the model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) in the following nearby locations. These are also displayed on the ensuing screenshots:

- M54J2 to M6 (via new link road);
- Blackhalve Lane, B4484 Long Knowle Lane, Lichfield Road and Wednesfield Way and a small section of A462 to the south of Sneyd Lane to Lichfield Road (all within Wolverhampton's boundary); and
- Bognop Road (from A460 to Essington village).

AM Peak



PM Peak



The impacts of this development will affect only small sections of SCC's road network. The majority of the impacts will be seen on CWC's roads and also some of the NH (National Highways) network. All three authorities will however need to advise

on the scope of any Transport Assessments that the developer is required to undertake to ensure that mitigation is provided where necessary.

SCC has shared outputs from the SATURN model with CWC for them to consider the impacts on their network. Please refer to CWC's consultation response for more information.

The traffic Model indicates that increases in traffic flows on the M54 between J2 and the M6 are in some part due to this development, though most of the cumulative impact is from the sites at Cross Green and in Codsall and Bilbrook. In terms of Staffordshire's network it is considered unlikely that there are any impacted locations that could not be mitigated to ensure the network continues to operate satisfactorily.

The developer will need to assess (and mitigate where necessary) the impact of trips on the A460, Bognop Road and travelling through Essington.
The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

Penkridge Area (Penkridge North 1,129 dwellings)

SCC has the following comments and observations in response to the strategic site at Penkridge which includes a site to the north of the village for 1,129 dwellings, accessed directly off the A449. There is also an existing consent in this location for 200 new homes, bringing the overall number of dwellings in this area to 1,329 units.

Accessibility

Please refer to the accessibility plans in the attached 'Accessibility Plans.zip' file. Approximately 50% of the site is within a 350 metre walk of a bus stop. This proportion of the site is within a 10-minute bus journey to a supermarket on a weekday and a Saturday; has access to a limited choice of employment via bus and rail; and is within a 40-minute bus journey to a hospital. Most of the site is within a 30-minute walk distance of GP services. Most of the site is within a 10-minute walk of a new first school and a 40-minute walk of Penkridge Middle School.

Walking and Cycling Proposals

The developer will need to ensure that the site is well connected to key attractions within the village such as the Middle and High Schools, the village centre and the railway station. There are also opportunities to provide more attractive leisure routes from the site to the village via the canal and existing footpaths and bridleways.

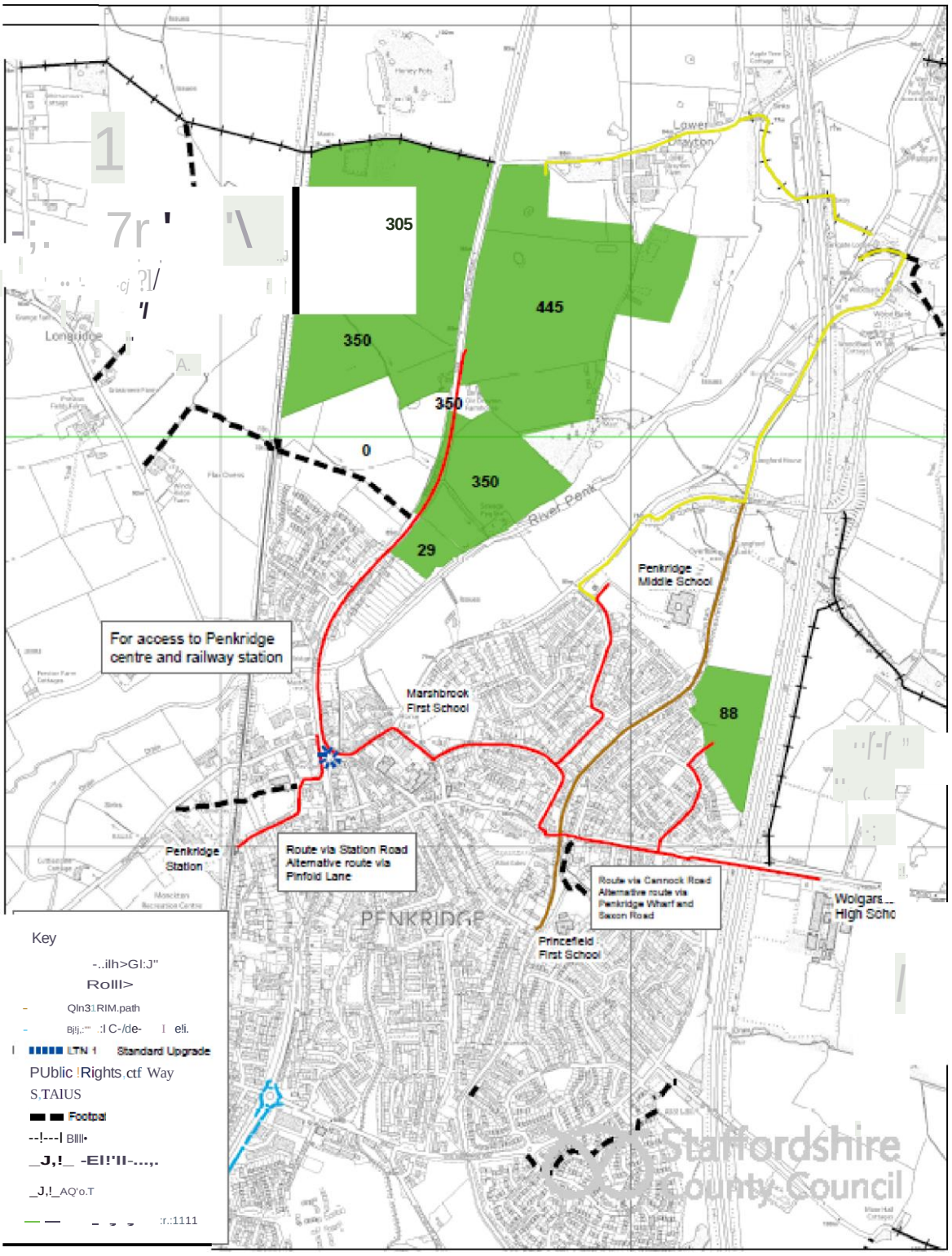
The plan below (Cycling and Walking Proposals – Penkridge Area) shows the active travel routes that SCC would like to see come forward in support of the proposed new developments. These include:

- Shared footway / cycle provision along the A449 from a crossing facility at the southern parcel of the development to Crown Bridge junction;

- Connections from Crown Bridge to the railway station, via St. Michael's Square and Station Road;
- Connections from Crown Bridge to the Middle School, via Mill Street, Bell Brook, Haling Road and Marsh Lane; and
- Connections to the High School from Haling Road and Cannock Road.
- The more attractive leisure route would head east out of the northern site, under the M6 via an existing crossing and joining the canal near Teddesley and heading south towards the village, with a spur off to the Middle school. Upgrades to towpaths and footpaths/bridleways would be required.

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Cyclling and W'alki111g Pro1posals,- Penkridg:e Area



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Staffordshire County Council

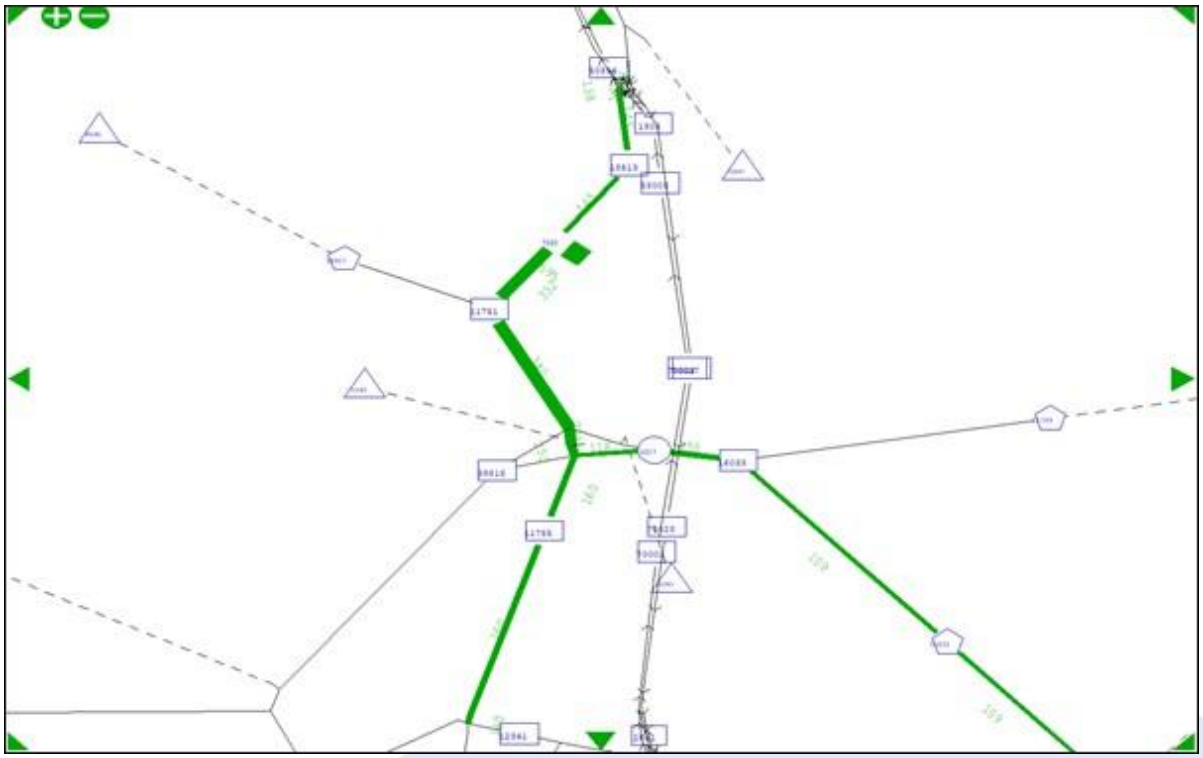
Highway Impact

Focussing on the Penkridge area, 1,329 new homes have been included in the traffic model, loading directly off the A449 to the north of the village centre. This includes an allocation of 1,129 new homes plus 200 which already have consent but were not included in the existing traffic model. A smaller site for 88 dwellings (Land at Cherrybrook) has not been included in this strategic modelling exercise.

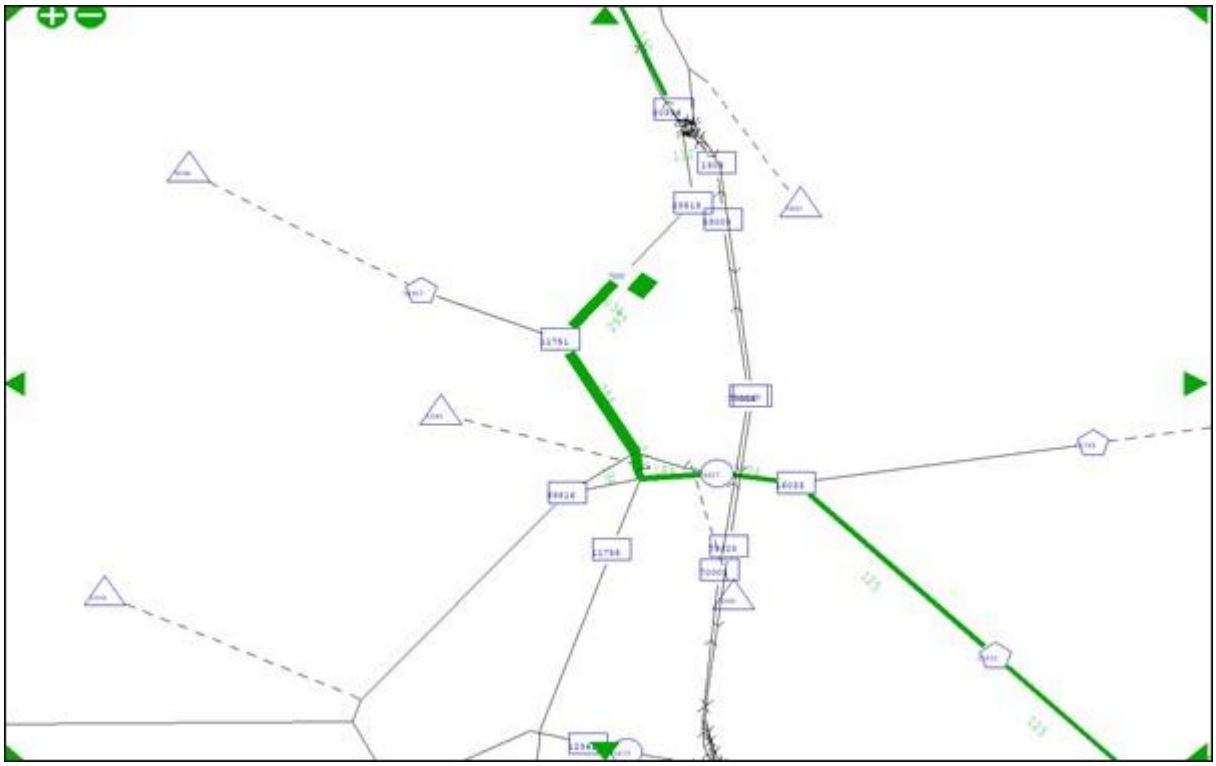
Analysis of the traffic model has shown that there are increases in trips (i.e. greater than 100 2-way trips) in the modelled peak hours (0800-0900 hours and 1700-1800 hours) at the following locations. These are also displayed on the screenshots below:

- M6;
- A449 (from M6J13 to Gailey); and
- through Penkridge towards Cannock.
  Most of these increases will be due to trips from the Penkridge site, although a small number of them will have originated from the other strategic sites contained within the model.

AM Peak



PM Peak



There is an increase of around 150 2-way trips on the A449 between the site and M6J13 in the AM peak, slightly less in the PM peak. The developer will need to provide an assessment of M6 J13 to see whether any mitigation is required.

To the south on the A449, there are around 300 to 350 additional 2-way trips between the development and the centre of the village. The traffic disperses as it leaves the village, with some trips terminating within the village, some travelling to and from Cannock (around 150 2-way trips in each peak hour) and some heading towards Gailey (just over 150 2-way trips in the AM peak, much less in the PM).

This additional traffic on the A449 will put pressure on the side roads and the ability for vehicles to exit from them. The developer will need to assess the capacity of various junctions along the route through the village. The main junction in the centre of Penkridge at Stone Cross is highly likely to require an improvement, and potentially other junctions such as the A449 / New Road. In addition, routes through the village towards Cannock will need to be assessed. Gailey island has been problematic for many years and will require an assessment. The proposed nearby freight depot will also add traffic at this location. However, the introduction of the new M54-M6 link road should relieve some pressure at the roundabout and the additional trips are unlikely to cause any unsurmountable problems.

None of these increases are considered to be at a level that would cause insurmountable problems and a thorough Transport Assessment will be required from the developers to understand what mitigation would be required to ensure the network continues to operate satisfactorily. The intention is that the traffic flow information derived from this model is used to inform the scope of the more detailed transport assessment work being prepared by the developers promoting these sites. It is

possible to use the model information to estimate the relative contributions towards mitigation where several developments are impacting in a given location.

Pp 53 Policy SA1 – Strategic Development Location : Land East of Bilbrook.

Pp 54 Policy SA2 – Strategic Development Location : Land Cross Green.

Pp 55 Policy SA3 – Strategic Development Location : Land North of Linthouse Lane.

Pp 56 Policy SA4 – Strategic Development Location : Land North of Penkridge.

SCC welcomes the preparation of Supplementary Planning Documents (SPD) and Infrastructure Delivery Strategies (IDS) to inform the release and phasing of these strategic sites. As referred to above, Staffordshire County Council has been working in partnership with SSDC, undertaking technical work to help show how these large housing allocations could be made acceptable in transport terms and this information can help inform the SPD and IDS.

Pp 57 Q7 SCC supports the proposed housing allocations in policies SA1-SA4 as long as they are supported by a robust evidence base that demonstrates how they can be made acceptable in transport terms. SCC has been working with SSDC to provide high level assessment work to help identify any showstoppers from a capacity, accessibility and connectivity perspective. This work will be presented in the 'Transport Impacts (with SCC) 2022' report.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code. Yes – from a transport acceptability perspective, the policy, vision and master planning needs to be developed at the earliest opportunity informed by the technical work referred to, supplemented by evidence provided by site promoters.

Pp58 Housing Allocations

pp 58 – pp 59 - Policy SA5 proposes housing allocations for settlements in Tiers 1-4 and other sites adjacent to neighbouring towns and cities (Stafford – Weeping Cross – 168 units and CWC Langley – 390 units). Appendix C contains housing allocation maps and proformas. It is noted that all of the proposed accesses just refer to vehicles and pedestrians, with no reference cycle access.

Pp 60 Q 8. SCC has reviewed the sites within Policy SA5 from a development management perspective and provided comments already regarding their potential to be served from the highway. Plans showing relative accessibility have also been produced for the majority of these sites.

Plans showing recommended and potential walking and cycling improvements to provide necessary connectivity have also been produced and are enclosed. These should be used to guide further assessment work should the sites be allocated.

SCC will expect each developer to engage with our Development Management section to scope out a Transport Assessment and identify any mitigation that is required to make the developments acceptable in transport terms. It is not envisaged at this stage that there would be any unsurmountable problems that would stop these sites coming forward through the Local Plan process.

Pp 63 Employment

Policy SA7 concerns the Employment Allocation – West Midlands Interchange.

Pp 65 Q 10 - SCC was an active participant in the Development Consent Order (DCO) process leading to the grant of planning consent and supports the proposed allocation having agreed the necessary mitigation to make development here acceptable in transport terms.

Pp 66 Development Management Policies.

Pp 66 para 6.4. It is noted that policies do not reflect the final wording but highlight key requirements, aims and measures that the final submitted policies will deliver.

Pp 71 HC9 – Design requirements

South Staffordshire Design Guide 2018 requires updating to reflect Cycle Infrastructure Design (Local Transport Note 1/20), Department for Transport, 2020, as advised by the National Model Design Code that refers to LTN 1/20 as detailed guidance that should inform local design codes. The five core design principles in LTN 1/20 are essential requirements that developers need to take into account. Based on best practice, routes should be Coherent; Direct; Safe; Comfortable and Attractive. By encompassing LTN 1/20 standards within South Staffordshire's Design Guide, developers will be aware of what is expected in Design and Access Statements and site-specific masterplans. This will ensure that high quality pedestrian and cycle facilities are regarded as an essential component of all site access and off-site highway works.

Pp 72 HC12 Parking Standards – the approach to electric vehicle charging for new development is welcomed to help reduce the impacts of climate change.

Pp 76 HC19 Wider green infrastructure design principles – the approach is welcomed to promote active travel.

Policy HC19 recognises the need to ensure that active travel opportunities are met within green infrastructure. It should be reflected in the Green Infrastructure SPD that delivery of this policy may require the upgrade of bridleways, footpaths and canals to provide high quality off-road provision for both pedestrians and cyclists to improve connectivity between development sites and local facilities/schools.

Pp78 Economic Vibrancy, Building a strong local Economy

EC1 Sustainable economic growth. The approach regards the promotion of active travel measures and multifunctional green spaces is welcomed but the policy needs to mention the requirement for public transport access to employment land.

SCC is concerned that the importance of Freight Infrastructure has not been sufficiently recognised.

SCC agrees that South Staffordshire is an attractive location for commercial development with a diverse range of small, medium, and large businesses and firms and its potential role in meeting the unmet employment needs of neighbouring authorities. We recognise the ambition to continue support and development of strategic employment sites including at i54 South Staffordshire, ROF Featherstone and West Midlands Interchange leading to greater inward investment and prosperity. We also note the concerns relating to the concentration of large scale developments, such as the West Midland Interchange (WMI) strategic rail freight interchange, which may pose a threat to the district in terms of the cumulative impact on the surrounding infrastructure.

We also recognise the importance of considering growth options in relation to their impacts on the highway network and how these are mitigated including the impacts of increased HGV usage and ability to park safely and securely.

HGV parking should be included as an example within policy EC1 – Sustainable Economic Growth which identifies support for provision of necessary infrastructure.

Pp 81 Community Services Facilities and Infrastructure

Policy EC9 - Infrastructure also identifies SSDCs willingness to work with partners to enable, support and co-ordinate delivery of infrastructure to support growth and infrastructure requirements within the Infrastructure Delivery Plan.

It is suggested that the Staffordshire Freight Strategy 2019 is referred to as a key evidence document within the Preferred Options report it can be found via the following link:

https://www.staffordshire.gov.uk/Transport/transportplanning/localtransportplan/Documents/Staffordshire-Freight-Strategy-June-2019-final-version.pdf

We are aware of critical shortages of HGV parking and driver welfare facilities across Staffordshire including South Staffordshire District. The Department for Transport National Survey of Lorry Parking 2017 identified that this HGV parking shortage is experienced across the region. Government too has recognised the critical importance of infrastructure to support hauliers and the logistics sector. In a ministerial statement of 8th November 2021 Government stated the planning system should play its part in meeting the needs of hauliers and addressing current deficiencies. Setting out proposals for short term measures and commitment to update both the National Lorry Parking Survey and Highways Circular 02/2013 The Strategic Road Network and the delivery of sustainable development.

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

The National Planning Policy Framework (NPPF) identifies two specific matters in relation to HGV parking:

1. the provision of overnight lorry parking facilities through planning policies, which should either propose sites or provide a supportive policy framework for anyone wanting to develop a lorry park. Key here is 'local shortages' where the highway authority will liaise with LPAs to ensure their plans make provision for lorry parks;

2. logistics sites should have adequate parking provision –existing sites may have parking but it is mostly operational i.e. part of the loading/unloading process. Other provision may be needed, similar to that proposed at the West Midlands Interchange not simply based on spaces per sq. m.

HGV parking areas are an important element of the logistics network and provide vital rest areas for drivers, help ensure safety for all road users and provide much needed security for transported goods, vehicles and drivers. These should be considered for inclusion within the reviewed Infrastructure Delivery Plan as they can be considered essential to support growth proposals.

HGV parking and driver welfare facilities are not specifically identified within the Preferred Options Plan and we feel this is an omission given the National Policy and the recent Ministerial Statement. Options for provision of facilities for HGV should be considered and identified for the next iteration of the Local Plan. We would be happy to provide support where required.

Pp 81 EC11 Sustainable transport – approach generally welcomed but the policy needs to support the delivery of Staffordshire's Bus Service Improvement Plan (BSIP) which also needs to be listed as key evidence.

<u>Note on SCC LCWIP Process</u>

Staffordshire's Local Cycling and Walking Infrastructure Plan (LCWIP) 2021 covers Burton upon Trent, Cannock, Lichfield, Newcastle-under-Lyme, Stafford and Tamworth. In 2021/22 the LCWIP is being expanded to include other medium-sized towns including Cheslyn Hay/Great Wyrley/Landywood. The LCWIP appraisals follow the methodology outlined by Department for Transport guidance. GIS analysis determines the routes that are likely to have the highest demand for cycling by mapping origin and destination points for commuter, school trips and forecast trips to/from development sites. These routes are further prioritised based on proximity to employment (including town centres), rail stations and accident data. The routes identified through the analysis are audited to determine a proposed coherent cycle network. Core walking zones focused on town centres are also assessed in terms of attractiveness, comfort, directness, safety and coherence. The outcome of the 2021/22 appraisals will be reported in an updated LCWIP due to be approved and published in 2022/23 and further updates will be made as resources permit.

Pp83 Under Key Evidence:

- add 'Brinsford Parkway Station Strategic Outline Business Case'.
- Delete Staffordshire Local Transport Plan 2011 and replace with South Staffordshire District Integrated Transport Strategy (to 2038) #

- Add Staffordshire Freight Strategy 2019
- Add Staffordshire's Bus Service Improvement Plan (BSIP) 2021

#The District Integrated Transport Strategy will be updated to reflect the emerging Publication Plan and will inform the next revision to the Infrastructure Delivery Plan.

Pp 92 Q 11 - do you agree with the proposed policy approaches set out in Ch 6?

Please see transport comments provided.

Q12
Do you agree that DS1-DS4 and SA1 – SA7 are strategic policies a) yes
b) are there any other policies in Ch 6 that need to be identified as strategic policies? No.

Pp 96 Appendix B Strategic Masterplanning Location Proformas Land East of Bilbrook

The proforma plan should show the proposed link road between Pendeford Mill Lane, Barnhurst Lane and Lane Green Road.

Education

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning: 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne, 3) Codsall & Perton and 4) Penkridge. These areas are broken down into smaller 'school place planning areas' and are used to plan the number of school places required. These school place planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas in line with Department for Education guidance.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne, whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

SOT has been working with South Staffordshire District Council to devise a strategy to aid their Local Plan aspirations. We expect that this will continue as the Local Plan progresses.

There has already been a total of 750 dwellings that have been delivered from 2018 to 2021. It is noted that SSDC are proposing to make provision for at least 4,131 dwellings between 2021 and 2038 which will equate to an annual requirement of around 243 dwellings. SSDC are also looking to deliver a proportion of the unmet

need of the Greater Birmingham Housing Market Area (GBHMA) which is an additional 4,000 dwellings. The number of dwellings proposed influences what additional school places would be necessary and whether this would take the form of expanding existing local schools and/or the provision of new schools.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of the proposed new homes in the right place at the right time. SCC would request that land is allocated for educational infrastructure when considering areas for development. Whether this is land adjacent to existing schools, land within a large, proposed development or land within a number of proposed developments.

To mitigate the indicative minimum dwelling numbers in tiers 1-3 villages (including the areas adjacent to neighbouring towns and cities) a total of 632 first school places, 1,067 primary school places, 506 middle school places, 762 secondary school places, 379 high school places and 279 post 16 places are required.

There are a further 288 sites in rural and tier 4 -5 settlements and 450 windfall sites: a total of 738 dwellings. Dependent on location a total of 111 first school places, 155 primary school places, 89 middle school places, 111 secondary school places, 66 high school places and 22 post 16 places are required.

It is appreciated that the Local Plan Review document sets out indicative levels of growth in each area, some mitigation for existing sites has already taken place and we have sought to provide some commentary on the locations for proposed growth at the end of this section. It should be noted that the numbers given above do not include additional Nursery provision or additional SEND provision. Provided below are some general principles that should be considered in the site selection process when determining scale of growth, location of sites and potential policy considerations.

School sizes are referred to in as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group). It is also possible for schools to operate at half forms of entry for example 1.5FE equals 45 children per year group, and in these instances, schools operate with classes that are mixed across year groups.

From an educational perspective some schools and governing bodies believe that teaching children from two age groups in one class (mixed age teaching) is beneficial to the pupils. However, there are many educators who don't believe this is the most appropriate method to organise and teach pupils, as it can present challenges due to the differences in ages and abilities which can affect learning outcomes.

Within the district 28 of the 46 schools physically located in the area are Academies or Free Schools, and this number is growing all the time as new free schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the Academy Trust would be the decision makers for any proposed expansions.

Irrespective of school governance it is important that the views of schools, Trusts and governing bodies are considered when proposing expansions or new schools, especially where this would require a different class organisation than currently being used. Currently we believe that any options that require a school to organise into mixed age teaching would not be the preferred option by the majority of schools.

A development or a combination of small developments of 750+ dwellings in an area may trigger the need for a new first/primary school and a development of around 5,000 dwellings a new secondary school. A 0.5FE (15 places per year group) expansion to an existing school could be considered for developments of up to 500 dwellings.

Any new first school(s) would need to be at least 1FE (150 places) plus nursery provision and would require land of 7,635m2 to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE First School (150 places + nursery provision) would cost in the region of £5 million pounds (as at Q4-2020). A 2FE First School (300 places + nursery provision) would require land of 12,870m2 to be provided and allocated within the local plan to facilitate this and would cost in the region of £6.9 million pounds (as at Q4-2020).

Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m2 to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £6,045,195 million pounds (as at Q4-2020). A 2FE Primary School (420 places + nursery provision) would require land of 20,430m2 to be provided and allocated within the local plan to facilitate this and would cost in the region of £9.5 million pounds (as at Q4-2020).

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m2 to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £20 million pounds plus (as at Q4-2020).

The costs above are based on estimated new school costs as at Q4 2020. The building cost multiplier and new school costs are due to be updated and it is anticipated that the estimated cost could increase significantly due to current market conditions. This is a **minimum cost to deliver any new school** and will need to be updated as and when any new school is required.

Where new schools are required the sites would need to be of regular shape, level topography, without significant topographical features that would be considered incongruent with the site's use as a school, free from contamination and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as (but not limited to) drainage and vehicular access and will be detailed and discussed when appropriate.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

As noted above we will continue to work alongside SSDC to identify the required mitigation for education infrastructure for proposed local plan housing through continued liaison.

Consideration is also required of the implications of proposed housing developments on school transport. Children in the villages/settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age, or where there is no available walking route to school. Therefore, there would be additional implications in terms of transport costs, logistics and highway constraints around school sites.

Any proposed development where the catchment and nearest schools are in excess of the walking distances noted above, or where there is no available walking route to access schools, may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional transport costs related to new development. However, SSDC should consider whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

In relation to the preferred areas of growth and the housing allocations for other areas we comment as follows:

Proposed Housing Growth – Locality 1

Penkridge Town

Provision for 1,217 dwellings, 88 dwellings through allocation of existing safeguarded land and a further 1,129 dwellings as part of the preferred new housing sites in Penkridge.

Penkridge operates a three-tier education system and contains three first schools, one middle school and one high school; the high school serves Penkridge Centre and the wider rural area.

There are 563 dwellings in Penkridge that have been/are being built out or have planning approval. This has resulted in a 0.5FE (75 places) expansion at Princefield First School which is in the process of being completed and a 0.5FE (60 places) expansion at Penkridge Middle which was completed in September 2020.

To mitigate the proposed new housing further educational infrastructure would be required. The new site has a new 1FE (150 places plus nursery provision) First School allocated. This land would need to be at least 7,635m2; the costs and details on the requirements for the land are detailed above.

Penkridge Middle School and Wolgarston High School would both require up to 1FE of additional school infrastructure to mitigate the impact of the proposed developments (an additional 120 and 90 places respectively).

Southern Edge of Stafford – (A34 corridor)

Provision for 168 dwellings as part of the preferred new housing sites around the southern edge of Stafford along the A34.

For school place planning purposes this site, due to its geographical location fall into Stafford South Primary Cluster and Stafford High School Cluster. Stafford operates a two-tier education system.

The catchment schools are All Saints CE (VA) Primary School (located within the South Staffordshire District boundary) and Walton High School.

Whilst it is expected that the proposed development may be able to be accommodated within the existing school infrastructure at both primary and secondary schools within the local area, further work will need to be undertaken to understand the impact of the combined infrastructure requirements of SSDC's Local Plan and Stafford Borough Council's Local Plan Review

Developer contributions may be required to mitigate the impact of the development.

Huntington

Provision for 83 dwellings, 39 dwellings through allocation of existing safeguarded land and a further 44 dwellings as part of the preferred new housing sites in Huntington.

For school place planning purposes these sites, due to their geographical location fall into Cannock 1 Primary Cluster and Cannock High School Cluster. Cannock operates a two-tier education system. The catchment schools are Littleton Green Primary School (located within South Staffordshire District boundary) and Cannock Chase High School.

It is expected that the proposed developments can be accommodated within the existing primary and secondary school infrastructure in Cannock.

Proposed Housing Growth – Locality 2

Land at Cross Green

Provision for 1,200 dwellings as part of the preferred new housing sites located in Cross Green.

The site at Cross Green has land allocated to provide a new 1FE (210 places plus nursery provision) school at primary phase. This land should be at least 11,415m2 to facilitate this. However, there may be a requirement for additional infrastructure at primary phase due to the total number of proposed dwellings being built (1,200),

which is higher than the 1,000 dwellings which could be accommodated within a new 1FE school. A site should be safeguarded to facilitate delivery of up to a 1.5FE new school (15,923m2) to ensure that the impact of the development can be fully mitigated.

The costs and details for the requirements of the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is expected that this development could be accommodated within existing infrastructure at middle/secondary phase, but further work needs to be completed and additional education infrastructure may still be required.

Transport to secondary education would be required from this site.

Brewood

Provision for 106 dwellings, 63 dwellings through allocation of existing safeguarded land and a further 43 dwellings as part of the preferred new housing sites in Brewood. Brewood operates a three-tier education system and contains one first school, one catholic primary and a middle school which serves the wider rural area. Brewood falls into the catchment area of Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment.

Transport to high school education would be required from these sites.

Coven

Provision for 48 dwellings through allocation of existing safeguarded land in Coven. Coven operates a three-tier education system and contains one first school. For Middle and High provision Coven falls into the catchment areas of Brewood Middle and Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment.

Transport to middle/high school education would be required from this site.

Wheaton Aston

Provision for 54 dwellings, 17 dwellings through re-allocated SAD housing allocations and a further 37 dwellings as part of the preferred new housing sites in Wheaton Aston. Wheaton Aston operates a three-tier education system and

contains one first school. For Middle and High provision Wheaton Aston falls into the catchment areas of Brewood Middle and Wolgarston High.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment

Transport to middle/high school education would be required from this site.

Proposed Housing Growth – Locality 3

Cheslyn Hay/Great Wyrley

Provision for 484 dwellings, 153 dwellings through re-allocated SAD housing allocations, 218 dwellings through allocation of existing safeguarded land and a further 113 dwellings as part of the preferred new housing sites in Cheslyn Hay/Great Wyrley.

Cheslyn Hay/Great Wyrley operates a two-tier education system and contains eight primary schools and two secondary schools.

It is expected that the proposed developments can be accommodated within the existing primary and secondary school infrastructure within the Cheslyn Hay/Great Wyrley high school place planning area.

Northern Edge of the Black Country (Linthouse Lane)

Provision for 1,976 dwellings as part of the preferred new housing sites located in Cross Green of which 1,200 houses would be delivered within this plan period at land north of Linthouse Lane.

The site at Linthouse Lane has land allocated to provide a new 2FE (420 places plus nursery provision) school at primary phase. This land should be at least 20,430m2 to facilitate this. The costs and details for the requirements of the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened e.g. phased opening up to 2FE.

It is expected that the proposed development can be accommodated within the existing secondary school infrastructure within the Cheslyn Hay/Great Wyrley high school cluster.

Transport to secondary education would be required from this site.

Featherstone and Shareshill

Provision for 49 dwellings through allocation of existing safeguarded land in Featherstone. Featherstone operates a two-tier education system and includes two

primary schools and the area falls into the Cheslyn Hay/Great Wyrley High school place planning area.

The proposed development may require additional educational infrastructure at primary phase, but it is expected it can be accommodated with the existing infrastructure at secondary phase.

Transport to secondary education would be required from this site.

Proposed Housing Growth – Locality 4

Codsall/Bilbrook 1279 dwellings

Provision for 1279 dwellings, 29 dwellings through re-allocated SAD housing allocations, 317 dwellings through allocation of existing safeguarded land and a further 933 dwellings as part of the preferred new housing sites in Codsall/Bilbrook. Codsall/Bilbrook operates a three-tier education system and contains three first schools, one catholic primary, two middle schools and one high school.

There are 421 dwellings in Codsall/Bilbrook that have been/are being built out or have planning approval.

The new site has a new 2FE (300 places plus nursery provision) First School allocated. This land would need to be at least 12,870m2, the costs and details on the requirements for the land are detailed above.

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is expected that the proposed developments can be accommodated within the existing middle school infrastructure within Codsall/Bilbrook but Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Perton

Provision for 150 dwellings through allocation of existing safeguarded land in Perton. Perton operates a three-tier education system and contains two first schools, one middle school and falls into the catchment area of Codsall High School.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Codsall High School to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Transport to high school education would be required from this site.

Pattingham – 40 dwellings

Provision for 40 dwellings, 18 dwellings through allocation of existing safeguarded land and a further 22 dwellings as part of the preferred new housing sites in Pattingham. Pattingham operates a three-tier education system contains one first schools, and pupils in Pattingham access Codsall Middle Schools and Codsall High School.

It is expected that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Codsall High School to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham.

Transport to middle/high school education would be required from these sites.

Proposed Housing Growth – Locality 5

Wombourne

Provision for 514 dwellings, 275 dwellings through allocation of existing safeguarded land and a further 239 dwellings as part of the preferred new housing sites in Wombourne. Wombourne operates a two-tier education system and contains four primary schools and one secondary school.

The primary schools and secondary school in the area are reaching capacity and additional infrastructure may be required dependent on the timing of future development in this area. SOT would welcome further discussions with SSDC to discuss future housing trajectory expected in this area.

Western Edge of the Black Country (Langley Road)

Provision for 390 dwellings as part of the preferred new housing site around the southern edge of Stafford along the A34.

The catchment schools are Bhylls Acre Primary School (located within the City of Wolverhampton boundary) and Wombourne High School.

It is expected that the proposed development can be accommodated within the existing primary school based on expected build out rates of the proposed development. Additional infrastructure may be required at secondary school dependent on the timing of future developments in the school catchment. SOT would welcome further discussions with SSDC to discuss future housing trajectory expected in this area.

Transport to secondary school education may be required from this site.

Kinver

Provision for 162 dwellings, 36 dwellings through re-allocated SAD housing allocations, 82 dwellings through allocation of existing safeguarded land and a further 44 dwellings as part of the preferred new housing sites in Kinver. Kinver

operates a two-tier education system contains one infant, one junior school and one secondary school.

It is expected that the proposed development can be accommodated within the existing primary and secondary school infrastructure.

Swindon

Provision for 22 dwellings, 11 dwellings through allocation of existing safeguarded land and a further 11 dwellings as part of the preferred new housing sites in Swindon. Swindon operates a two-tier education system and has one primary school and pupils in Swindon can access secondary education at Wombourne/Kinver High School cluster.

It is expected that the proposed development can be accommodated within the existing primary and secondary school infrastructure.

Transport to secondary school education may be required from this site.

Proposed Housing Growth - other settlements/tier 5 settlements/windfall sites

There are a further 288 sites in rural and tier 5 settlements and 450 windfall sites: a total of 738 dwellings. Dependent on location a total of 111 first school places, 155 primary school places, 89 middle school places, 111 secondary school places, 66 high school places and 22 post 16 places are required.

As the location and numbers are not known at this time, we would assess the required mitigation (if any) on a site-by-site basis in conjunction with any cumulative impact with other proposed Local Plan sites in the same school place planning area.

Aspirations for a new settlement A449/Westcoast mainline (Wolverhampton - Stafford)

Further discussions will need to be held with SSDC and proposed developers to outline the masterplan for the site so it can inform how the schools would be built/opened.

It should be noted that it is unlikely existing secondary education infrastructure can accommodate a large settlement. Careful consideration will therefore need to be given to the impact on secondary education infrastructure, including how any potential new school could be funded, delivered and sustained.

Public Health and Care

The following response has been developed to highlight the Public Health and Wellbeing implications of the local South Staffordshire Preferred Option plan. In addition, we have prepared a 'South Staffs Health Needs Outcomes' document, which is enclosed with this letter. This document should assist in ensuring key health issues are captured and evidenced in the Local Plan.

Theme	Planning issue	Health and wellbeing issue	South Staffordshire Plan Response
Healthy housing	• Housing design •Accessible housing • Healthy living • Housing mix and affordability	•Lack of living space - overcrowding • Unhealthy living environment – daylight, ventilation, noise • Excess deaths due to cold / overheating • Injuries in the home • Mental illness from social isolation and fear of crime	The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable or temporary accommodation. Both affordable and private housing should be designed to this high standard. ***Respo**nse: The proposal highlights a clear requirement and tenure split for affordable housing.*
2. Active travel	• Promoting walking and cycling • Safety • Connectivity • Minimising car use	• Physical inactivity, cardiovascular disease and obesity • Road and traffic injuries • Mental illness from social isolation • Noise and air pollution from traffic	A travel plan can address the environmental and health impacts of development by promoting sustainable transport, including walking and cycling. ***Response:** Although the document does not clearly identify an Active Travel Plan, there is identified opportunities for active travel, such as cycling and walking, being planned effectively to support healthy and active lifestyles amongst all sections of the community.* Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase levels of walking and cycling. Developments should prioritise the access needs of cyclists and pedestrians. Routes should be safe, direct and convenient and barriers

			and gated communities should be avoided. Developments should be accessible by public transport. Space for pedestrians and cyclists should be given priority over commercial and private vehicles. Maximum car parking levels allows for provision to be reduced as far as practicable. Car clubs can be effective in reducing car use and parking demand at new residential developments. ***Response:*** *Opportunities for active travel, such as cycling and walking, are being planned effectively to support healthy and active lifestyles amongst all sections of the community.*
3. Healthy environment	• Construction • Air quality • Noise • Contaminated land • Open space • Play space • Biodiversity • Local food growing • Flood risk • Overheating	•Disturbance and stress caused by construction activity • Poor air quality - lung and heart disease • Disturbance from noisy activities and uses of equipment • Health risks from toxicity of contaminated land • Physical inactivity, cardiovascular disease and obesity • Mental health benefits from access to nature and green space and water • Opportunities for food growing – active	Construction activity can cause disturbance and stress, which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements and pollution. Community engagement before and during construction can help alleviate fears and concerns. The long-term impact of poor air quality has also been linked to life-shortening lung and heart conditions, cancer and diabetes which currently has a rate of 81.1% slightly below the UK rate (86.3%) but above the regional rate (78.0%) Reducing noise pollution helps improve the quality of urban life.

		lifestyles, healthy diet and tackling food poverty • Excess summer deaths due to overheating	Access to open space has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland and other open space can improve physical and mental health regardless of social background. Access to nature and biodiversity contributes to mental health and wellbeing. New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity. ***Response:*** *The plan proposes to create/enhance multifunctional green spaces and the enhancement of the Green Infrastructure Network, however there is no detail that illustrates how this proposal will address physical inactivity, reduce obesity and use the spaces effectively to reduce Mental Health. There is also no detail in the proposal relating to* providing space *for local food growing/allotment space, which also helps promote more active lifestyles, better diets and social benefits.* Regular participation in physical activity among children and young people is vital for healthy growth and development. The location of play spaces should be accessible by walking and cycling routes that are suitable for children to use. South Staffordshire has a higher-than-average prevalence for excess weight in Reception aged school children.

			Response: *The Local Plan proposes to provide opportunities to promote a healthy weight environment supporting a Whole System Approach (WSA) to obesity in South Staffordshire and in addition are working as part of a WSA, when planning forms part of a wider approach to addressing obesity.* Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a significant impact on mental health and wellbeing. It is likely that increasing development densities and building coverage coupled with more frequent extreme weather events will increase urban flood risk. Parts of Southern Staffordshire are at risk from the following sources: fluvial, surface water, groundwater, sewers, reservoir inundation and canal overtopping/breaches. This study has shown that the most significant sources of flood risk in Southern Staffordshire are fluvial and surface water, (Southern Staffordshire ,Councils Level 1 Strategic Flood Risk Assessment Final Report October 2019) **Response:** *The proposal supports radical reductions in greenhouse gas emissions through the community's design, whilst also allowing for changing*

			demographics, future growth, and the impacts of climate change including flooding risk. However, it is not clear what the proposed plan is to reduce the risk of fluvial and surface water. Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people. Urban greening - tree planting, green roofs and walls and soft landscaping can help prevent summer overheating. ***Response:*** *Although the document does not clearly identify how air quality and climate change will be addressed there does appear to be some p*lanning for *the impact of climate change.*
4.Vibrant neighbourhood	• Healthcare services • Education • Access to social infrastructure • Local employment and healthy workplaces • Access to local food shops • Public buildings and spaces	• Access to services and health inequalities • Mental illness and poor self-esteem associated with unemployment and poverty • Limited access to healthy food linked to obesity and related diseases • Poor environment leading to physical inactivity • Ill health exacerbated through isolation, lack of social contact and fear of crime	Poor access and quality of healthcare services exacerbates ill health, making effective treatment more difficult. The provision of support services and advice on healthy living can prevent ill health. Access to a range of primary, secondary, and post-19 education improves self-esteem, job opportunities and earning capacity. In South Staffordshire, based on school location, for KS4 English & Maths Grades 9-5 (2019), South Staffordshire did not perform significantly above national and is

			statistically lower than the national average (37%). Good access to local services is a key element of a lifetime neighbourhood and additional services will be required to support new development. Not doing so will place pressure on existing services. ***Response:*** *Since lower educational attainment is linked to areas facing multiple socio-economic inequalities and includes South Staffordshire. It is good to see that the Local Plan Preferred Options document acknowledges some of the key health inequalities such as access to a good range of health services. However, at point "3.2 The strategic policies for an area should include policies and site allocations to address key issues" does not identify 'Health and Wellbeing/Preventative Health measures' as key issues to considered or addressed, as we know that the environment, we live in has a huge impact on our health. Further the evidence base detailed in "Promoting successful and sustainable communities" does not consider this either, particularly as 20.8% of 16+ have a limiting long-term illness (which is above England rate) and 49.4% of 65+ also have limiting long-term illness (above the England rate) that are primarily preventable and could be improved by addressing some of the most significant wider determinants*

			of health – those of the built and natural environment. The following evidence could have been considered – • *Marmot has recently reported on inequalities, and the environment was cited as a key determinant of health and wellbeing. (8) Marmot M. et al. Health equity in England: The Marmot Review 10 years on. London: Institute of Health Equity, 2020.) The report stated that the evidence of the relationships between health and the environment has grown and that the role the environment plays in influencing health is now better understood. Important areas that were covered included: air quality, transport, and housing.* • *Spatial planning for health: evidence review* Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses. Creating healthier workplaces can reduce ill health and employee sickness absence. ***Response:*** No evidence seen of how this will be addressed, these issues evident in the proposed plan. Data from NOMIS official Labour Market Profile shows that although the unemployment rate in South Staffordshire of 4.6% is below the West Midlands rate

			of 5.4% and UK rate of 5.0%. There should be some consideration given to the impact of unemployment as in some neighbourhoods a link can be drawn between the overlap of the spatial patterns of unemployment with the spatial distribution of social housing and socioeconomic problems (The Patterns of Unemployment and the Geography of Social Housing) The public realm has an important role to play in promoting walking and cycling, activity and social interaction. It also affects people's sense of place, security and belonging. It is a key component of a lifetime neighbourhood. Shelter, landscaping, street lighting and seating can make spaces attractive and inviting. Implementing inclusive design principles effectively creates an accessible environment, in particular for disabled and older people. ***Response:*** *The Local Plan Preferred Options document acknowledges inequalities in attainment levels within the district. However, other key health inequalities such as race inequality in housing and disadvantaged communities, are more likely to have less access to good quality open space, easy walking and cycling routes, well located services and good housing mix and design. They are also more likely to experience environmental burdens such as pollution, crime and social isolation which are not clearly addressed.*

Staffordshire County Council's Children and Families, Health and Wellbeing Team work closely with partners to drive forward improvements in health outcomes for children, young people and families across Staffordshire.

The County Council's Children and Families Health and Wellbeing Team have three priorities that focus our work: obesity, infant mortality, and mental health.

These priorities are shared within the Staffordshire Health and Wellbeing Board's Staffordshire Health & Wellbeing Strategy 2018-2023.

These priorities are also included in the Staffordshire Families Strategic Partnership – Staffordshire's Children, Young People and Families Strategy 2018-2028. Under the high-level priority 'Happy and Healthy' – *'improve children and families' mental health and emotional wellbeing'* and *'encourage communities to be more active and live healthier lifestyles'* and included. Under the high-level priority 'Safe and Belong' – *'Reduce infant and child mortality rates'* is included.

Appendix 1 contains an evidence base around the key priorities of the County Council's Children & Families, Health & Wellbeing Team (obesity, infant mortality, and mental health).

The County Council and partners have recently commenced work to establish and implement a whole systems approach (WSA) to address obesity and promote a healthy weight, called 'Better Health Staffordshire'. Obesity is a complex problem with multiple causes and significant implications for health and beyond. Tackling such an ingrained problem requires a long-term, system-wide approach that makes obesity everybody's business, tailored to local needs and works across the life course.

The use of the planning system to promote health and reduce inequalities is well established[1]. The Local Plan provides opportunities to promote a healthy weight environment supporting the WSA to obesity in South Staffordshire and Staffordshire. The Local Plan provides opportunity to demonstrate how South Staffordshire District Council, along with the County Council, are working as part of a whole system approach, where planning forms part of a wider approach to addressing obesity.

The Local Plan 'Preferred Options' document includes eight Strategic Objectives, all of which have some relevance to the health and wellbeing of the community.

Policies

In relation to the policies within the Plan the County Council welcomes the inclusion of Policy HC13 – Health and Wellbeing. This policy should provide the mechanism to address and promote health and wellbeing needs and support healthy communities. It is noted that the precise wording of the Policy is not included in the Preferred Options Plan just a direction of travel. We would be happy to assist in reviewing any draft

[1] Using the planning system to promote healthy weight environments (publishing.service.gov.uk)

wording ahead of the Publication Plan to ensure Health and Well-Being aspects are well considered.

The requirement for Design and Access Statements for large development (over 150+ dwellings) to demonstrate how specific measure have been designed to have a positive impact on the health and wellbeing of residents is welcome and supported.

The inclusion of a policy hook for a health and wellbeing Supplementary Planning Document (SPD) to provide further detailed guidance on how health and wellbeing benefits will be delivered through specific design interventions in also welcome and to be encouraged. We would be willing to support you in the production of the SPD.

The County Council appreciates the inclusion of Policy DS4 – Longer Term Growth Aspirations for a New Settlement. This sets the parameters for what a new settlement to be delivered would need to incorporate. The inclusion of 'green infrastructure and health' within this framework, where the settlement should be designed to provide choices and changes for all to live a healthy life, offers further opportunity to improve the health and wellbeing needs and opportunities for healthy lifestyles for residents.

Adult Social Care

It is acknowledged that the Plan identifies at Page 18 that meeting the housing needs of the ageing population is an issue to consider. It is also recognised in the same section that it is identified that the Local Plan will need to support the provision of specialist housing requirements of other groups, such as those with disabilities.

Policy HC4 - Homes for Older People sets out the requirements for new development to meet the needs of an ageing population and is supported. It is noted that the examples of general needs properties refer to single floor accommodation. There may be other options that facilitate two-storey accommodation such as through ceiling lifts, well designed stairs with stair lifts. The Plan should also make reference to housing for Older People also needing to be aspirational to encourage older persons to move from existing stock to new housing. Consideration of design and quality also needs to be a factor as well as numbers of units.

Policy HC5 - Specialist Housing Schemes provides support for proposals for specialist housing of all tenures. However, the examples listed in the plan lean towards specialist accommodation for older person e.g. extracare. Whilst this is needed and supported Policy HC5 doesn't appear to address providing for the wider population needs for people with disabilities across all age groups as identified on page 18. In preparing the detailed wording for Policy HC5 it is suggested that consideration in given to the following key Government documents published in late July 2021, which have a bearing on local planning across the full spectrum of disabilities:

- National Disability Strategy - GOV.UK (www.gov.uk) – addressing key barriers faced by disabled people including transport, housing and access to buildings and places.
- National strategy for autistic children, young people and adults: 2021 to 2026 - GOV.UK (www.gov.uk) – Stipulating commitments with regard to supported housing built by the new affordable homes programme

- Supported housing: national statement of expectations - GOV.UK (www.gov.uk) - Please also be aware of the following recent publication in relation to Supported Housing provision which covers supported housing provision for all needs:

The National Disability Strategy potentially provides advice and guidance that could be applied wider than Policy HC5 in terms of master planning, site layouts and design.

We may be able to assist later in the Plan period with local data but for now, a good source of data: Projecting Adult Needs and Service Information System (pansi.org.uk). There is also a link to Poppi data from this which covers the needs of older people and produces forward projections. This will cover a range of disabilities and needs and it generates data by district.

Ecology

In relation to Q1 the evidence base for the natural environment is appropriate.

Several allocations adjoin designated Biodiversity Alert Sites (BAS) and these will need to ensure the BAS's are buffered / protected and ideally enhanced.
The allocations sites are:

- Adjacent to Merry Hill, Wolverhampton
- Large site to east of Codsall / Bilbrook
- Small site to west of Codsall Station
- Site to west of Brewood

In addition the following site will need to consider onsite habitats:

- Adjacent to Merry Hill, Wolverhampton (onsite ponds and scrub / woodland)

Landscape

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

Generally, the policy approach should protect and enhance the Green Belt and Open Countryside. In addition, the policy could consider compensation or carbon offsetting of new development by well-designed tree and woodland planting in the green belt and open countryside where it fits the local landscape character guidelines.

Some areas along the urban conurbation edges could make a significant contribution to the identity of the adjacent settlement edge. New, well planned landscape features could provide valuable boundary features separating urban areas from the surrounding countryside, such as strong woodland belts. The Spatial Strategy could include an innovative Green Infrastructure policy which could be considered hand in hand with site selection options on a strategic level. Such a policy could take an overarching view on climate change, habitat loss and replacement over the whole District. The precedents for this multifunctional approach include the Forest of Mercia and National Forest. Large scale woodland creation could also be seen in the context of the wealth of historic designed parklands throughout South Staffordshire.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

The 5-tier classification for settlements is appropriate and it appears to achieve the necessary growth in housing and employment needs for the District.

Although it is mentioned in the report, the impact of the planned M6-M54 link road on the District infrastructure and settlements does not seem to have been considered. Additional landscape enhancement of the existing District highway infrastructure could offset the impact of the additional road travel as a result of expanding the Tier 1 and 2 settlements in particular.

The District is unusual in that whilst 80% of the area is in Green Belt and 14% is open countryside; there are significant historic major rural highways such as the A5, A34, A41, A449, A454, A458 and modern motorways including the M6, M54, and the M6Toll. All these roads will experience increased traffic throughout the plan period, and a strategic plan to enhance the setting of the roads by means of tree and woodland planting would help to integrate new development into the changing landscape. Where practical, the new landscape features should be multifunctional and should incorporate measures for active travel such as segregated cycleways, longer distance walking routes, new recreational opportunities, and linked ecological corridors.

The proposed radical changes to farming policies and the effects of the Environment Bill could also be considered in the Preferred Options. The farmed landscape is likely to undergo significant changes during the plan period, and the plan should embrace the change which should benefit both residents and the farming population, as well as the wider environment.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

The Criteria for the siting and design of a new settlement adjacent to the A449 and West Coast Main line are aspirational at this stage it will be necessary to ensure that the settlement fits into the local landscape character in the way that most other settlements in the district have evolved over hundreds of years.

Historic Environment

In general the approach taken with regards to archaeology and the historic environment is supported.

Q1 Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes - the evidence based with regards to archaeology and the historic environment, which comprises the existing South Staffordshire Historic Environment Assessment and a Stage 1 Historic Environment Site Assessment (HESA) is considered to be a robust and sufficient evidence base at this stage. The methodology of the HESA, which has been underpinned by a search of the Staffordshire Historic Environment Record (HER), has been developed in consultation with Historic England and the Staffordshire County Council Historic Environment Team, and is sufficiently detailed, and the HESA appears to be mostly (see Q8 below) accurate and well-considered.

Staffordshire County Council

Q3 a) Have the correct vision and strategic objectives been identified? Yes- Strategic Objective 13, which relates to 'Enhancing the Historic Environment' is supported and it is welcomed that specific mention is made of the district's canal network
3b) - Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? AND Q11 Do you agree with the proposed policy approaches set out in Chapter 6?
Yes - The policy directions outlined in Chapter 6 (in particular NB9 and NB10) appear to be sufficiently comprehensive to sustainably deliver these objectives.

Q8 Do you support the proposed housing allocations in Policy SA5? The HESA (and subsequent updates) has done a very useful job in assessing the potential historic environment/archaeological issues for each application. However, it must be noted here that subsequent to the production of the HESA, the Staffordshire Historic Environment Record (HER) has been made aware of a potential Second World War gun battery within part of Site 582 'West of Wolverhampton'. The evidence that has been provided is compelling and it is strongly recommended that the Stage 2 HESA for this site is enhanced to also include an assessment of the significance of this site, preferably with the input of a relevant specialist in this field, and in line with the guidance provided in Historic England's Military Structures Listing Selection Guide (Historic England 2017).

Public Rights of Way

The plan acknowledges that there are *Challenges around increasing cycle and footpath provision for leisure or commuting, including connecting to established routes* (p. 21). Ultimately sustainable travel should be a key element of the plan when looking at sites and should form a primary consideration of decision making when looking at sites and how access to and from them can be improved. There needs to be an aspiration to improve accessibility on the walking and cycling networks (including towpath links) throughout the District.

It is essential that the plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes that are developed to promote this.

The Plan Policies should recognise that any development needs to take appropriate mitigation to ensure the public path network is protected. In addition it should be recognised that there are likely to be many non-definitive routes across proposed development sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Where development is likely to affect the path network, either directly or indirectly, then section 106 funding and/or appropriate planning conditions improve the path network should be considered and provided for by Plan Policy. Where such instances occur developers should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council’s Rights of Way Improvement Plan.

This could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture

Flooding and Drainage

We have provided technical commentary on the sites being considered for allocation during the selection process so will not repeat those comments here.

Policy NB7 - Managing flood risk, sustainable drainage systems & water quality is supported and recognises the previous engagement with SCC in its role as Lead Local Flood Authority. We acknowledge reference in the Plan to the SCC SUDS Handbook in relation to drainage design. We'd like to ensure that this follows through into the final Policy wording to ensure that the SUDS Handbook is a material consideration in Planning decision making to ensure SUDS design, delivery and maintenance is properly addressed in new development.

In addition it would be useful if the supporting text could advise developer that SCC offer a Pre-App advice service and we encourage this practice to be used and has proven extremely useful in recent developments.

Digital Connectivity

It is noted that improving access to suitable broadband and digital communication networks is listed as an Issue/challenge fort the Plan. However, thereafter there is no mention of broadband or digital network in the Plan Polices.

Staffordshire County Council, and all the district councils have collaborated for the last eight years in ensuring Staffordshire reaches a high level of superfast broadband coverage. This has enabled 97% of premises to date, to be able to access this increasingly vital service.

Over that period we have seen Local Plans and Neighbourhood Plans with various different policy approaches to ensure new development delivered Superfast Broadband connectivity from the outset. However, during that time we have seen examples of development being built out without digital infrastructure being provided as part of construction and frustrated occupiers not being able to connect to a service. Where such instances occur, the problem is exacerbated by section 58 of the New Roads and Street Works Act 1991. This protects a street from any new excavations following any major surfacing works and can be in place for up to five. So, for newly adopted roads the restriction is in place from the outset meaning broadband providers cannot come in and lay cabling unless they are prepared to undertake full-width reinstatement of the footway, which is cost prohibitive. Hence the importance of installing digital connectivity infrastructure during build out.

Technology does not stand still. As internet applications expand in scale and volume, internet traffic is doubling every two years, meaning that the current limitations of digital connectivity will cease to be fit for purpose within the next ten years i.e. we need to move on from Superfast Broadband. Government is now talking about 'Gigabit Broadband' through the Industrial Strategy. This is delivered by gigabit-capable connections that can provide speeds of over 1000 megabits per second (Mbps). Gigabit-capable connections are often, but not always, delivered by full fibre connections and can also be delivered via technologies such as cable (DOCSIS 3.1) and fixed wireless access. Government approach is technology neutral and does not prescribe the type of technology that must be used, provided that it can provide speeds of over 1000 Mbps. However, for most instances full fibre will be the preferred means of delivery.

Government is clear that the provision of gigabit-capable connectivity to new build developments is crucial. A consultation in 2018 proposed to change building regulations to legislate for all new builds to have gigabit connectivity. However, subsequently the Government has secured commitments from network operators, outlining their commitment to work with housing developers on providing gigabit-capable connections to all new build developments across the UK. Although the exact mix of commercial delivery and publicly subsidised coverage is yet to be defined, results from an Open Market Review (OMR) from DCMS are expected by end of 2021, a common requirement will be facilitating (red carpet approach) wherever possible and practical, the means of operational delivery.

Given the uncertainty over where and when Government may head with Legislative changes what we'd like to work with you and agree suitable Policy drafting to ensure development is catered for by gigabit-capable connectivity. We can also provide signposting to Government and supplier guidance that could feature in the supporting text.

Climate Change

As noted earlier it is acknowledged that climate change is a key theme running through the Plan and is incorporated into a number of policies.

In relation to Policy NB5 - Renewable and low carbon energy generation. It is noted support is given for renewable energy schemes, such as wind and solar. Bullet point 3 provides for general support for on-shore wind and proposes removal of the areas of search set out in the core strategy. Given National Policy for on-shore wind implying sites need to be allocated in a Local Plan to be considered, is it the intention of Policy NB5 that whole of the District is to be considered potentially suitable for wind farm development subject to a criteria based assessment?

It is recognised that Policy NB5 confirms that renewable energy schemes in the green belt may be justified, where very special circumstances can be demonstrated. Given the extent of the Green Belt in the District and the limited location of connection points to the electricity grid will the Plan provide further guidance and/or clarity on what may constitute very special circumstances for Renewable Energy Development?

Staffordshire County Council

Yours sincerely

James Chadwick

Digitally signed by James Chadwick
Date: 2021.12.13 10:01:02 Z

James Chadwick
Principal Planning Policy Officer

Enclosures:

- Walking & Cycling Proposals (x 11)
- Accessibility Plans (x 7)
- APPENDIX 1 - Evidence Base: Children and Families Health and Wellbeing, Staffordshire County Council
- South Staffs Health Needs Outcomes Nov21

CITY OF WOLVERHAMPTON COUNCIL

13 December 2021

Strategic Planning Team
South Staffordshire Council
Council Offices
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Planning Team,

South Staffordshire Local Plan Review – Preferred Options Consultation

Thank you for the opportunity to comment on the South Staffordshire Local Plan (SSLP) Review Spatial Preferred Options Consultation. Please accept this letter as the final response of the City of Wolverhampton Council (CWC), following approval by Cabinet on 8 December 2021.

The following principles underpin our response, with more detailed comments provided in italics:

Duty to Cooperate and Statements of Common Ground

a) Acknowledgment that the Black Country authorities (BCA) and South Staffordshire District Council (SSDC) have been working together constructively on planning issues of mutual interest and that this is expected to continue with a focus on the phasing of new development and to ensure that the infrastructure required to address the impacts of development proposals is provided for;

b) Expectation that, as the Black Country Plan (BCP) and SSLP both move towards Publication in summer 2022, the BCA and SSDC will aim to reach agreement on all relevant cross-boundary issues and reflect this agreement in draft Statements of Common Ground (SoCG) to support each Plan;

c) Support for the preferred housing growth option of local housing need plus 4,000 homes to meet Greater Birmingham and Black Country Housing Market Area (HMA) need up to 2038;

d) Given detailed evidence provided by the Draft BCP that the Black Country has a very significant housing shortfall up to 2039, and the close geographical, migration and commuting links between the Black Country and South Staffordshire, request that the full 4,000 homes should be specifically allocated to meet Black Country housing needs;

It is welcome that SSDC continue to be committed to offering 4,000 homes to meet the shortfall in the wider HMA. Given the proximity of the Black Country to South Staffordshire, strong migration and commuting links, the location of a number of proposed growth sites close to the urban edge of the Black Country, and the fact that a large part of the HMA unmet need arises in the Black Country it is reasonable to claim all of the 4,000 homes being offered by SSDC towards meeting Black Country housing needs. The Preferred Options proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. This would represent a crucial contribution towards the estimated Black Country shortfall of 28,239 homes up to 2039, which is now clearly demonstrated through the Draft BCP and supporting evidence. We request that this allocation is clearly referenced in the Publication Plan.

e) Support the longer term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

f) Request that the South Staffordshire Housing and Employment Development Needs Assessment (HEDNA) is completed as soon as possible, with due regard to the Black Country EDNA (2021), the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study (WMSESS), and shared with the BCA as soon as possible to determine how far the SSLP will be able to contribute towards significant unmet employment land needs in the Black Country.

The SSLP has the potential to make a significant contribution towards addressing the large shortfall of 210 ha employment land evidenced by the Draft BCP and supporting 2021 EDNA. Therefore, it is of concern that no specific contribution can be offered because the employment land needs of South Staffordshire have not yet been established through the updated EDNA. This crucial piece of evidence must be completed as soon as possible, so that the figures generated can be used to inform the Publication BCP, SSLP and supporting Statements of Common Ground between the Black Country Authorities and SSDC.

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs including the Black Country. We request that this work is progressed as quickly as possible and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below.

Site allocations and cross-boundary infrastructure

g) Noting the scale and location of the proposed extensions to the Wolverhampton urban area and to commit to require further work on infrastructure requirements and assurances that close joint working on all relevant planning issues will continue throughout the Plan preparation process, SPD preparation, pre-application and planning application processes;

The proposed allocations adjoining Wolverhampton raise cross-boundary infrastructure issues, particularly given the location of Draft BCP housing allocation in the north east of the City which will also impact on local infrastructure. If infrastructure impacts are not fully assessed and mitigated through the contributions of developers and infrastructure providers these developments could have negative impacts on Wolverhampton infrastructure, including transport, public open space, education and health services. The developments could also have negative impacts on the environmental quality and amenity of immediately adjoining residential areas if not properly planned. Therefore, each development, including Langley Road, needs to be carefully masterplanned, based on sufficient detailed evidence, and it is vital that close joint working between SSDC and CWC continues on all relevant issues throughout the Plan preparation, SPD preparation and planning application processes.

h) Request that a SPD and Infrastructure Delivery Strategy is also prepared for the Langley Road site;

The proposed SPDs and Infrastructure Delivery Strategies for the Linthouse Lane and Cross Green sites are supported, however it is crucial that key planning issues for the Langley Road site are subject to the same level of discussion and agreement with CWC through preparation of an SPD and Infrastructure Delivery Strategy, to ensure that the design and infrastructure requirements for this significant development on the edge of the Wolverhampton area are fully explored and formally established before submission of a planning application.

i) Request that the affordable housing secured on sites proposed in the Plan within the Wolverhampton locality are allocated through nomination rights for Wolverhampton residents, and that this requirement is set out in the Publication Plan;

The Preferred Options proposes some significant allocations near the edge of Wolverhampton, totalling 3,566 homes. Policy DS3 states that these should be considered extensions to the Black Country to assist in meeting HMA needs – strengthening the case that these homes will meet Black Country needs rather than Birmingham needs. There is therefore a strong case for Wolverhampton residents to secure nomination rights for the 30% affordable housing proposed on these sites.

j) Request that the combined impact of SSLP and BCP developments on the wider transport network is assessed, that development links effectively to the strategic transport network and avoids excessive pressure on sensitive transport links, that effective sustainable transport solutions are provided to connect essential trips to the local network, and that developments seek to minimise trip generation through all available mechanisms;

In terms of transport infrastructure implications, close engagement will need to continue with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g. growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the

implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

k) Support for the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP;

The Cross Green mixed use development will help meet the employment land needs of the Black Country in a location close to significant employment opportunities at the i54 and ROF Featherstone strategic employment sites. The development will help deliver the ROF Featherstone strategic employment site and Brinsford Strategic Park and Ride site which will increase access to the rail network, and also addresses the HMA Strategic Growth Study recommendation for a strategic housing site in this locality.

l) Support for developing a Statement of Common Ground establishing the principle of self-containment regarding primary and secondary school places for both the SSLP and the BCP, however request further detail on how secondary school places arising from Linthouse Lane and Cross Green would be accommodated;

The Draft BCP identifies where, taking into account any planned provision, it is likely that a new school will need to be provided to meet local needs, and therefore land should be set aside to accommodate this. In Wolverhampton, land in Council ownership has been set aside for a two form entry primary school in the Bushbury area to meet the potential needs arising from housing developments in the north east of the City. Wolverhampton Local Education Authority (LEA) has advised that other primary and secondary school place needs arising from the Draft BCP can be accommodated within existing school capacity or extensions to existing schools, which will be funded by developer contributions, where this is financially viable.

SSDC currently operate a developer contribution system for school places needs arising from development. The Preferred Options document and IDP set out the expectation that there will not be a reliance on Wolverhampton schools to accommodate South Staffordshire pupils arising from new development, and vice versa, and that this will be set out in a Statement of Common Ground. Although sites are proposed for new primary schools at Linthouse Lane and Cross Green, there are no specific proposals to address secondary school place needs arising from these developments. The IDP states that developments of 5000 homes may generate the need for a new secondary school.

Bhylls Acre Primary is located in Wolverhampton, adjoining the Langley Road site. Although the school is under the jurisdiction of SSDC most pupils are Wolverhampton residents. Langley Road would also be in the catchment area for South Staffordshire secondary

schools. The Langley Road development would impact on the South Staffordshire area initially due to pupil demographics and South Staffordshire operating catchment areas. If the Published Admission Number at Bhylls Acre remained at 30 per year group, the delivery and phasing of the development would likely mean that new SSDC resident pupils could displace Wolverhampton resident pupils over time. However, the Wolverhampton Wards that are closest to the border show that cohorts entering reception up to academic year 2024-25 are anticipated to decrease based on birth rates. Therefore, any push back over time from the Langley Road development, for both primary and secondary phases, is expected to be capable of being catered for in existing provision within Wolverhampton, without the need for new schools or school extensions.

In conclusion, although it is welcome that SSDC are committed to meeting primary and secondary school place needs arising from Preferred Options development within South Staffordshire, and to establishing agreement on this with CWC through a SoCG, further details are required on how the secondary school places arising from Linthouse Lane and Cross Green would be accommodated. These details should be set out in the IDP and established, as far as possible, in the SoCG.

m) Request that land is set aside at Linthouse Lane and/or Cross Green sufficient to accommodate GP consulting rooms to serve all residents, in line with the principle of self-containment for urban extensions;

n) Request that SSDC develop a developer contribution system which will secure sufficient funds from major housing development to deliver GP consulting rooms in a timely manner, so that there are no negative impacts on Wolverhampton GP service provision;

o) Request that the SSLP makes clear that the Langley Road development will be required to make sufficient contributions to deliver an extra GP consulting room in south west Wolverhampton.

The Preferred Options document states that ensuring sufficient access to GP / health centres to accommodate residents from new developments will be a key challenge. The IDP states that access to GP provision has been identified as a local infrastructure concern. SSLP is considering requiring developer contributions towards health infrastructure such as GP / health centres, in a similar manner to the Draft BCP, and the NHS Estates team is due to provide estimates of site specific requirements and costs by the end of 2021. However, both the Linthouse Lane and Cross Green developments would generate a large number of additional patients and it is understood that there is no potential to extend local surgeries to accommodate this increase.

The part of South Staffordshire adjoining Wolverhampton is served by the South Staffordshire Clinical Commissioning Groups (CCGs) and Wolverhampton is served by the Black Country and West Birmingham (BCWB) CCG. Therefore, any cross-boundary solutions would require coordination of service improvements between adjoining CCGs. The BCWB CCG have advised CWC that the potential impact of Draft BCP housing sites on GP provision, which are concentrated in the north east of the City, can be mitigated through planned and potential service improvements which would be part-funded through developer contributions. However, it is not certain that these improvements could also absorb additional demand arising from Linthouse Lane and Cross Green. This is particularly a concern given the lack of available sites and expansion land for surgeries in the constrained urban area of Wolverhampton. BCWB CCG currently consider that the number of new patients generated

by the smaller Langley Road development could be accommodated through the addition of an extra consulting room at an existing local surgery in south west Wolverhampton.

Therefore, to avoid the potential for negative impacts on GP service provision in Wolverhampton, and in line with the principle of "self-containment" for urban extensions, it is crucial that land is set aside at the Linthouse Lane site and/or the Cross Green site sufficient to accommodate consulting rooms to serve all residents (including homes estimated for delivery post-2038). If this land is ultimately not required, due to service changes or availability of other sites for GP provision, it could be released for other uses. However, it is important that these developments are designed so that they are capable of delivering GP provision on site, if this is the only solution available at the time a planning application is submitted.

It is also essential that SSDC develop a developer contribution system which will secure sufficient funds from major housing developments to deliver consulting rooms in a timely manner which avoids impacts on Wolverhampton GP service provision. Finally, the SSLP needs to make clear that the Langley Road development will be required to make sufficient contributions to deliver an extra consulting room in south west Wolverhampton, through close consultation with BCWB CCG.

p) Request that green infrastructure proposals for developments on the edge of Wolverhampton are integrated with existing and potential networks in Wolverhampton.

As a supplement to the response provided above, detailed responses to specific consultation questions are attached as an appendix to this letter.

We look forward to working closely with South Staffordshire Council throughout the Local Plan Review process, through progressing joint evidence and the parallel review of the Black Country Plan.

Yours sincerely



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Lead Planning Manager (Sub-Regional Strategy)

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Appendix

City of Wolverhampton Council
Response to South Staffordshire Local Plan Review
Preferred Options Consultation Questions

Chapter 3

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

No

We welcome the reference in para 4.58 of the Plan to the need to update the 2018 EDNA in the light of Brexit and Covid-19. This will provide a more up to date position on the extent of the scale of the anticipated surplus of existing committed / allocated employment land against local needs, and what proportion of this may be available to meet wider needs, including those arising in the Black Country. **We request that this work is progressed as quickly as possible** and welcome any opportunity to engage in this work through the Duty to Cooperate.

In terms of other evidence, we request that the EDNA update has regard to the West Midlands Interchange Apportionment Study and West Midlands Strategic Employment Sites Study, both published in 2021 and discussed in more detail below (under Question 3).

Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

No

See answer provided to (b) below.

However, we support the continued promotion of the existing Brinsford Strategic Park and Ride site allocation in the Preferred Options and request that this project and other supporting infrastructure which increases access to the rail network should be fully promoted in the SSLP

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

Yes

Transport Infrastructure

In terms of transport infrastructure implications, close engagement will need to continue with Staffordshire County Council. As a gateway to the West Midlands, it is critical that the impact on the transport network of trip generation is assessed not just in the immediate vicinity of development but also in the corridors giving access into the urban area. Developments should minimise trip generation, through local provision of services, high-quality multi-modal connectivity and maximising opportunities arising from future transport developments e.g.

growth in electric vehicle usage. Good access to the rail network and provision of supporting infrastructure such as sufficient park and ride capacity are essential. Any impact of the implementation of HS2 should be taken into account and high quality pedestrian and cycling infrastructure should be incorporated for local journeys and first / last mile links.

Development should link effectively to the strategic transport network, in particular high-capacity corridors such as the A449 and the proposed M6 link road, avoiding excessive pressure on sensitive transport links such as the A454, the urban A460 and non-strategic routes. Where transport link improvements are required to mitigate trip generation impacts, appropriate funding mechanisms should be secured. Co-ordinated transport modelling exercises are currently underway for the SSLP and BCP. Initial indications are that potential impacts on the Wolverhampton highways network can be mitigated through a viable and deliverable package of developer funded improvements.

Education Infrastructure

The Draft BCP identifies where, taking into account any planned provision, it is likely that a new school will need to be provided to meet local needs, and therefore land should be set aside to accommodate this. In Wolverhampton, land in Council ownership has been set aside for a two form entry primary school in the Bushbury area to meet the potential needs arising from housing developments in the north east of the City. Wolverhampton Local Education Authority (LEA) has advised that other primary and secondary school place needs arising from the Draft BCP can be accommodated within existing school capacity or extensions to existing schools, which will be funded by developer contributions, where this is financially viable.

SSDC currently operate a developer contribution system for school places needs arising from development. The Preferred Options document and IDP set out the expectation that there will not be a reliance on Wolverhampton schools to accommodate South Staffordshire pupils arising from new development, and vice versa, and that this will be set out in a Statement of Common Ground. Although sites are proposed for new primary schools at Linthouse Lane and Cross Green, there are no specific proposals to address secondary school place needs arising from these developments. The IDP states that developments of 5000 homes may generate the need for a new secondary school.

Bhylls Acre Primary is located in Wolverhampton, adjoining the Langley Road site. Although the school is under the jurisdiction of SSDC most pupils are Wolverhampton residents. Langley Road would also be in the catchment area for South Staffordshire secondary schools. The Langley Road development would impact on the South Staffordshire area initially due to pupil demographics and South Staffordshire operating catchment areas. If the Published Admission Number at Bhylls Acre remained at 30 per year group, the delivery and phasing of the development would likely mean that new SSDC resident pupils could displace Wolverhampton resident pupils over time. However, the Wolverhampton Wards that are closest to the border show that cohorts entering reception up to academic year 2024-25 are anticipated to decrease based on birth rates. Therefore, any push back over time from the Langley Road development, for both primary and secondary phases, is expected to be capable of being catered for in existing provision within Wolverhampton, without the need for new schools or school extensions.

In conclusion, although it is welcome that SSDC are committed to meeting primary and secondary school place needs arising from Preferred Options development within South

Staffordshire, and to establishing agreement on this with CWC through a SoCG, further details are required on how the secondary school places arising from Linthouse Lane and Cross Green would be accommodated. These details should be set out in the IDP and established, as far as possible, in the SoCG.

Health Infrastructure

The Preferred Options document states that ensuring sufficient access to GP / health centres to accommodate residents from new developments will be a key challenge. The IDP states that access to GP provision has been identified as a local infrastructure concern. SSLP is considering requiring developer contributions towards health infrastructure such as GP / health centres, in a similar manner to the Draft BCP, and the NHS Estates team is due to provide estimates of site specific requirements and costs by the end of 2021. However, both the Linthouse Lane and Cross Green developments would generate a large number of additional patients and it is understood that there is no potential to extend local surgeries to accommodate this increase.

The part of South Staffordshire adjoining Wolverhampton is served by the South Staffordshire Clinical Commissioning Groups (CCGs) and Wolverhampton is served by the Black Country and West Birmingham (BCWB) CCG. Therefore, any cross-boundary solutions would require coordination of service improvements between adjoining CCGs. The BCWB CCG have advised CWC that the potential impact of Draft BCP housing sites on GP provision, which are concentrated in the north east of the City, can be mitigated through planned and potential service improvements which would be part-funded through developer contributions. However, it is not certain that these improvements could also absorb additional demand arising from Linthouse Lane and Cross Green. This is particularly a concern given the lack of available sites and expansion land for surgeries in the constrained urban area of Wolverhampton. BCWB CCG currently consider that the number of new patients generated by the smaller Langley Road development could be accommodated through the addition of an extra consulting room at an existing local surgery in south west Wolverhampton.

Therefore, to avoid the potential for negative impacts on GP service provision in Wolverhampton, and in line with the principle of “self-containment” for urban extensions, it is crucial that land is set aside at the Linthouse Lane site and/or the Cross Green site sufficient to accommodate consulting rooms to serve all residents (including homes estimated for delivery post-2038). If this land is ultimately not required, due to service changes or availability of other sites for GP provision, it could be released for other uses. However, it is important that these developments are designed so that they are capable of delivering GP provision on site, if this is the only solution available at the time a planning application is submitted.

It is also essential that SSDC develop a developer contribution system which will secure sufficient funds from major housing developments to deliver consulting rooms in a timely manner which avoids impacts on Wolverhampton GP service provision. Finally, the SSLP needs to make clear that the Langley Road development will be required to make sufficient contributions to deliver an extra consulting room in south west Wolverhampton, through close consultation with BCWB CCG.

In conclusion:

- Land should be set aside at Linthouse Lane and/or Cross Green sufficient to accommodate GP consulting rooms to serve all residents, in line with the principle of self-containment for urban extensions;

- SSDC should develop a developer contribution system which will secure sufficient funds from major housing development to deliver GP consulting rooms in a timely manner, so that there are no negative impacts on Wolverhampton GP service provision;

- The SSLP should make clear that the Langley Road development will be required to make sufficient contributions to deliver an extra GP consulting room in south west Wolverhampton.

Green Infrastructure

Green infrastructure proposals for developments on the edge of Wolverhampton should be integrated with existing and potential networks in Wolverhampton and reflect existing local open space deficiencies and improvement priorities in the relevant parts of Wolverhampton. This should be reflected in SPDs / Masterplans and Infrastructure Delivery Strategies.

Question 3: a) Have the correct vision and strategic objectives been identified?

No

We welcome the references in table 4 of the document to the need for the Plan to 'support the economies of adjoining areas and pressure to release land to meet a proportion of their unmet needs'. We also note the acknowledgement that the Black Country in particular has a significant unmet need for employment in the Local Plan period, and the need for the Plan to consider South Staffordshire's role in meeting any cross-boundary needs. This thinking is based on evidence in the form of the 2018 South Staffordshire EDNA and the 2017 Black Country EDNA, the latter subject to an update in 2021.

For consistency, **we request that the opportunity for the Plan to make a contribution towards wider unmet employment land needs is reflected in the Economic Vibrancy section of the Strategic Objectives of the Plan**. This would ensure consistency with the approach taken in Strategic Objective 2 which is related specifically to meeting unmet housing needs from the Greater Birmingham Housing Market Area.

Addressing the Black Country Employment Land Shortfall

Para 4.55 of the document confirms the Black Country Plan employment land shortfall of 210ha – the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the Plan should seek to provide for around 30% of B8 activity and 70% E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. Applying this apportionment to the delivery of the

employment land supply identified in the draft Black Country Plan would suggest B8 supply of some 106ha and E(g)(ii)(iii)/B2 supply of 247ha.

Using this approach, and before taking into account any potential contributions through the Duty to Cooperate the shortfall by use class is therefore some 64-70ha B8 and 149-163ha E(g)(ii)(iii)/B2.

In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/) . This suggests that a minimum of some 72ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be satisfied by this site should the South Staffordshire EDNA update confirm a surplus of employment land against local needs. We therefore request that this work is fully considered as part of the EDNA Update referred to above.

In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, and we are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford.

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

The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of ‘strategic employment sites’, and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.

The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. In spite of the recognition of the need for further work, the Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.

There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. We therefore **request that the Council engage with the Black Country and other relevant West Midlands local authorities in the follow-up work recommended in the WMSESS** and that this is reflected in the EDNA update.

In summary, we welcome the commitment in principle for the Local Plan to assist with meeting unmet employment land needs arising in the Black Country. The EDNA update will provide critical and timely evidence on the extent of any surplus from the existing supply, and whether additional opportunities would need to be considered both within the District and / or in adjacent areas having regard to the recommendations of the WMSESS.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

Yes

We support the longer term growth aspirations for a new settlement with strong sustainable transport links to the Black Country, which could help meet longer term Black Country housing shortfalls;

Chapter 5

Question 7:

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

Yes

However, the Langley Road site should also be subject to this approach, given the significant cross-boundary infrastructure and design implications of this development.

City of Wolverhampton Council, Civic Centre
St. Peter's Square
Wolverhampton. WV1 1SH

Statement of Common Ground between National Highways (NH), Staffordshire County Council (SCC), City of Wolverhampton Council (CWC)and South Staffordshire District Council

South Staffordshire Local Plan 2018-2039

December 2022

Transport Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC), National Highways (NH), Staffordshire County Council (SCC) & City of Wolverhampton Council (CWC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC), National Highways (NH), Staffordshire County Council (SCC) and City of Wolverhampton Council (CWC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2018-2039. CWC and SCC are parties to this statement of common ground to reflect their statutory responsibilities as highways authorities and to ensure that sustainable transport measures are appropriately prioritised in the delivery of the emerging local plan.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover key strategic transport matters relevant to the South Staffordshire Local Plan 2018-2039. This includes consideration of how the parties have worked together to identify impacts on the strategic and local highway networks, the approach to identifying mitigation and how the authorities will continue to work together going forward as sites allocated in the local plan are progressed.

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority area of South Staffordshire District, whilst having regard to potential cross-boundary transport matters arising from the South Staffordshire Local Plan 2018-2039 that may affect City of Wolverhampton Council.

Transport evidence base to date

4. In cooperating on strategic and cross-boundary transport matters the following documents have been of particular relevance to informing the parties' position:
    - Summary outcomes of the cumulative strategic highways modelling set out in the Staffordshire County Council consultation response to the Preferred Options consultation 2021
    - Land East of Bilbrook, Staffordshire – Strategic Transport Assessment 2022
    - Land at Cross Green – Strategic Transport Assessment 2022
    - Land North of Linthouse Lane, Wolverhampton - Strategic Transport Assessment 2022
    - Land North of Penkridge – Strategic Transport Assessment 2022
    - Strategic Road Network Impact Assessment Summary 2022
    - Local Cycling and Walking Infrastructure Plan 2021-2031
    - Staffordshire Bus Service Improvement Plan 2021
    - South Staffordshire Integrated Transport Strategy

5. As evidenced in the above, the parties to this SoCG have worked collaboratively over a number of years to prepare a highways evidence base to support the local plan. The parties have met as and when needed to progress this evidence base, responding to issues as they

emerged through the local plan's preparation. Key events in the plan's preparation, and the manner of co-operation between parties is set out below.

Previous consultation stages and ongoing cooperation to date on strategic transport issues

6. In 2018 SSDC consulted on an Issues and Options consultation setting out a preferred housing target and employment targets, indicating indicative development typologies that may assist in meeting these strategic growth needs. These development needs were not specific to individual sites or broad locations, meaning that there was limited ability for SCC, NH or CWC to correspond on specific transport issues at this stage, although a key part of the consultation that each party was given a chance to comment on was the adequacy of the planned transport evidence base to be used to support the Local Plan. A summary of key points raised in the consultation is set out below.

Respondent	Key strategic transport points from 2018 consultation response
SCC	- 2017 Integrated Transport Strategy should be included as evidence - Indicated intention to provide evidence of sustainable transport accessibility, indicated new development should have access to high quality public transport to jobs, education and services, whilst acknowledging the very limited funding to support bus services - Indicated intention to provide evidence of traffic impacts of proposed new development sites - Priority should be to locate development within easy access to the rail network - Feasibility of new rail station at Brinsford to be explored by Midlands Connect with engagement of SCC
NH	- Robust transport evidence base required to provide basis for selection of growth options and assessing impacts and necessary mitigation for preferred spatial option - Evidence base must include assessment of impact on SRN roads and junctions, both site specific and cumulative - Supportive of providing critical mass of development at smaller number of locations to ensure full use of sustainable and public transport in mitigation - Offered indications of potential highways implications of certain broad development locations
CWC	- Transport impacts of development, including on Wolverhampton, should be fully assessed, minimising trip generation - Allocations should link to the strategic transport network and avoid excessive pressure on sensitive transport links - Employment land allocations should be made in locations most accessible by a choice of means of transport to the Wolverhampton workforce - Support the Brinsford Strategic Park and Ride proposal

7. In preparing the subsequent 2019 Spatial Housing Strategy and Infrastructure Delivery consultation SSDC had regard to the views raised above, particularly the identified need to prioritise development in areas with high quality public transport links (especially rail) to jobs, education and services. It also noted the support for progressing feasibility work on the

rail-based park and ride at Brinsford and the need to fully assess cross-boundary transport impacts upon CWC's administrative area. It also had regards to the point raised by NH that concentrating a critical mass of development in a smaller number of large developments may offer better opportunities for public transport mitigation. SSDC also progressed initial discussions with NH and SCC at this point to understand the transport evidence base needed to support future iterations of the Local Plan where site allocations were identified.

8. This led to the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation in late 2019, which set out SSDC's preferred spatial distribution of housing growth and alternative strategies considered. The Council's preferred strategy concentrated new allocations primarily to the District's Tier 1 settlements, which had larger services and facilities and rail links into the conurbation, and urban edge locations directly adjacent to the cities and towns of the Black Country and their associated services and public transport links. Whilst specific sites were not identified at this stage, this approach of proposing growth in broad locations was used to help to understand the infrastructure needs and opportunities that would result from such an approach and test alternative methods of distributing growth with key stakeholders prior to site selection taking place. A summary of key points raised in the consultation is set out below.

Respondent	Key strategic transport points from 2019 consultation response
SCC	- Indicated SCC had request access to NH's model for the M54-M6 link road to assess impacts on the strategic road network (SRN) - Updated on jointly commissioned study between SCC and SSDC to examine the case for a new rail-based park and ride at Brinsford - Strategy should make best use of existing infrastructure to ensure it is sustainable and affordable - Expected that sustainable transport options are carried through to policies and mitigation proposals - Required highways mitigation to be identified with reference to traffic modelling to inform local plan - Provided indicative measures likely to support sustainable transport mitigation in specific broad locations
NH	- Highlighted need for a robust evidence base to provide basis for impacts on the SRN and necessary mitigation - Indicated SRN work will need to include SRN roads and junctions within the District and immediately nearby, assessed on both a site specific and cumulative basis - Advised on progress and likely impacts of West Midlands Interchange and M54/M6 Link Road scheme
CWC	- Requested development link effectively to strategic transport network and avoids excessive pressure on sensitive transport links - Additional homes for HMA wider needs should have good access and transport choice into Black Country urban area and wider HMA - Supported Brinsford Park and Ride allocation and requested this is promoted in local plan

9. In preparing the subsequent 2021 Preferred Options consultation SSDC worked with both NH and SCC to secure agreement to use the Saturn model associated with the M54/M6 link road development consent order to assess cumulative traffic flows arising from proposed development allocations prior to the 2021 Preferred Options consultation being finalised and identify any initial areas of concern. This exercise was completed alongside the preparation of the 2021 Preferred Options document, with the input of NH and SSDC to ensure a consistent picture of committed development and proposed allocations. The results from this exercise informed the SCC and NH's response to the consultation, which is included in the table below.

10. SSDC, CWC and SCC commissioned SLC Rail to prepare a Strategic Outline Business Case (SOBC) for a new parkway rail station at Brinsford. The SOBC considered options to address transport issues in the surrounding area around Brinsford, concluding that constructing a 2-platform station with a minimum service of 2 local trains per hour to Birmingham, alongside 500 car parking spaces, was considered the most appropriate solution, which could also be constructed with minimal intervention to existing rail infrastructure. This work also indicated that all scenarios would achieve a positive benefit to cost ratio and would increase net rail demand by nearly 500,000 trips. This confirmed the case for safeguarding the parkway land within the Cross Green housing development

Respondent	Key strategic transport points from 2021 consultation response
SCC	- Indicated that Brinsford Parkway Station Strategic Outline Business Case and Transport Impacts (with Staffordshire County Council) 2022 should both be listed in the evidence base - Requested support was stated for the rail-based parkway at Brinsford - Confirmed SCC's role in providing high level transport modelling, accessibility and connectivity advice in supporting the spatial strategy - Confirmed SCC's support for a rail-based parkway at Land at Cross Green and partnership working with CWC and SSDC to support its delivery - Provided updated accessibility modelling, cumulative assessments of strategic housing sites (including details of methodology used) and identified areas of the road network likely to require mitigation once transport assessments completed - Provided information on likely active travel mitigation measures for each site to inform further transport work - Indicated that an updated LCWIP would be published in 2022/23
NH	- Confirmed no additional transport evidence base required for employment due to the work undertaken through the DCO for West Midlands Interchange and the ROF Featherstone planning consent - Indicated a suitable transport approach first should be taken forward to support the housing allocations - Indicated NH's model for the M54-M6 link road should be used to determine trip distribution and assignment of traffic to inform the site's **own technical assessments**, which will then be used to identify the need for and form of any mitigation measures

	- Confirmed the principle of the approach taken by SSDC's transport evidence base had been agreed through discussions with SSDC, but that technical details remained to be agreed - Highlighted site specific highways considerations relating to strategic housing sites.
CWC	- Requested that combined impact of SSDC and potential developments set out in the Draft Black Country Plan are assessed - Requested development minimise trip generation through services, promote multi-modal connectivity and maximise opportunities for future vehicle technologies (electric vehicles) - Indicated that initial evidence from discussions to date suggested that impacts on CWC's highway network could be mitigated through a viable and deliverable package of developer-funded improvements - Indicated support for rail-based Brinsford park and ride allocation

11. Responding to the need for a further detailed transport evidence base to satisfy the issues raised in the consultation responses, NH, SSDC, SCC and CWC worked together with individual site promoters to agree the scope of Strategic Transport Assessments (STAs) for each of the district's four largest strategic housing allocations[1]. These assessments were then prepared by the site promoters, detailing the impacts of the sites on the surrounding highway network and proposing indicative mitigation measures (including public transport and active travel interventions where appropriate). Responding to the need for a cumulative assessment to be prepared, the site promoters also worked together jointly with SCC, CWC, SSDC and NH to prepare an assessment of cumulative transport impacts, which primarily related to the Strategic Road Network. This indicated that, at this time, no additional mitigation measures are needed to address cumulative impacts on the Strategic Road Network.

12. Since the 2021 Preferred Options consultation, the Strategic Outline Business Case (SOBC) for the Brinsford parkway has been completed and demonstrates that Brinsford station is a viable project. The station would open railway connectivity to around 500,000 journeys per annum (of which c 220k 'local' demand, 180k 'Parkway', 65k 'Brinsford area'). The Benefits/Costs Ratio (BCR) value (base cases 2.86 - 3.03) is 'high' resilient and tested against a range of sensitivities and the BCR remains satisfactory in all but the worst of scenarios. Early station scoping has been carried out, which would envisage a 'simple' unstaffed station with 500 car parking spaces with the design vision key to minimise interference on railway to reduce cost, construction time and risk. Land to accommodate this is being safeguarded in the Local Plan Publication Plan.

13. Engagement with Staffordshire County Council, City of Wolverhampton Council and West Midlands Rail Executive remains ongoing and positive. Discussions are underway to agree next steps on socialising the SOBC within the West Midlands, to include the West Midlands Combined Authority and West Midlands Connect. This will be the first important step of early activity for RNEP 'Develop' OBC stage.

[1] Land at Cross Green, Land off Linthouse Lane, Land North of Penkridge and Land East of Bilbrook

Areas of agreement and ongoing work

14. The following matters are agreed between all relevant parties to this Statement of Common Ground:

- Constructive and ongoing engagement has occurred between all parties and the Duty to Cooperate has been met
- The methodology used in the four Strategic Transport Assessments for the four strategic housing sites in the South Staffordshire Local Plan 2018-2039
- There is a need for cumulative impact assessment of the strategic housing sites on the Strategic Road Network
- Mitigation set out in the Strategic Transport Assessments (STAs) will be included in the Infrastructure Delivery Plan (IDP) to support site delivery
- SSDC and NH have agreed that a sustainable transport first approach should be undertaken to mitigate the impact of the allocated sites.
- Finalised mitigation schemes will be set out at the planning application stage and will prioritise delivery of active travel and sustainable transport mitigation measures over measures to facilitate car trips
- SSDC, SCC and CWC all support the delivery of the Brinsford Parkway project and will continue to work collaboratively with external stakeholders to progress its delivery
- Based on the evidence to date, there are no concerns about the potential deliverability of growth set out in the South Staffordshire Local Plan 2018-2039

15. Areas of ongoing work:

- Mitigation measures set out in the IDP/STAs are considered indicative and are not yet finalised – all parties will work collaboratively to bring forward final mitigation schemes
- NH require further work to assess cumulative impacts before mitigation proposals can be finalised – this will be progressed alongside the local plan and will be finalised at the planning application stage
- The STA and required mitigation measures for the strategic site north of Penkridge is yet to be agreed and finalised between SCC and the site promotors. The site promotors are currently addressing comments from SCC on their initial STA and mitigation package.

16. Areas of disagreement:

- None

Signatures

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

South Staffordshire District Council

Name: Kelly Harris

Position: Lead Planning Manager

Signature: [REDACTED]

Date: 27th January 2023

City of Wolverhampton Council

Name: Councillor Stephen Simkins

Position: Deputy Leader: Inclusive City Economy

Signature: [REDACTED]

Date: 8th March 2023

Staffordshire County Council

Name: Annabel Chell

Position: Head of Connectivity Strategy

Signature: [REDACTED]

Date: 17 April 2023

National Highways

Name: Ben Simm

Position: Spatial Planning Manager (Midlands)

Signature: [REDACTED]

Date: 13.12.2022

Statement of Common Ground between National Highways (NH), Staffordshire County Council (SCC), City of Wolverhampton Council (CWC)and South Staffordshire District Council

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Date~~ecember 2022~~

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Transport Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC), National Highways (NH), Staffordshire County Council (SCC) & City of Wolverhampton Council (CWC)

Introduction

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    - Strategic Road Network Impact Assessment Summary 2022
    - Local Cycling and Walking Infrastructure Plan 2021-2031
    - Staffordshire Bus Service Improvement Plan 2021
    - South Staffordshire Integrated Transport Strategy (2017)
    - Emerging South Staffordshire Integrated Transport Strategy (2024)

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5. As evidenced in the above, the parties to this SoCG have worked collaboratively over a number of years to prepare a highways evidence base to support the local plan. The parties have met as and when needed to progress this evidence base, responding to issues as they emerged through the local plan's preparation. Key events in the plan's preparation, and the manner of co-operation between parties is set out below.

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NH	- Robust transport evidence base required to provide basis for selection of growth options and assessing impacts and necessary mitigation for preferred spatial option - Evidence base must include assessment of impact on SRN roads and junctions, both site specific and cumulative - Supportive of providing critical mass of development at smaller number of locations to ensure full use of sustainable and public transport in mitigation - Offered indications of potential highways implications of certain broad development locations
CWC	- Transport impacts of development, including on Wolverhampton, should be fully assessed, minimising trip generation - Allocations should link to the strategic transport network and avoid excessive pressure on sensitive transport links - Employment land allocations should be made in locations most accessible by a choice of means of transport to the Wolverhampton workforce - Support the Brinsford Strategic Park and Ride proposal

7. In preparing the subsequent 2019 Spatial Housing Strategy and Infrastructure Delivery consultation SSDC had regard to the views raised above, particularly the identified need to prioritise development in areas with high quality public transport links (especially rail) to jobs, education and services. It also noted the support for progressing feasibility work on the rail-based park and ride at Brinsford and the need to fully assess cross-boundary transport impacts upon CWC's administrative area. It also had regards to the point raised by NH that concentrating a critical mass of development in a smaller number of large developments may offer better opportunities for public transport mitigation. SSDC also progressed initial discussions with NH and SCC at this point to understand the transport evidence base needed to support future iterations of the Local Plan where site allocations were identified.

8. This led to the 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in late 2019, which set out SSDC's preferred spatial distribution of housing growth and alternative strategies considered. The Council's preferred strategy concentrated new allocations primarily to the District's Tier 1 settlements, which had larger services and facilities and rail links into the conurbation, and urban edge locations directly adjacent to the cities and towns of the Black Country and their associated services and public transport links. Whilst specific sites were not identified at this stage, this approach of proposing growth in broad locations was used to help to understand the infrastructure needs and opportunities that would result from such an approach and test alternative methods of distributing growth with key stakeholders prior to site selection taking place. A summary of key points raised in the consultation is set out below.

Respondent	Key strategic transport points from 2019 SHSID consultation response
SCC	- Indicated SCC had request access to NH's model for the M54-M6 link road to assess impacts on the strategic road network (SRN) - Updated on jointly commissioned study between SCC and SSDC to examine the case for a new rail-based park and ride at Brinsford - Strategy should make best use of existing infrastructure to ensure it is sustainable and affordable - Expected that sustainable transport options are carried through to policies and mitigation proposals - Required highways mitigation to be identified with reference to traffic modelling to inform local plan - Provided indicative measures likely to support sustainable transport mitigation in specific broad locations
NH	- Highlighted need for a robust evidence base to provide basis for impacts on the SRN and necessary mitigation - Indicated SRN work will need to include SRN roads and junctions within the District and immediately nearby, assessed on both a site specific and cumulative basis - Advised on progress and likely impacts of West Midlands Interchange and M54/M6 Link Road scheme
CWC	- Requested development link effectively to strategic transport network and avoids excessive pressure on sensitive transport links - Additional homes for HMA wider needs should have good access and transport choice into Black Country urban area and wider HMA - Supported Brinsford Park and Ride allocation and requested this is promoted in local plan

9. In preparing the subsequent 2021 Preferred Options consultation SSDC worked with both NH and SCC to secure agreement to use the Saturn model associated with the M54/M6 link road development consent order to assess cumulative traffic flows arising from proposed development allocations prior to the 2021 Preferred Options consultation being finalised and identify any initial areas of concern. This exercise was completed alongside the preparation of the 2021 Preferred Options document, with the input of NH and SSDC to ensure a consistent picture of committed development and proposed allocations. The results from this exercise informed the SCC and NH's response to the consultation, which is included in the table below.

10. SSDC, CWC and SCC commissioned SLC Rail to prepare a Strategic Outline Business Case (SOBC) for a new parkway rail station at Brinsford. The SOBC considered options to address transport issues in the surrounding area around Brinsford, concluding that constructing a 2-platform station with a minimum service of 2 local trains per hour to Birmingham, alongside 500 car parking spaces, was considered the most appropriate solution, which could also be constructed with minimal intervention to existing rail infrastructure. This work also indicated that all scenarios would achieve a positive benefit to cost ratio and would increase net rail demand by nearly 500,000 trips. ~~This confirmed the case for safeguarding the parkway land within the Cross Green housing development~~

Respondent	Key strategic transport points from 2021 Preferred Options consultation response
SCC	- Indicated that Brinsford Parkway Station Strategic Outline Business Case and Transport Impacts (with Staffordshire County Council) 2022 should both be listed in the evidence base - Requested support was stated for the rail-based parkway at Brinsford - Confirmed SCC's role in providing high level transport modelling, accessibility and connectivity advice in supporting the spatial strategy - Confirmed SCC's support for a rail-based parkway at Land at Cross Green and partnership working with CWC and SSDC to support its delivery - Provided updated accessibility modelling, cumulative assessments of strategic housing sites (including details of methodology used) and identified areas of the road network likely to require mitigation once transport assessments completed - Provided information on likely active travel mitigation measures for each site to inform further transport work - Indicated that an updated LCWIP would be published in 2022/23
NH	- Confirmed no additional transport evidence base required for employment due to the work undertaken through the DCO for West Midlands Interchange and the ROF Featherstone planning consent - Indicated a suitable transport approach first should be taken forward to support the housing allocations

	- Indicated NH's model for the M54-M6 link road should be used to determine trip distribution and assignment of traffic to inform the site's own technical assessments, which will then be used to identify the need for and form of any mitigation measures - Confirmed the principle of the approach taken by SSDC's transport evidence base had been agreed through discussions with SSDC, but that technical details remained to be agreed - Highlighted site specific highways considerations relating to strategic housing sites.
CWC	- Requested that combined impact of SSDC and potential developments set out in the Draft Black Country Plan are assessed - Requested development minimise trip generation through services, promote multi-modal connectivity and maximise opportunities for future vehicle technologies (electric vehicles) - Indicated that initial evidence from discussions to date suggested that impacts on CWC's highway network could be mitigated through a viable and deliverable package of developer-funded improvements - Indicated support for rail-based Brinsford park and ride allocation

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11. Responding to the need for a further detailed transport evidence base to satisfy the issues raised in the consultation responses, prior to the 2022 Publication Plan consultation NH, SSDC, SCC and CWC worked together with individual site promoters to agree the scope of Strategic Transport Assessments (STAs) for each of the district's then proposed four largest strategic housing allocations (Land at Cross Green, Land off Linthouse Lane, Land North of Penkridge and Land East of Bilbrook)[1]. These assessments were then prepared by the site promoters, detailing the impacts of the sites on the surrounding highway network and proposing indicative mitigation measures (including public transport and active travel interventions where appropriate). Responding to the need for a cumulative assessment to be prepared, the site promoters also worked together jointly with SCC, CWC, SSDC and NH to prepare an assessment of cumulative transport impacts, which primarily related to the Strategic Road Network. This indicated that, at this time, no additional mitigation measures are needed to address cumulative impacts on the Strategic Road Network.

12. Following~~Since~~ the 2021 Preferred Options consultation, a~~the~~ Strategic Outline Business Case (SOBC) for the Brinsford parkway was~~has been~~ completed and indicated~~demonstrates~~ that Brinsford station is potentially a viable project. The station would open railway connectivity to around 500,000 journeys per annum (of which c 220k 'local' demand, 180k 'Parkway', 65k 'Brinsford area'). The Benefits/Costs Ratio (BCR) value (base cases 2.86 - 3.03) is 'high' resilient and tested against a range of sensitivities and the BCR remains satisfactory in all but the worst of scenarios. Early station scoping has been carried out, which would envisage a 'simple' unstaffed station with 500 car parking spaces with the design vision key to minimise interference on railway to reduce cost, construction time and risk. Safeguarded Land to accommodate ~~this is being~~the station was proposed in the ~~safeguarded in the~~ Local Plan Publication Plan (November 2022).

[1] Subsequently, as the Local Plan has evolved SSDC has removed two of these four sites from the plan (Linthouse Lane and Cross Green).~~Land at Cross Green, Land off Linthouse Lane, Land North of Penkridge and Land East of Bilbrook~~

Respondent	Key strategic transport points from 2022 Publication Plan consultation response
SCC	- Requested that developers of land north of Penkridge update the STA due to concerns with some of the schemes in the STA, though believe there is an acceptable solution tp be agreed prior to examination.
NH	- Welcome Policy EC12: Sustainable Transport however further details will be required for review as proposals are developed further, - Confirmed no additional transport evidence base required for employment due to the work undertaken through the DCO for West Midlands Interchange and the ROF Featherstone planning consent. - Indicated NH's model for the M54-M6 link has been provided to trip distribution and assignment of traffic to inform the site's own technical assessments, which will then be used to identify the need for and form of any mitigation measures. Confirmed that this is still to be determined. - Highlighted site-specific highways considerations relating to strategic housing sites.
CWC	- Requested development minimise trip generation through services, promote multi-modal connectivity and maximise opportunities for future vehicle technologies (electric vehicles) - Initial evidence suggested that impacts on CWC's highway network could be mitigated through a viable and deliverable package of developer-funded improvements - works to be completed in support of the Submission Plan in order that appropriate mitigation measures are agreed. - it is essential that the Plan and / or Statement of Common Ground provides assurance that CWC will be consulted on any transport assessments / planning applications associated with development sites near the Wolverhampton boundary, including land adjoining Perton and land adjoining Codsall / Bilbrook. - Indicated support for rail-based Brinsford park and ride allocation

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13. Following the 2022 Publication Plan proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all

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of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

14. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA. This has resulted in a revised housing target of 4,726 homes. This revised strategy resulted in two strategic sites (Land at Linthouse Lane and Land at Cross Green) being removed from the plan and therefore likely resulted in lesser impact on the Strategic Road Network and other junctions than the previous iteration of the plan.

15. For employment land the strategy will see the Council meet its own needs of 62.4ha and a contribution of 45.2ha to the unmet needs of the Black Country (excluding WMI). This will be predominately met by the existing pipeline of employment sites, with only one new allocation at M6 Junction 13 proposed.

16. The deletion of land at Cross Green from the Local Plan also means that part of the site is no longer proposed for safeguarding for Brinsford park and ride. Following the 2022 Publication Plan and the completion of the Strategic Outline Business Case for Brinsford park and ride. West Midlands Rail Executive commissioned consultants to assess the potential case for developing a number of new stations including Brinsford park and ride. The study concluded that bus enhancements were the optimum solution, but with an option to revisit rail if significant developments[2] materialise in the area. Given this uncertainty around the feasibility of the scheme, it is no longer considered appropriate that the scheme is included in the plan, however, will remain as an aspiration in SSDC's Infrastructure Delivery Plan should circumstances change which allow it to be revisited.

Respondent	Key strategic transport points from 2024 Publication Plan consultation response
SCC	- Land north of Penkridge to include a spine road to unlock the west of Penkridge site SCC are promoting. - Consideration will need to be given to the A449 junctions through Penkridge and Stafford as a result of the M6 Junction 13 allocation. Still need confirmation that this can be delivered in transport terms.

[2] The previous Cross Green allocation was already assumed within the analysis

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Commented [JJ2]: I'm not sure any transport work has been done on the local road network with just these two sites. Therefore I am not happy to say that there is lesser impact on 'other junctions'. If you are solely referring to other junction on the SRN then please make this clear, otherwise remove.

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Commented [JJ3]: I don't believe this comment originated from the SCC Connectivity Strategy Team and therefore don't feel it is appropriate to be in the SoCG that we are signing.

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NH	- Confirmed mitigation measures agreed through the DCO for West Midlands Interchange and the ROF Featherstone planning consent. Confirm that greatest traffic impact from M6, Junction 13 will be on Junction 13 itself. - Indicated NH's model for the M54-M6 link has been provided to trip distribution and assignment of traffic to inform the site's own technical assessments, which will then be used to identify the need for and form of any mitigation measures. Confirmed that this is still to be determined. - Highlighted site-specific highways considerations relating to strategic housing sites. - Support for an updated SoCG detailing how the Council has responded positively to comments and representations by National Highways as part of the Local Plan review process
CWC	- Identifies sites at Bilbrook, Perton and ROF Featherstone as close enough to potentially impact Wolverhampton infrastructure. - Further work is required to understand the combined impact of South Staffordshire development proposals and Wolverhampton Local Plan developments on the wider transport network. - Disappointing that the South Staffordshire Local Plan does not safeguard land for a rail based park and ride north of the M54. Request that the benefits of this proposal are recognised and that the Local Plan continues to promote a rail-based park and ride north of M54

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~~13. Engagement with Staffordshire County Council, City of Wolverhampton Council and West Midlands Rail Executive remains ongoing and positive. Discussions are underway to agree next steps on socialising the SOBC within the West Midlands, to include the West Midlands Combined Authority and West Midlands Connect. This will be the first important step of early activity for RNEP 'Develop' OBC stage.~~

Areas of agreement and ongoing work

~~14.~~17. The following matters are agreed between all relevant parties to this Statement of Common Ground:

- Constructive and ongoing engagement has occurred between all parties and the Duty to Cooperate has been met
- The methodology used in the two~~four~~ Strategic Transport Assessments for the two~~four~~ strategic housing sites in the South Staffordshire Local Plan 2023~~18~~-2041.~~39~~
- There is a need for cumulative impact assessment of the strategic housing sites on the Strategic Road Network
- That the combined impact of SSDC's Local Plan proposals on CWCs network can be considered and addressed when planning applications on relevant sites are submitted to SSDC. At this stage SSDC will undertake formal consultation with CWC highways team

Commented [EF4]: Is this still required considering latest version of the plan removed two strategic sites (Cross Green, Linthouse Lane) in close proximity to NHs network? Impacts of most significant sites at J13, north of Penkridge and East of Bilbrook already being considered through live applications.

- who will work with SCC highways to ensure impacts on both networks are ~~modelled~~assessed and appropriate mitigation measures identified.
- Mitigation set out in the Strategic Transport Assessments (STAs) will be included in future iterations of the Infrastructure Delivery Plan (IDP) to support site delivery
- SSDC and NH have agreed that a sustainable transport first approach should be undertaken to mitigate the impact of the allocated sites.
- Finalised mitigation schemes will be set out at the planning application stage and will prioritise delivery of active travel and sustainable transport mitigation measures over measures to facilitate car trips
- SSDC, SCC and CWC all support the ~~delivery~~ principle of the Brinsford Parkway ~~project and will continue to work collaboratively with external stakeholders to progress its delivery~~and will engage collaboratively if circumstances change which allow it to be revisited in the future
- Based on the evidence to date, there are no concerns about the potential deliverability of growth set out in the South Staffordshire Local Plan 2023~~18~~-2041~~39~~

~~15.~~18. Areas of ongoing work:

- Mitigation measures set out in the IDP/STAs are considered indicative and are not yet finalised – all parties will work collaboratively to bring forward final mitigation schemes
- NH require further work to assess cumulative impacts before mitigation proposals can be finalised – this will be progressed alongside the local plan and will be finalised at the planning application stage
- The STA and required mitigation measures for the strategic site north of Penkridge is yet to be agreed and finalised between SCC and the site promotors. The site promotors are currently addressing comments from SCC ~~on their initial STA and mitigation package.~~to live planning applications[3] covering the whole site to ensure the necessary mitigation measures are in place.

~~16.~~19. Areas of disagreement:

- None

[3] • 23/00851/FULMEI – Land East of the A449, controlled by Bloor Homes Ltd – detailed application for 135 dwellings;
• 23/01052/OUTMEI – Land East of the A449, controlled by Bloor Homes Ltd – outline application for 135 dwellings (note – this is the same site as 23/00851/FULMEI);
• 23/01079/OUTMEI – Land East and West of the A449, controlled by St Philips – outline application for up to 750 dwellings; and
• 24/00427/OUTMEI – Land West of the A449, controlled by Bloor Homes – outline application for up to 165 dwellings.

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Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: [redacted]

Date: ~~27th January 2023~~

City of Wolverhampton Council

Name: ~~Councillor Stephen Simkins~~

Position: ~~Deputy Leader: Inclusive City Economy~~

Signature: [redacted]

Date: ~~8th March 2023~~

Staffordshire County Council

Name: ~~Annabel Chell~~

Position: ~~Head of Connectivity Strategy~~

Signature: [redacted]

Date: ~~17 April 2023~~

National Highways

Name: ~~Ben Simm~~

Position: ~~Spatial Planning Manager (Midlands)~~

Signature: [redacted]

Date: ~~13.12.2022~~

Appendix 33: Relevant extracts from HMA authorities' response to October 2023 letter and April 2024 Regulation 19 consultation and commentary on their position.

Relevant extracts from responses to SSCs letter of 24th October 2023	Relevant extracts from responses to SSCs April 2024 Regulation 19 consultation	SSDC Commentary
Birmingham City Council (BCC) *Response received 30/11/23* Birmingham City Council has a significant housing shortfall in its emerging Birmingham Local Plan. Whilst this figure is subject to refinement as the Plan progresses, the estimate at the Issues ad Options stage was a shortfall of 78,500 dwellings to 2042. Whilst Birmingham City Council see neighbouring authorities, including South Staffordshire, as being fundamental in helping to address the shortfall, we acknowledge that should the NPPF be published as per the consultation draft, then it is less likely that Green Belt allocations will provide the solution to meeting the housing shortfall. Birmingham City Council would not object to a Plan purely because it did not include Green Belt allocations, should it be consulted on in the context of the NPPF, if drafted as per the recent consultation.	*LATE – received 06/06/24* This approach (Spatial Option I) has resulted in the identification of sufficient land to meet South Staffs' own housing need plus a contribution of 640 dwellings towards any unmet needs of the GBBCHMA representing more than a 15% increase on the District Council's own housing needs. It is appreciated that the Local Plan Review is still seeking to contribute towards the unmet needs of the GBBCHMA through a sustainable and balanced approach which continues to support the growth of the West Midlands Conurbation which is supported. This includes release of Green Belt land, and we welcome the recognition in the Local Plan that this situation constitutes exceptional circumstances to do this, consistent with the provisions of the NPPF. However, it is disappointing that this contribution is significantly reduced compared to the previous 4,000 dwelling figure, meaning that opportunities to help meet housing shortfalls elsewhere in the HMA have been lost.	Not a change of position by BCC. Whilst expressed disappointment at contribution being reduced in their Regulation 19 response, they did not object to 640 contribution, as confirmed by following statement: *"It is appreciated that the Local Plan Review is still seeking to contribute towards the unmet needs of the GBBCHMA through a sustainable and balanced approach which continues to support the growth of the West Midlands Conurbation which is supported."*
Bromsgrove District Council (RDC) and Redditch Borough Council (RBC) *Response received 21/11/23* I can confirm that BDC and RBC will respond fully on this issue in due course once they have had chance to review the NPPF changes and consider the implications for plan making. We expect this to form part of any response we submit at regulation 19 stage.	*No response.*	BDC and RBC never provided a position on the 640 contribution or through oral discussions/ written correspondence, and therefore did not change their position.
Cannock Chase District Council (CCDC) *Response received 04/12/23 (letter dated 24/11/23)* As an authority we have sought to progress the Local Plan under the existing, established legal planning framework as it has been informed by the evidence we have developed, both jointly and individually and because it is important that we have an up to date plan in place as soon as possible. It is in this context that we raise some concerns over the potential change in position of South Staffordshire District Council in relation to helping to accommodate your own housing needs and the unmet need of Greater Birmingham and the Black Country.	*Response received 21/05/24* It is noted that the Local Plan strategy has changed since the former Reg 19 plan was released in 2022 (now superseded). CCDC are pleased to see that the plan will still meet the Objectively Assessed Needs of South Staffordshire District and will not further exacerbate the shortfall of the wider Greater Birmingham and Black Country Housing Market Area, of which both authorities are a part of. The Publication Plan notes that the Strategic Growth Study (2018) on which the previous 4,000 home contribution was based is no longer up to date. It is recognised that the joint evidence commissioned by the authorities within the HMA (Strategic Growth Study, GL Hearn and Wood) is dated 2018, but this remains the only jointly agreed evidence which has informed options to address the HMA shortfall in Local Plan preparation to date. The options presented in the	As per CCDC's Regulation 19 response, there was some difference of opinion relating to the Strategic Growth Study 2018; although they also confirmed in this response that despite this, they supported an approach in which authorities themselves determine an appropriate contribution to unmet need. Notwithstanding this, CCDC expressed concern at the outset, should we be unable to meet our own needs (as per their response to letter of 24th October 2023). Their change of position to express satisfaction with the plan (as per their Regulation 19 response) was a result of SSC taking a different approach to that in the October 2023 letter i.e. by releasing some Green Belt at the district's most sustainable locations to ensure we were meeting our own needs and make a

Whilst the level of contribution is a matter for the individual authority to determine, it is considered a collective responsibility to address. We would therefore like to understand if there is any new evidence or whether any new SoCG's have been formed to support the option for South Staffordshire not to contribute towards the wider unmet needs of the GBBCHMA, and to collectively discuss what the implications of this decision are, and whether there are any alternate solutions. With regard to addressing your own housing needs, it would be helpful to understand what level of your own need cannot be met. If your authority cannot meet a substantial level of your own Districts housing need without Green Belt release, this is likely to have significant cross boundary implications. In this instance, the District Council would seek a meeting to raise our concerns regarding the potential implications of constrained supply in South Staffordshire. This could potentially increase the demand for housing in Cannock Chase District and may have ramifications for the new Local Plan at Examination. Therefore, we would want to discuss this matter urgently.	study have informed the contribution to the shortfall presented in the emerging Cannock Chase Local Plan (500 dwellings) based on the 'proportionate dispersal' approach, taking into account the constrained nature of the district (approx. 60% of land area within Cannock Chase National Landscape and/or Green Belt). The study did consider options to enable the shortfall to be addressed in full, if collectively all authorities contributed. Therefore, CCDC would contend the evidence still has validity, although it is accepted that an update is now required which both CCDC and SSDC have expressed support for through the joint HMA Development Needs Group meetings. CCDC supports the position that authorities in the HMA should determine the appropriate contribution to help reduce unmet need based on evidence and note that South Staffordshire have produced further evidence and tested additional options to inform the final housing target in the plan. However, this is not linked to the conclusions of the joint evidence base.	contribution to unmet needs. CCDC signing the SoCG therefore aligned with their position set out in response to SSC's April 2024 Regulation 19 consultation.
City of Wolverhampton Council (CWC) *Response received 23/01/24* Regarding the question on the City Council's likely views on the status of the proposed green belt allocations, it is considered premature to comment at this stage. The Council's position would need to be informed by the progress of the Wolverhampton Local Plan (WLP) which is programmed for consultation in early 2024.	*Response received 28/05/24* The SSLP proposes a housing requirement of 4,726 homes over the period 2023-2041, which includes a 640 homes contribution towards unmet needs of the GBBCHMA. This is significantly reduced from that set out in the previous Regulation 19 Plan which identified areas of green belt release to provide land for housing development on the edge of Wolverhampton as the primary source of this contribution. This change in approach, moving away from a strategy based on significant green belt release to meet needs arising in neighbouring areas, is made in the context of the current NPPF which post-dates the publication of the previous Regulation 19 Plan. We consider that the revised approach is in principle in accordance with the updated NPPF and therefore sound. However, in order to provide certainty for the progression of the WLP and to inform our ongoing Duty to Cooperate engagement with other neighbouring Local Plans, it is critical that a Wolverhampton element of the 640 homes contribution is confirmed as soon as possible.	No change of position from CWC. Concluded through their Regulation 19 response that the revised approach was sound.
Dudley Metropolitan Borough Council (DMBC) *Response received 18/12/23* We note that your letter states that no decisions have been made on the Plan's strategy and we understand that the Council also intends to undertake a second Regulation 19 consultation in April 2024. In the absence of the finalized NPPF, Dudley Council is unable to advise on its position if South Staffordshire District Council was to revise its housing strategy and no longer review its Green Belt boundaries. We are also unable to advise on whether a further Regulation 19 consultation	*Response received 29/05/24* The policy text currently refers to the delivery of a 'minimum' of 4,726 homes, consisting of the local housing need of 4,086 homes and a 640-home contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which is supported. We note however that the policy identifies a supply that includes 10% additional homes for plan flexibility (circa 5,200 homes in total). We would expect the delivery of any additional homes over the plan period to go towards the unmet housing needs of the GBBCHMA as per the capacity- led strategy of the Publication Plan which has identified the contribution to unmet needs to date. Therefore, we consider that	No change of position by DMBC. 640 home contribution is supported in DMBCs Regulation 19 consultation response (although request that this be expressed as a minimum).

would be appropriate, as currently proposed, without understanding the extend of any proposed changes to the existing Plan's overall strategy. On this basis, we would advise that at this stage it is premature for us to provide a full response to this question but would gladly provide a follow up response once we have received the publication of the revised NPPF.	the policy should explicitly express the contribution to unmet housing needs as a 'minimum' to be considered sound.	
Lichfield District Council (LDC) *Response received 13/12/23 (letter dated 11/12/23)* As the revised NPPF has not yet been published it is difficult to comment as to the approach to consideration of Green Belt boundaries. However, it is noted that the proposed wording states that *"Green Belt boundaries are not **required** to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period"* [our emphasis]. As such the District Council's view is it should not be automatically the case that SSDC determine to no longer consider the Green Belt boundaries, particularly given the significant scale of the unmet needs within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). There are limited areas beyond the Green Belt within the GBBCHMA and should all authorities determine not to consider their Green Belt boundaries this will significantly limit the ability of the authorities to address the shortfall.	*Response received 28/05/24* Lichfield District Council is supportive of SSDC in meeting its own objectively assessed local housing need through the allocation of a minimum of 4,086 homes as detailed within Policy DS4: Development Needs. Lichfield District Council welcomes 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 the emerging unmet housing needs within the GBBCHMA.	LDC did not object to the 640 contribution in their Reg 19 response but said it would need to be robustly justified, which we feel with have done through the plan and supporting evidence. Therefore, signing the November 2024 SoCG which includes 640 contribution does not represent a change of position by LDC.
North Warwickshire Borough Council (NWBC) *No response.*	*Response received 30/05/24* It is not considered that the Plan is positively prepared, justified or effective especially in light of the previous Reg 19 Publication Plan (i) 2022, and the evidence for that Plan which still exists. It does not adequately address the unmet need in relation to the housing shortfall for the Greater Birmingham and Black Country housing market area. The resulting major reduction in the housing proposed to address that unmet need within the latest Reg 19 Publication Plan, will have an impact on the level of unmet need remaining overall, increasing pressure on other adjoining authorities.	Whilst NWBC did object to our reduced contribution, through discussions at the HMA meetings it was recognised that SSDCs (and others) revised approach to Green Belt release was permitted by national policy and under the subsequent transitional arrangements. NWBC were accepting of this position which led to the SoCG being signed.
Sandwell Metropolitan Borough Council (SMBC) *Response received 23/11/23* Your letter states that no decisions have been made on the Plan's strategy and we understand that the Council also intends to undertake a second Regulation 19 consultation in April 2024. It is hard for Sandwell to comment on whether this is the right approach without knowing how and by how much the strategy will change. If there are significant changes we would advise caution in proceeding to a second Regulation 19 consultation and would advise that it would be better and in line with the NPPF to go back to Regulation 18 consultation stage. Your letter also seeks Sandwell Council's position if SSDC were to revise its housing strategy to no longer review Green Belt boundaries to accommodate the housing needs of the District or GBBCHMA. Sandwell Council considers it is premature to respond to this question as we are	*LATE – received 03/06/24* Note the SSLP housing target of local housing need plus 640 homes to address the Greater Birmingham and Black Country Housing Market Area housing shortfall up to 2041. Consider that the SSLP has been prepared in a manner which is legally compliant and meets the Duty to Cooperate. However, the SSLP will not be considered sound (in terms of being positively prepared and effective) unless and until SoCG are agreed with relevant parties.	No objection from SMBC to the 640 home contribution through their response to our Regulation 19 consultation and therefore signing the SoCG is not a change of position.

still awaiting the publication of the revised NPPF. Once this has been published and proposed amendments understood, we would then be happy to comment.		
Shropshire Council (SC) *Response received 14/11/23* Within your correspondence you have posed the scenario of revisiting the housing strategy within the emerging Local Plan, to no longer review Green Belt boundaries to accommodate the housing needs of SSDC or your wider Housing Market Area (HMA), this being the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Ultimately, the decision on the suitability of this scenario is a matter for SSDC, informed by consideration of its implications both for the ability to meet SSDC need and the ability to contribute to unmet needs forecast to arise within the GBBCHMA. However, it is considered sensible that this decision is informed by proactive D2C discussions, particularly with other Local Planning Authorities within the GBBCHMA (including those where unmet housing needs are forecast to arise). We would note that Shropshire Council is of course not a part of the GBBCHMA, as it represents its own self-contained HMA. The most sustainable solution for households whose needs are not able to be met within one Local Planning Authority within a HMA, is within the wider HMA. This is because these areas are likely to already form part of the 'area of search' for these households. In the context of unmet housing need within the GBBCHMA, such areas would of course include SSDC. As such, we would suggest that any decision regarding the suitability of the aforementioned scenario is informed by consideration of the implications for achieving sustainable patterns of development. We would also note that whilst the proposed changes to paragraph 142 of the NPPF mean that Green Belt boundaries are not required to be reviewed and altered if this is the only means of meeting local housing need, this process can still be undertaken, if it is considered an appropriate mechanism for meeting housing need and achieving sustainable development by the relevant Local Planning Authority. Through the D2C process, Shropshire Council is proposing a 1,500 dwelling contribution towards the unmet housing needs forecast to arise within the Black Country Authorities (located within the GBBCHMA), as they indicated that even with the 4,000 dwelling contribution proposed by SSDC, their HMA is unlikely to be able to accommodate all their unmet housing needs.	*LATE received 04/06/24* it is understood that within the Publication Plan for South Staffordshire, it is proposed that a contribution of some 640 dwellings towards the unmet housing needs of the GBBCHMA. This principle of contributing to the unmet housing needs forecast to arise in the GBBCHMA is supported. With regard to the extent of the contribution proposed within the Publication Plan for South Staffordshire, this is ultimately a matter for the D2C process between yourself and the GBBCHMA Authorities. However, we would note: a. South Staffordshire District Council forms part of the GBBCHMA within which an unmet housing need is forecast to arise. b. It is most sustainable to meet housing needs within the Local Planning Authorities where the need arises and where this is not possible within their HMA, as this represents the same 'area of search' for these households. c. The proposed contribution is substantially lower than the 4,000 dwelling contribution previously proposed. d. Whilst the NPPF now stipulates that "once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated." it also specifies that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified."	SC's position was that the extent of the contribution was a matter for GBBCHMA authorities so did not directly conclude that this was not supported, therefore signing the November 2024 SoCG is not a change of position.
Solihull Metropolitan Borough Council (SMBC) *No response.*	*Response received 30/05/24* SMBC notes that this iteration of the plan includes a significantly different housing requirement than that included in the R19 version of the plan published	No objection from SMBC to the 640 home contribution through their response to our Regulation 19 consultation

	in November 2022. It recognises that, at least in part, this is driven by SSDC seeking to use the greater flexibilities in the December 2023 NPPF in its approach to release of Green Belt land to accommodate needs. SMBC is seeking to adopt a similar approach in its emerging local plan, which is currently at examination, and it believes there are parallels in the circumstances which justify such an approach, for both authorities.	and therefore signing the SoCG is not a change of position.
Stratford on Avon District Council (SoADC) *No response.*	*No response.*	SoADC never provided a position on the 640 contribution or through oral discussions/ written correspondence, and therefore did not change their position.
Tamworth Borough Council (TBC) *Response received 23/11/23* We have no specific comments to make to your proposal not to review Green Belt boundaries to accommodate the housing needs of the District or GBBCHMA, if the proposed changes to paragraph 142 of the NPPF are enacted.	*No response.*	TBC never provided a position on the 640 contribution or through oral discussions/ written correspondence, and therefore did not change their position.
Telford and Wrekin Council (TaWC) *No response.*	*No response.*	TaWC never provided a position on the 640 contribution or through oral discussions/ written correspondence, and therefore did not change their position.
Walsall Metropolitan Borough Council (WMBC) *Response received 22/01/24* The NPPF, published in December 2023, confirms that that there is no requirement for green belt boundaries to be reviewed or changed when plans are being prepared or updated, but planning authorities may choose to review green belt boundaries where exceptional circumstances are fully evidenced and justified, through the plan making process (para 145). However, the duty to co-operate remains at least until secondary legislation and/or revised national policy requirements come into effect with regard to the Levelling Up and Regeneration Act 2023: paragraph 25 of the NPPF states that planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries; effective and on-going joint working between strategic policy-making authorities is integral to the production of a positively prepared and justified strategy, including whether development needs that cannot be met wholly within a particular plan area could be met elsewhere (para 26); in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground (para 27).	*Response received 12/08/24 (following officer response on 29/05/24)* We note the wording in paragraph 145 of the December 2023 NPPF. However, we contend that the framework should be viewed as a whole. We consider that the proposal in the plan to reduce the number of homes proposed to contribute to meeting the needs of neighbouring authorities from 4,000 to 640 does not align well with the test of soundness requiring plans to be positively prepared. …we welcome the acknowledgement by South Staffordshire in the draft SoCG that there are very significant shortfalls in housing arising from the Black Country. In view of this acknowledgement, we remain to be convinced how you are then able to conclude that "SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances. NPPF paragraph 145 states "strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies." In our view the need for changes to Green Belt boundaries should be established by the evidence of housing need at the strategic level, and there has been no demonstrable change in the evidence to justify exceptional circumstances that might support detailed amendments to boundaries in relation to individual sites.	Whilst WMBC did raise concerns on our reduced contribution, through discussions at the HMA meetings it was recognised that SSDCs (and others) revised approach to Green Belt release was permitted by national policy and under the subsequent transitional arrangements. WMBC were accepting of this position which led to the SoCG being signed.

In addition, the test of soundness requiring plans to be positively prepared and that unmet demand from neighbouring authorities is accommodated where it is practical to do so, also stands paragraph 35a. Our position is, therefore, that in order to meet continued duty to co-operate requirements and ensure that you are able to demonstrate that the South Staffordshire local plan review is positively prepared, SSDC continue to engage with neighbouring authorities under duty to cooperate and seek to contribute to meeting the unmet housing needs in particular of these authorities, including Walsall, where this is justified through the evidence base. With regard to the evidence, the GBBCHMA Strategic Growth Study (GL Hearn) arose out of the Birmingham Development Plan examination and sought to address the housing needs identified in that plan to 2031. It pre-dates the introduction of the standard method for calculating housing need. The introduction of the standard method and the rolling forward of housing requirements mean that housing need in the region is now much greater than set out in the study. Furthermore, paragraph 230 of the NPPF (December 2023) states that the policies in this framework will apply for the purpose of examining plans where those plans reach regulation 19 stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the framework in accordance with the above arrangements. Given that your local plan review has completed its regulation 19 consultation, it would appear that, even if you sought to consult again on a revised regulation 19 plan in Spring 2024, the requirement for plans to be positively prepared would remain, and indeed the revised position on the potential release of green belt land to meet housing needs would not appear to apply. Even without this text, a change to the strategy of the plan of this significance is likely to require a new regulation 18 consultation, including a revised sustainability appraisal to assess the environmental outcomes of this change in strategy. This would mean that in our view it would be unlikely that, in allowing for any new regulation 18 consultation as may be necessary, with such a change the plan would be able to be submitted under the existing plan-making regime.		
Wyre Forest District Council (WFDC) *Response received 17/11/23* If South Staffordshire District Council were to revise its development strategy in the light of expected Government changes and decide to no longer remove sites from the Green Belt in order to be able to accommodate either its own housing requirement or that of the wider Housing Market Area, then that would have much wider repercussions than in just South Staffordshire. If you decide to follow this strategy, will	*No response.*	WFDCs position was that the extent of the contribution was a matter for GBBCHMA authorities so did not directly conclude that this was not supported, therefore signing the November 2024 SoCG is not a change of position.

you be increasing the density on those sites which are outside of the Green Belt or potentially looking to allocate new sites? With neighbouring authorities which were also previously looking to allocate sites in the Green Belt, now also not proposing to take land out of the Green Belt, where will the housing requirement be met? This will inevitably put more pressure on neighbouring authorities which are not constrained by Green Belt. As a neighbouring authority, albeit outside of the Housing Market Area, which is also heavily constrained by Green Belt which covers the eastern part of our District nearest to the conurbation, we would not be in a position to offer up any land to help meet any housing shortfall from neighbouring authorities.		

Appendix 34 - Email correspondence and track changes / comments on bilateral SoCGs

Birmingham City Council (BCC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix**
18th October 2024	SSDC to BCC	Acknowledgement from SSDC	N/A	N/A
14th October 2024	BCC to SSDC	BCC provided the fully signed SOCG	Fully signed SoCG	No – same as previous but additional signature
9th October 2024	SSDC to BCC	Acknowledgement from SSDC	N/A	N/A
9th October 2024	BCC to SSDC	Email from BCC providing an update on timescales	N/A	N/A
9th October 2024	SSDC to BCC	Email from SSDC asking for an update on timescales	N/A	N/A
26th September 2024	SSDC to BCC	Acknowledgement from SSDC	N/A	N/A
25th September 2024	BCC to SSDC	Email from BCC saying they will progress the SoCG	N/A	N/A
23rd September 2024	SSDC to BCC	Email from SSDC asking for an update on the SoCG and providing a clean copy signed by SSDC	SoCG signed by SSDC	No – same as previous but track changes accepted and signed by SSDC
22nd August 2024	SSDC to BCC	Email saying that SSDC are happy with the suggested changes.	N/A	N/A
29th July 2024	BCC to SSDC	Email from BCC to SSDC with suggested changes.	Track change SoCG	Yes
18th July 2024	SSDC to BCC	Email from SSDC to BCC asking for formal member sign off on the SoCG	Clean copy of SoCG	No – same as previous but clean copy
21st March 2024	BCC to SSDC	Email from Birmingham confirming they are happy with the SoCG at an officer level.	N/A	N/A
8th March 2024	SSDC to BCC	Initial email from SSDC to Birmingham with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG (track change update from 2022 version) Covering letter	Yes

Alex Evans

Subject: FW: Birmingham-SSDC SoCG 2024

From: Alex Evans
Sent: 18 October 2024 11:59
To: Maria Dunn <[redacted]>
Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

Hi Maria,

That's great, thanks for this. Much appreciated!

Best wishes

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Maria Dunn
Sent: 14 October 2024 16:45
To: Alex Evans

Cc: Sarah Scannell ; Edward Fox
Subject: RE: Birmingham-SSDC SoCG 2024

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Dear Alex,

Please find attached a signed version of the DtC statement. Apologies for the delay.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



OFFICIAL

From: Alex Evans <[redacted]>
Sent: 09 October 2024 15:38
To: Maria Dunn <[redacted]>
Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

Hi Maria,

No worries, thanks for letting me know.

Cheers
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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OFFICIAL

From: Maria Dunn <[redacted]>
Sent: Wednesday, October 9, 2024 3:34 PM
To: Alex Evans <[redacted]>
Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

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Hi Alex,

I am still awaiting sign off from our Deputy leader.

Sorry for the delay.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



From: Alex Evans <[redacted]>
Sent: 09 October 2024 14:37
To: Maria Dunn <[redacted]
Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

Hi Maria,

I hope all is well,

I was just wondering how things were going with getting the SoCG signed off please?

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk



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From: Alex Evans
Sent: Thursday, September 26, 2024 11:50 AM
To: Maria Dunn <[redacted]>

Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

Thanks Maria, much appreciated. Let us know if you need anything from our end.

Best wishes

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Maria Dunn <[redacted]>
Sent: Wednesday, September 25, 2024 12:39 PM
To: Alex Evans <[redacted]>
Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

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Hi Alex,

Sorry, I think this has fallen off my radar. I'll pick this up with our portfolio holder.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



OFFICIAL

From: Alex Evans <[redacted]
Sent: Monday, September 23, 2024 3:52 PM
To: Maria Dunn <[redacted]>
Cc: Sarah Scannell <[redacted]>; Edward Fox [redacted]
Subject: RE: Birmingham-SSDC SoCG 2024

Hi Maria,

Hope all is well,

I was just wondering how you were getting on with getting the SoCG signed. I have attached a clean copy which has been signed from our end.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]





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OFFICIAL

From: Alex Evans
Sent: Thursday, August 22, 2024 3:36 PM
To: Maria Dunn <[redacted]>
Cc: Sarah Scannell <[redacted]; Edward Fox <[redacted]
Subject: RE: Birmingham-SSDC SoCG 2024

Hi Maria,

Apologies for the delay in coming back to you on this. We are happy with your proposed changes and for it to proceed through our respective agreement processes.

We are happy for the SoCG to be dated before the consultation NPPF was published to make it clear that the SoCG was agreed before then?

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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From: Maria Dunn <[redacted]
Sent: Monday, July 29, 2024 12:23 PM
To: Alex Evans <[redacted]>
Cc: Sarah Scannell <S[redacted] Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex,

I've suggested some changes. I do feel like we might be telling a different story once we get the new NPPF and I'm sure we'll all be taking stock of what it means for us.

Happy to get this signed through the formal channels once you've confirmed you're happy with the changes your end.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



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

South Staffordshire Local Plan 2023-2041

Position at July 2024

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Birmingham City Council (BCC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2023-2041.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023-2041 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and BCC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs.

8. The Birmingham Development Plan 2017 also established a shortfall of 37,900 dwellings over the period 2011-2031. More recent land supply estimates[2] suggest this shortfall had fallen to around 6,300 dwellings across the GBBCHMA (2011-2031), however the emerging Birmingham Local Plan ~~Issues and~~Preferred Options consultation indicates that this shortfall is now likely to increase to around 46~~78~~,000 dwellings over the 2020-2042 period, although this plan is still at an early stage in its production. The Black Country authorities[3] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

Commented [MD1]: The Sandwell letter had more up to date information than this. Is it work updating to reflect that? It was based on published positions for Dudley, Wolverhampton and Sandwell and an estimate for Walsall.

9. SSDC and BCC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities[4]. This led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. Notwithstanding the fact that BCC would prefer all contributions to be made to the overall HMA shortfall, rather than apportioned, SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

10. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by

[2] https://www.birmingham.gov.uk/downloads/download/2434/gbbchma_housing_supply_and_need_position_statement_september_2020_updated_december_2021

[3] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

11. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

12. SSDC and BCC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider the issue holistically.

Employment

13. SSDC and BCC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.

14. The South Staffordshire Local Plan 2023-2041 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

15. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its

own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

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~~18.~~17. Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[5] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country authorities and 53ha from Birmingham (taken from the Stantec report). The remaining land supply from WMI aside from the South Staffordshire, Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site. Birmingham City Council has however recently evidenced a shortfall of 73.64ha of employment land against its identified need to 2042 through its ~~Issues and~~Preferred Options Consultation Document published ~~24th October 2022~~8th July 2024.

Cross boundary transport impacts

~~19.~~18. SSDC and BCC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to Birmingham City Council's administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

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

~~20.~~19. SSDC and BCC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~21.~~20. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~22.~~21. SSDC has an identified a 162pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period[6]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

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~~24.~~23. In response to these requests BCC indicated that, at this time, it is likely that the new Birmingham Plan will need to identify new sites to meet its own pitch needs, meaning it is unlikely that additional pitches could be offered to SSDC. However, it confirmed that it had not yet explored options for a new publicly owned site, nor had it engaged site promoters of proposed general housing allocation sites to see if their sites could contribute to increasing overall pitch delivery. There are no allocations within the Birmingham Local Plan Preferred Options. The document sets out a policy which is designed to guide new development to approiate locations. ~~se points were not anticipated to be addressed before the Preferred Options document in 2024.~~

[6] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

Natural Environment

~~25.~~24. SSDC and BCC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~26.~~25. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Birmingham City Council

Name:

Position:

Signature:

Date:

Alex Evans

Subject: FW: Birmingham-SSDC SoCG 2024

OFFICIAL

From: Alex Evans <[redacted]>
Sent: Thursday, July 18, 2024 9:53 AM
To: Maria Dunn <[redacted]>
Cc: Sarah Scannell <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

Some people who received this message don't often get email from [redacted] Learn why this is important

Good morning Maria,

I hope you're doing well.

Following on from agreeing the SoCG at officer level, we are now seeking to get them formally signed off. I have attached a clean copy dated July 2024 which we previously agreed at officer level. However, I appreciate that it may now need updating to reflect the Birmingham Local Plan Preferred Options Document which is currently at consultation?

Once we have agreed any amendments (if required), if you are able to organise for it to be signed / take it through the approval process your end and provide us with a countersigned copy that would be much appreciated.

If you will need to take the SoCG through the member agreement process, could you please provide me with some rough timescales.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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OFFICIAL

From: Maria Dunn <[redacted]>
Sent: Thursday, March 21, 2024 1:01 PM
To: Alex Evans <[redacted]>
Cc: Sarah Scannell <[redacted]>
Subject: RE: Birmingham-SSDC SoCG 2024

You don't often get email from [redacted] Learn why this is important

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Hi Alex,

Just to confirm we are happy with this at the officer level.

Many thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



OFFICIAL

From: Alex Evans <[redacted]>
Sent: Friday, March 8, 2024 2:07 PM
To: Maria Dunn <[redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: Birmingham-SSDC SoCG 2024

You don't often get email from [redacted]. Learn why this is important

Dear Maria

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes. I have also attached a covering letter which sets out a summary of key changes from a SSDC perspective.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024.**

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct Dial [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Maria

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

Gypsy & Traveller Provision

In August 2023 work began on an update to SSDCs Gypsy and Traveller Accommodation Assessment (GTAA) to assess need over the updated plan period to 2041. The updated assessment has identified a need of 162 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite exploring all available opportunities, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the district's 5 year pitch need. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the district. The position remains that SSDC still requires assistance in addressing its unmet pitch needs.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[redacted]

Lead Planning Manager
Planning
South Staffordshire Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Position at ~~November 2022~~date

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Birmingham City Council (BCC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and BCC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs.

8. The Birmingham Development Plan 2017 also established a shortfall of 37,900 dwellings over the period 2011-2031. More recent land supply estimates[2] suggest this shortfall had fallen to around 6,300 dwellings across the GBBCHMA (2011-2031), however the emerging Birmingham Local Plan Issues and Options consultation indicates that this shortfall is now likely to increase to around 78,000 dwellings over the 2020-2042 period, although this plan is still at an early stage in its production. The Black Country authorities[3] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

9. SSDC and BCC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities[4]. This ~~has~~ led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. Notwithstanding the fact that BCC would prefer all contributions to be made to the overall HMA shortfall, rather than apportioned, SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

10. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study

[2] https://www.birmingham.gov.uk/downloads/download/2434/gbbchma_housing_supply_and_need_position_statement_september_2020_updated_december_2021

[3] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

(2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

~~9.~~11. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

~~10.~~12. SSDC and BCC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to ~~address~~ consider the issue holistically.

Employment

~~11.~~13. SSDC and BCC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.

14. The South Staffordshire Local Plan 2023~~18~~-2041~~39~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

15. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply

commitments and allocations.The resulting contribution towards unmet need is an output of these updates to the evidence base.

~~12.~~

16. ~~South Staffordshire's EDNA 2020-2040~~The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

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Cross boundary transport impacts

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

Infrastructure

~~15.~~20. SSDC and BCC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~16.~~21. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~17.~~22. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[6].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

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~~19.~~24. In response to these requests BCC indicated that, at this time, it is likely that the new Birmingham Plan will need to identify new sites to meet its own pitch needs, meaning it is unlikely that additional pitches could be offered to SSDC. However, it confirmed that it had not yet explored options for a new publicly owned site, nor had it engaged site promoters of proposed general housing allocation sites to see if their sites could contribute to increasing overall pitch delivery. These points were not anticipated to be addressed before the

[6] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Preferred Options document in 2024~~3~~.

Natural Environment

~~20.~~25. SSDC and BCC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~21.~~26. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: 

Date: ~~27th January 2023~~

Birmingham City Council

Name: ~~Ian Ward~~

Position: ~~Leader of Birmingham City Council~~

Signature: 

Date: ~~20 January 2023~~

From: Alex Evans
Sent: 25 November 2024 13:25
To: Michael Dunphy - Strategic Planning and Conservation Manager <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SSDC SoCG 2024

Hi Mike,

Many thanks for the comments and suggested changes. We are happy with what you have suggested. I can send through clean copies with the changes made if that would be helpful?

Is it still your intention to have member briefings on these in December? It would be good to have an indication of when you will be looking to have them formally signed off?

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Michael Dunphy - Strategic Planning and Conservation Manager
<[redacted]>
Sent: 21 November 2024 17:34
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SSDC SoCG 2024

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex

Please see attached apologies for the time taken getting these back to you, there a few suggestions / comments on these, if you focus on the BDC version as the comments there can apply to both statements, the RBC one only has one comment which is specific to RBC but the other comment still stand in relation to this as well, hope that makes sense?

These haven't been to members yet so will need to remain confidential for the time being.

Thanks
Mike

Mike Dunphy
Strategic Planning and Conservation Manager
Bromsgrove District and Redditch Borough Councils
Tel: [redacted]
Email: [redacted]

Bromsgrove District Council Redditch Borough Council
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www.bromsgrove.gov.uk www.redditchbc.gov.uk

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

South Staffordshire Local Plan 202318-204139

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Bromsgrove District Council (BDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231~~18~~-20413~~9~~.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 20231~~18~~-20413~~9~~ and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

   - Housing (including housing needs across the GBBCHMA);
   - Employment land;
   - Transport and infrastructure matters;
   - Gypsy and traveller accommodation; and
   - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

Commented [MD1]: Not sure this true, suggest we delete

Commented [MD2]: Are these strategic matters bearing in mind we have never discussed them?

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

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

Housing

7. SSDC and BDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

8. SSDCs November 2022 (Regulation 19) Publication Plan which housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

~~7.~~10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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~~8.~~11. BDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ SSDC~~S~~ is party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the West Midlands Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

~~9.~~12. SSDC's Economic Development Needs Assessment (June 2022) and subsequent update concludes that SSDC lies within a Functional Economic Market Area (FEMA) which includes South Staffordshire, Wolverhampton, Dudley, Walsall, Cannock Chase and Stafford. BDC's Housing and Economic Development Needs Assessment (HEDNA) (January 2022) identifies two possible options for defining Bromsgrove's FEMA, one of which would be to use the GBBC HMA geography, as this reflects an economic area centred on Birmingham and aligns with Travel to Work Areas. Despite differences in FEMA definitions, there is nothing within guidance to suggest that a FEMA defines an exclusive relationship and therefore SSDC and BDC will continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.No further cross-boundary issues have been identified.

~~10.~~13. The South Staffordshire Local Plan 20231~~8~~-20413~~9~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024)~~2020-2040~~ suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 273~~6~~.6ha to the unmet needs of other local authorities. . In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to

more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~11.~~16. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[3] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire~~, and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

~~12.~~17. SSDC and BDC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Bromsgrove administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~13.~~18. SSDC and BDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~14.~~19. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~15.~~20. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[4].

[3] West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)
[4] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report ~~August 2021~~2024

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SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~16.~~21. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~17.~~22. BDC's latest response to the August 2022 correspondence suggests that there is no free pitch provision on existing public sites in Bromsgrove and that meeting BDC's own need is likely to require pitches within the Green Belt. BDC indicated that they may approach site promoters to consider options for -publicly run sites in the future and that all publicly owned land that BDC was aware of has been considered at this stage. Therefore, in SSDC's view it is currently unclear at this stage as to what extent BDC may or may not be able to assist in meeting unmet pitch need arising from SSDC as currently site promoters have not been approached and it is unclear from the information provided whether options for a new publicly run site have currently been examined.

Natural Environment

~~18.~~23. SSDC and BDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~19.~~24. No cross-boundary issues have been identified.

Commented [MD3]: As above not sure we need this section

Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District

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Council and Bromsgrove District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Bromsgrove District Council

Name:

Position:

Signature:

Date:

DRAFT

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

South Staffordshire Local Plan 202318-204139

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Redditch Borough Council (RBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231~~18~~-20411~~39~~.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 20231~~18~~-20411~~39~~ and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and RBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. - Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Whilst those plans are now at an early stage it as acknowledged that the evidence supporting the Black Country Plan identified a significant unmet need which will need to be further evidenced and quantified.

8. SSDCs November 2022 (Regulation 19) Publication Plan which housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

~~7.~~11.

~~8.~~12. RBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ SSDC is ~~a~~ party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

~~9.~~13. SSDC and RBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.

~~10.~~14. The South Staffordshire Local Plan 20231~~8~~-20413~~9~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

15. South Staffordshire's ~~EDNA 2020-2040~~ Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

16. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands

Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~11.~~17. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire~~, and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

~~12.~~18. SSDC and RBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two~~four~~ strategic housing site allocations, however none are within close proximity to the Redditch administrative area. No other cross-boundary transport issues have been identified.

Commented [MD1]: Not sure we need this section due to the lack of shared boundary and distance between authorities

Infrastructure

~~13.~~19. SSDC and RBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~14.~~20. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~15.~~21. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 97~~72~~ pitches within the first 5 year period[3]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~16.~~22. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. ~~-~~In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~17.~~23. RBC's most recent response was to the January 2022 correspondence where they considered that there is insufficient evidence to conclude that there was a strong connection between movement patterns of travellers between the authority areas. Therefore, additional provision within the Redditch area would not provide a sustainable solution to meeting the specific needs of the Gypsy and Traveller population within the South Staffordshire area. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SSDC acknowledges that it has less of a functional relationship with RBC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in RBC's administrative area if this secured them a permanent pitch. In SSDC's view it is therefore currently unclear as to what extent RBC may or may not be able to assist in meeting unmet pitch need arising from SSDC. RBC maintain that the evidence does not provide clear evidence of a functional link with regard to Gypsy and Traveller Accommodation Needs, which can be closely related to extended family and their existing locations. The GBBCHMA strategic study does not consider the needs of Gypsy and Travellers and It is not clear whether any work has been previously done to evidence this functional link in relation to these specific gypsy and traveller needs. Therefore, RBC feel that the emphasis remains as stated here - that it is very much unclear as to what extent RBC may/may not be able to assist in meeting SSDC's pitch needs.

Natural Environment

~~18.~~24. SSDC and RBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

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~~19.~~25. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Redditch Borough Council

Name:

Position:

Signature:

Date:

DRAFT

South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct Dial: [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Mike

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

Gypsy & Traveller Provision

In August 2023 work began on an update to SSDCs Gypsy and Traveller Accommodation Assessment (GTAA) to assess need over the updated plan period to 2041. The updated assessment has identified a need of 162 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite exploring all available opportunities, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the district's 5 year pitch need. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the district. The position remains that SSDC still requires assistance in addressing its unmet pitch needs.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[redacted]

Lead Planning Manager
Planning
South Staffordshire Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

[Insert Date]

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Bromsgrove District Council (BDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

- Housing (including housing needs across the GBBCHMA);
- Employment land;
- Transport and infrastructure matters;
- Gypsy and traveller accommodation; and
- Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and BDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

8. SSDCs November 2022 (Regulation 19) Publication Plan which housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

~~7.~~10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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~~8.~~11. BDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ SSDS is party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the West Midlands Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

~~9.~~12. SSDC's Economic Development Needs Assessment (June 2022) and subsequent update concludes that SSDC lies within a Functional Economic Market Area (FEMA) which includes South Staffordshire, Wolverhampton, Dudley, Walsall, Cannock Chase and Stafford. BDC's Housing and Economic Development Needs Assessment (HEDNA) (January 2022) identifies two possible options for defining Bromsgrove's FEMA, one of which would be to use the GBBC HMA geography, as this reflects an economic area centred on Birmingham and aligns with Travel to Work Areas. Despite differences in FEMA definitions, there is nothing within guidance to suggest that a FEMA defines an exclusive relationship and therefore SSDC and BDC will continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.No further cross-boundary issues have been identified.

~~10.~~13. The South Staffordshire Local Plan 2023~~18~~-2041~~39~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024)~~2020-2040~~ suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. . In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to

more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~11.~~16. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[3] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire, ~~and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

~~12.~~17. SSDC and BDC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Bromsgrove administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~13.~~18. SSDC and BDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~14.~~19. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~15.~~20. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[4].

[3] West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

[4] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~16.~~21. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~17.~~22. BDC's latest response to the August 2022 correspondence suggests that there is no free pitch provision on existing public sites in Bromsgrove and that meeting BDC's own need is likely to require pitches within the Green Belt. BDC indicated that they may approach site promoters to consider options for publicly run sites in the future and that all publicly owned land that BDC was aware of has been considered at this stage. Therefore, in SSDC's view it is currently unclear at this stage as to what extent BDC may or may not be able to assist in meeting unmet pitch need arising from SSDC as currently site promoters have not been approached and it is unclear from the information provided whether options for a new publicly run site have currently been examined.

Natural Environment

~~18.~~23. SSDC and BDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~19.~~24. No cross-boundary issues have been identified.

Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District

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Council and Bromsgrove District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Bromsgrove District Council

Name:

Position:

Signature:

Date:

DRAFT

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

[Insert Date]

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Redditch Borough Council (RBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and RBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. - Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Whilst those plans are now at an early stage it as acknowledged that the evidence supporting the Black Country Plan identified a significant unmet need which will need to be further evidenced and quantified.

8. SSDCs November 2022 (Regulation 19) Publication Plan which housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

~~7.~~11.

~~8.~~12. RBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ SSDC is ~~a~~party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

~~9.~~13. SSDC and RBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.

~~10.~~14. The South Staffordshire Local Plan 2023~~18~~-2041~~39~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

15. South Staffordshire's ~~EDNA 2020-2040~~ Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

16. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands

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Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~11.~~17. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire~~, and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

~~12.~~18. SSDC and RBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two~~four~~ strategic housing site allocations, however none are within close proximity to the Redditch administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~13.~~19. SSDC and RBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~14.~~20. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~15.~~21. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 97~~72~~ pitches within the first 5 year period[3]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~16.~~22. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. ~~-~~In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~17.~~23. RBC's most recent response was to the January 2022 correspondence where they considered that there is insufficient evidence to conclude that there was a strong connection between movement patterns of travellers between the authority areas. Therefore, additional provision within the Redditch area would not provide a sustainable solution to meeting the specific needs of the Gypsy and Traveller population within the South Staffordshire area. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SSDC acknowledges that it has less of a functional relationship with RBC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in RBC's administrative area if this secured them a permanent pitch. In SSDC's view it is therefore currently unclear as to what extent RBC may or may not be able to assist in meeting unmet pitch need arising from SSDC. RBC maintain that the evidence does not provide clear evidence of a functional link with regard to Gypsy and Traveller Accommodation Needs, which can be closely related to extended family and their existing locations. The GBBCHMA strategic study does not consider the needs of Gypsy and Travellers and It is not clear whether any work has been previously done to evidence this functional link in relation to these specific gypsy and traveller needs. Therefore, RBC feel that the emphasis remains as stated here - that it is very much unclear as to what extent RBC may/may not be able to assist in meeting SSDC's pitch needs.

Natural Environment

~~18.~~24. SSDC and RBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

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~~19.~~25. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Redditch Borough Council

Name:

Position:

Signature:

Date:

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Cannock Chase District Council (CCDC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
2nd October	SSDC to CCDC	Email from SSDC with the final fully signed copy.	Fully signed SoCG	No – same as previous but signed
1st October 2024	CCDC to SSDS	Email from CCDC with signed copy	SOCG signed by CCDC	No – same as previous but signed
1st October 2024	SSDC to CCDC	Email from SSDC responding	N/A	N/A
1st October 2024	CCDC to SSDC	Email from CCDC saying that the SoCG is now signed and querying date on the cover	N/A	N/A
23rd September 2024	SSDC to CCDC	Email from SSDC acknowledging CCDC response	N/A	N/A
23rd September 2024	CCDC to SSDC	Email from CCDC providing an update	N/A	N/A
23rd September 2024	SSDC to CCDC	Email from SSDC asking for an update on the signing of the SoCG	N/A	N/A
9th September 2024	CCDC to SSDC	Email from CCDC saying that they are chasing up the signature.	N/A	N/A
18th July 2024	SSDC to CCDC	Email from SSDC asking CCDC to progress the SoCG through their formal agreement process.	Officer Agreed SoCG	No – same as previous version
3rd April 2024	SSDC to CCDC	Email from SSDC with an updated SoCG	Updated SoCG	No – updated footnote only (see email)
26th March 2024	CCDC to SSDC	Email from CCDC saying they are largely happy with the SoCG but query a footnote reference.	SoCG with Track changes accepted	No – same as previous but track changes accepted
25th March 2024	SSDC to CCDC	Email from SSDC with an updated version of the SoCG to reflect CCDC comments.	Updated SoCG	Yes

14th March 2024	CCDC to SSDC	Email from CCDC who are happy with the SoCG apart from the section on Gypsy and Travellers which they set out.	Updated SoCG	Yes
14th March 2024	SSDC to CCDC	Email from SSDC with the amalgamated SoCG attached.	Amalgamated SoCG	Yes
12th March 2024	CCDC to SSDC	Email from CCDC saying they are happy for SSDC to amalgamate the two SoCG and provided a track change copy for their SoCG	Track change copy of the SoCG provided by CCDC	Yes
11th March 2024	SSDC to CCDC	Email from SSDC offering to amalgamate the two SoCG	N/A	N/A
8th March 2024	SSDC to CCDC	Initial email from SSDC to Cannock with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes
6th March 2024	CCDC to SSDC	CCDC sent a draft SoCG to SSDC	Draft SoCG	Yes

Alex Evans

Subject: FW: SoCG CCDC and SSDC
Attachments: SoCG South Staffordshire District Council and Cannock Chase District Council 2024 signed.docx

From: Alex Evans
Sent: 02 October 2024 09:20
To: Jemma March <[redacted]>
Subject: RE: SoCG CCDC and SSDC

Thanks Jemma, much appreciated!

Please find attached a countersigned copy for your records.

Best wishes
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Jemma March <[redacted]>
Sent: Tuesday, October 1, 2024 3:49 PM

To: Alex Evans <[redacted]>
Subject: RE: SoCG CCDC and SSDC

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Hi Alex,

Amended version attached.

Jemma

Jemma March | Interim Planning Policy Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | [redacted] | www.cannockchasedc.gov.uk

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From: Alex Evans <[redacted]>
Sent: Tuesday, October 1, 2024 3:03 PM
To: Jemma March <[redacted]>
Subject: RE: SoCG CCDC and SSDC

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Hi Jemma,

That's brilliant thank you. Would you be happy to amend the date on the front to September to make it more recent? I can then send you a counter-signed copy for your records.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Jemma March <[redacted]>
Sent: Tuesday, October 1, 2024 1:22 PM
To: Alex Evans <[redacted]>
Subject: SoCG CCDC and SSDC

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Hi Alex,

I finally have the signed SoCG. I don't know if you'd rather have a different month on the front page as it currently says April but then signed in October? I realise it is reflective of a point in time but I'm also ok if that is amended before signing at your end.

Jemma

Jemma March | Interim Planning Policy Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | www.cannockchasedc.gov.uk

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Alex Evans

Subject: FW: SoCG FEMA

From: Alex Evans
Sent: 23 September 2024 14:05
To: Jemma March <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SoCG FEMA

Hi Jemma,

That's great, thanks for letting me know. Much appreciated!

Thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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From: Jemma March <[redacted]>
Sent: Monday, September 23, 2024 2:00 PM
To: Alex Evans <[redacted]>

Cc: Edward Fox <[redacted]>
Subject: RE: SoCG FEMA

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Hi Alex,

I have already politely chased and raised it again this morning. Sushil has a catch up with Dean tomorrow and will follow up on this and another we require signing. I'm sure it's not an issue, it's just a case of competing priorities I expect.

Jemma

Jemma March | Interim Planning Policy Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | www.cannockchasedc.gov.uk

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From: Alex Evans <[redacted]>
Sent: Monday, September 23, 2024 1:52 PM
To: Jemma March [redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SoCG FEMA

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Hi Jemma,

Hope all is well with you,

I just wanted to check how you were getting on with getting the bilaterial SoCG signed please?

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 [redacted]
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From: Jemma March <[redacted]
Sent: Monday, September 9, 2024 12:26 PM
To: Alex Evans [redacted]; Edward Fox <[redacted]
Subject: SoCG FEMA

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Hi both,

Please find attached signed FEMA SoCG. With regards to the other SoCG I will ask chase up the signature.

Jemma

Jemma March | Interim Planning Policy Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] www.cannockchasedc.gov.uk

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Alex Evans

Subject: FW: SoCG

From: Alex Evans
Sent: 18 July 2024 11:49
To: Jemma March <[redacted]
Cc: [redacted] Edward Fox <[redacted]
Subject: FW: SoCG

Good morning Jemma,

I hope you're doing well.

Following on from agreeing the SoCG at officer level earlier in the year, we are now seeking to get them formally signed off.

If you are able to organise for it to be signed / take it through the approval process your end and provide us with a signed copy that would be much appreciated. From our end, we have delegated authority to sign the SoCG so will be able to sort this fairly easily.

If you will need to take the SoCG through the member agreement process, could you please provide me with some rough timescales.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: Wednesday, April 3, 2024 9:40 AM
To: Jemma March <J[redacted]
Cc: Edward Fox <[redacted] Sushil Birdi <[redacted]
Subject: RE: SoCG

Hi Jemma

I hope you had a good easter break.

Thanks for this. Good spot on the footnote, I've updated it to refer to the 2024 update in the attached version.

We are happy with it from our side so happy to progress it forward.

Many thanks

Alex

From: Jemma March <[redacted]>
Sent: Tuesday, March 26, 2024 4:44 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox [redacted]; Sushil Birdi <[redacted]>
Subject: RE: SoCG

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Hi Alex,

Thanks for this. Having looked through again, the amendments all seem logical so I think we are almost there.
Your comment for para 23 states that you have updated the G&T figures - is the footnote still correct for that - (footnote 7 South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021) or has there been an update?

I have accepted all track changes in the version attached. Hopefully this suits what you need for your upcoming consultation and we can move towards adding signatures on both sides.

Jemma

Cannock Chase COUNCIL

Jemma March | Planning Policy Consultant
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | www.cannockchasedc.gov.uk

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From: Alex Evans <[redacted]
Sent: Monday, March 25, 2024 12:48 PM
To: Jemma March <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SoCG

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Hi Jemma

Apologies for the delay in getting back to you. I've made a few suggestions to your track changes and comments explaining them which will hopefully be acceptable.

In terms of the Gypsy and Travellers section, I am happy with your proposed wording for this version of the SoCG. Hopefully we will be able to agree a position in a future SocG revision.

Please let me know your thoughts or if you have any queries.

Thanks

Alex

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

Cannock Chase Local Plan (2018-2040)

South Staffordshire Local Plan 202318-20392041

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20232318-20414139 and the Cannock Chase Local Plan 2018-2040 by the respective authorities.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the ~~South Staffordshire Local Plan 2018-2039~~two Local Plans and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

   - Housing (including housing needs across the GBBCHMA);
   - Employment land;
   - Transport and infrastructure matters;
   - Gypsy and traveller accommodation; and
   - Natural environment (Special Areas of Conservation).

3. This SoCG has evolved from a version signed in November 2022 which was originally prepared to support the submission stage of the South Stafford Local Plan. Since that time both the Cannock Local Plan and the South Staffordshire Local Plan has been subject to delay for differing reasons. Consequently there has been revisions to each authorities Local Development Schemes to reflect the revised timescales for submission, as well as extensions to the plan period which will cover 2018-2040 for Cannock and 20232318-2041 for South Staffordshire.

4. ~~Both local plans are anticipated to be submitted to the Secretary of State in 2024, however there is a key difference in how the plans will be examined.~~ Cannock Chase Local Plan Publication Reg 19. is subject to public consultation from 5th February 2024 - 18th March 2024. In line with para 203 of the revised NPPF (published 19th December 2023), the Cannock Chase Local Plan will be examined under the relevant previous version of the Framework (last substantively revised in 2021). ~~As South Staffordshire will consult on the Reg 19. South Staffordshire Local Plan after 19 March 2024, it will be examined against the recently published NPPF (Dec 23). This point is of note because it has implications for the final strategy set in each Local Plan.~~

Commented [AE1]: We wouldn't want tie ourselves at this stage to only being able to be examined under the New NPPF in case this changes or if para 203 is interpreted differently.

Geography covered by Statement of Common Ground

~~3.~~5. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Cannock Chase District ~~Council~~.

~~4.~~6. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North

Staffordshire FEMA[2] , Cannock Chase FEMA [3]and Black Country FEMA[4]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

~~5.~~7. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The~~y~~ key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.

~~6.~~8. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

Housing

~~7.~~9. SSDC and CCDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[5] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

10. CCDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which sought~~eeks~~ to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing

Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

[3] Cannock Chase EDNA 2019 and 2020 update

[4] Black Country EDNA 2017 and 2021 update

[5] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

DRAFT

South Staffordshire Local Plan 20233~~18~~ 20413~~9~~ & Cannock Chase Local Plan (2018-2040) shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is~~was~~is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically. The SoCG is~~was~~ currently signed by 9~~xx~~ of the 17~~14~~ signatories sought. Government consultations on potential amendments to the plan making system and to the NPPF meant that some parties were reluctant to sign due to the potential implications for their emerging strategies. This is more a reflection of the wider context of proposals at national level and does not represent a failure of cooperative working of the HMA, as there was continuous discussion at the meetings of the GBBCHMA Development Needs Group which was involved representation of all parties.

Commented [AE2]: The housing shortfall is still a live issue so would 'is' be more appropriate?

Commented [AE3]: Lichfield may still sign up to it.

~~8.~~11. Since the consultation at preferred options stage in 2021, Cannock Chase has consistently presented a contribution of 500 dwellings towards the HMA shortfall in the emerging Cannock Chase Local Plan. South Staffordshire District Council is preparing to finalise the Reg 19. South Staffordshire Local Plan which will be drafted in the context of the revised NPPF.

Employment

~~9.~~12. SSDC and CCDC both sit within the South Staffordshire functional economic market area (FEMA) and the Cannock Chase functional economic market area (FEMA).

~~10.~~13. The South Staffordshire Local Plan 20233~~18~~-20413~~9~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's ~~EDNA 2020-2040~~ Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

16. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands

DRAFT

Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. South Staffordshire's EDNA is in the process of being updated and the final conclusion may differ.

Commented [AE4]: This is not being updated as part of the new EDNA so will stay the same

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

12.18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on the need for an updated evidence base regarding needs relating to the evidence base on West Midlands Strategic Employment Sites. The original SoCG covering the South Staffordshire FEMA was signed in 2022 by Cannock Chase District Council but will be revisited once the South Staffordshire EDNA has been completed.

Cross boundary transport impacts

19. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Cannock administrative area. SSDC have not proposed any strategic site allocations in close proximity to Cannock administrative area through the emerging local plan.

13.20. One strategic site allocation for 43 dwellings is proposed through the Cannock Chase Local Plan at the boundary with SSDC. This site is currently a part developed, mixed-use site immediately adjacent to existing development in Cannock on three boundaries and is part brownfield land. Allocation of the site will result in Green Belt release, although evidence to support the Cannock Local Plan suggests the contribution of the site to the Green Belt is low.

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

Access to the site is within the Cannock boundary and as the closest facilities are within Cannock it is unlikely to have cross boundary implications for traffic or with regard to impacts on other infrastructure. No other cross-boundary transport issues have been identified.

Infrastructure

~~14.~~21. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~15.~~22. Necessary infrastructure (including school places) will be delivered within ~~South Staffordshire~~the respective Councils own authority boundaries. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~16.~~23. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7]. ~~This evidence is currently being reviewed to take into account the extension to the plan period and the change in government definition to Gypsy and Travellers.~~ SSDC's ~~considers that latest evidence from Council's~~ Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

24. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

Commented [AE5]: The latest figures from the updated GTAA are included in the sentence above.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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25. CCDC responded stating that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This was a point of uncommon ground between the two authorities at that time as SSDC considered that all options should be explored.

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Natural Environment

~~25.~~30. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

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~~[8] Cannock Chase Gypsy and Traveller Accommodation Assessment 2019~~

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Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Cannock Chase District Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: SoCG
Attachments: SoCG South Staffs - Cannock 2024 revised (track change version) - joined version.docx

From: Jemma March <[redacted]>
Sent: 14 March 2024 16:17
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SoCG

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex,

Thank you for amalgamating them. Everything is fine, except for the Gypsy and Travellers section. The new text I had written was intended to replace some of the existing text so that it's a presents detail about our evidence/requirement for Cannock and is up to date to suit both our plans. I've made it clearer in the attached version by proposing deletion of some text. It still presents a general summary and still clearly highlights the area of disagreement, including the specific point on publicly run sites (para 25) but I do wonder if this is a bigger issue whether it would be preferable to capture all the detail in a separate SoCG, if that's required on this issue? We can review after looking at your response to the reg 19 consultation. The only reason I'm suggesting a separate SoCG is because ideally we wanted this general SoCG to support both plans and we both want this text agreed fairly quickly.

Jemma

Jemma March | Planning Policy Consultant
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | www.cannockchasedc.gov.uk

Information you supply to us via email will be dealt with in line with data protection legislation. We will use your information to enable us to fulfil our duties in relation to your enquiry. To that end, where the law allows, your information may be shared with relevant departments within the council, and with other authorities and organisations where required. Cannock Chase Council is the data controller for any personal information you provide. For more information on your data protection rights relating to the service to which your email relates, please visit www.cannockchasedc.gov.uk/privacynotice

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

Cannock Chase Local Plan (2018-2040)

South Staffordshire Local Plan 202318-20392041

[Insert Date]

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231~~18~~-20411~~39~~ and the Cannock Chase Local Plan 2018-2040 by the respective authorities.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the ~~South Staffordshire Local Plan 2018-2039~~two Local Plans and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

   - Housing (including housing needs across the GBBCHMA);
   - Employment land;
   - Transport and infrastructure matters;
   - Gypsy and traveller accommodation; and
   - Natural environment (Special Areas of Conservation).

3. This SoCG has evolved from a version signed in November 2022 which was originally prepared to support the submission stage of the South Stafford Local Plan. Since that time both the Cannock Local Plan and the South Staffordshire Local Plan has been subject to delay for differing reasons. Consequently there has been revisions to each authorities Local Development Schemes to reflect the revised timescales for submission, as well as extensions to the plan period which will cover 2018-2040 for Cannock and 20231~~18~~-2041 for South Staffordshire.

4. Both local plans are anticipated to be submitted to the Secretary of State in 2024, however there is a key difference in how the plans will be examined. Cannock Chase Local Plan Publication Reg 19. is subject to public consultation from 5th February 2024 - 18th March 2024. In line with para 203 of the revised NPPF (published 19th December 2023), the Cannock Chase Local Plan will be examined under the relevant previous version of the Framework (last substantively revised in 2021). As South Staffordshire will consult on the Reg 19. South Staffordshire Local Plan after 19 March 2024, it will be examined against the recently published NPPF (Dec 23). This point is of note because it has implications for the final strategy set in each Local Plan.

Geography covered by Statement of Common Ground

~~3.~~5. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Cannock Chase District ~~Council~~.

~~4.~~6. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North

Staffordshire FEMA[2] , Cannock Chase FEMA [3]and Black Country FEMA[4]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

~~5.~~7. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The~~y~~ key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.

~~6.~~8. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

Housing

~~7.~~9. SSDC and CCDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[5] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

10. CCDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which sought~~eeks~~ to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing

Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

[3] Cannock Chase EDNA 2019 and 2020 update

[4] Black Country EDNA 2017 and 2021 update

[5] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground wasis considered to be the appropriate vehicle by which to consideraddress the issue holistically. The SoCG was signed by xx of the 14 signatories sought. Government consultations on potential amendments to the plan making system and to the NPPF meant that some parties were reluctant to sign due to the potential implications for their emerging strategies. This is more a reflection of the wider context of proposals at national level and does not represent a failure of cooperative working of the HMA, as there was continuous discussion at the meetings of the GBBCHMA Development Needs Group which was involved representation of all parties.

8.11. Since the consultation at preferred options stage in 2021, Cannock Chase has consistently presented a contribution of 500 dwellings towards the HMA shortfall in the emerging Cannock Chase Local Plan. South Staffordshire District Council is preparing to finalise the Reg 19. South Staffordshire Local Plan which will be drafted in the context of the revised NPPF.

Employment

9.12. SSDC and CCDC both sit within the South Staffordshire functional economic market area (FEMA) and the Cannock Chase functional economic market area (FEMA).

10.13. The South Staffordshire Local Plan 20233818-20414139 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's EDNA 2020-2040 Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 2736.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

16. In additionAdditionally, the SSDC Local Plan will release 232ha of Green Belt to deliver a allocate the consented large-scale strategic rail freight interchange called West Midlands

Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. South Staffordshire's EDNA is in the process of being updated and the final conclusion may differ.

~~11.~~17. Supporting work commissioned to examine the apportionment of WMI[6] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. CCDC has formally stated their employment land provision in their forthcoming Regulation 19 Pre-Submission Local Plan ~~will~~ includes 10 ha of employment land at the West Midlands Interchange as identified in the SFRI 2021 Study. The remaining land supply from WMI aside from the South Staffordshire, Cannock Chase and Black Country apportionment has not to date been formally stated as necessary to meet needs by the other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

~~12.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites. The original SoCG covering the South Staffordshire FEMA was signed in 2022 by Cannock Chase District Council but will be revisited once the South Staffordshire EDNA has been completed.

Cross boundary transport impacts

19. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. ~~SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Cannock administrative area.~~ SSDC have not proposed any strategic site allocations in close proximity to Cannock administrative area through the emerging local plan.

~~13.~~20. One strategic site allocation for 43 dwellings is proposed through the Cannock Chase Local Plan at the boundary with SSDC. This site is currently a part developed, mixed-use site immediately adjacent to existing development in Cannock on three boundaries and is part brownfield land. Allocation of the site will result in Green Belt release, although evidence to support the Cannock Local Plan suggests the contribution of the site to the Green Belt is low.

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

Access to the site is within the Cannock boundary and as the closest facilities are within Cannock it is unlikely to have cross boundary implications for traffic or with regard to impacts on other infrastructure. No other cross-boundary transport issues have been identified.

Infrastructure

~~14.~~21. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~15.~~22. Necessary infrastructure (including school places) will be delivered within ~~South Staffordshire~~the respective Councils own authority boundaries. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~16.~~23. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7]. This evidence is currently being reviewed to take into account the extension to the plan period and the change in government definition to Gypsy and Travellers. SSDC's ~~considers that latest evidence from Council's~~ Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

24. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

DRAFT

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Commented [JM1]: Unsure if all this detail is still required given that it seems to present a lot of detail about Cannock and not Stafford back in 2022? I have tried to summarise instead in para 23 and would prefer to delete this text if that suits?

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South Staffordshire District Council

Name:

Position:

Signature:

Date:

Cannock Chase District Council

Name:

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Signature:

Date:

DRAFT

Alex Evans

Subject: FW: SoCG
Attachments: SoCG South Staffs - Cannock 2024 revised (track change version) - joined version.docx

From: Alex Evans
Sent: 14 March 2024 12:12
To: Jemma March <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: SoCG

Hi Jemma

Thanks for this.

I have amalgamated the two versions into the one attached. We have not had a chance to review your changes yet – I thought I'd just focus on getting them all into one document in the first instance.

We will review your proposed changes and if you could do the same for ours that would be much appreciated. We can then look at getting a final version agreed.

Many thanks

Alex

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

Cannock Chase Local Plan (2018-2040)

South Staffordshire Local Plan 202318-20392041

[Insert Date]

DRAFT

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~~11.~~17. Supporting work commissioned to examine the apportionment of WMI[6] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. CCDC has formally stated their employment land provision in their forthcoming Regulation 19 Pre-Submission Local Plan ~~will~~ includes 10 ha of employment land at the West Midlands Interchange as identified in the SFRI 2021 Study. The remaining land supply from WMI aside from the South Staffordshire, Cannock Chase and Black Country apportionment has not to date been formally stated as necessary to meet needs by the other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

~~12.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites. The original SoCG covering the South Staffordshire FEMA was signed in 2022 by Cannock Chase District Council but will be revisited once the South Staffordshire EDNA has been completed.

Cross boundary transport impacts

19. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. ~~SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Cannock administrative area.~~ SSDC have not proposed any strategic site allocations in close proximity to Cannock administrative area through the emerging local plan.

~~13.~~20. One strategic site allocation for 43 dwellings is proposed through the Cannock Chase Local Plan at the boundary with SSDC. This site is currently a part developed, mixed-use site immediately adjacent to existing development in Cannock on three boundaries and is part brownfield land. Allocation of the site will result in Green Belt release, although evidence to support the Cannock Local Plan suggests the contribution of the site to the Green Belt is low.

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

Access to the site is within the Cannock boundary and as the closest facilities are within Cannock it is unlikely to have cross boundary implications for traffic or with regard to impacts on other infrastructure. No other cross-boundary transport issues have been identified.

Infrastructure

~~14.~~21. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~15.~~22. Necessary infrastructure (including school places) will be delivered within ~~South Staffordshire~~the respective Councils own authority boundaries. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~16.~~23. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7]. This evidence is currently being reviewed to take into account the extension to the plan period and the change in government definition to Gypsy and Travellers. SSDC's ~~considers that latest evidence from Council's~~ Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

24. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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25. CCDC responded stating that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This was a point of uncommon ground between the two authorities at that time as SSDC considered that all options should be explored.

26. CCDC published the Cannock Chase Gypsy and Traveller Accommodation Assessment in 2019 which set out a need for 25 pitches across the original plan period (2038) as well as 0-4 to meet undertermined households and 10 plots to meet the needs of Travelling Showpeople. It did not identify any need for transit sites and considered the issue of need to be self-contained within Cannock District, however noted the general desire for Gypsy and Travellers to locate close to the A5 strategic road network which runs through the authority areas of South Staffordshire, Cannock and Lichfield. CCDC has not been able to identify sites to meet the need in full and wrote to neighbouring authorities in 2021 asking if any unmet need could be met in neighbouring authority areas. All responses received indicated there was no spare capacity for plots or pitches in adjoining authority areas, including in South Staffordshire and therefore CCDC undertook further work to identify additional capacity within the authority area in preparation for the final Reg 19 stage.

27. SSDC wrote further to neighbouring authorities in October 2023 notifying that there was an intention to progress the South Staffordshire Local Plan after a period of delay. In relation to Gypsy and Traveller Need SSDC requested an update to the steps taken to examine all potential pitch supply options. CCDC responded by confirming that a Gypsy and Traveller Topic Paper was in production to support the Reg 19. Consultation which would set out in detail the work undertaken by the Council to date to explore all sources of sites. However, it was still not possible for the need identified in the 2019 evidence to be met within CCDC, therefore a shortfall remains and there is not considered to be any capacity to accommodate the need of authorities adjacent to CCDC.

~~17.~~28. CCDC intends to publish the Topic Paper alongside the consultation planned in Feb-March 2024. Updates to existing evidence on need is in progress by SSDC. The issue of meeting the needs of Gypsy and Travellers will require review and further discussion between CCDC and SSDC before the Local Plans are submitted and may result in further updates to this SoCG.

~~18.~~29. CCDC's ~~latest~~ response to the August 2022 correspondence from South Staffordshire states that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This is not something that we intend to explore further. No engagement has taken place with site owners in respect of potential to allocate part of their site for a publicly run site. Again, there are no plans to investigate this further.

~~19.~~30. Publicly owned sites have been considered for potential new sites but these options were very limited when considered against CCDC assessment criteria. The CCDC Regulation 19 pre-submission consultation Local Plan was considered at the council's Cabinet on 25th August 2022. The CCDC Pre-submission consultation includes provision for a site for gypsy accommodation (Policy SO 3.3) which will help address the need identified in evidence for accommodation for gypsy and travellers. Whilst this provides a 5 year supply there remains a longer term need which is proposed to be addressed in a review of the Local Plan following an update of the evidence base.

~~20.~~31. To support the provision of gypsy and traveller sites within Cannock District the use of publicly owned land was investigated, along with privately operated sites through its continual Call for Sites and proactive search for suitable sites including sites within the Green Belt. Two permissions for new sites within the Green Belt have been given in recent years and the proposed allocation within the Regulation 19 Pre-submission consultation version of the Local Plan is an extension to an existing site within the Green Belt.

~~21.~~32. The evidence[8] to support the Local Plan did not identify a need for transit sites and there was no evidence of any households wishing to move to Cannock Chase or of any residents on existing sites stating that they were planning to move away from the area. CCDC have considered potential new sites against site selection criteria but options were very limited and CCDC is not able to identify any surplus capacity on sites not within the Green Belt or sites within the Green Belt for gypsy and travellers at this time that can be exported through the Duty to Cooperate at this time and stage in the preparation of the Local Plan.

~~22.~~33. To support the ongoing cooperation between the authorities an update of the evidence on the assessment of the accommodation needs for gypsy and travellers which considers any longer-term unmet need arising within Cannock District over a wider geography than just Cannock Chase District and South Staffordshire District given the strategic nature of the A5 corridor which could then inform future allocations is supported by CCDC. At this current time CCDC are not in a position to examine the potential for new publicly run sites. SSDC's request was submitted at the time CCDC were preparing to seek authority to embark on their Regulation 19 consultation and too late to be considered as part of the plan making process. A response to the SSDC request cannot be provided at this time and will be considered as part of future work streams.

~~23.~~34. In SSDC's view it is therefore currently unclear as to what extent CCDC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as CCDC appears to be indicating that it has no intention of examining the potential for new publicly run sites in the Green Belt or new publicly run sites delivered alongside wider allocations for other uses.

~~24.~~35. How SSDC can address their identified unmet need for gypsy and traveller accommodation provision is currently not an area upon which agreement is yet reached.

Commented [JM1]: Unsure if all this detail is still required given that it seems to present a lot of detail about Cannock and not Stafford back in 2022? I have tried to summarise instead in para 23 and would prefer to delete this text if that suits?

Natural Environment

~~25.~~36. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

~~26.~~37. Both CCDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and CCDC

[8] Cannock Chase Gypsy and Traveller Accommodation Assessment 2019

will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

~~27.~~38. SSDC and CCDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Cannock Chase District Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: SoCG
Attachments: SoCG South Staffs Cannock revised (track change version) 2024 - Copy.docx

From: Jemma March <[redacted]>
Sent: 12 March 2024 14:01
To: Alex Evans <[redacted]
Subject: RE: SoCG

You don't often get email from [redacted] Learn why this is important

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex,

We also did a track change version but forgot to send on. I think our main amendments were to add parts to the introduction to reflect the changes in timetable and the NPPF, reduce the amount of info on G&T, although we can still say that's an area for further discussion, and to make it clearer about the contribution for the SRFI. Happy for you to look into the amendments and amalgamate. I have attached the track change version we sent to members. They have signed off the text that I sent to you so if we are presenting anything vastly different I will need to take it through them again. However, we had expected you may make changes to the version we sent.

Jemma

Jemma March | Planning Policy Consultant
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | www.cannockchasedc.gov.uk

Information you supply to us via email will be dealt with in line with data protection legislation. We will use your information to enable us to fulfil our duties in relation to your enquiry. To that end, where the law allows, your information may be shared with relevant departments within the council, and with other authorities and organisations where required. Cannock Chase Council is the data controller for any personal information you provide. For more information on your data protection rights relating to the service to which your email relates, please visit www.cannockchasedc.gov.uk/privacynotice

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

Cannock Chase Local Plan (2018-2040)

South Staffordshire Local Plan 202318-20392041

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231~~8~~-20411~~9~~ and the Cannock Chase Local Plan 2018-2040 by the respective authorities.

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Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. South Staffordshire's EDNA is in the process of being updated and the final conclusion may differ.

~~11.~~17. Supporting work commissioned to examine the apportionment of WMI[6] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. CCDC has formally stated their employment land provision in their forthcoming Regulation 19 Pre-Submission Local Plan ~~will~~ includes 10 ha of employment land at the West Midlands Interchange as identified in the SFRI 2021 Study. The remaining land supply from WMI aside from the South Staffordshire, Cannock Chase and Black Country apportionment has not to date been formally stated as necessary to meet needs by the other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

~~12.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites. The original SoCG covering the South Staffordshire FEMA was signed in 2022 by Cannock Chase District Council but will be revisited once the South Staffordshire EDNA has been completed.

Cross boundary transport impacts

19. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. ~~SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Cannock administrative area.~~ SSDC have not proposed any strategic site allocations in close proximity to Cannock administrative area through the emerging local plan.

~~13.~~20. One strategic site allocation for 43 dwellings is proposed through the Cannock Chase Local Plan at the boundary with SSDC. This site is currently a part developed, mixed-use site immediately adjacent to existing development in Cannock on three boundaries and is part brownfield land. Allocation of the site will result in Green Belt release, although evidence to support the Cannock Local Plan suggests the contribution of the site to the Green Belt is low.

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

Access to the site is within the Cannock boundary and as the closest facilities are within Cannock it is unlikely to have cross boundary implications for traffic or with regard to impacts on other infrastructure. No other cross-boundary transport issues have been identified.

Infrastructure

~~14.~~21. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~15.~~22. Necessary infrastructure (including school places) will be delivered within ~~South Staffordshire~~the respective Councils own authority boundaries. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~16.~~23. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7]. This evidence is currently being reviewed to take into account the extension to the plan period and the change in government definition to Gypsy and Travellers. SSDC's ~~considers that latest evidence from Council's~~ Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

24. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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25. CCDC responded stating that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This was a point of uncommon ground between the two authorities at that time as SSDC considered that all options should be explored.

26. CCDC published the Cannock Chase Gypsy and Traveller Accommodation Assessment in 2019 which set out a need for 25 pitches across the original plan period (2038) as well as 0-4 to meet undetermined households and 10 plots to meet the needs of Travelling Showpeople. It did not identify any need for transit sites and considered the issue of need to be self-contained within Cannock District, however noted the general desire for Gypsy and Travellers to locate close to the A5 strategic road network which runs through the authority areas of South Staffordshire, Cannock and Lichfield. CCDC has not been able to identify sites to meet the need in full and wrote to neighbouring authorities in 2021 asking if any unmet need could be met in neighbouring authority areas. All responses received indicated there was no spare capacity for plots or pitches in adjoining authority areas, including in South Staffordshire and therefore CCDC undertook further work to identify additional capacity within the authority area in preparation for the final Reg 19 stage.

~~17.~~27. SSDC wrote further to neighbouring authorities in October 2023 notifying that there was an intention to progress the South Staffordshire Local Plan after a period of delay. In relation to Gypsy and Traveller Need SSDC requested an update to the steps taken to examine all potential pitch supply options. CCDC responded by confirming that a Gypsy and Traveller Topic Paper was in production to support the Reg 19. Consultation which would set out in detail the work undertaken by the Council to date to explore all sources of sites. However, it was still not possible for the need identified in the 2019 evidence to be met within CCDC, therefore a shortfall remains and there is not considered to be any capacity to accommodate the need of authorities adjacent to CCDC. CCDC published the Topic Paper alongside the Reg 19 consultation in Feb-March 2024. Updates to existing evidence on need is in progress by SSDC.

~~18. CCDC's latest response to the August 2022 correspondence states that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This is not something that we intend to explore further. No engagement has taken place with site owners in respect of potential to allocate part of their site for a publicly run site. Again, there are no plans to investigate this further.~~

~~19. Publicly owned sites have been considered for potential new sites but these options were very limited when considered against CCDC assessment criteria. The CCDC Regulation 19 pre-submission consultation Local Plan was considered at the council's Cabinet on 25th August 2022. The CCDC Pre-submission consultation includes provision for a site for gypsy accommodation (Policy SO 3.3) which will help address the need identified in evidence for accommodation for gypsy and travellers. Whilst this provides a 5 year supply there remains a longer term need which is proposed to be addressed in a review of the Local Plan following an update of the evidence base.~~

~~20.~~28. ~~To support the provision of gypsy and traveller sites within Cannock District the use of publicly owned land was investigated, along with privately operated sites through its~~

~~continual Call for Sites and proactive search for suitable sites including sites within the Green Belt. Two permissions for new sites within the Green Belt have been given in recent years and the proposed allocation within the Regulation 19 Pre-submission consultation version of the Local Plan is an extension to an existing site within the Green Belt.~~

~~21. The evidence[8] to support the Local Plan did not identify a need for transit sites and there was no evidence of any households wishing to move to Cannock Chase or of any residents on existing sites stating that they were planning to move away from the area. CCDC have considered potential new sites against site selection criteria but options were very limited and CCDC is not able to identify any surplus capacity on sites not within the Green Belt or sites within the Green Belt for gypsy and travellers at this time that can be exported through the Duty to Cooperate at this time and stage in the preparation of the Local Plan.~~

~~22. To support the ongoing cooperation between the authorities an update of the evidence on the assessment of the accommodation needs for gypsy and travellers which considers any longer-term unmet need arising within Cannock District over a wider geography than just Cannock Chase District and South Staffordshire District given the strategic nature of the A5 corridor which could then inform future allocations is supported by CCDC. At this current time CCDC are not in a position to examine the potential for new publicly run sites. SSDC's request was submitted at the time CCDC were preparing to seek authority to embark on their Regulation 19 consultation and too late to be considered as part of the plan making process. A response to the SSDC request cannot be provided at this time and will be considered as part of future work streams.~~

~~23. In SSDC's view it is therefore currently unclear as to what extent CCDC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as CCDC appears to be indicating that it has no intention of examining the potential for new publicly run sites in the Green Belt or new publicly run sites delivered alongside wider allocations for other uses.~~

~~24.~~29. The issue of meeting the needs of Gypsy and Travellers will require review and further discussion between CCDC and SSDC before the Local Plans are submitted and may result in further updates to this SoCG or a separate SoCG on this issue. How SSDC can address their identified unmet need for gypsy and traveller accommodation provision is currently not an area upon which agreement is yet reached.

Commented [JM1]: Unsure if all this detail is still required given that it seems to present a lot of detail about Cannock and not Stafford back in 2022? I have tried to summarise instead in para 23 and would prefer to delete this text if that suits?

Natural Environment

~~25.~~30. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

~~26.~~31. Both CCDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and CCDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address

~~[8] Cannock Chase Gypsy and Traveller Accommodation Assessment 2019~~

wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

~~27.~~32. SSDC and CCDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Cannock Chase District Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: SoCG

From: Alex Evans
Sent: 11 March 2024 10:18
To: Jemma March <[redacted]>; Edward Fox <[redacted]>
Cc: Kelly Harris <[redacted]>; Sushil Birdi <[redacted]>
Subject: RE: SoCG

Hi Jemma,

Apologies I must have missed this last week. I sent a separate track change version to you on Friday.

I'm happy to review the version you have sent across and see if I can amalgamate the two together and send back to you?

Many thanks

Alex

Alex Evans

Subject: FW: Cannock-SSDC SoCG 2024
Attachments: SSDC Covering Letter - SOCG March 2024 - Cannock.pdf; Cannock-SSDC SoCG 2024.docx

From: Alex Evans
Sent: 08 March 2024 14:11
To: [redacted]
Cc: Jemma March <[redacted]>; Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: Cannock-SSDC SoCG 2024

Dear Sushil

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes. I have also attached a covering letter which sets out a summary of key changes from a SSDC perspective.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024.**

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk







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South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct Dial: [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Sushil

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

Gypsy & Traveller Provision

In August 2023 work began on an update to SSDCs Gypsy and Traveller Accommodation Assessment (GTAA) to assess need over the updated plan period to 2041. The updated assessment has identified a need of 162 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite exploring all available opportunities, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the district's 5 year pitch need. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the district. The position remains that SSDC still requires assistance in addressing its unmet pitch needs.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[redacted]

Lead Planning Manager
Planning
South Staffordshire Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Position at date~~November 2022~~

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District Cannock Chase District Council.

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

Key Strategic Matters

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

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council
[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council
[3] Cannock Chase EDNA 2019 and 2020 update
[4] Black Country EDNA 2017 and 2021 update

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

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

Housing

7. SSDC and CCDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[5] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

8. CCDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

9. SSDC and CCDC both sit within the South Staffordshire functional economic market area (FEMA) and the Cannock Chase functional economic market area (FEMA).

10. The South Staffordshire Local Plan 202318-204139 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

11. South Staffordshire's ~~EDNA 2020-2040~~ Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin

[5] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

12. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

13. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[6] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA.

~~11.~~14. CCDC has formally stated their employment land provision in their ~~forthcoming~~ Regulation 19 Pre-Submission Local Plan ~~will~~ includes 10 ha of employment land at the West Midlands Interchange as identified in the SFRI 2021 Study. The remaining land supply from WMI aside from the South Staffordshire, Cannock Chase and Black Country apportionment has not to date been formally stated as necessary to meet needs by the other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

~~12.~~15. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances

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

on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites.

Cross boundary transport impacts

~~13.~~16. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Cannock administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~14.~~17. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~15.~~18. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~16.~~19. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~17.~~20. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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

~~18.~~21. CCDC's latest response to the August 2022 correspondence states that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This is not something that we intend to explore further. No engagement has taken place with site owners in respect of potential to allocate part of their site for a publicly run site. Again, there are no plans to investigate this further.

~~19.~~22. Publicly owned sites have been considered for potential new sites but these options were very limited when considered against CCDC assessment criteria. The CCDC Regulation 19 pre-submission consultation Local Plan was considered at the council's Cabinet on 25th August 2022. The CCDC Pre-submission consultation includes provision for a site for gypsy accommodation (Policy SO 3.3) which will help address the need identified in evidence for accommodation for gypsy and travellers. Whilst this provides a 5 year supply there remains a longer term need which is proposed to be addressed in a review of the Local Plan following an update of the evidence base.

~~20.~~23. To support the provision of gypsy and traveller sites within Cannock District the use of publicly owned land was investigated, along with privately operated sites through its continual Call for Sites and proactive search for suitable sites including sites within the Green Belt. Two permissions for new sites within the Green Belt have been given in recent years and the proposed allocation within the Regulation 19 Pre-submission consultation version of the Local Plan is an extension to an existing site within the Green Belt.

~~21.~~24. The evidence[8] to support the Local Plan did not identify a need for transit sites and there was no evidence of any households wishing to move to Cannock Chase or of any residents on existing sites stating that they were planning to move away from the area. CCDC have considered potential new sites against site selection criteria but options were very limited and CCDC is not able to identify any surplus capacity on sites not within the Green Belt or sites within the Green Belt for gypsy and travellers at this time that can be exported through the Duty to Cooperate at this time and stage in the preparation of the Local Plan.

~~22.~~25. To support the ongoing cooperation between the authorities an update of the evidence on the assessment of the accommodation needs for gypsy and travellers which considers any longer-term unmet need arising within Cannock District over a wider geography than just Cannock Chase District and South Staffordshire District given the strategic nature of the A5 corridor which could then inform future allocations is supported by CCDC. At this current time CCDC are not in a position to examine the potential for new publicly run sites. SSDC's request was submitted at the time CCDC were preparing to seek authority to embark on their Regulation 19 consultation and too late to be considered as part of the plan making process. A response to the SSDC request cannot be provided at this time and will be considered as part of future work streams.

[8] Cannock Chase Gypsy and Traveller Accommodation Assessment 2019

~~23.~~26. In SSDC's view it is therefore currently unclear as to what extent CCDC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as CCDC appears to be indicating that it has no intention of examining the potential for new publicly run sites in the Green Belt or new publicly run sites delivered alongside wider allocations for other uses.

~~24.~~27. How SSDC can address their identified unmet need for gypsy and traveller accommodation provision is currently not an area upon which agreement is yet reached.

Natural Environment

~~25.~~28. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

~~26.~~29. Both CCDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and CCDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

~~27.~~30. SSDC and CCDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name: ~~**Kelly Harris**~~

Position: ~~**Lead Planning Manager**~~

Signature: 

Date: ~~**27th January 2023**~~

Cannock Chase District Council

Name: ~~**Dean Piper**~~

Position: ~~**Head of Economic Prosperity**~~

Signature: [redacted]

Date: ~~**8th November 2022**~~

Alex Evans

Subject: FW: SoCG
Attachments: SoCG SSDC CCDC 2024.docx

From: Jemma March <[redacted]>
Sent: 06 March 2024 09:47
To: Alex Evans <[redacted]>; Edward Fox <[redacted]>
Cc: Kelly Harris <[redacted]>; Sushil Birdi <[redacted]>
Subject: SoCG

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Apologies for the delay,

Please find attached a draft Statement of Common Ground for consideration. I have used the 2022 general issues one as the starting point and so it follows a similar format with updated text. I am hoping the SoCG will cover both plans and could potentially include both logo's to avoid creating two nearly identical statements but let me know what your thoughts are on this.

Kind regards,

Jemma

Jemma March | Planning Policy Consultant
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
[redacted] | www.cannockchasedc.gov.uk

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

Cannock Chase Local Plan (2018-2040)

South Staffordshire Local Plan 2018-2041

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2018-2039 and the Cannock Chase Local Plan 2018-2040 by the respective authorities.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the two Local Plans and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

3. This SoCG has evolved from a version signed in November 2022 which was originally prepared to support the submission stage of the South Staffordshire Local Plan. Since that time both the Cannock Local Plan and the South Staffordshire Local Plan has been subject to delay for differing reasons. Consequently there has been revisions to each authorities Local Development Schemes to reflect the revised timescales for submission, as well as extensions to the plan period which will cover 2018-2040 for Cannock and 2018-2041 for South Staffordshire.

4. Both local plans are anticipated to be submitted to the Secretary of State in 2024, however there is a key difference in how the plans will be examined. Cannock Chase Local Plan Publication Reg 19. is subject to public consultation from 5th February 2024 - 18th March 2024. In line with para 203 of the revised NPPF (published 19th December 2023), the Cannock Chase Local Plan will be examined under the relevant previous version of the Framework (last substantively revised in 2021). As South Staffordshire will consult on the Reg 19. South Staffordshire Local Plan after 19 March 2024, it will be examined against the recently published NPPF (Dec 23). This point is of note because it has implications for the final strategy set in each Local Plan.

Geography covered by Statement of Common Ground

5. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Cannock Chase District.

6. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North

Staffordshire FEMA[2] , Cannock Chase FEMA [3]and Black Country FEMA[4]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

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

Housing

9. SSDC and CCDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[5] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.

10. CCDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which sought to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground was considered to be the appropriate vehicle by which to address the issue holistically. The SoCG was signed by xx

Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

[3] Cannock Chase EDNA 2019 and 2020 update

[4] Black Country EDNA 2017 and 2021 update

[5] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

of the 14 signatories sought. Government consultations on potential amendments to the plan making system and to the NPPF meant that some parties were reluctant to sign due to the potential implications for their emerging strategies. This is more a reflection of the wider context of proposals at national level and does not represent a failure of cooperative working of the HMA, as there was continuous discussion at the meetings of the GBBCHMA Development Needs Group which was involved representation of all parties.

11. Since the consultation at preferred options stage in 2021, Cannock Chase has consistently presented a contribution of 500 dwellings towards the HMA shortfall in the emerging Cannock Chase Local Plan. South Staffordshire District Council is preparing to finalise the Reg 19. South Staffordshire Local Plan which will be drafted in the context of the revised NPPF.

Employment

12. SSDC and CCDC both sit within the South Staffordshire functional economic market area (FEMA) and the Cannock Chase functional economic market area (FEMA).

13. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. South Staffordshire's EDNA is in the process of being updated and the final conclusion may differ.

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

16. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black

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

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Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites. The original SoCG covering the South Staffordshire FEMA was signed in 2022 by Cannock Chase District Council but will be revisited once the South Staffordshire EDNA has been completed.

Cross boundary transport impacts

17. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC have not proposed any strategic site allocations in close proximity to Cannock administrative area through the emerging local plan.
18. One strategic site allocation for 43 dwellings is proposed through the Cannock Chase Local Plan at the boundary with SSDC. This site is currently a part developed, mixed-use site immediately adjacent to existing development in Cannock on three boundaries and is part brownfield land. Allocation of the site will result in Green Belt release, although evidence to support the Cannock Local Plan suggests the contribution of the site to the Green Belt is low. Access to the site is within the Cannock boundary and as the closest facilities are within Cannock it is unlikely to have cross boundary implications for traffic or with regard to impacts on other infrastructure. No other cross-boundary transport issues have been identified.

Infrastructure

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

20. Necessary infrastructure (including school places) will be delivered within the respective Councils own authority boundaries. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

21. SSDC has an identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period[7]. This evidence is currently being reviewed to take into account the extension to the plan period and the change in government definition to Gypsy and Travellers.
SSDC's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

22. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

23. CCDC responded stating that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This was a point of uncommon ground between the two authorities at that time as SSDC considered that all options should be explored.

24. CCDC published the Cannock Chase Gypsy and Traveller Accommodation Assessment in 2019 which set out a need for 25 pitches across the original plan period (2038) as well as 0-4 to meet undertermined households and 10 plots to meet the needs of Travelling Showpeople. It did not identify any need for transit sites and considered the issue of need to be self-contained within Cannock District, however noted the general desire for Gypsy and Travellers to locate close to the A5 strategic road network which runs through the authority areas of South Staffordshire, Cannock and Lichfield. CCDC has not been able to identify sites to meet the need in full and wrote to neighbouring authorities in 2021 asking if any unmet need could be met in neighbouring authority areas. All responses received indicated there was no spare capacity for plots or pitches in adjoining authority areas, including in South Staffordshire and therefore CCDC undertook further work to identify additional capacity within the authority area in preparation for the final Reg 19 stage.

25. SSDC wrote further to neighbouring authorities in October 2023 notifying that there was an intention to progress the South Staffordshire Local Plan after a period of delay. In relation to Gypsy and Traveller Need SSDC requested an update to the steps taken to examine all potential pitch supply options. CCDC responded by confirming that a Gypsy and Traveller Topic Paper was in production to support the Reg 19. Consultation which would set out in detail the work undertaken by the Council to date to explore all sources of sites. However, it was still not possible for the need identified in the 2019 evidence to be met within CCDC, therefore a shortfall remains and there is not considered to be any capacity to accommodate the need of authorities adjacent to CCDC.

26. CCDC intends to publish the Topic Paper alongside the consultation planned in Feb-March 2024. Updates to existing evidence on need is in progress by SSDC. The issue of meeting the

needs of Gypsy and Travellers will require review and further discussion between CCDC and SSDC before the Local Plans are submitted and may result in further updates to this SoCG.

Natural Environment

27. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

28. Both CCDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and CCDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs.

29. SSDC and CCDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Cannock Chase District Council

Name:

Position:

Signature:

Date:

DRAFT

Dudley Metropolitan Borough Council (DMBC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
4th November 2024	DMBC to SSDC	Acknowledgement from DMBC	N/A	N/A
4th November 2024	SSDC to DMBC	Email from SSDC providing counter-signed copies	Fully signed SoCG	No – same as previous but signed
1st November 2024	DMBC to SSDC	Email from DMBC providing a signed copy of the SoCG	SoCG signed by DMBC.	No – same as previous but signed
24th October 2024	DMBC to SSDC	Email from DMBC saying that the SoCG were approved at cabinet	N/A	N/A
25th September 2024	DMBC to SSDC	Email from DMBC saying they are happy with the SoCG and taking a cabinet paper in October.	N/A	N/A
17th September 2024	SSDC to DMBC	Email from SSDC confirming they have moved the issue to an area of disagreement and providing a track change and clean copy of the SoCG	Track change and clean copies of the SoCG	N/A
16th September 2024	DMBC to SSDC	Email from DMBC confirming they would like the issue moved to matters of disagreement	N/A	N/A
22nd August 2024	SSDC to DMBC	Email from SSDC with alternative proposed wording	N/A	N/A
9th August 2024	DMBC to SSDC	Email from DMBC with proposed wording on the query	N/A	N/A
29th July 2024	SSDC to DMBC	Email from SSDC setting out their position on the query with them happy to move it to an area of disagreement	N/A	N/A
24th July 2024	DMBC to SSDC	Email from DMBC acknowledging SSDC's last email	N/A	N/A
24th July 2024	SSDC to DMBC	Email from DMBC with comments on DMBC's query	N/A	N/A
23rd July 2024	DMBC to SSDC	Email from DMBC querying a change to the SoCG	N/A	N/A

23rd July 2024	SSDC to DMBC	Email from SSDC providing comments on DMBC's query	N/A	N/A
22nd July 2024	DMBC to SSDC	Email from DMBC providing an update on timescales and querying a change on the SoCG	N/A	N/A
18th July 2014	SSDC to DMBC	Email from SSDC asking for DMBC to take the SoCG through their formal agreement process.	As previous email on 1st July 2024	No – same as previous
1st July 2024	SSDC to DMBC	Email from SSDC with changes made to the SoCG	SoCG track change and a clean copy	Yes – track change copy only
24th June 2024	SoCG discussed at DtC meeting			
13th June 2024	DMBC to SSDC	Email from DMBC with additional change to the SoCG	SoCG with DMBC's track changes.	Yes
12th June 2024	DMBC to SSDC	Email from DMBC providing track changes on SoCG	(SoCG superseded by next email)	No – superseded by next email
6th June 2024	SSDC to DMBC	Email from SSDC asking for the SoCG to be progressed following its Reg19 Local Plan consultation	N/A	N/A
8th April 2024	DMBC to SSDC	Email from DMBC advising they will need to do briefings for approval and as they have elections in May they will need to await the outcomes of this	N/A	N/A
18th March 2024	DMBC to SSDC	Email from DMBC providing an update on timescales	N/A	N/A
8th March 2024	SSDC to DMBC	Initial email from SSDC to DMBC with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter	Yes

Alex Evans

From: Vicki Popplewell (Planning) <[redacted]>
Sent: 04 November 2024 11:52
To: Alex Evans
Subject: RE: [EXTERNAL EMAIL] RE: South Staffordshire Council Statements of Common Ground - signed copies

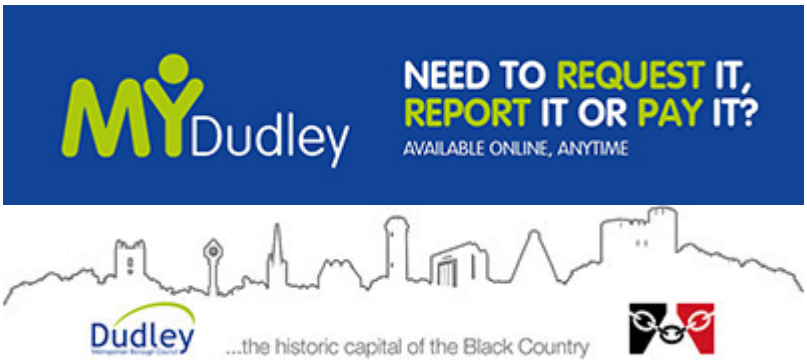
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Thanks Alex

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]>
Sent: 04 November 2024 10:25
To: Vicki Popplewell (Planning) <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: [EXTERNAL EMAIL] RE: South Staffordshire Council Statements of Common Ground - signed copies

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Hi Vicki,

Many thanks for sending across signed copies of both SoCG.

Please find a countersigned copy of the bilateral SoCG for your records.

I have all of the signatures back on the FEMA SoCG now, so I'll look to get a fully signed copy circulated to all parties shortly.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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From: Vicki Popplewell (Planning) <[redacted]
Sent: 01 November 2024 11:48
To: Edward Fox <[redacted]
Subject: South Staffordshire Council Statements of Common Ground - signed copies

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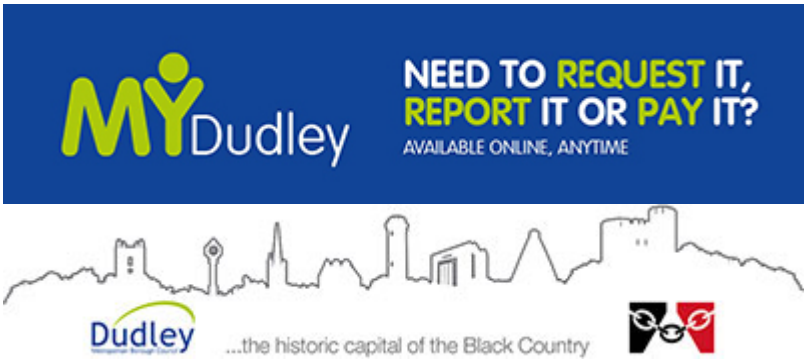
Hi Ed

Please find signed copies attached.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
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Alex Evans

From: Vicki Popplewell (Planning) <[redacted]>
Sent: 24 October 2024 06:51
To: Edward Fox; Alex Evans
Subject: SoCG

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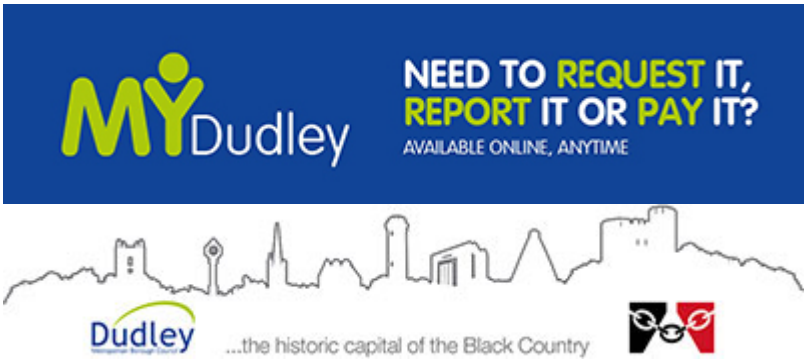
Hi

Both SoCG were approved at Cabinet yesterday evening. We have a 5 day call in period. I will arrange for signatures to be added and send through to you the end of next week or early the following week.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
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Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: SoCG

From: Vicki Popplewell (Planning) <[redacted]
Sent: 25 September 2024 16:45
To: Alex Evans <[redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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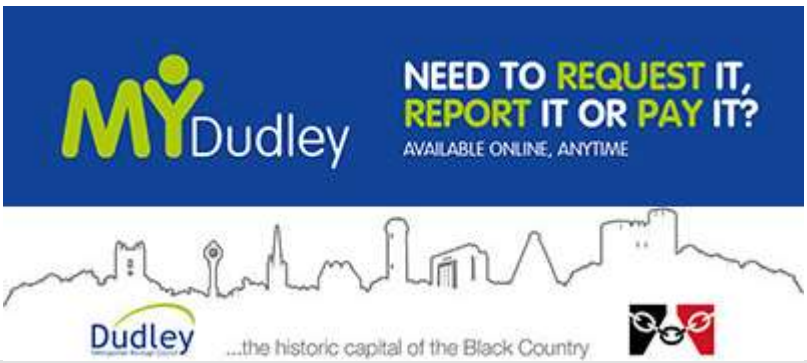
Thanks Alex

The document appears fine to me. I advised Ed that I will be taking a report to Cabinet in 24 Oct to seek approval for the bilateral and FEMA SoCG.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]
Sent: Tuesday, September 17, 2024 4:58 PM
To: Vicki Popplewell (Planning) <[redacted]>
Cc: Edward Fox [redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Vicki,

Thanks for your email and discussing the SoCG during the meeting with Ed.

I've added in a section 'Matters of Disagreement on Gypsy & Traveller Provision'. I've included our wording which we suggested in my email on 22nd August and your position after so it reads:

'SSDC is largely content with the approach DMBC has taken to maximise supply in the Dudley area. However, SSDC continues to request DMBC explore any publicly owned land in the Green Belt which would be a suitable location for a public site as requested in its letter dated December 2023. DMBC has confirmed that the Dudley Local Plan is an urban led strategy and that a review of the Green Belt does not form part of the Plan's overall spatial strategy.'

I have attached a new track change and clean copy of the SoCG which hopefully you are now comfortable to take through your Cabinet.

Please let me know if there are any issues or if you want to discuss anything.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

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From: Vicki Popplewell (Planning) <[redacted]>
Sent: Monday, September 16, 2024 2:21 PM
To: Edward Fox [redacted]; Alex Evans <[redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi both

As discussed with Ed at our last DtC meeting, I have reconsidered the proposed wording.

I don't feel in a position to accept the additional put forward by South Staffs. Therefore, I would suggest that the SoCG reflects the following

Matter of disagreement:

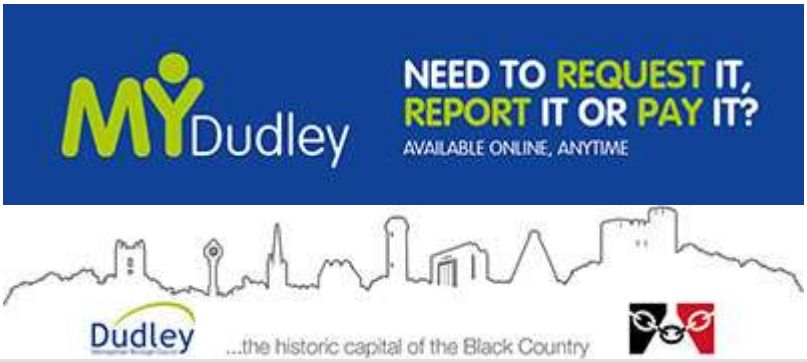
SSDC is largely content with the approach DMBC has taken to maximise supply in the Dudley area. However, SSDC encourages DMBC to explore any publicly owned land in the Green Belt which would be a suitable location for a public site as requested in its letter dated December 2023. DMBC has confirmed that the Dudley Local Plan is an urban led strategy and that a review of the Green Belt does not form part of the Plan's overall spatial strategy.

Ed, as discussed I intend to take the two SoCG (FEMA and Bilateral) to our Cabinet in October so if could send the updated bilateral one to me after you have reviewed my suggested wording above that would be great.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]>
Sent: Thursday, August 22, 2024 4:14 PM
To: Vicki Popplewell (Planning) <[redacted]
Cc: Edward Fox [redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Vicki,

My turn to apologise for the delay in getting back to you.

Unfortunately, we can't agree to your proposed wording as it makes it sound like it's a matter which has been resolved and South Staffs have accepted that Dudley shouldn't look for a public G&T site in the Green Belt. We would therefore like to include the following wording from a South Staffs viewpoint:

'SSDC is largely content with the approach DMBC has taken to maximise supply in the Dudley area. However, SSDC continues to request DMBC explore any publicly owned land in the Green Belt which would be a suitable location for a public site as requested in its letter dated December 2023.'

We are happy for you to respond with the Dudley viewpoint after? Or we can include this under a separate 'matters of disagreement' heading if that would make it clearer.

[redacted]

Happy to have a chat if that would help?

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Vicki Popplewell (Planning) <[redacted]>
Sent: Friday, August 9, 2024 12:30 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Alex

Apologies for the delay in getting back to you. Last week's NPPF threw a curve ball at us (you as well) and took me off my day job.

With regards to the sentence in para 25 - *However, SSDC would support exploration of any publicly owned land in the Green Belt which would be a suitable location for a public site.*

I am uncomfortable with this sentence as it is not the spatial strategy approach we have taken with our Plan under the extant guidance which SSDC acknowledged in your rep to the DLP Reg 18 consultation. If we were to review any public land in the GB we would be opening ourselves up for reviewing other sites which is not consistent with the current approach we have taken.

[redacted]

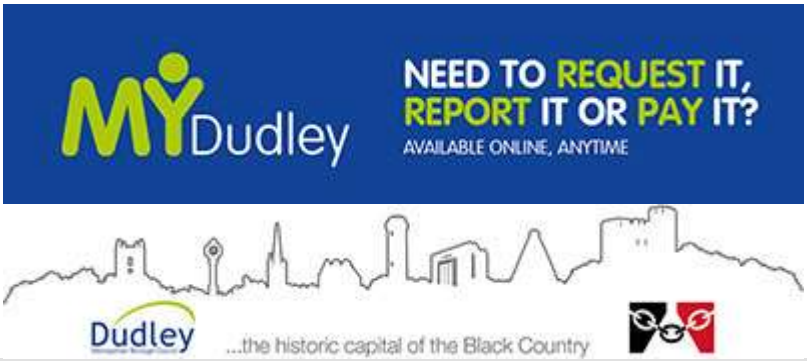
My suggested re-wording would be as follows and we may wish to include this as an area for disagreement. Let me know what you think

However, whilst SSDC would support exploration of any publicly owned land in the Green Belt which would be a suitable location for a public site, DMBC has confirmed that the spatial approach to their local plan is to focus development within its urban area in the most sustainable locations, supported by community facilities and local infrastructure, whilst ensuring the most efficient use of land.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]
Sent: Monday, July 29, 2024 11:16 AM
To: Vicki Popplewell (Planning) <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Vicki,

I have spoken to Ed this morning.

Our position is that we would like to keep the wording in. This is because we are encouraging all our neighbouring authorities to take the same steps towards meeting gypsy and traveller provision as we have, including looking for a public site on Green Belt land. We feel it is important to show that we are taking a consistent line in all our D2C discussions with neighbouring authorities. You are of course welcome to add your position in after and explain why you consider it would not be appropriate for you to look at a public site in the Green Belt. We are also happy to move this to a separate section of 'matters of disagreement' if you think this would add clarity.

I welcome your thoughts and happy to have arrange a quick catch up to discuss?

Thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Vicki Popplewell (Planning) <[redacted]>
Sent: Wednesday, July 24, 2024 10:58 AM
To: Alex Evans <[redacted]
Cc: Edward Fox [redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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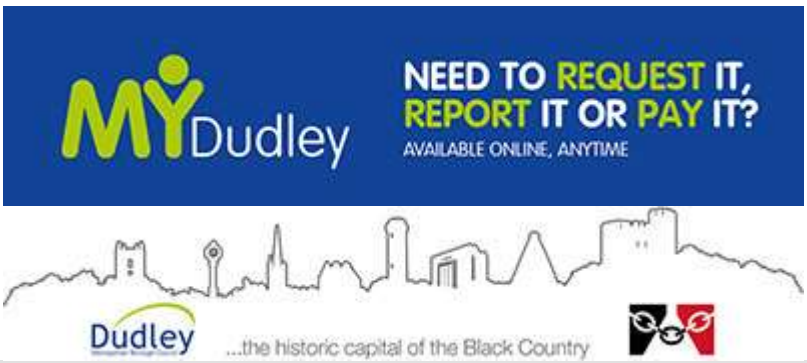
Hi Alex

I did review the SoCG you resent on 1sy July and didn't read through the email. I would appreciate it if you could discuss with Ed next week. Happy to have a catch up with both of you if best rather than exchanging emails.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]
Sent: Wednesday, July 24, 2024 9:30 AM
To: Vicki Popplewell (Planning) <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Good morning Vicki,

I proposed the wording in my email on the 1st July (see email chain below).

I understand your comments around the Dudley Local Plan strategy being urban led.

From our point of view, we are encouraging our neighbouring authorities to consider all of the approaches we have taken to trying to meet our gypsy and traveller need, including looking at sites in the Green Belt.

Ed is off this week, but I'll have a chat with him next week and get back to you.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Vicki Popplewell (Planning) <[redacted]
Sent: Tuesday, July 23, 2024 6:17 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Alex

I'm afraid the last sentence in para 25 threw me as I didn't recall seeing it before in the updated/amended version you previously circulated and which I sent back to you in June and we discussed at the last DtC meeting on 24 June. Hence me querying. Correct me if I'm wrong but this has been made as an addition to the updated document I sent back to you in June with my amends etc?

It is my view that we are unable to agree to the sentence being included. The Dudley Local Plan strategy is an urban led strategy. As discussed that the last DtC meeting when we were reviewing my comments on the SoCG the Plan's strategy doesn't include a review of GB boundaries and on this basis any sites in the GB do not past the gateway for site assessment.

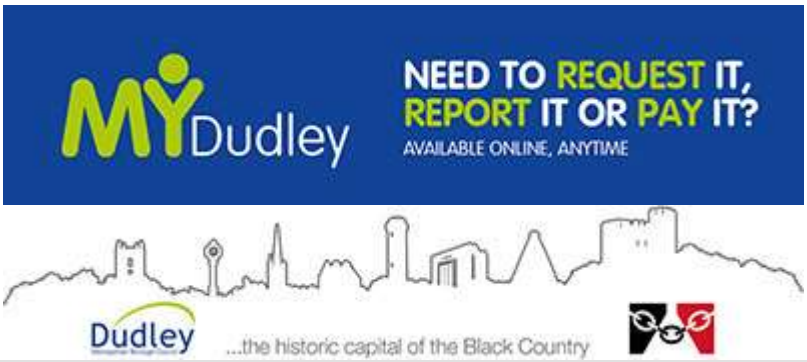
When we did review the GB (as part of Black Country Plan) we didn't find any appropriate sites for G&T in the GB- so even if we accepted this sentence we still wouldn't be able to find any suitable sites.

Could you review the sentence in light of my comments. Happy to have a catch up with you and Ed if needed next week.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]
Sent: Tuesday, July 23, 2024 11:31 AM
To: Vicki Popplewell (Planning) <[redacted]
Cc: Edward Fox <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Vicki,

Thanks for progressing the SoCG, its much appreciated.

My comment related to removing the reference to Green Belt in the second sentence (to reflect the approach Dudley has taken to site assessment).

We would want to keep in reference to Green Belt in the last sentence as we would be supportive of Dudley exploring options for a public owned site in the Green Belt, in line with the approach that South Staffs has taken.

Apologies for the confusion. I'm happy to have a chat through if that would help.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

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From: Vicki Popplewell (Planning) <[redacted]>
Sent: Monday, July 22, 2024 7:21 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Alex

I'm hoping to brief our Project Board on the SoGC next week and take to Cabinet 25 Sep for formal sign off.

With regards to para 25 and the comments you have made. Can you confirm if you are referring to remove reference to the GB in the 2nd sentence or the final sentence of the paragraph.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
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Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



From: Alex Evans <[redacted]
Sent: Thursday, July 18, 2024 12:15 PM
To: Vicki Popplewell (Planning) <[redacted]>
Cc: Edward Fox <[redacted]
Subject: FW: [EXTERNAL EMAIL] RE: SoCG

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Good morning Vicki,

I hope you're doing well.

Following on from my previous email I just wanted to check that you are happy with the SoCG? We are also now seeking to get them formally signed off.

Assuming you are happy with the attached version, if you are able to organise for it to be signed / take it through the approval process your end and provide us with a signed copy that would be much appreciated. From our end, we have delegated authority to sign the SoCG so will be able to sort this fairly easily.

If you will need to take the SoCG through the member agreement process, could you please provide me with some rough timescales.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: Monday, July 1, 2024 4:39 PM
To: Vicki Popplewell (Planning) <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

Hi Vicki,

Please find attached the meeting minutes from last week. Please feel free to amend or add to them.

I have also attached the TC version and a clean version of the SOCG which we went through last week. We have added in the below sentence in relation to gypsy provision:

'SSDC is largely content with the approach DMBC has taken to maximise supply in the Dudley area. However, SSDC would support exploration of any publicly owned land in the Green Belt which would be a suitable location for a public site.'

Please let me know if you are happy with this or wish to make any further amendments.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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Statement of Common Ground between Dudley Metropolitan Borough Council and South Staffordshire District Council

South Staffordshire Local Plan 202318-204139

Position at dateNovember 2022

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Dudley Metropolitan Borough Council (DMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2023~~18~~-2041~~39~~.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023~~18~~-2041~~39~~ and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South Staffordshire FEMA[2] and Black Country FEMA[3]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council
[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council
[3] Black Country EDNA 2017 and 2021 update

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

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

Housing

7. SSDC and DMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[4] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Whilst SSDC has raised points through the Draft Black Country Plan consultation which it considers may reduce this shortfall, it is common ground that there is likely to be a very significant shortfall arising from the Black Country and that this requires discussion under the Duty to Cooperate. Following the cessation of work on the Black Country Plan in autumn 2022, DMBC are now preparing a Local Plan for the Dudley area and held a Regulation 18 consultation in late 2023.

8. DMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities[5]. This ~~has~~ led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. ~~DMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.~~ . This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

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~~15.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including DMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and DMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including DMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and DMBC's stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites.

Cross boundary transport impacts

~~16.~~19. SSDC and DMBC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Dudley administrative area. No other cross-boundary transport issues have been identified at this stage. However, SSDC and DMBC will continue to work together to ensure that any cross-boundary transport matters arising are addressed.

[7] The figures are subject to change through the plan making process and further information becoming available.

Commented [VP(3]: Alex - please note This figure is subject to change given Local Plan reps received on some employment sites but it's the latest published figures. So might want to add a footnote

Commented [AE4R3]: Footnote added

Commented [VP(5]: I removed reference to CWC as I assume its from their SoCG

Commented [AE6R5]: Yes, left in by mistake - apologies

Infrastructure

~~17.~~20. SSDC and DMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas

~~18.~~21. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified at this stage. SSDC, Staffordshire CC and DMBC will continue to work together to ensure that any cross-boundary matters arising are addressed.

Gypsy & Traveller Provision

~~19.~~22. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[8].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~20.~~23. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. ~~-~~In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~21.~~24. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country

[8] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Plan review. However, no details were given about efforts made to examine the potential for expanded or new public site provision, nor was a follow-up response received to SSDC's subsequent August 2022 letter.

~~22.~~25. Subsequently, correspondence dated 11th and 18th December 2023, has confirmed that DMBC's one existing public/Council owned Traveller site is fully occupied with a waiting list. DMBC indicated that no site submissions had been received for Gypsy and Traveller sites and despite undertaking a recent assessment of a number of Council owned sites ~~that a review of a number of sites~~ (including public land~~) and Green Belt),~~ ~~had~~ only ~~identified~~ one site was identified that would suitably accommodate a permanent transit site. This~~,~~ site ~~which~~ has since secured planning permission. DMBC has confirmed that as part of the work on the Reg 18 Draft Dudley Local Plan, it is likely that the Council will have a shortfall in meeting its own Gypsy and Traveller sites. If it is not possible to meet this shortfall, the remaining need will be met within the "broad location" of the Dudley urban area through the planning application process. ~~is now the subject of a planning application.~~ DMBC also indicated that ~~it will consider engaging with site promoters/proposed allocations to identify if part of a wider site can be made available for a publicly run site as part of its Local Plan work being progressed in 2023~~work was ongoing internally to consider the potential to improve capacity for existing sites(s). ~~-~~SSDC is largely content with the approach DMBC has taken to maximise supply in the Dudley area. However, SSDC would support exploration of any publicly owned land in the Green Belt which would be a suitable location for a public site. ~~has not currently reviewed the site assessment work undertaken by DMBC but will continue to engage with DMBC as its plan preparation progresses to identify if there is scope for a contribution to SSDC's unmet needs.~~

Commented [VP(7]: I've removed GB ref as we removed GB sites from out site assessment work in light of the urban/brownfield led approach and NPPF

Commented [AE8R7]: Kept in reference to public land but happy to remove Green Belt

Commented [VP9]: Should this para be updated to reflect our most recent correspondence in Dec 2023 which confirms that Dudley has a shortfall in its own supply

Commented [AE10R9]: Done

Natural Environment

~~23.~~26. SSDC and DMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~24.~~27. No cross-boundary issues have been identified at this stage.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: [redacted]

Date: ~~27th January 2023~~

Dudley Metropolitan Borough Council

Name: ~~Cllr Patrick Harley~~

Position: ~~Leader of the Council~~

Signature: [redacted]

Date: ~~24 March 2023~~

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: SoCG
Attachments: Dudley-SSDC SoCG Junde 2024 TC copy - DMBC comments 13-06-24.docx

From: Vicki Popplewell (Planning) <[redacted]>
Sent: 13 June 2024 10:31
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]; Kelly Harris <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex

Apologies, I missed off an amended sentence on the track changes I sent yesterday and have included on the attached – it the last sentence on para 17 that has been updated with the BC EDNA reference update

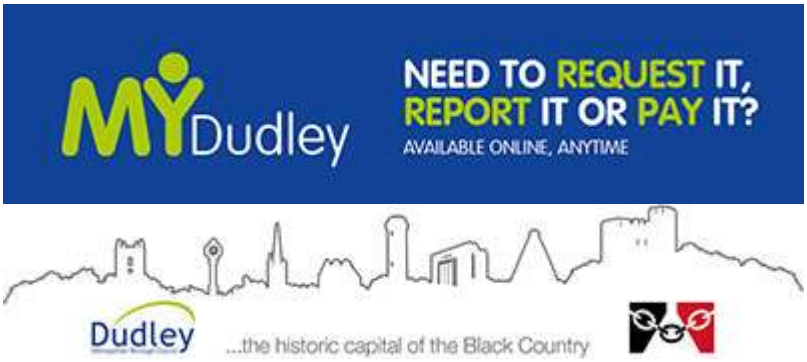
Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk






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

South Staffordshire Local Plan 202318-204139

Position at dateNovember 2022

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Dudley Metropolitan Borough Council (DMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2023~~18~~-2041~~39~~.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023~~18~~-2041~~39~~ and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South Staffordshire FEMA[2] and Black Country FEMA[3]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council
[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council
[3] Black Country EDNA 2017 and 2021 update

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

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

Housing

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Commented [VP(2]: Alex - please note This figure is subject to change given Local Plan reps received on some employment sites but it's the latest published figures. So might want to add a footnote

Commented [VP(3]: I removed reference to CWC as I assume its from their SoCG

~~15.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including DMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and DMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including DMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and DMBC's stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites.

Cross boundary transport impacts

~~16.~~19. SSDC and DMBC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Dudley administrative area. No other cross-boundary transport issues have been identified at this stage. However, SSDC and DMBC will continue to work together to ensure that any cross-boundary transport matters arising are addressed.

Infrastructure

~~17.~~20. SSDC and DMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas

~~18.~~21. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified at this stage. SSDC, Staffordshire CC and DMBC will continue to work together to ensure that any cross-boundary matters arising are addressed.

Gypsy & Traveller Provision

~~19.~~22. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~20.~~23. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. ~~-~~In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~21.~~24. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. However, no details were given about efforts made to examine the potential for expanded or new public site provision, nor was a follow-up response received to SSDC's

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

subsequent August 2022 letter.

~~22.~~25. Subsequently, correspondence dated 11th and 18th December 2023, has confirmed that DMBC's one existing public/Council owned Traveller site is fully occupied with a waiting list. DMBC indicated that no site submissions had been received for Gypsy and Traveller sites and despite undertaking a recent assessment of a number of Council owned sites ~~that a review of a number of sites (including public land and Green Belt), had~~ only ~~identified~~ one site was identified that would suitably accommodate a permanent transit site. This~~,~~ site ~~which~~ has since secured planning permission. DMBC has confirmed that as part of the work on the Reg 18 Draft Dudley Local Plan, it is likely that the Council will have a shortfall in meeting its own Gypsy and Traveller sites. If it is not possible to meet this shortfall, the remaining need will be met within the "broad location" of the Dudley urban area through the planning application process. ~~is now the subject of a planning application.~~ DMBC also indicated that ~~it will consider engaging with site promoters/proposed allocations to identify if part of a wider site can be made available for a publicly run site as part of its Local Plan work being progressed in 2023~~work was ongoing internally to consider the potential to improve capacity for existing sites(s). ~~-~~SSDC has not currently reviewed the site assessment work undertaken by DMBC but will continue to engage with DMBC as its plan preparation progresses to identify if there is scope for a contribution to SSDC's unmet needs.

Commented [VP(4]: I've removed GB ref as we removed GB sites from out site assessment work in light of the urban/brownfield led approach and NPPF

Commented [VP5]: Should this para be updated to reflect our most recent correspondence in Dec 2023 which confirms that Dudley has a shortfall in its own supply

Natural Environment

~~23.~~26. SSDC and DMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~24.~~27. No cross-boundary issues have been identified at this stage.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: [redacted]

Date: ~~27th January 2023~~

Dudley Metropolitan Borough Council

Name: ~~Cllr Patrick Harley~~

Position: ~~Leader of the Council~~

[redacted]

Signature:

Date: ~~24 March 2023~~

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: SoCG
Attachments: Dudley-SSDC SoCG Junde 2024 TC copy - DMBC comments.docx

From: Vicki Popplewell (Planning) <[redacted]>
Sent: 12 June 2024 14:39
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: [EXTERNAL EMAIL] RE: SoCG

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Hi Alex

See comments and changes on the attached version. I'm happy to have another look through once mine and your track changes/comments have been accepted for any typos etc as it will be easier to read clean version. Hope my changes/comments make sense.

Apologies for taking so long to get back to you.

Ian Culley will co-ordinate a response to the FEMA SoCG and I have fed Dudley's comments to him.

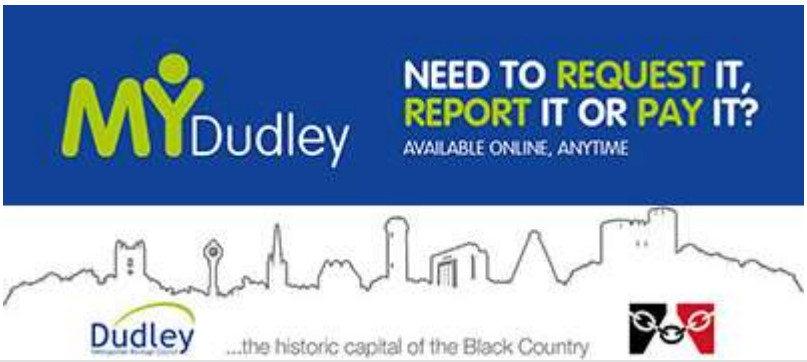
Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk







From: Alex Evans <[redacted]>
Sent: Thursday, June 6, 2024 2:13 PM
To: Vicki Popplewell (Planning) <[redacted]>
Cc: Edward Fox <[redacted]>; Kelly Harris [redacted]
Subject: [EXTERNAL EMAIL] RE: SoCG

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Hi Vicki,

I have previously sent you a draft SoCG (attached) in relation to the South Staffordshire emerging Local Plan. As I'm sure you are aware, we ran a 6 weeks consultation on the Plan which closed on Friday, 31st May (details via the link below).

https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review

Now that you have had time to fully consider the Plan and supporting evidence as a whole, we are looking to progress the SoCG at pace to support the submission of the Plan.

I am aware that we are currently in a pre-election period due to the general election taking place on the 4th July. However, we can still progress the SoCG in confidence at an officer level ready to take them through the formal agreement process after the election.

I would therefore welcome any comments or suggested amendments (as track changes) on the draft SoCG by 21st June.

Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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From: Vicki Popplewell (Planning) <[redacted]
Sent: Monday, April 8, 2024 3:37 PM
To: Alex Evans <[redacted]>
Subject: SoCG

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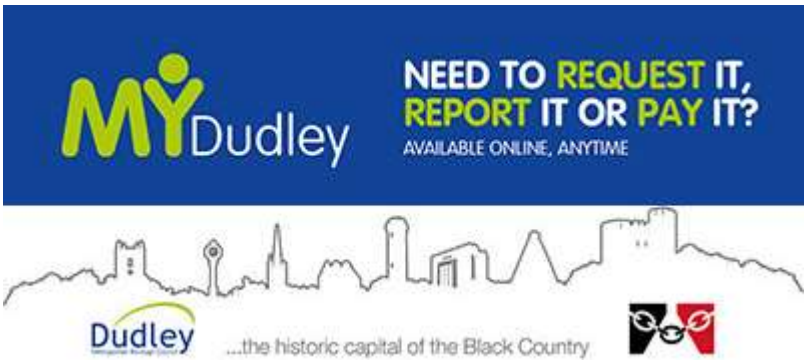
Hi Alex

I will have to hold off sending comments back on the two SoCGs you have sent to us as I've been advised I need to do briefings for approval and as we have elections in May I will need to await the outcomes of this.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 816941
www.dudley.gov.uk



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Alex Evans

From: Vicki Popplewell (Planning) <[redacted]>
Sent: 18 March 2024 08:51
To: Alex Evans
Subject: SoCG

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Hi Alex

Apologies. I'm on leave this week and I haven't had chance to go through the SoCGs you forward previously as I've been busy with CPO statement deadlines.

I will pick up the SoCG emails when I'm back next week.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
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Alex Evans

From: Alex Evans
Sent: 08 March 2024 14:14
To: Vicki Popplewell
Cc: Kelly Harris; Edward Fox
Subject: Dudley-SSDC SoCG 2024
Attachments: SSDC Covering Letter - SOCG March 2024 - Dudley.pdf; Dudley-SSDC SoCG 2024.docx

Dear Vicki

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes. I have also attached a covering letter which sets out a summary of key changes from a SSDC perspective.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024.**

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk



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South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct Dial: [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Vicki

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

Gypsy & Traveller Provision

In August 2023 work began on an update to SSDCs Gypsy and Traveller Accommodation Assessment (GTAA) to assess need over the updated plan period to 2041. The updated assessment has identified a need of 162 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite exploring all available opportunities, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the district's 5 year pitch need. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the district. The position remains that SSDC still requires assistance in addressing its unmet pitch needs.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[redacted]

Lead Planning Manager
Planning
South Staffordshire Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Position at date~~November 2022~~

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Dudley Metropolitan Borough Council (DMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South Staffordshire FEMA[2] and Black Country FEMA[3]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council
[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council
[3] Black Country EDNA 2017 and 2021 update

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

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

Housing

7. SSDC and DMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[4] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Whilst SSDC has raised points through the Draft Black Country Plan consultation which it considers may reduce this shortfall, it is common ground that there is likely to be a very significant shortfall arising from the Black Country and that this requires discussion under the Duty to Cooperate. Following the cessation of work on the Black Country Plan in autumn 2022, DMBC are now preparing a Local Plan for the Dudley area and held a Regulation 18 consultation in late 2023.

8. DMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities[5]. This ~~has~~ led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. ~~DMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.~~. This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

~~8.~~10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

~~9. SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.~~

~~10.~~11. DMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ SSDC is party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

~~11.~~12. SSDC and DMBC both sit within the South Staffordshire Functional Economic Market Area (FEMA). DMBC is also within the Black Country FEMA and SSDC is identified as being outside of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between DMBC and SSDC on employment matters.

~~12.~~13. The South Staffordshire Local Plan 20231~~18~~-20411~~39~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own ~~local~~ needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's ~~EDNA 2020-2040~~ Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~13.~~16. ~~In addition~~Additionally, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[6] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire~~, and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs of the Black Country FEMA.

~~14.~~17. DMBC have~~s~~ prepared an Economic Land Needs Assessment 2020-2041 with the other Black Country authorities examining employment land requirements across the Black Country FEMA. This identifies a shortfall of 153ha of employment land across the Black Country FEMA, and of this, CWC have a shortfall of 52ha. The Black Country EDNA recommends that

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

in meeting this shortfall the Black Country authorities should engage with neighbouring Local Plan areas with a strong or moderate economic relationship to the Black Country FEMA been part of the preparation of the Black Country Plan. Published evidence from that plan, at the Reg 18 Stage, as informed by the EDNA 2021, indicated that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities through the duty to cooperate process. DMBC (and the three other, as part of the Black Country authorities), haves therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall. However, in October 2022, the Black Country Councils confirmed that work on the Black Country Plan had ceased, and that the four councils would be preparing individual local plans. These plans will be informed by an update of the Black Country EDNA 2021, and that update will confirm the employment land scenario and associated shortfall arising in each of the local authority areas and the associated sum across the FEMA as a whole.

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

Cross boundary transport impacts

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

Infrastructure

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

18.21. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified at this stage. SSDC, Staffordshire CC and DMBC will continue to work together to ensure that any cross-boundary matters arising are addressed.

Gypsy & Traveller Provision

~~19.~~22. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~20.~~23. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. ~~-~~In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~21.~~24. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. However, no details were given about efforts made to examine the potential for expanded or new public site provision, nor was a follow-up response received to SSDC's subsequent August 2022 letter.

~~22.~~25. Subsequently, correspondence has confirmed that DMBC's one existing public/Council owned Traveller site is fully occupied with a waiting list. DMBC indicated that no site submissions had been received for Gypsy and Traveller sites and that a review of a number of sites (including public land and Green Belt) had only identified one site that would suitably accommodate a permanent transit site, which is now the subject of a planning application. DMBC also indicated that it will consider engaging with site promoters/proposed allocations

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

to identify if part of a wider site can be made available for a publicly run site as part of its Local Plan work being progressed in 2023. SSDC has not currently reviewed the site assessment work undertaken by DMBC but will continue to engage with DMBC as its plan preparation progresses to identify if there is scope for a contribution to SSDC's unmet needs.

Natural Environment

23.26. SSDC and DMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

24.27. No cross-boundary issues have been identified at this stage.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: [redacted]

Date: ~~27th January 2023~~

Dudley Metropolitan Borough Council

Name: ~~Cllr Patrick Harley~~

Position: ~~Leader of the Council~~

Signature: [redacted]

Date: ~~24 March 2023~~

Lichfield District Council (LDC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
9th September 2024	SSDC to LDC	Email from SSDC with a countersigned copy	Fully signed SoCG	No – same but signed
6th September 2024	LDC to SSDC	Email from LDC with the signed SoCG.	SoCG signed by LDC	No – same but signed
18th July 2024	SSDC to LDC	Email from SSDC asking for LDC to take the SoCG through its formal agreement processes	Reattached the previously officer agreed SoCG.	No – same as previous
21st March 2024	LDC to SSDC	Email from LDC agreeing the SoCG at an officer level.	N/A	N/A
21st March 2024	SSDC to LDC	Email from SSDC providing a copy of the SoCG agreed in the meeting.	SoCG agreed at DtC meeting	Yes
21st March 2024	DtC meeting between SSDC and LDC which discussed the SoCG			
20th March 2024	SSDC to LDC	Email from SSDC with the majority of track changes accepted with the outstanding issues to be discussed at a DtC meeting the next day	SoCG with track changes accepted	No – same but track changes accepted
15th March 2024	LDC to SSDC	Email from LDC with suggested track changes	SoCG with LDC track changes?	Yes
8th March 2024	SSDC to LDC	Initial email from SSDC to Lichfield with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

From: Alex Evans
Sent: 09 September 2024 10:28
To: Patrick Jervis
Cc: Edward Fox
Subject: RE: Statement of Common Ground for South Staffs Local Plan
Attachments: Statement of Common Ground South Staffs - Lichfield signed.pdf

Good morning Patrick,

Please find attached a counter copy for your records.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Patrick Jervis <[redacted]>
Sent: Friday, September 6, 2024 8:18 AM
To: Alex Evans <[redacted]>; Edward Fox <[redacted]>
Subject: Statement of Common Ground for South Staffs Local Plan

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Morning both – hope you're both well?

Please find attached SoCG signed by our cabinet member, could you send me the fully signed copy once available please for our records?

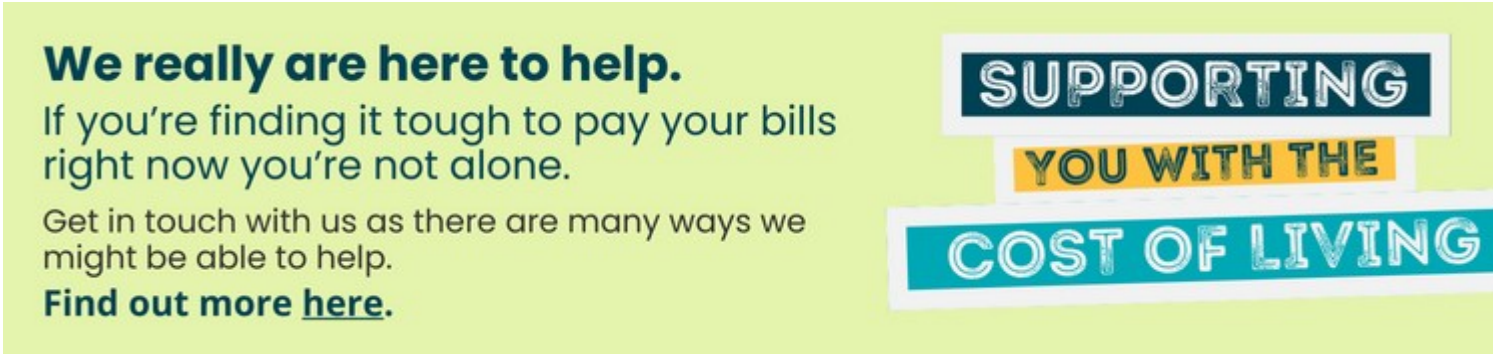
Cheers

Patrick Jervis MRTPI (he/him)
Principal Policy and Strategy Officer (Planning)

Core

Office: 01543 308132 | **Mobile:** [redacted]

Lichfield District Council



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Alex Evans

Subject: FW: Lichfield-SSDC SoCG 2024
Attachments: Lichfield-SSDC SoCG 2024 - July 2024.docx

From: Alex Evans
Sent: 18 July 2024 12:23
To: Patrick Jervis <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: Lichfield-SSDC SoCG 2024

Good morning Patrick,

I hope you're doing well.

Following on from agreeing the SoCG at officer level earlier in the year, we are now seeking to get them formally signed off.

If you are able to organise for it to be signed / take it through the approval process your end and provide us with a signed copy that would be much appreciated. From our end, we have delegated authority to sign the SoCG so will be able to sort this fairly easily.

If you will need to take the SoCG through the member agreement process, could you please provide me with some rough timescales.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk

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From: Patrick Jervis <[redacted]
Sent: Thursday, March 21, 2024 2:42 PM
To: Alex Evans <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: Lichfield-SSDC SoCG 2024

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex,

Looks good to me – happy to confirm at an officer level we're happy with the SoCG.

Kind regards

Patrick Jervis MRTPI (he/him)
Principal Policy and Strategy Officer (Planning)

Core

Office: 01543 308132 | **Mobile:** [redacted]

Lichfield District Council

From: Alex Evans <[redacted]>
Sent: 21 March 2024 12:42
To: Patrick Jervis <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: Lichfield-SSDC SoCG 2024

Hi Patrick,

Thanks for the meeting just now.

As discussed, please find attached the SoCG with the agreed amendments to para 11.

If you could please review and confirm you are happy that would be much appreciated.

Many thanks

Alex

.

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

South Staffordshire Local Plan 2023-2041

Position at date

Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Lichfield District Council (LDC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Lichfield District Council (LDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2023-2041.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023-2041 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and LDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. In October 2022 the authorities ceased work on the joint Black Country Plan and are now preparing individual local plans covering each authority respectively. Whilst those plans are now at an early stage it as acknowledged that the evidence supporting the Black Country Plan identified a significant unmet need which will need to be further evidenced and quantified. Several of the authorities have published Issues & Options consultations which identify unmet needs and confirmation from some that they will not be considering the release of Green Belt.

8. SSDCs November 2022 (Regulation 19) Publication Plan which housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore SSDC consider the study is no longer a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

11. LDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced and justified. SSDC is party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the West Midlands Development Needs Group Statement of Common Ground and potential future Statements of Common Ground are considered to be an appropriate vehicle by which to consider the issue holistically.

Employment

12. SSDC and LDC are within separate functional economic market area but continue to work together collaboratively as part of West Midlands Development Needs Group.

13. The South Staffordshire Local Plan 2023-2041 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic

Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

16. Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire, Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

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

Infrastructure

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

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

Gypsy & Traveller Provision

20. SSDC has an identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period[3]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

21. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

22. LDC's confirmed in response to the August 2022 correspondence that LDC are unable to meet its own Gypsy and Traveller accommodation requirements and as such would not be able to assist in meeting wider unmet need. Indeed, LDC had previously written to neighbouring authorities including SSDC to ascertain if any were able to assist in meeting its unmet need in relation to accommodation for Gypsies and Travellers. SSDC confirmed at that time they were unable to provide such assistance. LDC is in the early stages of preparing a new local plan for the district, as part of this process it will prepare further evidence in respect of provision for Gypsies and Travellers accommodation.

Natural Environment

23. SSDC and LDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

24. Both LDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and LDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

25. SSDC and LDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Lichfield District Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: Lichfield-SSDC SoCG 2024
Attachments: Lichfield-SSDC SoCG 2024 - officer draft 20 March.docx

From: Alex Evans
Sent: 20 March 2024 16:31
To: Patrick Jervis <[redacted]>
Cc: Kelly Harris <[redacted] Edward Fox <[redacted]>
Subject: RE: Lichfield-SSDC SoCG 2024

Hi Patrick

Ahead of the meeting tomorrow, please find attached a version with all of the track changes accepted apart from paragraph 11 which we still need to discuss.

See you tomorrow,

Thanks

Alex

From: Patrick Jervis <[redacted]
Sent: Friday, March 15, 2024 9:14 AM
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Lichfield-SSDC SoCG 2024

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Morning Alex,

I hope you're well. Please see attached with some suggested changes and a couple of comments. My main thoughts are around the HMA wide SoCG – I'm possibly a bit hazy on where this got to but I don't recall it ever reaching the point of being formally signed as the revised NPPF dropped. I think possibly we need some clarity around that matter in the attached. As I'd have advised in the HMA group LDC were content to sign up to the SoCG given it's stated position of 2022 but I don't think any of us then got to the point of signing it – may be me miss remembering things so apologies if that's so!

Happy to have a meeting/chat if there's anything you want to go through. Just so you're aware I'm on leave from 23rd March until 16th April so could meet next week or it would need to wait until I return.

Have a good weekend,

Ta

Patrick Jervis MRTPI (he/him)
Principal Policy and Strategy Officer (Planning)

Core

Office: 01543 308132 | **Mobile:** [redacted]

Lichfield District Council

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

South Staffordshire Local Plan 202318-204139

Position at dateNovember 2022

Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Lichfield District Council (LDC)

Commented [PJ1]: As this is to be an officer agreed draft when published can we ensure that this is very clear when the document is published.

We do have authority delegated to our portfolio holder to sign off on SoCGs so should be able to progress a signed version expediently when appropriate.

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Lichfield District Council (LDC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

   - Housing (including housing needs across the GBBCHMA);
   - Employment land;
   - Transport and infrastructure matters;
   - Gypsy and traveller accommodation; and
   - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to the be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts.

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

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

Housing

7. SSDC and LDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. ~~Since that time the Black Country authorities have announced that they are no longer progressing with a~~In October 2022 the authorities ceased work on the joint Black Country Plan and are now ~~to prepare~~ preparing individual local plans covering each authority respectively. Whilst those plans are now at an early stage it as acknowledged that the evidence supporting the Black Country Plan identified a significant unmet need which will need to be further evidenced and quantified. Several of the authorities have published Issues & Options consultations which identify unmet needs and confirmation from some that they will not be considering the release of Green Belt.

Commented [PJ2]: Just wonder whether we need something in here about the progress the BC authorities have started to make – perhaps doesn't need to go as far as my suggestion.

8. SSDCs November 2022 (Regulation 19) Publication Plan which housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore SSDC consider the study is no longer a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

~~7.~~10. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites,- SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

8.11. LDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced and justified. As such, both authorities are SSDC is party to the emerging 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a wholeBoth authorities had previously been party to an emerging SOCG to cover the GBBCHMA. However, the parties acknowledge that this was not progressed to date, as changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence and/or statements to consider housing shortfalls and its potential solutions. Both councils agree that Ggiven the scale and complexity of the housing shortfalls arising in the HMA, the West Midlands Development Needs Group and a potential future Statement of Common Ground is considered to be an appropriate vehicle by which to consideraddress the issue holistically.

Commented [PJ3]: I think perhaps we could do with a quick discussion on this bit – my memory on the HMA wide SOCG has gone hazy but I don't recall it every being finalised? Didn't it kind of get taken over by the NPPF changes etc? This reads to me as if it was completed with some parties signing which isn't my recollection of the situation – sorry if I'm totally wrong!

Commented [PJ4]: See above comment – think this may need revising

Employment

9.12. SSDC and LDC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers West Midlands Development Needs Group to progress any necessary follow-on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.

10.13. The South Staffordshire Local Plan 202318-204139 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's EDNA 2020-2040 Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 2736.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This

recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~11.~~16. ~~In addition~~Additionally,~~,~~ the SSDC Local Plan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire~~, and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the unmet needs of the Black Country ~~-~~FEMA~~unmet needs~~, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

~~12.~~17. SSDC and LDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two~~four~~ strategic housing site allocations, however none are within close proximity to the Lichfield administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~13.~~18. SSDC and LDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~14.~~19. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~15.~~20. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year

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period[3].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~16.~~21. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. ~~-~~In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~17.~~22. LDC's confirmed~~latest~~ in response ~~response~~ to the August 2022 correspondence ~~suggests that there is no free pitch provision on existing public sites in Lichfield, who have also identified a shortfall in pitches as part of the review of the Lichfield Local Plan~~that LDC are unable to meet its own Gypsy and Traveller accommodation requirements and as such would not be able to assist in meeting wider unmet need. Indeed, LDC ~~has~~ had previously written to neighbouring authorities including SSDC to ascertain if any were able to assist in meeting its unmet need in relation to accommodation for Gypsies and Travellers. SSDC confirmed at that time they were unable to provide such assistance. ~~The initial questions from the Planning Inspectorate on the submission of the review of the Lichfield Local Plan may result in LDC revisiting the site assessments done previously to see if any further capacity can be found. Therefore, in SSDC's view it is currently unclear at this stage as to what extent LDC may or may not be able to assist in meeting unmet pitch need arising from SSDC pending LDC revisiting their site assessment.~~ LDC is in the early stages of preparing a new local plan for the district, as part of this process it will prepare further evidence in respect of provision for Gypsies and Travellers accommodation ~~as part of the examination of its Local Plan. Should this work identify additional pitches beyond those already identified this will first be required to meet LDC's own need prior to any consideration of assisting neighbouring authorities with their need~~.

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Natural Environment

~~18.~~23. SSDC and LDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

~~19.~~24. Both LDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and LDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

~~20.~~25. SSDC and LDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position: ~~Kelly Harris~~

Signature: [redacted]

Date: ~~27th January 2023~~

Lichfield District Council

Name: ~~Cllr Iain Eadie~~

Position: ~~Deputy Leader~~

[redacted]

Signature:

Date: ~~28/03/2023~~

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Alex Evans

From: Alex Evans
Sent: 08 March 2024 14:16
To: Patrick Jervis ([redacted])
Cc: Kelly Harris; Edward Fox
Subject: Lichfield-SSDC SoCG 2024
Attachments: Lichfield-SSDC SoCG 2024.docx; SSDC Covering Letter - SOCG March 2024 - Lichfield.pdf

Dear Patrick

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes. I have also attached a covering letter which sets out a summary of key changes from a SSDC perspective.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024.**

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk



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South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct Dial: [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Patrick

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

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We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[redacted]

Lead Planning Manager
Planning
South Staffordshire Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Position at date~~November 2022~~

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10.13. The South Staffordshire Local Plan 202318-204139 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

14. South Staffordshire's EDNA 2020-2040 Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 2736.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands

Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

11.16. In additionAdditionally,, the SSDC Local Plan will release 232ha of Green Belt to deliver a allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire, and Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the unmet needs of the Black Country -FEMAunmet needs, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

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

Infrastructure

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

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

Gypsy & Traveller Provision

15.20. SSDC has an identified a 162121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9272 pitches within the first 5 year period[3].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

16.21. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

17.22. LDC's latest response to the August 2022 correspondence suggests that there is no free pitch provision on existing public sites in Lichfield, who have also identified a shortfall in pitches as part of the review of the Lichfield Local Plan. LDC has previously written to neighbouring authorities including SSDC to ascertain if any were able to assist in meeting its unmet need in relation to accommodation for Gypsies and Travellers. SSDC confirmed at that time they were unable to provide such assistance. The initial questions from the Planning Inspectorate on the submission of the review of the Lichfield Local Plan may result in LDC revisiting the site assessments done previously to see if any further capacity can be found. Therefore, in SSDC's view it is currently unclear at this stage as to what extent LDC may or may not be able to assist in meeting unmet pitch need arising from SSDC pending LDC revisiting their site assessment. LDC will prepare further evidence in respect of provision for Gypsies and Travellers accommodation as part of the examination of its Local Plan. Should this work identify additional pitches beyond those already identified this will first be required to meet LDC's own need prior to any consideration of assisting neighbouring authorities with their need.

Natural Environment

18.23. SSDC and LDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

19.24. Both LDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other

protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and LDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

~~20.~~25. SSDC and LDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position: ~~Kelly Harris~~

Signature: [redacted]

Date: ~~27th January 2023~~

Lichfield District Council

Name: ~~Cllr Iain Eadie~~

Position: ~~Deputy Leader~~

Signature: [redacted]

Date: ~~28/03/2023~~

North Warwickshire Borough Council (NWBC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
23rd May 2025	SSDC to NWBC	Email from SSDC providing counter signed copy of the SoCG	Fully signed copy of the SOCG	No – same but signed
23rd May 2025	NWBC to SSDC	Email from NWBC with signed SoCG	Signed SoCG from NWBC	No – same but signed
23rd May 2025	SSDC to NWBC	Email from SSDC saying we are happy with the changes	N/A	N/A
23rd May 2025	NWBC to SSDC	Email from NWBC giving an update on timescales	N/A	N/A
23rd May 2025	NWBC to SSDC	Email from NWBC with additional revision to the SoCG	SoCG with additional revision	Yes
23rd May 2025	NWBC to SSDC	Email from NWBC with revisions to the SOCG	SoCG to revisions	yes
22nd May 2025	NWBC to SSDC	Email from NWBC providing an update	N/A	N/A
22nd May 2025	SSDC to NWBC	Email from SSDC acknowledging the previous email and setting out time scales	N/A	N/A
22nd May 2025	NWBC to SSDC	Email from NWBC saying they will look at the SoCG	N/A	N/A
22nd May 2025	SSDC to NWBC	Email from SSDC asking for the SOCG to be progressed ahead of the hearing sessions.	Draft SoCG	No – same as previous
11th November 2024	SSDC to NWBC	Email from SSDC asking for an update.	N/A	N/A
5th November 2024	SSDC to NWBC	Email from SSDC asking for an update	N/A	N/A
28th October 2024	SSDC to NWBC	Email for SSDC asking for NWBC to provide a response.	N/A	N/A
20th September 2024	SSDC to NWBC	Email from SSDC asking for an update and for the SOCG to be progressed ahead of submission of the South Staffordshire Local Plan.	N/A	N/A
18th July 2024	SSDC to NWBC	Email from SSDC asking for an update	N/A	N/A
4th July 2024	SSDC to NWBC	Email from SSDC acknowledging NWBC's email	N/A	N/A

4th July 2024	NWBC to SSDC	Email from NWBC saying they will hopefully be able to look at in over the next week for so	N/A	N/A
4th July 2024	SSDC to NWBC	Email from SSDC asking for an update	N/A	N/A
27th June 2024	SSDC to NWBC	Email from SSDC asking for an update	N/A	N/A
6th June 2024	SSDC to NWBC	Email from SSDC updating NWBC on the Local Plan consultation and asking for the SoCG to be progressed.	N/A	N/A
3rd April 2024	SSDC to NWBC	Email from SSDC asking for an update	N/A	N/A
25th March 2024	SSDC to NWBC	Email from SSDC asking for an update	N/A	N/A
8th March 2024	SSDC to NWBC	Initial email from SSDC to North Warwickshire with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

From: Alex Evans
Sent: 23 May 2025 17:52
To: Dorothy Barratt; Annette Roberts; Edward Fox; Kelly Harris
Subject: RE: North Warks-SSDC SoCG 2024 revision
Attachments: North Warwickshire-SSDC SoCG signed.pdf

Thanks Dot – really appreciate you sorting this so quickly. Please find attached a countersigned copy.

Thanks again,

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Dorothy Barratt <[redacted]
Sent: 23 May 2025 12:39
To: Alex Evans <[redacted]>; Annette Roberts [redacted]>; Edward Fox <[redacted]>; Kelly Harris <[redacted]>
Subject: North Warks-SSDC SoCG 2024 revision

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Dear All

Please find attached the signed copy of the SSDC without Draft on it. Please can you send me back the SoCG when signed from your side.

Hope all goes well with the examination.

Thank you.

Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: [redacted]
Days: Tuesday to Friday

Web: www.northwarks.gov.uk

Social:



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Alex Evans

From: Alex Evans
Sent: 23 May 2025 12:20
To: Dorothy Barratt; Edward Fox; Annette Roberts
Subject: RE: North Warks-SSDC SoCG 2024 revision

Hi Dot

Yes we are happy with the attached version. If you could get it signed today that would be much appreciated.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 696421
www.sstaffs.gov.uk





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From: Dorothy Barratt <[redacted]>
Sent: 23 May 2025 12:12
To: Alex Evans <[redacted]>; Edward Fox <[redacted]>; Annette Roberts

<[redacted]>
Subject: FW: North Warks-SSDC SoCG 2024 revision

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For information.

I will be leaving work today by 4 pm so please let me know as soon as possible if this revised version is acceptable. Otherwise it will be Wednesday morning before I will be able to finalise this.

Thanks Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

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Mobile: [redacted]
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Social:

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From: Dorothy Barratt
Sent: 23 May 2025 11:46
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]>
Subject: North Warks-SSDC SoCG 2024 revision

Hi Alex

I have just spoken to my Chief Executive who has asked for the attached revision. Are you happy with this? If so, I can accept the track changes and get his signature on it.

Thanks Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: [redacted]
Days: Tuesday to Friday

Web: www.northwarks.gov.uk

Social:





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

South Staffordshire Local Plan 2023-2041

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and North Warwickshire Borough Council (NWBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2023-2041.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023-2041 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
   - Housing (including housing needs across the GBBCHMA);
   - Employment land;
   - Transport and infrastructure matters;
   - Gypsy and traveller accommodation; and
   - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and

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

employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

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

Housing

7. SSDC and NWBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities have participated in both the Strategic Housing Market Assessments including the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2036. Each authority have considered how through their own plan-making process to assist in addressing unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Subsequent Local Plan consultations from City of Wolverhampton Council, Sandwell MBC and Dudley MBC continue to demonstrate that a significant unmet need remains. In SSDC's view, the GBBCHMA remains the appropriate geography over which to plan for housing shortfalls. In NWBC's view, as there is no functional relationship between North Warwickshire and the Black Country it is not considered that North Warwickshire will deliver towards the housing shortfall identified in the Black Country.

8. NWBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. SSDC is party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. Given the scale and complexity of the housing shortfalls arising in the HMA, a joint HMA Statement of Common Ground is considered to be an appropriate vehicle by which to consider the issue holistically.

9. SSDC Previously proposed a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

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Matter not Agreed in relation to housing

10. Following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected an amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

11. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based

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

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

Employment

13. SSDC and NWBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow-on work identified as necessary in the West Midlands Strategic Employment Sites Study 2022.

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

Cross boundary transport impacts

15. SSDC and NWBC are committed to continue working together in partnership, alongside their respective highway authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the North Warwickshire administrative area.

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

Infrastructure

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

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

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Gypsy & Traveller Provision

19. SSDC has an identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period[3]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

20. SSDC has written to all adjacent and housing market area authorities in January 2022 and then in August 2022 during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

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

21. NWBC has indicated they are unable to assist in the provision of publicly owned pitches to cater for the needs of Gypsy and Travellers in South Staffordshire. In the Local Development Scheme NWBC has committed to bring forward a a review of their Local Plan which will include consideration of Gypsy and Traveller needs and this may be an issue that could be considered at that time.

22.

~~21. SSDC wrote to NWBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. NWBC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent NWBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation regarding what options to explore additional public pitches have/have not been considered by NWBC.~~

~~22.1. NWBC has indicated they are unable to assist in the provision of publicly owned pitches to cater for the needs of Gypsy and Travellers in South Staffordshire.~~

~~23. In the Local Development Scheme NWBC has committed to bring forward a a review of their Local Plan which will include consideration of Gypsy and Traveller needs and this may be an issue that could be considered at that time.~~

Natural Environment

~~24.~~23. SSDC and NWBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~25.~~24. No cross-boundary issues have been identified.

DRAFT

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

North Warwickshire Borough Council

Name: Steve Maxey

Position: Chief Executive

Signature:

Date:

DRAFT

Alex Evans

From: Dorothy Barratt <[redacted]>
Sent: 23 May 2025 10:27
To: Alex Evans
Subject: North Warks-SSDC SoCG 2024 revision
Attachments: North Warks-SSDC SoCG 2024 revision.docx

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HI Alex

I have made some tweaks to the SoCG and took off track changes. I have sent to our Chief Executive to see if he is ok to sign. Are you happy with the attached?

Thanks Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: 07909094494
Days: Tuesday to Friday

Web: www.northwarks.gov.uk

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

South Staffordshire Local Plan 2023-2041

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and North Warwickshire Borough Council (NWBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2023-2041.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023-2041 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
   - Housing (including housing needs across the GBBCHMA);
   - Employment land;
   - Transport and infrastructure matters;
   - Gypsy and traveller accommodation; and
   - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and

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

employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

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

Housing

7. SSDC and NWBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities have participated in both the Strategic Housing Market Assessments including the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2036. Each authority have considered how through their own plan-making process to assist in addressing unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Subsequent Local Plan consultations from City of Wolverhampton Council, Sandwell MBC and Dudley MBC continue to demonstrate that a significant unmet need remains. In SSDC's view, the GBBCHMA remains the appropriate geography over which to plan for housing shortfalls. In NWBC's view, as there is no functional relationship between North Warwickshire and the Black Country it is not considered that North Warwickshire will deliver towards the housing shortfall identified in the Black Country.

8. NWBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. SSDC is party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. Given the scale and complexity of the housing shortfalls arising in the HMA, a joint HMA Statement of Common Ground is considered to be an appropriate vehicle by which to consider the issue holistically.

9. SSDC Previously proposed a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

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Matter not Agreed in relation to housing

10. Following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected an amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

11. Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based

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

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

Employment

13. SSDC and NWBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow-on work identified as necessary in the West Midlands Strategic Employment Sites Study 2022.

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

Cross boundary transport impacts

15. SSDC and NWBC are committed to continue working together in partnership, alongside their respective highway authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the North Warwickshire administrative area.

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

Infrastructure

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

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

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Gypsy & Traveller Provision

19. SSDC has an identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period[3]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

20. SSDC has written to all adjacent and housing market area authorities in January 2022 and then in August 2022 during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

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

21. SSDC wrote to NWBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. NWBC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent NWBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation regarding what options to explore additional public pitches have/have not been considered by NWBC.

22. NWBC has indicated they are unable to assist in the provision of publicly owned pitches to cater for the needs of Gypsy and Travellers in South Staffordshire.

23. In the Local Development Scheme NWBC has committed to bring forward a a review of their Local Plan which will include consideration of Gypsy and Traveller needs and this may be an issue that could be considered at that time.

Natural Environment

24. SSDC and NWBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

25. No cross-boundary issues have been identified.

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Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

North Warwickshire Borough Council

Name: Steve Maxey

Position: Chief Executive

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: North Warks-SSDC SoCG 2024

From: Dorothy Barratt <[redacted]>
Sent: 22 May 2025 18:10
To: Kelly Harris <[redacted]>; Mike Dittman <[redacted]>
Cc: Alex Evans <[redacted]>; Annette Roberts <[redacted]>; Edward Fox <[redacted]>; Annette Roberts <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

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Thanks Kelly

Yes just going through now and I think it is almost there. I will liaise with Alex tomorrow and provide an update tomorrow.

Thanks Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: [redacted]
Days: Tuesday to Friday

Web: www.northwarks.gov.uk

Social:



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From: Kelly Harris <[redacted]>
Sent: 22 May 2025 18:02
To: Dorothy Barratt <[redacted]>; Mike Dittman <[redacted]>

Cc: Alex Evans <[redacted]>; Annette Roberts <[redacted]>; Edward Fox <[redacted]>; Annette Roberts <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

> **Caution:** Warning external email

Hi Dot

Appreciate you trying to resolve this. DtC is Wednesday morning, so we need to say something on this day. if its unsigned with a covering email to say its now going through your agreement processes? [redacted] Let me know if we can help at all. On reading through, I think we were largely there with the wording. Fingers crossed!

Kelly Harris

Lead Planning Manager
Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk







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From: Dorothy Barratt <[redacted]>
Sent: 22 May 2025 17:42
To: Kelly Harris <[redacted]; Mike Dittman <[redacted]>
Cc: Alex Evans <[redacted]>; Annette Roberts <[redacted]>; Edward Fox <[redacted]>; Annette Roberts <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

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Hi Kelly,

I am sorry you have had to chase. Too be honest not sure if I can sort out tomorrow and we are closed on Tuesday, but I will try to at least to get something to you even if it is not a signed document. I will see what I can do.

Thanks Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: [redacted]
Days: Tuesday to Friday

Web: www.northwarks.gov.uk

Social:



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From: Kelly Harris <[redacted]>
Sent: 22 May 2025 17:38
To: Dorothy Barratt <[redacted]>; Mike Dittman <[redacted]>
Cc: Alex Evans <[redacted]>; Annette Roberts <[redacted]>; Edward Fox

<[redacted]>; Annette Roberts <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

> **Caution:** Warning external email

Hi Dot,

Thank you so much for replying, we really appreciate it. I attached the last version I had to the first email, but I've attached it again here. We start on legal matters on Tuesday, so would be grateful if you could get it back to us by then. Its obviously of its time when we submitted in December 2024. I'm not around tomorrow, but my colleague Alex who is cc'd is around if you need to speak to him tomorrow.

Regards,

Kelly Harris

Lead Planning Manager
Planning
South Staffordshire Council

Tel: [redacted]
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From: Dorothy Barratt <[redacted]>
Sent: 22 May 2025 17:32
To: Kelly Harris <[redacted]; Mike Dittman <[redacted]>
Cc: Alex Evans <[redacted]>; Annette Roberts <[redacted]>; Edward Fox <[redacted]>; Annette Roberts <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

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Dear Kelly and Team

I am sorry we have not sorted this out. For lots of reasons it dropped off my radar. I will need to refresh where we got to but hopefully we can sort it out swiftly.

Please could you share with me what you believe to be the latest SoCG.

Kind regards

Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: [redacted]
Days: Tuesday to Friday

Web: www.northwarks.gov.uk

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From: Kelly Harris <[redacted]>
Sent: 22 May 2025 16:48

To: Dorothy Barratt <[redacted]>; Mike Dittman <[redacted]>
Cc: Alex Evans <A[redacted]>; Annette Roberts <[redacted]>; Edward Fox <[redacted]>; Annette Roberts <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

> **Caution:** Warning external email

Dear Dot/Mike

We start our Local Pan hearings next week, and [redacted] identified that the lack of signature to our shared SoCG may be a problem for our inspectors, particularly given your representations to R19 and signature on the HMA SoCG. Is there any chance you would be now willing to respond to our emails and sign the SoCG please? [redacted]
So can I ask if you could sign it to avoid that scenario escalating, please?

I look forward to hearing from you.

Regards,

Kelly Harris

Lead Planning Manager
Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk

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d this E-mail in error and that any use is strictly prohibited.

Alex Evans

Subject: FW: North Warks-SSDC SoCG 2024
Attachments: North Warks-SSDC SoCG 2024 TC copy.docx

From: Annette Roberts <[redacted]
Sent: 11 November 2024 19:07
To: Steve Maxey <[redacted]>
Cc: Edward Fox <[redacted]
Subject: FW: North Warks-SSDC SoCG 2024

Dear Steve

Apologies for contacting you again regarding this. My team have subsequent to our recent conversation tried to contact the team direct, but to date have no response and we are keen to conclude on this.

Would anyone be able to assist?

Kindest Regards

Annette

Annette Roberts

Corporate Director of Place and Communities
Corporate Leadership Team
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk

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Alex Evans

Subject: FW: North Warks-SSDC SoCG 2024
Attachments: North Warks-SSDC SoCG 2024 TC .docx

From: Edward Fox
Sent: 05 November 2024 08:51
To: Dorothy Barratt <[redacted]>
Cc: Kelly Harris <[redacted]>; Alex Evans <[redacted]>; Annette Roberts <[redacted]>; Mike Dittman [redacted]
Subject: RE: North Warks-SSDC SoCG 2024

Hi Dot,

I hope you are well? [redacted]

It is our intention to submit the Local Plan next month so we really do need to come to a position on the attached SoCG.

I would appreciate it if you could provide any track changes to the SoCG by the end of the week please, as well as an indication of your timescales for getting it signed.

I look forward to hearing from you.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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Alex Evans

Subject: FW: North Warks-SSDC SoCG 2024

From: Annette Roberts
Sent: 28 October 2024 20:26
To: [redacted]
Subject: FW: North Warks-SSDC SoCG 2024

Dear Steve

I trust this finds you well and I hope you don't mind the email out of the blue.

My team have tried on numerous occasions to contact the policy team at North Warks BC to get a position on the attached SSDC draft Statement of Common Ground as detailed below, but without success. We weren't sure if we had the correct email address so I am sending this direct to you.

If you are able to assist in us having a response, then that would be really appreciated.

Thanks again for your time.

Annette Roberts

Corporate Director of Place and Communities
Corporate Leadership Team
South Staffordshire Council

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From: Edward Fox
Sent: Friday, September 20, 2024 4:06 PM
To: Dorothy Barratt <[redacted]>; Mike Dittman <[redacted]>
Cc: Kelly Harris <[redacted]; Alex Evans <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

Good afternoon Dot & Mike,

Hope you're both well.

As you will be aware, South Staffordshire Council is urgently working towards submission of our Local Plan prior to Christmas, including being able to submit bilateral statements of common ground with all GBBCHMA authorities.

As set out in the email trail below, we have tried to engage with you on a number of occasions since March on the draft SoCG that we sent you. I am mindful that in your representation to our April 2024 Regulation 19 consultation, you state that we have failed to comply with the Duty to Cooperate. We are strongly of the view that this is not the case, so think it is very important that we can set out our respective positions, and our areas of agreement and disagreement, through a SoCG. We have made a few updates to the SoCG as the initial draft was circulated prior to our Reg 19 consultation, and I would welcome you reviewing this as soon as possible and setting out any track changes – please see attached.

Given the delay in getting this agreed at officer level, please could I ask for your comments by **close of play next Friday (27th Sept)**? As you can appreciate, if we are unable to progress SoCGs with any authorities, then we will need to provide an audit trail of this should it be queried by the inspector, but I very much hope we can avoid this by finalising the SoCG with yourselves asap.

I look forward to hearing from you.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Edward Fox
Sent: Thursday, July 18, 2024 8:55 AM
To: Dorothy Barratt <[redacted]>
Cc: Mike Dittman <[redacted]>; Kelly Harris <[redacted]>; Alex Evans <[redacted]
Subject: RE: North Warks-SSDC SoCG 2024

Hi Dot,

Further to the below, are you able to provide an update for when you will be able to provide us comments on the draft SoCG we sent you please?

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]

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From: Edward Fox
Sent: Thursday, July 4, 2024 4:04 PM
To: Dorothy Barratt <[redacted]>
Cc: Mike Dittman <[redacted] Kelly Harris <[redacted]>; Alex Evans <[redacted]
Subject: RE: North Warks-SSDC SoCG 2024

Hi Dot,

[redacted] thank you for coming back to me.

We look forward to receiving a response on this from you in the next week or so.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk

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From: Dorothy Barratt <[redacted]>
Sent: Thursday, July 4, 2024 4:01 PM
To: Edward Fox <[redacted]>
Cc: Mike Dittman <[redacted]>; Kelly Harris <[redacted]>; Alex Evans <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

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Good afternoon Edward,

I am sorry I have been very quiet on this [redacted] and a major appeal I have had little time to do anything.

I am hopeful in the next week or so to be able to get back to you with at least some response. I apologise for the delay.

Kind regards

Dot

Dorothy Barratt
Forward Planning & Economic Development Manager
North Warwickshire Borough Council

Phone: 01827 719250
Mobile: [redacted]
Days: Tuesday to Friday
Web: www.northwarks.gov.uk
Social:



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From: Edward Fox <[redacted]>
Sent: Thursday, July 4, 2024 9:20 AM
To: Dorothy Barratt <[redacted]>
Cc: Mike Dittman <[redacted]; Kelly Harris [redacted]>; Alex Evans <[redacted]>
Subject: RE: North Warks-SSDC SoCG 2024

> **Caution:** Warning external email

Dear Dot,

I was wondering if you've seen my email below and are able to confirm to me when you will be able to get comments on the SoCG back to me please?

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]

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From: Edward Fox
Sent: Thursday, June 27, 2024 1:01 PM
To: Dorothy Barratt <[redacted]>

Cc: [redacted] Kelly Harris <[redacted]>; Alex Evans <[redacted]>
Subject: FW: North Warks-SSDC SoCG 2024

Dear Dot,

Alex informs me that he has emailed you numerous times regarding the draft SoCG and we've had no response.

As you will appreciate, following our Reg 19 consultation we want to make progress on this now so please can you come back to me with comments on the draft SoCG as soon as possible please? Please can you indicate when you envisage you will be able to provide comments by?

I look forward to hearing from you.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]

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From: Alex Evans
Sent: Thursday, June 6, 2024 2:16 PM
To: [redacted]
Subject: FW: North Warks-SSDC SoCG 2024

Dear Dot,

I have previously sent you a draft SoCG (attached) in relation to the South Staffordshire emerging Local Plan. As I'm sure you are aware, we ran a 6 weeks consultation on the Plan which closed on Friday, 31st May (details via the link below).

https://www.sstaffs.gov.uk/planning/planning-policy/local-plan-review

Now that you have had time to fully consider the Plan and supporting evidence as a whole, we are looking to progress the SoCG at pace to support the submission of the Plan.

I am aware that we are currently in a pre-election period due to the general election taking place on the 4th July. However, we can still progress the SoCG in confidence at an officer level ready to take them through the formal agreement process after the election.

I would therefore welcome any comments or suggested amendments (as track changes) on the draft SoCG by 21st June.

Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk

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From: Alex Evans
Sent: Wednesday, April 3, 2024 3:14 PM
To: [redacted]
Subject: FW: North Warks-SSDC SoCG 2024

Dear Dot,

I just wanted to send a reminder that we wanted to get officer agreement on the attached update to the SoCG.

I will be finalising our Duty to Cooperate Topic Paper early next week so I will need any comments by then if possible please. If that's not possible we will publish the draft as it is but make it clear that it has not yet been agreed by officers.

Also just to let you know our Regulation 19 Plan was approved last night at Committee for consultation later this month (link to further details and the Plan below). We will of course get back in contact once we formally start the consultation.

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Many thanks

Alex

From: Alex Evans
Sent: Monday, March 25, 2024 1:24 PM
To: [redacted]
Cc: Edward Fox <[redacted]; Kelly Harris <[redacted]
Subject: FW: North Warks-SSDC SoCG 2024

Dear Dot

I was wondering if you had been able to review the attached draft SoCG.

Just to confirm at this stage we are only seeking to agree draft wording at officer level which can be subject to change.

If you could let me know if you are happy with the current wording or have any amendments that would be much appreciated.

Kind regards

Alex

From: Alex Evans
Sent: Friday, March 8, 2024 2:17 PM
To: [redacted]
Cc: Kelly Harris <[redacted]; Edward Fox <[redacted]>
Subject: North Warks-SSDC SoCG 2024

Dear Dot

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new

Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes. I have also attached a covering letter which sets out a summary of key changes from a SSDC perspective.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024.**

Kind regards

Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk



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South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct Dial: [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Dot

As you will be aware, South Staffordshire District Council (SSDC) previously carried out a consultation on a Regulation 19 Plan in November 2022. However, work was paused on this Plan in January 2023 following proposed changes to national policy. As part of this Plan, SSDC sought to agree Statements of Common Ground (SoCG) between ourselves and individual authorities we have relationships with to show progress on Duty to Cooperate matters.

SSDC will be carrying out a consultation on a new Regulation 19 Plan which anticipated to start in April 2024 with a plan period covering 2023 – 2041. We are therefore seeking to agree a new SoCG taking into account SSDC's new Regulation 19 Plan. I have attached a track-change version of the previous SoCG which has been updated to reflect SSDC's new Regulation 19 Plan consultation and other factual changes.

A summary of some of the key changes from SSDC are provided below:

Housing

SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. In the new Regulation 19 Plan, SSDC is now proposing a strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the district with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

Employment

As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites.

Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

Gypsy & Traveller Provision

In August 2023 work began on an update to SSDCs Gypsy and Traveller Accommodation Assessment (GTAA) to assess need over the updated plan period to 2041. The updated assessment has identified a need of 162 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period. Despite exploring all available opportunities, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the district's 5 year pitch need. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the district. The position remains that SSDC still requires assistance in addressing its unmet pitch needs.

We are seeking to agree the attached amended SoCG at an officer level in the first instance, recognising that this may be caveated to it being subject to a subsequent more formal agreement process. It is SSDC's intention to publish the officer agreed SoCG on its website to support its Regulation 19 Plan.

I would appreciate it if you could review and if satisfied, sign or arrange for the appropriate representative to sign the SoCG on behalf of your Local Authority. Or alternatively, please respond with any amendments or comments you wish to make to the SoCG prior to signing. We would like to have the SoCG agreed and signed off at officer level by **Friday 22nd March 2024**

Kind regards

Kelly Harris

[redacted]

Lead Planning Manager
Planning
South Staffordshire Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and North Warwickshire Borough Council (NWBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both

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

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

Housing

7. SSDC and NWBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities have participated in both the Strategic Housing Market Assessments including the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2036. Each authority have considered how through their own plan-making process to assist in addressing unmet needs. The Black Country authorities[2] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Whilst those plans are now at an early stage it as acknowledged that the evidence supporting the Black Country Plan identified a significant unmet need which will need to be further evidenced and quantified. In SSDC's view, the GBBCHMA remains the appropriate geography over which to plan for housing shortfalls. In NWBC's view, as there is no functional relationship between North Warwickshire and the Black Country it is not considered that North Warwickshire will deliver towards the housing shortfall identified in the Black Country.

8. NWBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are working to progress the emerging~~ SSDC is party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions.Given the scale and complexity of the housing shortfalls arising in the HMA, a joint HMA Statement of Common Ground is considered to be an appropriate vehicle by which to consider~~address~~ the issue holistically.

Employment

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

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

DRAFT

Cross boundary transport impacts

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

Infrastructure

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

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

Gypsy & Traveller Provision

13. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 97~~72~~ pitches within the first 5 year period[3].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

14. SSDC has written to all adjacent and housing market area authorities in January 2022 and then in August 2022 during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

DRAFT

communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~14.~~15.

~~15.~~16. SSDC wrote to NWBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. NWBC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent NWBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation regarding what options to explore additional public pitches have/have not been considered by NWBC. NWBC has indicated they are unable to assist in the provision of publicly owned pitches to cater for the needs of Gypsy and Travellers in South Staffordshire. In the Local Development Scheme NWBC has committed to bring forward a Gypsy and Traveller DPD and this may be an issue that could be considered at that time.

Natural Environment

~~16.~~17. SSDC and NWBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~17.~~18. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

North Warwickshire Borough Council

Name:

Position:

DRAFT

Signature:

Date:

DRAFT

Sandwell Metropolitan Borough Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
30th July 2024	SSDC to SMBC	Email from SSDC providing a Countersigned copy	Fully signed SoCG	No – same as previous but signed
29th July 2024	SMBC to SSDC	Email from SMBC providing a signed copy.	SoCG signed by Sandwell	No – same as previous but signed
22nd July 2024	SSDC to SMBC	Email from SSDC with a clean copy of the SoCG with the error fixed.	Clean copy of the SoCG	No- same as previous but clean copy with error corrected
22nd July 2024	SMBC to SSDC	Email from SMBC stating they are happy with the changes but spotted one error.	N/A	N/A
17th July 2024	SSDC to SMBC	Email from SSDC with some additional proposed changes	SoCG with additional changes	Yes
9th July 2024	SSDC to SMBC	Email from SSDC accepting most of the changes but raising a couple of queries.	N/A	N/A
8th July 2024	SMBC to SSDS	Email from SMBC with track changes	SoCG with track changes	Yes
27th June 2024	SSDC to SMBC	Email from SSDC acknowledging SMBC's email	N/A	N/A
27th June 2024	SMBC to SSDC	Email from SMBC with an update on timescales	N/A	N/A
24th June 2024	SSDC to SMBC	Email from SSDC asking for an update	N/A	N/A
6th June 2024	SSDC to SMBC	Email from SSDC requesting that the SoCG be progressed following the consultation on the Reg19 Plan	N/A	N/A
10th April 2024	SMBC to SSDC	Email from SMBC saying that they can't make officer comments on the SoCG before reviewing the Reg 19 Plan.	N/A	N/A

3rd April 2024	SSDC to SMBC	Email from SSDC asking for an update and notifying that the Regulation 19 Plan had been approved by the Council for consultation.	N/A	N/A
25th March 2024	SSDC to SMBC	Email from SSDC asking for an update	N/A	N/A
8th March 2024	SSDC to SMBC	Initial email from SSDC to Samdwell with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

Subject: FW: Sandwell-SSDC SoCG 2024
Attachments: Sandwell-SSDC SoCG 2024 July 2024 signed.docx

From: Alex Evans
Sent: 30 July 2024 09:22
To: Patricia Mccullagh <[redacted]; Edward Fox [redacted]>
Cc: Kelly Harris <[redacted]>; Philippa1 Smith <[redacted]>; Andy Miller <[redacted]
Subject: RE: Sandwell-SSDC SoCG 2024

Hi Trisha,

That's great, thanks for getting this sorted. Its much appreciated.

Please find attached a countersigned copy for your records.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Patricia Mccullagh <[redacted]>
Sent: Monday, July 29, 2024 2:34 PM
To: Alex Evans <[redacted]k>; Edward Fox <[redacted]>
Cc: Kelly Harris [redacted]; Philippa1 Smith <[redacted]>; Andy Miller [redacted]>
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Alex

Please find attached signed SoCG.

Regards
Trisha

From: Alex Evans [redacted]k>
Sent: Monday, July 22, 2024 11:29 AM
To: Patricia Mccullagh <[redacted]>; Edward Fox <[redacted]
Cc: Kelly Harris <[redacted]>; Philippa1 Smith <[redacted]; Andy Miller <[redacted]>
Subject: RE: Sandwell-SSDC SoCG 2024

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Good morning Trisha,

Thanks for confirming that you are happy with the changes. Yes, apologies for the error (that's me trying to work on multiple SoCG simultaneously).

I've attached a clean copy with the track changes accepted and the above mentioned error corrected.

If you are able to organise for it to be signed / take it through the approval process your end and provide us with a signed copy that would be much appreciated. From our end, we have delegated authority to sign the SoCG so will be able to sort this fairly easily.

If you will need to take the SoCG through the member agreement process, could you please provide me with some rough timescales.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Patricia Mccullagh <[redacted]
Sent: Monday, July 22, 2024 11:03 AM
To: Alex Evans <[redacted] Edward Fox <[redacted]>
Cc: Kelly Harris [redacted] Philippa1 Smith <[redacted]; Andy Miller <[redacted]
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Alex

Yes happy with changes although in para 23 I assume you meant SMBC's approach and not CWC's approach?

SSDC will review CWC's approach when further details are published as part of SMBC Regulation 19 Plan.

Regards
Trisha

From: Alex Evans <[redacted]>
Sent: Wednesday, July 17, 2024 1:15 PM
To: Patricia Mccullagh <[redacted]; Edward Fox <[redacted]
Cc: Kelly Harris <[redacted]>; Philippa1 Smith <[redacted]>; Andy Miller <[redacted]>
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Trisha,

Further to my email below, I've incorporated a couple of changes into paragraphs 10 and 23 to address my points below which hopefully you will be happy with.

If you are happy with them, I'll send a clean copy with the track changes accepted which we can arrange to be signed / take them through our agreement processes?

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Position at ~~November 2022~~date

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Sandwell Metropolitan Borough Council (SMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 202318-204139.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 202318-204139 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment

Geography covered by Statement of Common Ground

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

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[1] and are either within, or are closely functionally related to, the South Staffordshire FEMA[2] and Black Country FEMA[3]. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

Key Strategic Matters

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

[1] The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council
[2] South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council
[3] Black Country EDNA 2017 and 2021 update

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

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

Housing

~~7.~~ SSDC and SMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities[4] similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored. Whilst SSDC has raised points through the Draft Black Country Plan consultation which it considers may reduce this shortfall, it is common ground that there is likely to be a very significant shortfalls arising from the Black Country and that this requires discussion under the Duty to Cooperate.~~–~~ Following the cessation of work on the Black Country Plan in autumn 2022, SMBC have been preparing the Sandwell Local Plan (SLP) and consulted on its Draft SLP (Regulation 18) in December 2023, which demonstrated a shortfall of 18,606 homes. ~~Since that time the Black Country authorities have announced that they are no longer progressing with a joint Black Country Plan and are now to prepare individual local plans covering each authority respectively. Whilst those plans are now at an early stage it as acknowledged that the evidence supporting the Black Country Plan identified a significant unmet need which will need to be further evidenced and quantified.~~

7.

8. SMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities[5]. This ~~has~~ led to SSDC proposing a 4,000 dwelling contribution to the unmet needs of the HMA, using the scale of locations set out in the GBBCHMA Strategic Growth Study. ~~SMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.~~ This was reflected in SSDCs November 2022 (Regulation 19) Publication Plan which proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

9. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the plan was paused. This reflected amendment to national Green Belt policy which subsequently came into force through the December 2023 NPPF. This confirmed that "Once established, there is no requirement for Green Belt

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

boundaries to be reviewed or changed when plans are being prepared or updated", and that "Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process". SSDC is also aware that the delay caused by the pause to the South Staffordshire Local Plan means that the Strategic Growth Study (2018) is no longer considered up to date in planning terms and therefore a sound evidential basis for the previously proposed 4000 home contribution. SSDC no longer considers that all of the previous proposed Green Belt sites are justified by exceptional circumstances and given this and SSDCs previous proposed plan period (to 2039) being inconsistent with national policy, SSDC no longer consider the 2022 (Regulation 19) version of the plan to be sound and suitable to progress to submission.

~~9. SSDC, Black Country authorities and Birmingham will work towards an agreed approach as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.~~ Given this change of circumstances, SSDC has revisited its strategic approach and tested further spatial strategy options considering the ways in which housing growth could be distributed across the district. SSDC is now proposing an alternative strategy that brings forward suitable safeguarded land and open countryside sites but limits Green Belt release to its Tier 1 settlements. These are the most sustainable settlements in the District with access to rail links, and limited Green Belt release at these settlements aligns with NPPF para 146(b) to give first consideration to land which is previously developed and/or is well served by public transport. Under SSDCs revised capacity led strategy based on the most suitable and sustainable sites, SSDC will allocate sufficient sites to meet its own needs, plus a small surplus (currently 640 dwellings when accounting for our own housing needs based upon the 2023 Standard Method calculation) that could be attributed to unmet needs of the GBBCHMA.

10. SMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. ~~including how contributions can be apportioned to meeting needs arising in individual areas where shortfalls arise.~~ However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider~~address~~ 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.

Employment

11. SSDC and SMBC both sit within the South Staffordshire functional economic market area (FEMA). SMBC is also within the Black Country FEMA and SSDC is identified as being outside

of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between SMBC and SSDC on employment matters.

12. The South Staffordshire Local Plan 2023~~18~~-2041~~39~~ proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

13. South Staffordshire's ~~EDNA 2020-2040~~ Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.

14. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27~~36~~.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

~~13.~~15. ~~In addition~~Additionally, the SSDC Local PLan will ~~release 232ha of Green Belt to deliver a~~ allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[6] suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country ~~planning~~ authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire~~, and~~ Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area including Birmingham. This may increase the apportionment of land from WMI which could potentially be apportioned towards the ~~Black Country~~ unmet needs~~.~~ of the Black Country FEMA, dependent on the stance of other authorities related to the site.

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

14.16. SMBC have prepared an Economic Land Needs Assessment 2020-2041 with the other Black Country authorities examining land requirements across the Black Country FEMA. This identifies a shortfall of 153ha employment land across the Black Country FEMA, and of this, SMBC have a shortfall of 170ha. ds been part of the preparation of the Black Country Plan. Evidence from this suggested that the Black Country as a whole has a 210ha shortfall of employment land and that it The Black Country EDNA recommends that in meeting this shortfall the Black Country authorities should engage with neighbouring Local Plan areas with a strong or moderate economic relationship to the Black Country FEMA would require assistance from other local authorities through the duty to cooperate. SMBC (and the three other Black Country authorities) , as part of the Black Country authorities, hashave therefore been in duty to cooperate discussions SMBC with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

15.17. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including SMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. In addition, the Black Country Authorities are also leading the preparation of a Statement of Common Ground which will cover the Black Country FEMA and authorities with which the Black Country has an evidenced functional relationship. The geography of this Statement of Common Ground has significant overlap with that associated with the South Staffordshire FEMA. SSDC and SMBC consider that these two is FEMA-wide statements of common ground areis the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including SMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls.. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and SMBC's stances on the need for an updated evidence base needs relating to the evidence base on regarding West Midlands Strategic Employment Sites.

Cross boundary transport impacts

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

Infrastructure

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

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

Gypsy & Traveller Provision

~~19.~~21. SSDC has an identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92~~72~~ pitches within the first 5 year period[7]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~20.~~22. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

~~21.~~23. A March 2022 response from the Black Country local authorities indicated that no additional sites had been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work. Therefore, the Black Country authorities considered it unlikely that they would be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. SMBCs response to SSDC letter of October 2023 dated 23 November 2023 clarified the position set out in the Draft SLP. That through the work undertaken for the Draft SLP, Sandwell identified a need for 14 pitches for Gypsy and Travellers over the plan period, including 8 pitches within the first 5 year period[8]. Through the site assessment process for the SLP, Sandwell identified provision for 10 pitches, leaving a shortfall of 4 pitches. The Council explored all potential sites for their suitability for plots and pitches including council land and the potential to expand or new public site provision, it also engaged with site promoters through 'Call for Sites' to explore if they were willing to make part of their site available for a publicly run site, no new sites were identified.~~At the time, no details were given about efforts made to examine the potential for expanded or new public~~

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021
[8] Black Country GTAA 2022 https://www.sandwell.gov.uk/downloads/download/493/sandwell-local-plan-housing-evidence

~~site provision. SMBC has since indicated that it has no plots available on existing public sites for SSDC needs. However, it also indicates it will engage with site promoters through a 'Call for Sites' to explore if they are willing to make part of their site available for a publicly run site during 2023 and that options for a new publicly run site in the Green Belt will be examined through its Issues and Options consultation for the Sandwell Development Plan. It has also stated that further work to consider whether there is publicly owned land for permanent sites will likely be undertaken during 2023. SSDC and SMBC will continue to work together to identify whether SMBC can contribute to SSDC's unmet needs as the SMBC and SSDC plans progress.~~ SSDC will review CWC's approach when further details are published as part of SMBC Regulation 19 Plan.

Natural Environment

~~22.~~24. SSDC and SMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.

~~23.~~25. No other cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature:



Date: ~~27th January 2023~~

Sandwell Metropolitan Borough Council

Name: ~~Tony McGovern~~

Position: ~~Director of Regeneration & Growth~~

Signature:



Date: ~~23/01/2023~~