Alex Evans

Subject: FW: Sandwell-SSDC SoCG 2024

From: Alex Evans
Sent: 09 July 2024 12:10
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,

Many thanks for the proposed amendments. We are happy with most of them, I just have a couple of queries below.

In relation to the GBBCHMA 2022 SoCG you added: 'including how contributions can be apportioned to meeting needs arising in individual areas where shortfalls arise'. I don't think that the 2022 SoCG does include details of apportionment? I'm happy to change this to say that a future SoCG update will look at apportionment if that's acceptable to you?

In relation to Gypsy and Travellers and the work you have done to explore potential sites, is this available to view or will more detail be provided as part of a future Reg19 consultation?

Just to let you know I'm on leave after today for the rest of the week, so I can pick this up when I'm back next week or I'm sure Ed will be happy to help with anything while I'm off.

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 8, 2024 10:29 AM
To: Edward Fox <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris [redacted]; Philippa1 Smith <[redacted]; Andy Miller <[redacted]>
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Ed

Please find attached SoCG with proposed track changes.

Regards
Trisha

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.

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.

~~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

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

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 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~~

[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

~~for Sites' to explore if they are willing to make part of their site available for a publicly run site during 2023 and that options for a new publicly run site in the Green Belt will be examined through its Issues and Options consultation for the Sandwell Development Plan. It has also stated that further work to consider whether there is publicly owned land for permanent sites will likely be undertaken during 2023. SSDC and SMBC will continue to work together to identify whether SMBC can contribute to SSDC's unmet needs as the SMBC and SSDC plans progress.~~

Natural Environment

~~22.~~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:

[redacted]

Date: ~~27th January 2023~~

Sandwell Metropolitan Borough Council

Name: ~~Tony McGovern~~

Position: ~~Director of Regeneration & Growth~~

Signature: [redacted]

Date: ~~23/01/2023~~

Alex Evans

Subject: FW: Sandwell-SSDC SoCG 2024

From: Edward Fox <[redacted]>
Sent: Thursday, June 27, 2024 12:56 PM
To: Patricia Mccullagh <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]; Philippa1 Smith <[redacted]; Andy Miller <[redacted]
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Trisha,

Thanks for coming back to me and confirming timescales for a response.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Patricia Mccullagh <[redacted]>
Sent: Thursday, June 27, 2024 10:44 AM
To: Edward Fox <[redacted]k>
Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]; Philippa1 Smith [redacted]; Andy Miller [redacted]
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Ed

All well, busy, assume you are too.

Apologies for not responding to date, I hope to be able to respond with comments next week.

Regards
Trisha

From: Edward Fox [redacted]
Sent: Monday, June 24, 2024 4:15 PM
To: Patricia Mccullagh <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris [redacted]; Philippa1 Smith [redacted]>; Andy Miller <[redacted]
Subject: FW: Sandwell-SSDC SoCG 2024

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Hi Trisha,

I hope you are well?

Alex informs me that we haven't received any comments from yourselves on the draft bilateral SoCG between our authorities to support submission of our plan (attached). I know we gave a deadline of 21st June and we are happy to give an extension to this, but are you able to indicate when you will be able to get us comments by please?

I'm conscious that your Duty to Cooperate dated 20th June will require our response, but we feel that it would be advantageous to understand your position on our SoCG prior to responding to your letter.

I look forward to hearing from you.

Kind regards

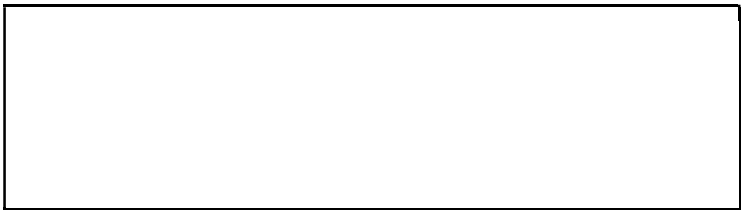
Ed

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 2:21 PM
To: Patricia Mccullagh <[redacted]>
Cc: Andy Miller <[redacted]>; Philippa1 Smith <[redacted]> Edward Fox <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Sandwell-SSDC SoCG 2024

Hi Patricia

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]

[redacted]

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From: Patricia Mccullagh <[redacted]
Sent: Wednesday, April 10, 2024 9:15 AM
To: Alex Evans <[redacted]>
Cc: Andy Miller <[redacted]>; Philippa1 Smith <[redacted]
Subject: RE: Sandwell-SSDC SoCG 2024

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Hi Alex

Unfortunately, Sandwell's position on this is that we can't make an officer comment in advance of reviewing the Plan as a whole and political approval for our response. If published we would like the wording to be clear that we have not agreed any changes instead of - *that it has not ~~yet~~ been agreed by officers*.

Regards

Patricia McCullagh
Team Leader Planning Policy
T: [redacted]

E: [redacted]

My working days are Mon – Thurs

Sandwell Council House, Directorate of Regeneration and Growth, Freeth Street, Oldbury, B69 3DE
For visitors to Council House the satnav post code is B69 3DB

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From: Alex Evans <[redacted]
Sent: 03 April 2024 15:23
To: Patricia Mccullagh <[redacted]
Subject: FW: Sandwell-SSDC SoCG 2024

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Dear Patricia,

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 1:27 PM
To: ([redacted]
Subject: FW: Sandwell-SSDC SoCG 2024

Dear Patricia

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 2:20 PM
To: ([redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: Sandwell-SSDC SoCG 2024

Dear Patricia

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]
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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 Patricia

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 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. 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. 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 boundaries to be reviewed or changed when plans are being prepared or updated", and that

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

"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. 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. 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 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.

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. 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.

~~14.~~16. SMBC ha~~d~~s been part of the preparation of the Black Country Plan. Evidence from this suggested that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities through the duty to cooperate.

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

SMBC, as part of the Black Country authorities, has therefore been in duty to cooperate discussions SMBC with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

15.17. 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. SSDC and SMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including SMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and SMBC's stances on ~~the need for an updated evidence base~~ 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 two~~four~~ strategic housing site allocations, however none are within close proximity to the Sandwell administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

17.19. 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

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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

Natural Environment

~~22.~~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.

~~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:

[redacted]

Date: ~~27th January 2023~~

Sandwell Metropolitan Borough Council

Name: ~~Tony McGovern~~

Position: ~~Director of Regeneration & Growth~~

Signature: [redacted]

Date: ~~23/01/2023~~

Shropshire Council (SC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
5th November 2024	SC to SSDC	Email from SC providing a countersigned copy	Fully signed SoCG	No – same as previous but signed
5th November 2024	SSDC to SC	Email from SSDC accepting changes and providing a signed copy of the SoCG	Copy of the SoCG signed by SSDC	No – same as previous but signed
4th November 2024	SC to SSDC	Email from SC on timescales and a suggested amendment	N/A	N/A
25th October 2024	SC to SSDC	Email from SC providing an update on timescales	N/A	N/A
25th October 2024	SSDC to SC	Email from SSDC asking for an update	N/A	N/A
9th October 2024	SSDC to SC	Email from SSDC asking for an update	N/A	N/A
23rd September 2024	SSDC to SC	Email from SSDC asking for an update	N/A	N/A
18th July 2024	SSDC to SC	Email from SSDC asking SC to take the SoCG through their formal agreement process	N/A	N/A
8th April 2024	SSDC to SC	Email from SSDC accepting the changes	SoCG with changes accepted	No – same as previous but track changes accepted
3rd April 2024	SC to SSDC	Email from SC with some suggested changes	SoCG with suggested changes	Yes
25th March 2024	SSDC to SC	Email from SSDC asking for an update	N/A	N/A
8th March 2024	SSDC to SC	Initial email from SSDC to Shropshire Council the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

Subject: FW: Shropshire-SSDC SoCG 2024

From: Edward Fox <[redacted]>
Sent: 05 November 2024 15:32
To: 'Edward West' <[redacted]; Dan Corden [redacted]>
Cc: Alex Evans <[redacted]; Kelly Harris <[redacted]>
Subject: RE: Shropshire-SSDC SoCG 2024

Many thanks Eddie.

Best wishes,

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk

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From: Edward West <[redacted]>
Sent: 05 November 2024 15:22
To: Edward Fox <[redacted]>; Dan Corden <[redacted]>

Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Shropshire-SSDC SoCG 2024

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Hi Ed,

[redacted]

Anyway, see attached signed SoCG. Best of luck with your progress.

Kind regards

Eddie

Eddie West
Planning Policy and Strategy Manager
Growth and Development
Shropshire Council

From: Edward Fox <[redacted]>
Sent: 05 November 2024 11:04
To: Edward West <[redacted]>; Dan Corden <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Shropshire-SSDC SoCG 2024

Hi Eddie,

[redacted]

I agree that the sentence you refer to in para 6 can be removed, so I done this in the attached. Kelly has delegation to sign SoCGs for South Staffs so I've added her signature. I'm happy for you to sign for SC.

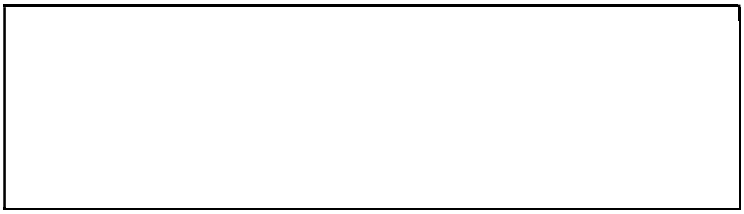
Thanks

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

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From: Edward West <[redacted]>
Sent: 04 November 2024 18:31
To: Edward Fox <[redacted]; Dan Corden <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Shropshire-SSDC SoCG 2024

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Hi Ed,

[redacted]

[redacted]

The SoCG looks fine except for the ref to new green belt policy in para 6, which now seems a little dated. Suggest we just remove it rather than amend. Otherwise happy to sign. Are you ok with my signature on this?

Thanks
Eddie

Eddie West
Planning Policy and Strategy Manager
Growth and Development
Shropshire Council

From: Edward Fox <[redacted]>
Sent: 25 October 2024 09:11
To: Edward West <[redacted] Dan Corden <[redacted]>
Cc: Alex Evans [redacted]>; Kelly Harris <[redacted]>
Subject: FW: Shropshire-SSDC SoCG 2024

Hi Eddie/Dan,

I hope you're both well.

Alex tells me with still haven't heard back from you on timescales for getting the attached SoCG signed which we will need for the submission of our Local Plan.

I do appreciate that it is a vey busy time for you trying to get your plan over the line, but we do need to be in a position where we have all of these SoCGs signed off by the start of December at the latest for submission of our plan.

I would appreciate it if you could come back to me asap with timescales for us receiving the signed version.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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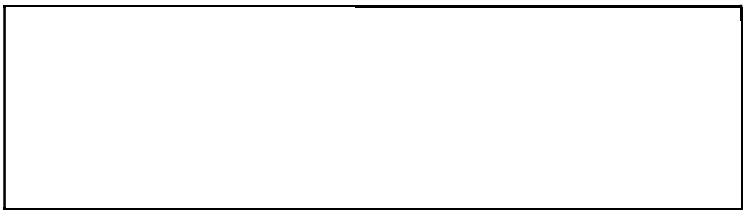
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From: Alex Evans <[redacted]>
Sent: 24 October 2024 12:59
To: Edward Fox <[redacted]>
Subject: FW: Shropshire-SSDC SoCG 2024

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: 09 October 2024 14:25
To: Eddie West <[redacted]>; Dan Corden <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: FW: Shropshire-SSDC SoCG 2024

Hi both,

I was wondering if you had a timeframe for getting the SoCG signed please? We are currently preparing everything ready for submission.

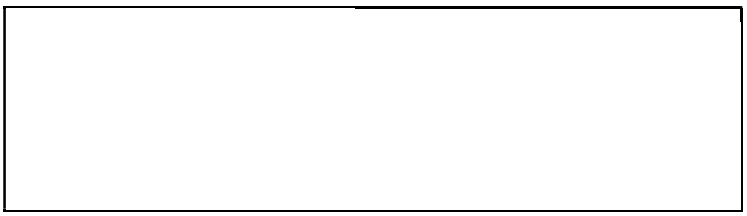
Many thanks

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, September 23, 2024 1:21 PM
To: Eddie West <[redacted]>; Dan Corden <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: FW: Shropshire-SSDC SoCG 2024

Hi Eddie and Dan,

I hope you are both well,

I just wanted to check how you were getting on with getting the SoCG signed off if possible please?

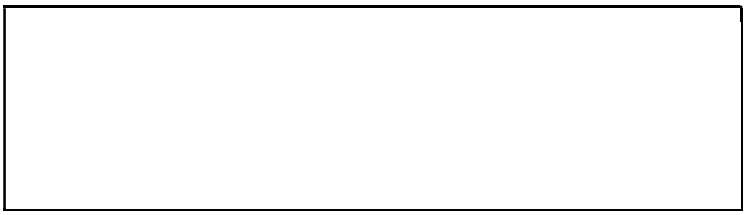
Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: Thursday, July 18, 2024 12:27 PM
To: Eddie West <[redacted]>; Dan Corden <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: FW: Shropshire-SSDC SoCG 2024

Good afternoon Eddie,

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.

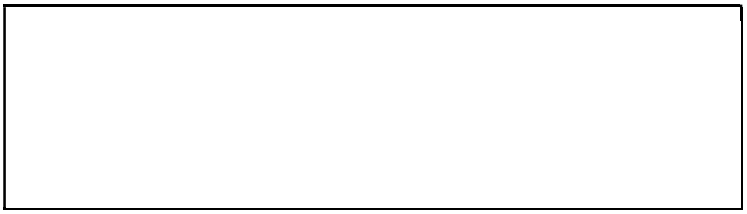
If you will need to take the SoCG through the member agreement process, could you please provide me with some rough timescales.

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: Monday, April 8, 2024 5:56 PM
To: Edward West <[redacted]>; Dan Corden <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: Shropshire-SSDC SoCG 2024

Hi Eddie & Dan,

Many thanks for getting back to me with the suggested changes which I have accepted.

I also note your comments on G&T provision which we are happy to pick up as part of future Local Plan Consultations. As part of our upcoming Reg19 consultation we have produced a G&T Topic Paper which will set out our approach towards meeting our needs. This includes having previously written to all proposed housing allocations to see if they would be willing to allocate part of their site for G&T provision.

Just to note I have updated footnote 2 to reference the most recent GTAA update which the figures are taken from.

If you could confirm that you are happy with the attached version as an initial officer draft SoCG that would be much appreciated.

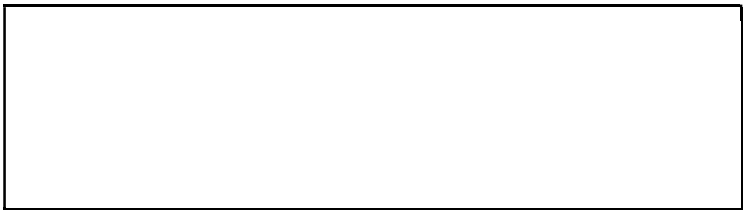
Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Edward West <[redacted]>
Sent: Wednesday, April 3, 2024 4:02 PM
To: Alex Evans <[redacted]>
Cc: Dan Corden <[redacted]>
Subject: RE: Shropshire-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,

Apologies for the delay in responding (both Dan and I were on leave last week).

See attached with a few suggested amends and a more general comment relating to G&T provision, which may be something we will wish to pick up in future consultations on the LP. Happy to discuss at our next DtC catch up or earlier if needed.

Kind regards,

Eddie

Eddie West
Planning Policy and Strategy Manager

Statement of Common Ground between Shropshire 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) & Shropshire Council (SC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Shropshire Council (SC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231839-20413939.

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 20231839-20413939 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing;
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural and historic environment including designated sites.

Geography covered by Statement of Common Ground

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

Key Strategic Matters

4. The local authorities have had positive, constructive and on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The parties have already entered into a Statement of Common Ground to inform the submission of the draft Shropshire Local Plan (2016-2038) which is currently at Examination. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites.

5. The following issues are considered to 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.

DRAFT

Housing

6. SC and SSDC are within separate housing market areas (HMAs). Although SC are not within the GBBCHMA[1] they are members of the Technical Officers Group as a related planning authority. ~~Both authorities are actively engaged in 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 emerging housing shortfalls forecast to arise within the GBBCHMA. 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. ~~Whilst both parties have already engaged constructively with regional partners on this issue, which has included offers of assistance towards accommodating emerging unmet need forecast to arise in the Black Country which forms part of the GBBCHMA, given the scale and complexity of the housing shortfalls forecast to arise in the GBBCHMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to address~~consider the issue ~~holistically moving forward.~~

[redacted]

7. No other housing related cross-boundary issues have been identified.

Employment

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

Cross boundary transport impacts

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

Infrastructure

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

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

[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

Gypsy & Traveller Provision

12. SSDC has identified a 162~~121~~ pitch need for Gypsy and Traveller households in South Staffordshire over the proposed local plan period, including 92~~72~~ pitches within the first 5 year period[2].

13. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC consider they can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same HMA.

[redacted]

14. SC has not assessed SSDC's evidence on Gypsy and Traveller Needs, and reserve the right to comment on this as part of future consultations into the South Staffordshire Local Plan. However, SC would note that the Planning Policy for Traveller Sites (PPTS) includes a particular emphasis on the potential for private provision to meet need, which should be considered in full. This need was formally identified in evidence published after the submission of the Shropshire Local Plan for Examination in September 2021. SC and SSDC have an established agreed position as of August 2021 on this issue as part of the SoCG that has informed the draft Shropshire Local Plan. This acknowledged that whilst no strategic cross-boundary matter had been identified in relation to gypsy and traveller needs arising in the South Staffordshire District Council area, that updated evidence on this issue would be prepared by SSDC to inform their ongoing Local Plan review. This also agreed that in the event that this emerging evidence identified a need which SSDC considered could not be accommodated within the SSDC administrative area, ~~,~~that due to the advanced stage of the Shropshire Local Plan preparation this would form part of duty to cooperate discussions with respect to a future Local Plan review process in Shropshire.

15. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the potential pitch shortfall that they consider is likely to exist, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested these authorities to examine their ability to contribute to its unmet pitch needs, specifically in the form of the potential for extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC.

16. SSDC then wrote again to these same authorities in August 2022, providing an update on extra efforts that they had made to identify new public sites within the District upon Staffordshire County Council land. This letter communicated that SSDC consider that a significant shortfall still remained and that SSDC consider they require assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period

[2] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

DRAFT

to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

17. SC's most recent response to the August 2022 correspondence confirmed their previous January 2022 position that Shropshire would not be able to accommodate any identified unmet Gypsy and Traveller needs from South Staffordshire, due to a notable mismatch in both timing of our Local Plan preparation cycles, as agreed in the SoCG agreed between the parties to inform the Shropshire Local Plan (referred to in Para 14 above), and having regard to the geography of Shropshire's gypsy and traveller provision and main areas of demand. SC confirmed it is seeking to address the needs identified within its own GTAA, but based upon this evidence are not proposing to allocate specific sites for this purpose in the emerging Shropshire Local Plan. SC has confirmed that given the advanced stage of its own Plan making, that it has not investigated the potential for any new additional public sites to be created as part of wider allocations beyond that already identified within its Plan as part of its current Plan review cycle. Both parties agree that this is an issue which can be reviewed further as part of future Plan review cycles if required.

Natural Environment

18. SSDC and SC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

19. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Shropshire Council

Name:

Position:

Signature:

DRAFT

Date:

DRAFT

Alex Evans

Subject: FW: Shropshire-SSDC SoCG 2024
Attachments: Shropshire-SSDC SoCG 2024 ew and dc.docx

From: Alex Evans <[redacted]>
Sent: 25 March 2024 13:42
To: Edward West [redacted]
Subject: FW: Shropshire-SSDC SoCG 2024

> You don't often get email from [redacted]. Learn why this is important

Dear Eddie

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 2:22 PM
To: Eddie West [redacted]
Cc: Dan Corden <[redacted]; Kelly Harris <[redacted]; Edward Fox <[redacted]>
Subject: Shropshire-SSDC SoCG 2024

Dear Ed

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]
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South Staffordshire Council

Sent via email to:
[redacted]

Please ask for: Ed Fox

Direct [redacted]

Email: [redacted]

8th March 2024

South Staffordshire District Council – Statement of Common Ground Covering Letter March 2024

Dear Edward

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 Shropshire 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) & Shropshire Council (SC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Shropshire Council (SC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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:

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    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural and historic environment including designated sites.

Geography covered by Statement of Common Ground

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

Key Strategic Matters

4. The local authorities have had positive, constructive and on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The parties have already entered into a Statement of Common Ground to inform the submission of the draft Shropshire Local Plan (2016-2038) which is currently at Examination. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites.

5. The following issues are considered to 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.

DRAFT

Housing

6. SC and SSDC are within separate housing market areas (HMAs). Although SC are not within the GBBCHMA[1] they are members of the Technical Officers Group as a related planning authority. ~~Both authorities are actively engaged in 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 emerging housing shortfalls forecast to arise within the GBBCHMA. 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. - Whilst both parties have already engaged constructively with regional partners on this issue, which has included offers of assistance towards accommodating emerging unmet need forecast to arise in the Black Country which forms part of the GBBCHMA, given the scale and complexity of the housing shortfalls forecast to arise in the GBBCHMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to ~~address~~consider the issue holistically moving forward.

7. No other housing related cross-boundary issues have been identified.

Employment

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

Cross boundary transport impacts

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

Infrastructure

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

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

[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

DRAFT

Gypsy & Traveller Provision

12. SSDC has identified a 162121 pitch need for Gypsy and Traveller households in South Staffordshire over the proposed local plan period, including 9272 pitches within the first 5 year period[2].

13. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC consider they can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same HMA.

14. SC has not assessed SSDC's evidence on Gypsy and Traveller Needs. This need was formally identified in evidence published after the submission of the Shropshire Local Plan for Examination in September 2021. SC and SSDC have an established agreed position as of August 2021 on this issue as part of the SoCG that has informed the draft Shropshire Local Plan. This acknowledged that whilst no strategic cross-boundary matter had been identified in relation to gypsy and traveller needs arising in the South Staffordshire District Council area, that updated evidence on this issue would be prepared by SSDC to inform their ongoing Local Plan review. This also agreed that in the event that this emerging evidence identified a need which SSDC considered could not be accommodated within the SSDC administrative area, ~~,~~ that due to the advanced stage of the Shropshire Local Plan preparation this would form part of duty to cooperate discussions with respect to a future Local Plan review process in Shropshire.

15. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the potential pitch shortfall that they consider is likely to exist, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested these authorities to examine their ability to contribute to its unmet pitch needs, specifically in the form of the potential for extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC.

16. SSDC then wrote again to these same authorities in August 2022, providing an update on extra efforts that they had made to identify new public sites within the District upon Staffordshire County Council land. This letter communicated that SSDC consider that a significant shortfall still remained and that SSDC consider they require assistance in addressing its unmet pitch needs through new or expanded publicly run sites. 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.

[2] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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17. SC's most recent response to the August 2022 correspondence confirmed their previous January 2022 position that Shropshire would not be able to accommodate any identified unmet Gypsy and Traveller needs from South Staffordshire, due to a notable mismatch in both timing of our Local Plan preparation cycles, as agreed in the SoCG agreed between the parties to inform the Shropshire Local Plan (referred to in Para 14 above), and having regard to the geography of Shropshire's gypsy and traveller provision and main areas of demand. SC confirmed it is seeking to address the needs identified within its own GTAA, but based upon this evidence are not proposing to allocate specific sites for this purpose in the emerging Shropshire Local Plan. SC has confirmed that given the advanced stage of its own Plan making, that it has not investigated the potential for any new additional public sites to be created as part of wider allocations beyond that already identified within its Plan as part of its current Plan review cycle. Both parties agree that this is an issue which can be reviewed further as part of future Plan review cycles if required.

Natural Environment

18. SSDC and SC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

19. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Shropshire Council

Name:

Position:

Signature:

Date:

DRAFT

Solihull Metropolitan Borough Council (SMBC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
29th October 2024	SSDC to SMBC	Acknowledgement from SSDC	N/A	N/A
29th October 2024	SMBC to SSDC	Emil from SMBC providing a signed copy of the SoCG	SoCG signed by Solihull	No – same as previous but signed
25th October 2024	SSDC to SMBC	Email from SSDC asking for an update	N/A	N/A
9th October 2024	SSDC to SMBC	Email from SSDC asking for an update	N/A	N/A
23rd September 2024	SSDC to SMBC	Email from SSDC asking for an update on the signing of the SoCG	N/A	N/A
17th July 2024	SSDC to SMBC	Email from SSDC providing a clean copy of the SoCG for signing	Clean copy of the SoCG	No – same but clean copy
11th April 2024	SSDC to SMBC	Email from SSDC accepting the majority of changes but providing a couple of amendments	SoCG with SSDC changes	Yes
10th April 2024	SMBC to SSDC	Email from SMBC providing comments on the SoCG	SoCG with SMBC comments	Yes
3rd April 2024	SSDC to SMBC	Email from SSDC asking for an update and providing a link to the Reg19 Plan approved at Full 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 Solihull MBC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

Subject: FW: Solihull-SSDC SoCG 2024

From: Edward Fox <[redacted]
Sent: 29 October 2024 13:18
To: 'Gary Palmer (Solihull MBC)' <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]
Subject: RE: Solihull-SSDC SoCG 2024

HI Gary,

Many thanks for sending the final version.

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: Gary Palmer (Solihull MBC) <[redacted]
Sent: 29 October 2024 11:36

To: Edward Fox <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Solihull-SSDC SoCG 2024

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Hi all

Many apologies for not getting this sorted sooner, but signed version now attached.

The SCG has been agreed in the context of the Dec 2023 NPPF and it may be the case that an addendum or amended agreement may be required upon the publication of the new NPPF, which is still expected before the end of the year.

Regards

Gary Palmer

From: Edward Fox <[redacted]>
Sent: 25 October 2024 09:34
To: Gary Palmer (Solihull MBC) <[redacted]>
Cc: Alex Evans <[redacted]>; Kelly Harris [redacted]
Subject: FW: Solihull-SSDC SoCG 2024

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or forward to: [redacted]

Hi Gary,

I hope you're well.

Alex tells me wie still haven't heard back from you on timescales for getting the attached SoCG signed which we will need for the submission of our Local Plan.

I do appreciate that it is a very busy time, but we do need to be in a position where we have all of these SoCGs signed off by the start of December at the latest for submission of our plan.

I would appreciate it if you could come back to me asap with timescales for us receiving the signed version.

Kind regards

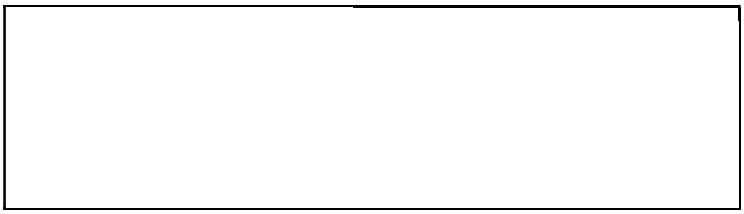
Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning

South Staffordshire Council

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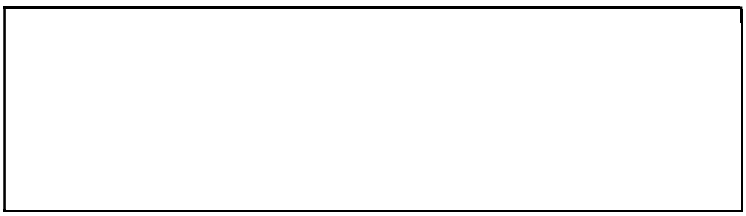
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From: Alex Evans <[redacted]
Sent: 24 October 2024 12:58
To: Edward Fox <[redacted]>
Subject: FW: Solihull-SSDC SoCG 2024

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: 09 October 2024 14:27
To: Palmer, Gary (Places Directorate - Solihull MBC) <[redacted]
Cc: Mark Andrews <[redacted]>; Edward Fox <[redacted]>
Subject: FW: Solihull-SSDC SoCG 2024

Hi Gary,

Further to my email below I was wondering if you had a timeframe for getting the SoCG signed off please? We are currently preparing documents ready for submission.

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, September 23, 2024 1:13 PM
To: Palmer, Gary (Places Directorate - Solihull MBC) <[redacted]>
Cc: Mark Andrews <[redacted]; Edward Fox <[redacted]>
Subject: FW: Solihull-SSDC SoCG 2024

Hi Gary,

Hope things are well with you and sorry to hear about the Solihull Local Plan.

I just wanted to check that you were still happy to progress signing the attached SoCG? I appreciate that things have moved on since it was agreed at officer level, however it is backdated to July 2024 and reflects our positions at that time.

Please let me know if you want to chat anything through.

Best wishes

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, July 17, 2024 12:59 PM
To: 'Gary Palmer (Solihull MBC)' <[redacted]>
Cc: 'Mark Andrews (Solihull MBC)' <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Solihull-SSDC SoCG 2024

Hi Gary,

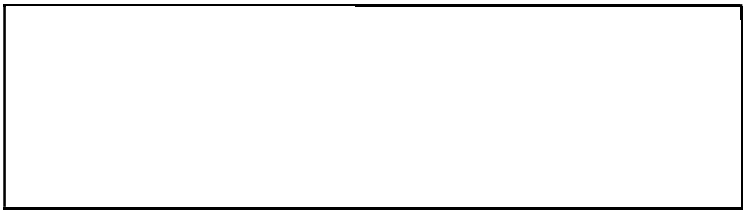
Following on from my email below I have attached a clean copy of the SoCG with the changes accepted and signed from our end. Assuming that you are happy with the couple of minor amendments set out in my previous email, if you are able to organise for it to be signed / take it through the approval process your end and provide us with a countersigned copy that would be much appreciated.

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: Thursday, April 11, 2024 11:00 AM
To: Gary Palmer (Solihull MBC) <[redacted]
Cc: Mark Andrews (Solihull MBC) <[redacted]; Edward Fox <[redacted]>
Subject: RE: Solihull-SSDC SoCG 2024

Hi Gary,

Many thanks for this. We are happy with most of your changes. I've just made a couple of amendments in the attached version described below:

1. I've just added in reference to Sandwell in paragraph 8 as they have carried out a Reg 18 consultation as well.

2. In regard to paragraph 13, we are not currently in a position confirm our view on this until this has been fleshed out more through your examination and we have had time to consider it more fully. I have therefore changed this to SMBC's view rather than ours.

I hope these changes are both acceptable but please let me know if not?

Thanks again,
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 Solihull Metropolitan Borough Council and South Staffordshire District Council

South Staffordshire Local Plan 202318-204139

[Insert Date]

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Solihull Metropolitan Borough Council (SMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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 Solihull Metropolitan 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. 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.

[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

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 (SGS) (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The parties acknowledge that the SGS forms part of the evidence base (not policy) for relevant plans and that through more detailed work of their own plans the proposed locations for strategic growth in the SGS may not be suitable, achievable or deliverable and/or other strategic options may be available.

8. The Black Country authorities[2] 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[3] consultation in 2021 that this shortfall stood at around 28,000 dwellings (up to 2036), despite Green Belt release being explored. ~~At the time of writing this shortfall, and whether their approach to dealing with it within their plan area, has not been subject to examination and is not in an adopted plan.~~ 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. It is further noted that three~~wo~~ of the Black Country authorities that have published R18 plans (Dudley MBC, ~~and~~ Wolverhampton CC and Sandwell MBC) have done so on the basis that (a) they are not able to accommodate their own needs and (b) they are not proposing the release of any sites from the Green Belt.

9. The parties recognise that Birmingham City Council have published an Issues and Options consultation in October 2022 which indicates a shortfall of over 78,000 (to 2042) dwellings based on existing known supply. This is the first BCC publication setting out the nature of unmet need beyond 2031. ~~The contribution of 4,000 dwellings[4] towards the HMA shortfall included in SSDC plan was made before this publication.~~

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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

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

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10. SSDCs previous November 2022 (Regulation 19) Publication Plan proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

11. 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.

~~9.~~12. 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.~~13. SMBC and SSDC both recognise the importance of developing an appropriate 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 subsequent 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 further iterations of the Development Needs Group Statement of Common Ground is considered to be ~~the~~ an appropriate vehicle by which to consider~~address~~ the issue holistically. ~~SSDC recognise that~~ In SMBC's view, ~~-~~changes to national planning policy may also have an impact on the continuing examination of SMBC's

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plan and the greater flexibilities provided by the new NPPF may allow SMBC to revise its contribution to the HMA shortfall as SSDC has done.

Employment

~~11.~~14. SSDC and SMBC are within separate functional economic market areas but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.No further cross-boundary issues have been identified.

~~12.~~15. 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.

16. 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.

17. 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.~~18. ~~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

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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.

~~14.~~19. In the context of the potential apportionment of employment land at the WMI, the parties recognise that proposals for UK Central included in SMBC's emerging plan also include strategic employment land being provided beyond the local needs of the host authority. More clarity on how this could be accounted/attributed for is expected to be included in the Inspectors' report which will be received in due course.

Cross boundary transport impacts

~~15.~~20. 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 two~~four~~ strategic housing site allocations, however none are within close proximity to the Solihull administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~16.~~21. SSDC and SMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~17.~~22. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~18.~~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[5].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~19.~~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

[5] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

DRAFT

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.

~~20.~~25. SSDC wrote to SMBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. ~~SMBC have not responded to these requests to date.~~ In SSDC's view it is ~~therefore~~ currently unclear as to what extent SMBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by SMBC. SMBC assert that there is no current surplus of pitches in Solihull and that experience from adopting SMBC's existing Gypsy & Traveller DPD that any future additional pitches needed to accommodate SMBC's own needs would need to be provided in the Green Belt and as such Solihull is in no sequentially preferable position to accommodate any of SSDC's needs.

Commented [GP1]: Our position was expressed at our DtC meeting, so I don't believe it is fair to say we've not responded. The paragraph goes on to indicate our assertion, so it does acknowledge our response.

Commented [AE2R1]: That's fine

Natural Environment

~~21.~~26. SSDC and SMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~22.~~27. No specific 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 Solihull Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name:

Position:

Signature:

DRAFT

Date:

Solihull Metropolitan Borough Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: Solihull-SSDC SoCG 2024
Attachments: Solihull-SSDC SoCG 2024.docx

From: Gary Palmer (Solihull MBC) <[redacted]>
Sent: 10 April 2024 16:16
To: Alex Evans <[redacted]>
Cc: Mark Andrews (Solihull MBC) <[redacted]>
Subject: FW: Solihull-SSDC SoCG 2024

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Hi Alex

Apologise for the delay …

Attached is a copy of the SoCG with a few amendments from us. We were keen to see the emerging R19 plan in order to do so, so thank you again for providing the link.

It may be the case that through our representation on your plan we may wish to revisit the SoCG before the plan is submitted for examination.

Best of luck when the consultation starts.

Regards,

Gary

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

South Staffordshire Local Plan 202318-204139

[Insert Date]

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Solihull Metropolitan Borough Council (SMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231~~8~~-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~~8~~-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 Solihull Metropolitan 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. 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.

[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

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 (SGS) (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The parties acknowledge that the SGS forms part of the evidence base (not policy) for relevant plans and that through more detailed work of their own plans the proposed locations for strategic growth in the SGS may not be suitable, achievable or deliverable and/or other strategic options may be available.

8. The Black Country authorities[2] 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[3] consultation in 2021 that this shortfall stood at around 28,000 dwellings (up to 2036), despite Green Belt release being explored. ~~At the time of writing this shortfall, and whether their approach to dealing with it within their plan area, has not been subject to examination and is not in an adopted plan.~~ 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. It is further noted that two of the Black Country authorities that have published R18 plans (Dudley MBC and Wolverhampton CC) have done so on the basis that (a) they are not able to accommodate their own needs and (b) they are not proposing the release of any sites from the Green Belt.

9. The parties recognise that Birmingham City Council have published an Issues and Options consultation in October 2022 which indicates a shortfall of over 78,000 (to 2042) dwellings based on existing known supply. This is the first BCC publication setting out the nature of unmet need beyond 2031. ~~The contribution of 4,000 dwellings[4] towards the HMA shortfall included in SSDC plan was made before this publication.~~

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

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

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10. SSDCs previous November 2022 (Regulation 19) Publication Plan proposed housing growth that included 4000 homes contribution towards the GBBCHMA shortfall but required significant Green Belt release in order to do so.

11. 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.

~~9.~~12. 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.~~13. SMBC and SSDC both recognise the importance of developing an appropriate 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 subsequent 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 further iterations of the Development Needs Group Statement of Common Ground is considered to be ~~the~~ an appropriate vehicle by which to consider~~address~~ the issue holistically. SSDC recognise that changes to national planning policy may also have an impact on the continuing examination of SMBC's plan and the

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greater flexibilities provided by the new NPPF may allow SMBC to revise its contribution to the HMA shortfall as SSDC has done.

Employment

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

12.15. 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.

16. 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.

17. -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.

13.18. 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

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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.

~~14.~~19. In the context of the potential apportionment of employment land at the WMI, the parties recognise that proposals for UK Central included in SMBC's emerging plan also include strategic employment land being provided beyond the local needs of the host authority. More clarity on how this could be accounted/attributed for is expected to be included in the Inspectors' report which will be received in due course.

Cross boundary transport impacts

~~15.~~20. 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 two~~four~~ strategic housing site allocations, however none are within close proximity to the Solihull administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~16.~~21. SSDC and SMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~17.~~22. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~18.~~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[5].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~19.~~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

[5] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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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.

~~20.~~25. SSDC wrote to SMBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. ~~SMBC have not responded to these requests to date.~~ In SSDC's view it is ~~therefore~~ currently unclear as to what extent SMBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by SMBC. SMBC assert that there is no current surplus of pitches in Solihull and that experience from adopting SMBC's existing Gypsy & Traveller DPD that any future additional pitches needed to accommodate SMBC's own needs would need to be provided in the Green Belt and as such Solihull is in no sequentially preferable position to accommodate any of SSDC's needs.

Commented [GP1]: Our position was expressed at our DtC meeting, so I don't believe it is fair to say we've not responded. The paragraph goes on to indicate our assertion, so it does acknowledge our response.

Natural Environment

~~21.~~26. SSDC and SMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~22.~~27. No specific 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 Solihull Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name:

Position:

Signature:

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Date:

Solihull Metropolitan Borough Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: Solihull-SSDC SoCG 2024

From: Alex Evans <[redacted]>
Sent: Wednesday, April 3, 2024 4:04 PM
To: Gary Palmer (Solihull MBC) <[redacted]>
Subject: FW: Solihull-SSDC SoCG 2024

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or forward to: [redacted]

Dear Gary,

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 1:55 PM
To: Palmer, Gary (Places Directorate - Solihull MBC) <[redacted]>
Subject: FW: Solihull-SSDC SoCG 2024

Dear Gary

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 2:24 PM
To: Palmer, Gary (Places Directorate - Solihull MBC) <[redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: Solihull-SSDC SoCG 2024

Dear Gary

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 Gary

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.

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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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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 Solihull Metropolitan Borough Council and South Staffordshire District Council

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

[Insert Date]

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11. 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.

~~9.~~12. 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.~~13. 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. 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.~~14. SSDC and SMBC are within separate functional economic market areas but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.No further cross-boundary issues have been identified.

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~~12.~~15. 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.

16. 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.

17. -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.~~18. ~~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.

~~14.~~19. In the context of the potential apportionment of employment land at the WMI, the parties recognise that proposals for UK Central included in SMBC's emerging plan also include strategic employment land being provided beyond the local needs of the host authority. More clarity on how this could be accounted/attributed for is expected to be included in the Inspectors' report which will be received in due course.

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Cross boundary transport impacts

~~15.~~20. 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 two~~four~~ strategic housing site allocations, however none are within close proximity to the Solihull administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~16.~~21. SSDC and SMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~17.~~22. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~18.~~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[5].
SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~19.~~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

[5] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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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.

~~20.~~25. SSDC wrote to SMBC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. SMBC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent SMBC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by SMBC. SMBC assert that there is no current surplus of pitches in Solihull and that experience from adopting SMBC's existing Gypsy & Traveller DPD that any future additional pitches needed to accommodate SMBC's own needs would need to be provided in the Green Belt and as such Solihull is in no sequentially preferable position to accommodate any of SSDC's needs.

Natural Environment

~~21.~~26. SSDC and SMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~22.~~27. No specific 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 Solihull Metropolitan Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Solihull Metropolitan Borough Council

Name:

Position:

Signature:

DRAFT

Date:

DRAFT

Stafford Borough Council (SBC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
5th September 2024	SSDC to SBC	Email from SSDC providing a countersigned copy	Fully signed SoCG	No – same as previous but signed
4th September 2024	SBC to SSDC	Email from SBC providing a signed copy of the SoCG	SoCG signed by SBC	No – same as previous but signed
4th September 2024	SSDC to SBC	Acknowledgement from SSDC	N/A	N/A
4th September 2024	SBC to SSDC	Response from SBC regarding sign off	N/A	N/A
4th September 2024	SSDC to SBC	Response from SSDC regarding sign off	N/A	N/A
4th September 2024	SBC to SSDC	Response from SBC regarding sign off	N/A	N/A
4th September 2024	SSDC to SBC	Response from SSDC regarding sign off	N/A	N/A
4th September 2024	SBC to SSDC	Email from SBC asking if the SoCG requires Cabinet Member sign-off	Attachment relates to FEMA SoCG	No
2nd September 2024	SSDC to SBC	Email from SSDC providing a clean copy	Clean copy of the SoCG	No – same as previous but clean copy
2nd September 2024	SBC to SSDC	Email from SBC asking for a clean copy	N/A	N/A
2nd September 2024	SSDC to SBC	Email from SSDC accepting the amendment.	As before with change accepted.	No – same as before but changes accepted
30th August 2024	SBC to SSDC	Email from SBC providing an amendment on the SoCG	SoCG with amendments	Yes
19th July 2024	SSDC to SBC	Email from SSDC providing a timescale	N/A	N/A
18th July 2024	SBC to SSDC	Email from SBC asking for timescales	N/A	N/A
18th July 2024	SSDC to SBC	Email from SSDC asking for the SoCG to be formally signed through their agreement process	N/A	N/A
11th April 2024	SBC to SSDC	Acknowledgement from SBC	N/A	N/A
11th April 2024	SSDC to SBC	Email from SSDC saying they are happy with the changes and will treat it as an officer agreed version.	N/A	N/A

10th April 2024	SBC to SSDC	Email from SBC with some amendments to the SoCG	SoCG with amendments	Yes
25th March 2024	SSDC to SBC	Acknowledgement from SSDC	N/A	N/A
25th March 2024	SBC to SSDC	Email from SBC providing an update	N/A	N/A
25th March 2024	SSDC to SBC	Email from SSDC asking for an update	N/A	N/A
8th March 2024	SBC to SSDC	Acknowledgement from SBC	N/A	N/A
8th March 2024	SSDC to SBC	Response from SSDC	N/A	N/A
8th March 2024	SBC to SSDC	Email from SBC asking when the new Regulation 19 Plan will be available in the public domain	N/A	N/A
8th March 2024	SSDC to SBC	Initial email from SSDC to Stafford BC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

Subject: FW: South Staffordshire Bilaterial- SoCG update
Attachments: 4Sept2024 SBC Cllr sign off SSDC SoCG FINAL.pdf

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Edward Fox <[redacted]>
Sent: 05 September 2024 08:52
To: Alex Yendole <[redacted]>
Cc: Alex Evans <[redacted]>
Subject: RE: South Staffordshire Bilaterial- SoCG update

Hi Alex,

Please see final countersigned SoCG for your records.

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: Alex Yendole <[redacted]>
Sent: Wednesday, September 4, 2024 3:13 PM
To: Edward Fox <[redacted]>; Alex Evans <[redacted]>
Subject: RE: South Staffordshire Bilaterial- SoCG update

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Ed

As promised please find attached the signed Statement of Common Ground from our Cabinet Member

Looking forward to hearing from you

Kind regards

Alex

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Edward Fox <[redacted]>
Sent: 04 September 2024 09:19
To: Alex Yendole <[redacted]; Alex Evans [redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Great. Many thanks Alex.

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Alex Yendole <[redacted]
Sent: Wednesday, September 4, 2024 9:18 AM
To: Edward Fox [redacted] Alex Evans <[redacted]>
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Thanks Ed

Will be in touch once I have Cabinet Member sign off with the SoCG

Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] www.staffordbc.gov.uk

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From: Edward Fox <[redacted]
Sent: 04 September 2024 09:15
To: Alex Yendole <[redacted] Alex Evans <[redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Hi Alex,

This August 2024 version will be the final version of the SoCG for submission, so sounds like you will need Cabinet Member sign off.

As it stands, we are being asked to proceed on the basis that we will be submitting as per Kelly's email. Obviously if that were to change then we would notify you and other DtC partners.

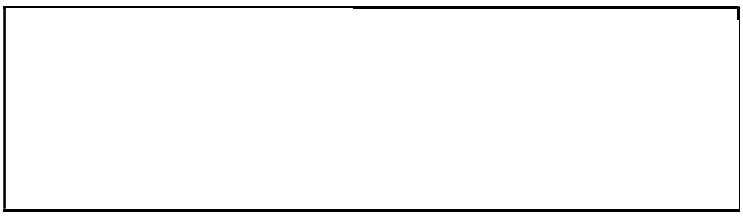
Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

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From: Alex Yendole <[redacted]>
Sent: Wednesday, September 4, 2024 8:59 AM
To: Edward Fox <[redacted]>; Alex Evans [redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Thanks Ed

I am able to sign off provided it is not the 'final word' i.e. not reached Submission to Examination stage

If it has then I will ask my Cabinet Member to sign off

Therefore need to know the SSDC decision on next steps

Looking forward to hearing from you

Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Edward Fox <[redacted]>
Sent: 04 September 2024 08:54
To: Alex Yendole <[redacted] Alex Evans <[redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Hi Alex,

It depends on individual authorities' delegation. So we have delegation for Kelly to sign all SoCGs for us, whereas other authorities have to take them through their Cabinet for agreement. It doesn't matter to us whether they are signed at officer or politician level, as long as the officer has the delegation to do so.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Alex Yendole <[redacted]
Sent: Wednesday, September 4, 2024 8:37 AM
To: Edward Fox <[redacted]>; Alex Evans [redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Hi Ed

Hope you are OK today

Further to Kelly's email attached, please could you confirm whether this version requires Cabinet Member sign off as the final version ahead of moving to Submission and Examination on the SSDC Local Plan

If not then I will sign at the officer level and send back to you through the snapshot in time approach

Looking forward to hearing from you

Many thanks

Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
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From: Edward Fox <[redacted]>
Sent: 02 September 2024 09:43
To: Alex Yendole <[redacted]>; Alex Evans <[redacted]>
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Hi Alex,

Clean version attached.

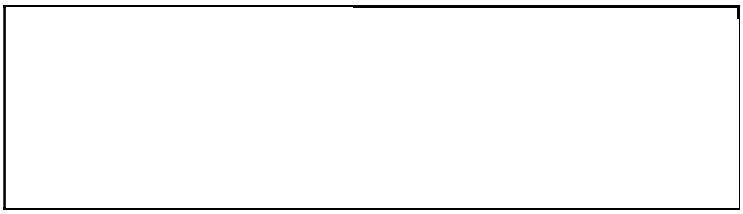
Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Alex Yendole <[redacted]
Sent: Monday, September 2, 2024 9:41 AM
To: Edward Fox <[redacted]; Alex Evans [redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Thanks Ed

Do you want to send me a clean version for me to forward to my Cabinet Member?

Looking forward to hearing from you

Alex

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
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From: Edward Fox <[redacted]>
Sent: 02 September 2024 09:36
To: Alex Yendole <[redacted]; Alex Evans [redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Morning Alex,

Alex is on leave this week but I'm happy with your track change and for the attached to be signed off by your cabinet member.

I have accepted your change, removed the draft watermark, and dated the cover page.

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: Alex Yendole <[redacted]>
Sent: Friday, August 30, 2024 2:15 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex

Hope all is good with you

Please find attached a minor amendment to the SSDC - SBC Statement of Common Ground

Once I have heard back from you I will forward to my Cabinet Member for sign off

Looking forward to hearing from you

Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] www.staffordbc.gov.uk

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

South Staffordshire Local Plan

2023-2041

[Insert Date]

DRAFT

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stafford Borough Council (SBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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;
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

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

Key Strategic Matters

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

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

Housing

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

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Employment

7. SSDC and SBC both sit within the South Staffordshire functional economic market area (FEMA).

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

9. South Staffordshire's 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.

10. 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. Nevertheless, it should be noted that Stafford Borough Council are making provision to fully meet employment need within the Borough area and therefore are not seeking to identify any employment land need for the Borough from the site at M6 Junction 13.

11. 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

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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.

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

Cross boundary transport impacts

13. SSDC and SBC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Stafford administrative area. As these sites progress the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

Infrastructure

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

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

Gypsy & Traveller Provision

16. 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[1]. 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.

[1] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

17. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (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. It should be noted that SSDC and SBC are in separate housing market areas. 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, which SBC responded to in November 2023.

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

Natural Environment

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19. SSDC and SBC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

20. Both SBC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and SBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. 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 processes.

21. SSDC and SBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Stafford Borough Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: South Staffordshire Bilaterial- SoCG update
Attachments: 18July2024 AYamended SoCG South Staffs Stafford Draft 2024 officer agreed version 11.04.2024.docx

From: Alex Evans [redacted]>
Sent: 19 July 2024 10:58
To: Alex Yendole <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Hi Alex

We are hoping to get them signed by early / mid-September in order have everything ready for submission. Do you think this would be doable?

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 Yendole <[redacted]>
Sent: Thursday, July 18, 2024 12:49 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: Re: South Staffordshire Bilaterial- SoCG update

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Thanks Alex

Please could you give me the timescale

My Cabinet Member is currently on holiday for a few weeks

Looking forward to hearing from you

Alex

Sent from Outlook for Android

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Alex Evans <[redacted]>
Sent: Thursday, July 18, 2024 12:34:38 PM
To: Alex Yendole <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: South Staffordshire Bilaterial- SoCG update

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Good afternoon Alex,

I hope you're doing well.

Following on from agreeing the Bilateral 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.

In relation to the FEMA SOCG, I am just waiting for comments from the Black Country authorities which are being collated by Wolverhampton. I will then be able to circulate a revised draft for comment.

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 Yendole <[redacted]
Sent: Thursday, April 11, 2024 10:35 AM
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]>; Dean Piper <[redacted] Edward Fox <[redacted]>
Subject: RE: South Staffordshire FEMA - SoCG update

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Thanks Alex

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Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Alex Evans <[redacted]
Sent: Thursday, April 11, 2024 10:30 AM
To: Alex Yendole <[redacted]>
Cc: Kelly Harris <[redacted]>; Dean Piper <[redacted]>; Edward Fox <[redacted]>
Subject: RE: South Staffordshire FEMA - SoCG update

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Hi Alex

That's great, thanks for the amendments to both SoCG.

We are happy with the changes, so I'll treat these as agreed versions with initial officer level sign off.

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: Alex Yendole <[redacted]
Sent: Wednesday, April 10, 2024 3:25 PM
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]; Dean Piper [redacted] Edward Fox <[redacted]
Subject: RE: South Staffordshire FEMA - SoCG update

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi Alex

Good to hear from you and apologies for the delay

Please find attached an updated version of the Statement of Common Ground between South Staffordshire and Stafford Borough Councils with initial officer level sign off, subject to political agreement in due course as part of the Local Plan process.

The key change added to this Statement of Common Ground relates to the new employment allocation at M6 Junction 13 clarifying that this is not required to meet any of Stafford Borough's future employment needs, with provision being addressed through the new Local Plan.

As attached is an updated version, with very minor text changes relating to Stafford Borough, to the South Staffordshire FEMA.

Apologies for sending this through after the deadline of Friday 22 March 2024 but it was important to view the Special Full Council agenda including the Publication (Regulation 19) version of the New Local Plan before responding, made available via the link below:

https://southstaffs.cmis.uk.com/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/2654/Committee/5/SelectedTab/Documents/Default.aspx

Looking forward to hearing from you

Many thanks

Alex



Alex Yendole | Strategic Planning & Placemaking Manager
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Statement of Common Ground between Stafford 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) & Stafford Borough Council (SBC)

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DRAFT

discussed with adjacent authorities and other authorities within the same housing market area.

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Natural Environment

~~17.~~19. SSDC and SBC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

~~18.~~20. Both SBC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and SBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. 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 processes.

~~19.~~21. SSDC and SBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Stafford Borough Council

Name:

Position:

Signature:

Date:

DRAFT

Alex Evans

From: Alex Evans
Sent: 25 March 2024 14:07
To: Alex Yendole
Subject: RE: Stafford-SSDC SoCG 2024

Thanks Alex, much appreciated!

From: Alex Yendole <[redacted]
Sent: Monday, March 25, 2024 2:04 PM
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]; Edward Fox <[redacted]
Subject: RE: Stafford-SSDC SoCG 2024

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Thanks Alex

Will try and get sign off through our Head of Service this week

Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Alex Evans <[redacted]>
Sent: Monday, March 25, 2024 2:02 PM
To: Alex Yendole <[redacted]
Cc: Kelly Harris <[redacted]; Edward Fox [redacted]>
Subject: RE: Stafford-SSDC SoCG 2024

CAUTION: This email originated from outside of the Council. DO NOT click links or open attachments unless you recognise the sender and know the content is safe.

Hi Alex

I was wondering if you had been able to review the 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.

Many thanks

Alex

From: Alex Yendole <[redacted]>
Sent: Friday, March 8, 2024 2:45 PM
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]; Edward Fox <[redacted]
Subject: RE: Stafford-SSDC SoCG 2024

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Thanks Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Alex Evans [redacted]
Sent: Friday, March 8, 2024 2:43 PM
To: Alex Yendole <[redacted]
Cc: Kelly Harris <[redacted]; Edward Fox <[redacted]>
Subject: RE: Stafford-SSDC SoCG 2024

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Hi Alex

I hope all is well,

We are currently anticipating it will be made public around the 22nd March if all goes to plan.

Many thanks

Alex

From: Alex Yendole <[redacted]k>
Sent: Friday, March 8, 2024 2:34 PM
To: Alex Evans <[redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox [redacted]>
Subject: RE: Stafford-SSDC SoCG 2024

You don't often get email from [redacted] Learn why this is important

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Hi Alex

Many thanks for the message and good to hear from you

Please could you let me know the date that the new Regulation 19 Plan will be available in the public domain, which I presume is when it is considered at Council and / or Cabinet

Looking forward to hearing from you

Hope you have a good weekend

Best wishes

Alex

Stafford BOROUGH COUNCIL

Alex Yendole | Strategic Planning & Placemaking Manager
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[redacted] | www.staffordbc.gov.uk

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From: Alex Evans <[redacted]>
Sent: Friday, March 8, 2024 2:25 PM
To: Alex Yendole <[redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: Stafford-SSDC SoCG 2024

CAUTION: This email originated from outside of the Council. DO NOT click links or open attachments unless you recognise the sender and know the content is safe.

Dear Alex

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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Submit it as bad/spam
Blocklist sender

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 Alex

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 Stafford Borough Council and South Staffordshire District Council

South Staffordshire Local Plan

202318-204139

[Insert Date]

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stafford Borough Council (SBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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;
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

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

Key Strategic Matters

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

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

Housing

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

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Employment

7. SSDC and SBC both sit within the South Staffordshire functional economic market area (FEMA).

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

9. South Staffordshire's ~~EDNA 2020-2040~~ 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.

10. 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.

~~9.~~11. ~~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

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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.

~~10.~~12. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and SBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and SBC stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites.

Cross boundary transport impacts

~~11.~~13. SSDC and SBC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing four strategic housing site allocations, however none are within close proximity to the Stafford administrative area. As these sites progress the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

Infrastructure

~~12.~~14. SSDC and SBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~13.~~15. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~14.~~16. 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[1]. 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

[1] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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area.

~~15.~~17. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (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. It should be noted that SSDC and SBC are in separate housing market areas. 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.

~~16.~~18. 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's view is that the potential for additional public pitch options in SBC has not been fully explored. SBC consider that public pitch options have been fully explored, with all of the plots on existing public sites currently occupied and therefore unable to support South Staffordshire's unmet need. In addition the Borough Council hold a waiting list for plots for when any become available. This unfortunately is rare as we have recently had to reduce the number of pitches during a refurbishment and most of the residents on the site have lived there for long periods of time and are not considering moving. Based on current market conditions and available resources for effective delivery within Stafford Borough all potential site delivery options for gypsies, both public and private, have been considered through submissions from landowners / developers, including in the Green Belt areas. At this stage the Borough Council are not aware of any publicly owned land which is available to deliver new gypsy sites despite reviewing Stafford Borough Council's land and working with Staffordshire County Council over a number of years in an attempt to identify new gypsy sites. Based on exploring the options set out by SSDC in it's letter dated 8 August 2022, at this stage SBC's position is that it is consequently unable to identify potential new gypsy sites to accommodate the needs from South Staffordshire.

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Natural Environment

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~~18.~~20. Both SBC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and SBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. 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.

~~19.~~21. SSDC and SBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Stafford Borough Council

Name:

Position:

Signature:

Date:

DRAFT

Stratford-on-Avon District Council (SoADC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
11th December 2024	SoADC to SSDC	Email from SoADC with signed copy	Signed SoCG	No – same as previous but signed
4th December 2024	SSDC to SoADC	Email from SSDC accepting changes and adding in a couple of additional changes	Track change copy of SoCG with additional changes (Track change and clean copy)	Yes – track change copy
4th December 2024	SoADC to SSDC	Email from SoADC with proposed changes	Track change copy of SoCG	Yes
3rd December 2024	SSDC to SoADC	Response from SSDC on timescales	Attached previous agreed version	No – same as previous
3rd December 2024	SoADC to SSDC	Email from SoADC saying they will progress the SoCG and providing timescales	N/A	N/A
3rd December 2024	SSDC to SoADC	Acknowledgement from SSDC	N/A	N/A
2nd December 2024	SoADC to SSDC	Acknowledgement from SoADC saying they will look into it.	N/A	N/A
27th November 2024	SSDC to SoADC	Email from SSDC asking for timescales	N/A	N/A
18th November 2024	SSDC to SoADC	Email from SSDC asking for timescales	N/A	N/A
6th November 2024	SSDC to SoADC	Email from SSDC asking for timescales	N/A	N/A
25th October 2024	SSDC to SoADC	Email from SSDC asking for timescales	N/A	N/A
29th July 2024	SoADC to SSDC	Email from SoADC saying they will need member sign-off	N/A	N/A
28th June 2024	SoADC to SSDC	Email from SoADC with signed copy	SoCG signed by SoADC	No -same but signed
27th June 2024	SSDC to SoADC	Email from SSDC with clean copy for signing	Clean copy of SoCG	No – same as previous
27th June 2024	SoADC to SSDC	Email from SoADC confirming timescales for signoff	N/A	N/A

27th June 2024	SSDC to SoADC	Email from SSDC saying they will send through a clean copy for signing and asking about timescales for signoff	N/A	N/A
27th June 2024	SoADC to SSDC	Email from SoADC agreeing the SoCG	N/A	N/A
27th June 2024	SSDC to SoADC	Email from SSDC asking for a response	N/A	N/A
6th June 2024	SSDC to SoADC	Email from SSDC asking for the SoCG to be progressed following the South Staffs Reg19 Local Plan consultation.	N/A	N/A
8th April 2024	SSDC to SoADC	Email from SSDC asking for an update	N/A	N/A
8th March 2024	SSDC to SoADC	Initial email from SSDC to SoADC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

Subject: FW: Stratford- SSDC SoCG 2024
Attachments: 2024.12.04 Stratford - SSDC SoCG 2024 FINAL VERSION.pdf

From: Gemma Hawkesford <[redacted]
Sent: 11 December 2024 15:35
To: Edward Fox <[redacted]
Cc: Kelly Harris <[redacted]; Tim Webb <[redacted]>; Joanne Bozdoganli <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

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Hi Ed,

We've now received the approval of the Leader of the Council to submit the signed Statement of Common Ground to you. Please see attached a pdf version complete with signatures.

I trust this is all you need from us at this stage? Apologies again for the delay in getting this to you and good luck with Submission!

Kind regards,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

Please note I work part-time and am available Tuesday-Thursday each week.

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: [redacted]

South Warwickshire Together

From: Edward Fox <[redacted]>
Sent: Wednesday, December 4, 2024 2:09 PM
To: Gemma Hawkesford <[redacted]
Cc: Kelly Harris <[redacted]>; Tim Webb <[redacted]; Joanne Bozdoganli <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

WARNING: This email originated from outside of Stratford-on-Avon District Council.
THINK TWICE: Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Gemma,

Thank you for looking at the SoCG so quickly.

I'm happy with your amendments and have also added in details of Birmingham's housing shortfall and updated our position slightly in relation to gypsies and travellers.

Assuming you are happy with these changes I have also attached a clean version for signing, but any further queries then please let me know.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
www.sstaffs.gov.uk

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

South Staffordshire Local Plan 2023-2041

~~June~~ December 2024

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stratford-on-Avon District Council (SoADC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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.

3. In respect of plan-making in Stratford-on-Avon District, the Council is working with Warwick District Council to prepare a South Warwickshire Local Plan (SWLP) for the period to 2050. A scoping consultation was undertaken in 2021 and Regulation 18 Issues and Options held between 9 January and 6 March 2023. Regulation 19 Preferred Options consultation is planned to take place from January to March 2025 with aAdoption of this newthe Part 1 SWLP Local Plan to supersede the current adopted Core Strategy (2016) is expected in 20275. More information is available at www.southwarwickshire.org.uk/swlp/. The Council is also preparing a Site Allocations Plan to sit alongside the adopted Core Strategy and more information is available at www.stratford.gov.uk/siteallocations . Both The plans areis seeking to address strategic cross boundary issues.

Geography covered by Statement of Common Ground

4. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Stratford-on-Avon District Council.

5. Although not neighbouring authorities, both Councils are within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[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.

[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

Key Strategic Matters

6. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. 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.

7. 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

8. SSDC and SoADC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within 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. An update to the Strategic Growth Study is proposed to commence in 2025, with both authorities as participants.

~~8.~~9. 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~~With the exception of Walsall Council, all the Black Country authorities consulted on Regulation 19 ~~stage~~Local Plans in autumn 2024 and there is a collective shortfall across the Black Country area of approximately 30,000 dwellings. Birmingham City Council are also preparing a new Birmingham Local Plan with their most recent Preferred Options consultation (July 2024) identifying a shortfall of approximately 46,000 dwellings. ~~It~~It ~~is~~s acknowledged that at this point in time, there is a ~~the evidence supporting the Black Country Plan identified a~~ significant unmet need of housing and employment land which will need to be ~~further evidenced and quantified~~addressed.

Commented [GH1]: Should reference also be made to Birmingham's unmet need?

Commented [EF2R1]: Agreed - latest position added

~~9.~~10. SoADC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the 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. The 2022 Statement of Common Ground is expected to be

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

updated via a 2024/25 version, which both Councils will be signatories of. ~~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's planned refresh of the Strategic Growth Study and associated Statement of Common Ground ~~is~~ are considered to be the appropriate vehicles by which to consider the issue holistically.

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Commented [EF4R3]: Agree -think it will be the new year. Happy with your proposed wording

Employment

~~10.~~11. SSDC and SoADC are within separate functional economic market areas but continue to work together collaboratively as part of GBBCHMA Technical Officers' Group.

Cross boundary transport impacts

~~11.~~12. SSDC and SoADC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two strategic housing site allocations, however none are within close proximity to the Stratford-on-Avon administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~12.~~13. SSDC and SoADC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~13.~~14. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~14.~~15. 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 the Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~15.~~16. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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. 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. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SoADC's most recent response to the August 2022 correspondence stated that in view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SoADC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding this, SoADC is keen to work with authorities across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) in respect of evidence gathering to better understand these functional relationships. SSDC acknowledges that it has less of a functional relationship with SoADC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in SoADC's administrative area if this secured them a permanent pitch.

~~16.~~18. SoADC are ~~P~~planning for Gypsies and Travellers through the preparation of the South Warwickshire Local Plan and have ~~commissioned a~~recently completed a 2024 GTAA to help inform that process. This identifies a need across Stratford and Warwick districts for 89 traveller pitches, 18 Travelling Showperson plots and 35 permanent residential moorings over the proposed 25 year South Warwickshire Local Plan period to 2050. There is also an additional recommendation that two transit sites are developed. The Preferred Options SWLP (December 2024) includes a Draft Policy Direction which proposes that this need will largely be met by requiring the provision of traveller pitches and travelling showperson plots on large scale development sites which deliver over 500 homes. However, as this is a Draft Policy Direction and the Preferred Options SWLP does not contain site allocations, it is uncertain how many development sites providing 500+ homes will be included within the plan, and therefore how much of the identified Gypsy and Traveller need will be met through this method. SoADC therefore advise that it is unlikely that they will be able to assist with meeting any of SSDC's need given its own recently identified high level of need. PO has minimal weight at the moment. ~~No decisions have yet been made about how needs will be met. In~~ SSDC will review SoADCs approach when considering and responding to the SWLP Preferred Options consultation. ~~'s view it is therefore currently unclear as to what extent SoADC may or may not be able to assist in meeting unmet pitch need arising from SSDC until work on SoADC's plan has been progressed.~~

Commented [GH5]: SWLP PO is planned to get approval from our Joint Cabinet Committee on 12th Dec so this position should be confirmed ahead of your deadline of 16th Dec.

Commented [EF6R5]: Noted

Commented [GH7]: You may wish to revise this in light of our updated GTAA evidence of local need.

Commented [EF8R7]: Please see update

Natural Environment

~~17.~~19. SSDC and SoADC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~18.~~20. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name: Kelly Harris

Position: Lead Planning Manager

Signature: [redacted]

Date: 4th December~~28th June~~ 2024

Stratford-on-Avon District Council

Name: Jo Bozdoganli

Position: Policy Manager

Signature:

Date:

Alex Evans

Subject: FW: Stratford- SSDC SoCG 2024
Attachments: 2024.12.04 Stratford - SSDC SoCG 2024.docx; 2024.12.04 Stratford - SSDC SoCG 2024 CLEAN VERSION.docx

From: Gemma Hawkesford <[redacted]>
Sent: 04 December 2024 11:03
To: Edward Fox <[redacted]>
Cc: Kelly Harris <[redacted]>; Tim Webb <[redacted]>; Joanne Bozdoganli <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

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Hi Ed,

Please find attached a tracked changes version of the SoCG. There are three main areas of proposed changes:

- Factual updates re the South Warwickshire Local Plan (FYI – it is going before our Joint Cabinet Committee on 12th Dec for approval for Reg 18 Pref Opts consultation in January 2025)
- Updates re the latest position across the GBBCHMA i.e. Black Country shortfall, planned 2025 Strategic Growth Study refresh and emerging 2024/25 Statement of Common Ground
- Updates on our Gypsy and Traveller need position following completion of the South Warwickshire GTAA

Let me know your thoughts on these and hopefully we can progress to a final version for signing asap. If there is a delay receiving Leader sign off we would be happy for you to submit a draft version as you suggest.

Thanks,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

Please note I work part-time and am available Tuesday-Thursday each week.

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: [redacted]

South Warwickshire Together

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

South Staffordshire Local Plan 2023-2041

~~June~~ December 2024

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

South Staffordshire District Council

Name: Kelly Harris

Position: Lead Planning Manager

Signature: 

Date: 4th December~~28th June~~ 2024

Stratford-on-Avon District Council

Name: Jo Bozdoganli

Position: Policy Manager

Signature:

Date:

Alex Evans

Subject: FW: Stratford- SSDC SoCG 2024

From: Edward Fox <[redacted]>
Sent: Tuesday, December 3, 2024 1:49 PM
To: Gemma Hawkesford <[redacted]>
Cc: Kelly Harris <[redacted]>; Tim Webb <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

WARNING: This email originated from outside of Stratford-on-Avon District Council.
THINK TWICE: Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Gemma,

Kelly has asked me to pick this up for her.

In terms of timescales, we are submitting the plan on 16th December, so ideally, we would have all signed SoCGs to submit by then. I appreciate this may be challenging based upon your timescales below. If it isn't possible to have a signed copy for submission, it would be good to understand if you would be willing for us to publish a draft SoCG, clearly marked 'draft – officer agreed but subject to formal sign off', or something similar?

Attached is the latest version that we had, but happy for it to be updated and the date on the cover changed as required.

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: Gemma Hawkesford <[redacted]
Sent: 03 December 2024 11:57
To: Kelly Harris [redacted]
Cc: Edward Fox <[redacted] Tim Webb <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

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Hi Kelly,

I'm just picking this up following a request from John Careford late last week. Due to staffing changes over the summer it would appear that we didn't ever get member sign off of the SoCG between our two authorities. Please accept our apologies for this.

Could you let me know your timescales for receiving the agreed SoCG? As the latest version we have on file is dated June 2024, I'm currently just doing some factual updates to bring it up to date. We will need to share it with our colleagues at Warwick DC through our joint working protocol on the South Warwickshire Local Plan. It will then require sign off from our Leader so I anticipate this whole process could take approximately 7-10 days, but hopefully we can get it to you sooner.

Kind regards,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

Please note I work part-time and am available Tuesday-Thursday each week.

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: [redacted]

South Warwickshire *Together*

Alex Evans

From: Kelly Harris
Sent: 03 December 2024 09:56
To: John Careford
Subject: RE: Stratford- SSDC SoCG 2024

Follow Up Flag: Follow up
Flag Status: Flagged

Cheers John!

Kelly Harris

Lead Planning Manager
Planning
South Staffordshire Council

Tel: [redacted]
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From: John Careford <[redacted]
Sent: 02 December 2024 12:46
To: Kelly Harris <[redacted]
Subject: RE: Stratford- SSDC SoCG 2024

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[redacted] Looking into it – appears they were prepared but not signed. Will let you know. Apologies.

John Careford *MRTPI (he/him)*
Head of Development
Stratford on Avon District Council
PA: Samantha Betts
Tel: [redacted]
Email: [redacted]
Web: www.stratford.gov.uk

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From: Kelly Harris <[redacted]>
Sent: Wednesday, November 27, 2024 1:43 PM
To: John Careford <[redacted]
Subject: FW: Stratford- SSDC SoCG 2024

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Hi John,

Sorry to chase you but we need to submit in next 2 weeks. Any chance I can poke to get this actioned please?

Thanks in advance.

Kelly Harris

Lead Planning Manager
Planning
South Staffordshire Council

Tel: [redacted]
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From: Alex Evans <[redacted]>
Sent: 18 November 2024 15:21
To: Greg Macrdechian <[redacted]>; [redacted] stratford-dc.gov.uk>; Jo Bozdoganli <[redacted]
Cc: Edward Fox <[redacted]>; Kelly Harris <[redacted] Annette Roberts <[redacted]>
Subject: FW: Stratford- SSDC SoCG 2024

Dear Greg, Jo & John

Further to my emails below, could you please provide me with an update in regard to formally signing off the SoCG? We are keen to have the SoCG signed asap so we can include it as part of our submission documents for the Local Plan.

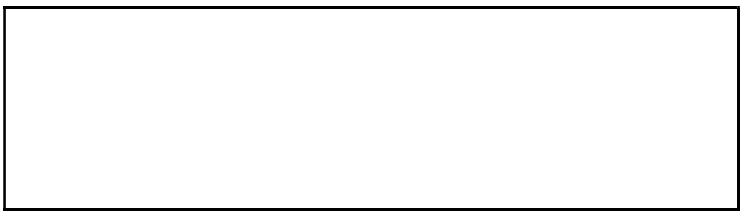
Kind regards

Alex
Alex Evans

Strategic Planning Assistant Team Manager

Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: 06 November 2024 12:04
To: [redacted]stratford-dc.gov.uk
Cc: Edward Fox <[redacted]; [redacted]tratford-dc.gov.uk
Subject: FW: Stratford- SSDC SoCG 2024

Hi Greg,

Further to Ed's email below, I was wondering if you were close to being able to provide us with a signed copy of the SoCG please? We are currently preparing documents ready for the submission of the Local Plan.

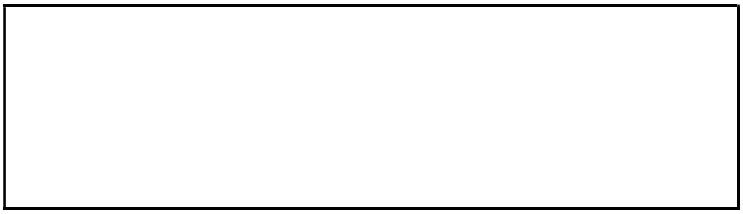
Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Edward Fox <[redacted]
Sent: 25 October 2024 14:42
To: 'Greg Macrdechian' <[redacted]
Cc: Joanne Bozdoganli <[redacted]>; Alex Evans <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

Hi Greg,

We're now in the process of pulling together all the documents for submission of our Local Plan, and further to your email below, I noticed that we didn't get the final signed version of the Statement of Common Ground as you needed to run it past your portfolio holder and Leader. Are you able to advise on timescales for receiving the final signed version please? I'm happy to keep it dated June 2024, to reflect it was an officer agreed position at that date.

I look forward to hearing from you.

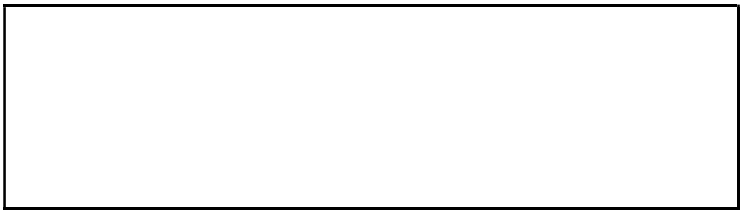
Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

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From: Greg Macrdechian <[redacted]>
Sent: 29 July 2024 13:37
To: Edward Fox <[redacted]>
Cc: Joanne Bozdoganli <[redacted]>
Subject: Stratford- SSDC SoCG 2024

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Dear Ed,

I previously sent over a signed SoCG to yourself about 4 weeks ago. Unfortunately, I was unaware of the correct protocol in getting SoCG sign off between ourselves and Warwick District Council (an agreement that has been put I place die to the nature of our join plan making), therefore we will need to circulate the SoCG to our WDC colleagues first and then to both sets of portfolio holders and leaders.

I am about to go on annual leave so will need to pick this up on my return on the 19th Aug.

I would like to apologise and ensure I give this my attention on my return.

Best regards

Greg

Greg Macrdechian
Interim Head of Policy & Building Control

Stratford on Avon District Council, Elizabeth House, Church Street, Stratford upon Avon, Warwickshire, CV37 6HX
Switchboard +44 (0)1789 267575. Direct +44 [redacted]
email [redacted], web www.stratford.gov.uk

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---

From: Greg Macrdechian
Sent: Friday, June 28, 2024 9:51 AM
To: Edward Fox <[redacted]>
Cc: John Careford <[redacted]>; Alex Evans <[redacted]>; Kelly Harris

<[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

Hi Ed

Please find attached signed copy of the SoCG

Best regards

Greg

Greg Macrdechian
Interim Head of Policy & Building Control

Stratford on Avon District Council, Elizabeth House, Church Street, Stratford upon Avon, Warwickshire, CV37 6HX
Switchboard +44 (0)1789 267575. Direct +44 ([redacted]
[redacted]rd.gov.uk

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From: Edward Fox <[redacted]>
Sent: Friday, June 28, 2024 9:39 AM
To: Greg Macrdechian <[redacted]
Cc: John Careford [redacted]>; Alex Evans <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Stratford- SSDC SoCG 2024

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Hi Greg,

Thanks for confirming. Please see attached final SoCG for signing.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Greg Macrdechian <[redacted]>
Sent: Thursday, June 27, 2024 5:06 PM
To: Edward Fox <[redacted]>
Cc: John Careford <[redacted] Alex Evans [redacted]; Kelly Harris <[redacted]
Subject: FW: Stratford- SSDC SoCG 2024

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Hi Ed

I have delegated powers to sign off the SoCG.

Best regards

Greg

Greg Macrdechian
Interim Head of Policy & Building Control

Stratford on Avon District Council, Elizabeth House, Church Street, Stratford upon Avon, Warwickshire, CV37 6HX
Switchboard +44 (0)1789 267575. Direct +44 [redacted]
email [redacted], web www.stratford.gov.uk

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From: Edward Fox <[redacted]>
Sent: Thursday, June 27, 2024 4:55 PM
To: Greg Macrdechian <[redacted]>
Cc: John Careford <[redacted]; Alex Evans [redacted]; Kelly Harris <[redacted]
Subject: RE: Stratford- SSDC SoCG 2024

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Thanks Greg,

I will send across a clean officer agreed version for signing. We have delegation to sign these SoCG but I know some other authorities require Cabinet Member sign off, so if you are able to confirm your sign off process so we can understand rough timescales then that would be appreciated.

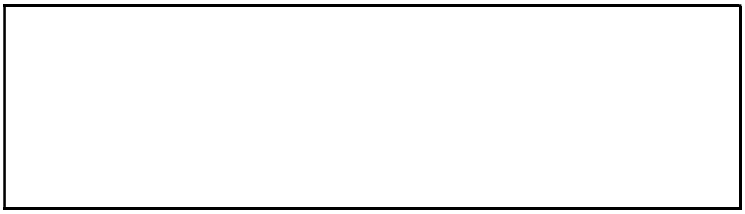
Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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From: Greg Macrdechian <[redacted]>
Sent: Thursday, June 27, 2024 1:54 PM
To: Edward Fox <[redacted]>
Cc: John Careford <[redacted]>
Subject: FW: Stratford- SSDC SoCG 2024

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Dear Edward,

Apologies for the delay in responding to your draft SoCG.

I believe the draft SoCG covers off the main related strategic points relating to the wider Greater Birmingham & Black Country Housing Market Area (GBBCHMA) and I concur with the closing statement that both authorities will continue to work closely to address strategic matters moving forward through our respective plan making processes.

Best regards

Greg

Greg Macrdechian
Interim Head of Policy & Building Control

Stratford on Avon District Council, Elizabeth House, Church Street, Stratford upon Avon, Warwickshire, CV37 6HX
Switchboard +44 (0)1789 267575. Direct +44 [redacted]
email [redacted] **web www.stratford.gov.uk**

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From: John Careford <[redacted]
Sent: Thursday, June 27, 2024 1:41 PM
To: Greg Macrdechian <[redacted]
Subject: FW: Stratford- SSDC SoCG 2024

Hi Greg,
Can you respond/action pls.
Thanks

John Careford *MRTPI (he/him)*
Head of Development
Stratford-on-Avon District Council
[redacted]

Our organisation is working flexibly, which means, if you receive this email 'out of hours', whilst it suits me to email at that time, I do not expect a response or action outside of your working hours.

From: Edward Fox <[redacted]
Sent: Thursday, June 27, 2024 1:14 PM
To: John Careford [redacted]>
Cc: Kelly Harris <[redacted]>; Alex Evans <[redacted]>; Planning Policy <Planning.Policy@stratford-dc.gov.uk>; Joanne Bozdoganli <[redacted]
Subject: FW: Stratford- SSDC SoCG 2024

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Dear John,

Alex informs me that he has emailed you a number of occasions 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.

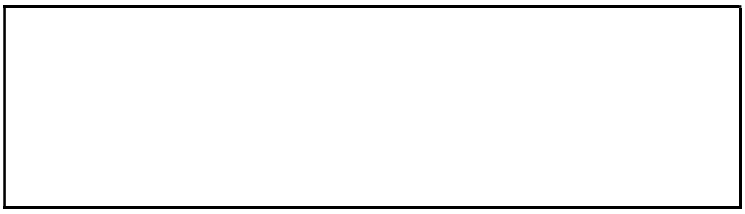
Kind regards

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 2:31 PM
To: '[redacted]stratford-dc.gov.uk' <[redacted]
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]; planning.policy@stratford-dc.gov.uk
Subject: FW: Stratford- SSDC SoCG 2024

Hi John,

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.

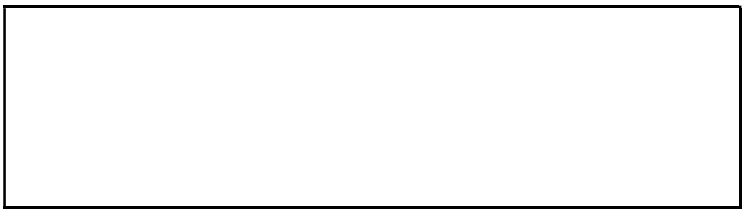
Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: Wednesday, April 3, 2024 4:09 PM
To: '[redacted]@stratford-dc.gov.uk' <[redacted]stratford-dc.gov.uk>
Subject: FW: Stratford- SSDC SoCG 2024

Dear John,

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: Friday, March 8, 2024 2:26 PM
To: '[redacted]@stratford-dc.gov.uk' <[redacted]@stratford-dc.gov.uk>
Cc: Kelly Harris <[redacted]; Edward Fox [redacted]
Subject: Stratford- SSDC SoCG 2024

Dear John

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]
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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 John

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 Stratford-on-Avon District Council and South Staffordshire District Council

South Staffordshire Local Plan 202318-204139

dateJanuary 2023

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

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stratford-on-Avon District Council (SoADC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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.

3. In respect of plan-making in Stratford-on-Avon District, the Council is working with Warwick District Council to prepare a South Warwickshire Local Plan for the period to 2050. A scoping consultation was undertaken in 2021 and Regulation 18 Issues and Options ~~consultation is subject to consultation~~held between 9 January and 6 March 2023. Adoption of this new Part 1 Local Plan to supersede the current adopted Core Strategy (2016) is expected in 2025. More information is available at www.southwarwickshire.org.uk/swlp/. The Council is also preparing a Site Allocations Plan to sit alongside the adopted Core Strategy and more information is available at www.stratford.gov.uk/siteallocations . Both plans are seeking to address strategic cross boundary issues.

Geography covered by Statement of Common Ground

4. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Stratford-on-Avon District Council.

5. Although not neighbouring authorities, both Councils- are within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[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.

[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

Key Strategic Matters

6. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. 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.

7. 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

8. SSDC and SoADC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within 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.

9. SoADC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA 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.

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

Employment

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

Cross boundary transport impacts

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

Infrastructure

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

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

Gypsy & Traveller Provision

14. SSDC has an identified a 16221 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 972 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.

15. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

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

16. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SoADC's most recent response to the August 2022 correspondence stated that in view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SoADC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding this, SoADC is keen to work with authorities across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) in respect of evidence gathering to better understand these functional relationships. SSDC acknowledges that it has less of a functional relationship with SoADC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in SoADC's administrative area if this secured them a permanent pitch. SoADC are Planning for Gypsies and Travellers through the preparation of the South Warwickshire Local Plan and have commissioned a GTAA to help inform that process. No decisions have yet been made about how needs will be met. In SSDC's view it is therefore currently unclear as to what extent SoADC may or may not be able to assist in meeting unmet pitch need arising from SSDC until work on SoADC's has been progressed.

Natural Environment

17. SSDC and SoADC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

18. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature [redacted]

Date: ~~27th January 2023~~

Stratford-on-Avon District Council

Name: ~~Tony Jefferson~~

Position: ~~Leader of the Council~~

Signature [redacted]

Date: ~~17 January 2023~~

Tamworth Borough Council (TBC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
5th July 2024	TBC to SSDC	Email from TBC with a countersigned copy	Fully signed SoCG	No – same as previous but signed
5th July 2024	SSDC to TBC	Email from SSDC providing a clean copy signed by SSDC for TBC to sign	Clean copy of the SoCG signed by SSDC	No – same as previous
3rd July 2024	TBC to SSDC	Email from SBC confirming that they will sign the SoCG and asking for a clean copy to sign	N/A	N/A
2nd July 2024	SSDC to TBC	Acknowledgement from SSDC	N/A	N/A
2nd July 2024	TBC to SSDC	Email from TBC providing an update on timescales	N/A	N/A
27th June 2024	SSDC to TBC	Acknowledgement from SSDC	N/A	N/A
27th June 2027	TBC to SSDC	Email from TBC providing an update on timescales	N/A	N/A
27th June 2024	SSDC to TBC	Email from SSDC asking for an update on timescales	N/A	N/A
11th June 2024	TBC to SSDC	Email from TBC saying they will check where they got up to	N/A	N/A
6th June 2024	SSDC to TBC	Email from SSDC asking for the SoCG to be progressed following the South Staffordshire Reg19 Local Plan consultation.	N/A	N/A
12th April 2024	TBC to SSDC	Email from TBC providing an update on timescales	N/A	N/A
9th April 2024	SSDC to TBC	Email from SSDC asking for an update on timescales	N/A	N/A
22nd March 2024	TBC to SSDC	Email from TBC saying they are happy with the SoCG and providing an update on timescales	N/A	N/A
8th March 2024	SSDC to TBC	Initial email from SSDC to TBC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter	Yes

Alex Evans

From: Powell, Richard <[redacted]>
Sent: 05 July 2024 14:33
To: Alex Evans
Cc: Miller, Anna
Subject: RE: Tamworth-SSDC SoCG 2024
Attachments: Tamworth-SSDC SoCG 2024 signed.docx

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Alex,

Signed copy attached.

Regards,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]

From: Alex Evans <[redacted]
Sent: Friday, July 5, 2024 12:55 PM
To: Powell, Richard <[redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

Hi Richard,

That's good news, thanks for letting me know.

Please find attached a clean version for signing. If you could send across a counter signed copy that would be much appreciated.

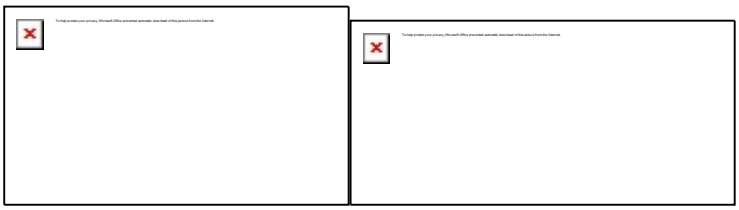
If you have any queries, please let me know.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Powell, Richard <[redacted]
Sent: Wednesday, July 3, 2024 6:48 PM
To: Alex Evans <[redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

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Hi Alex,

I've got the ok to sign the document. Would you be able to send me over a copy of the latest version, so I can make sure we're signing the correct one please?

Thanks,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire

B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]

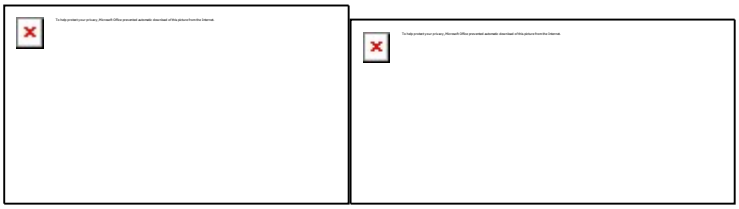
From: Alex Evans <[redacted]>
Sent: Tuesday, July 2, 2024 4:26 PM
To: Powell, Richard <[redacted]>
Subject: RE: Tamworth-SSDC SoCG 2024

Great, thanks Richard!

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Powell, Richard <[redacted]>
Sent: Tuesday, July 2, 2024 4:09 PM
To: Alex Evans <[redacted]>
Subject: RE: Tamworth-SSDC SoCG 2024

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Hi Alex,

I should be able to run this by the portfolio holder tomorrow and, unless they raise any issues, we should be able to send you a signed version back by the end of the week.

Regards,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]

From: Alex Evans <[redacted]
Sent: Thursday, June 27, 2024 3:26 PM
To: Powell, Richard <[redacted]>
Subject: RE: Tamworth-SSDC SoCG 2024

Hi Richard

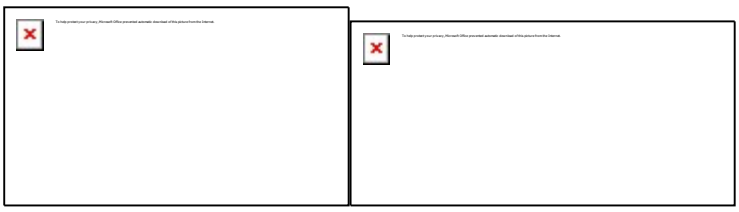
Great thanks, much appreciated!

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Powell, Richard <[redacted]
Sent: Thursday, June 27, 2024 3:23 PM
To: Alex Evans <[redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

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Hi Alex,

I sent it to my AD to ask if she was happy to sign it off, but she's been on leave for a bit. She's around today though, so I'll chase it up again for you now.

Regards,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]k

From: Alex Evans <[redacted]
Sent: Thursday, June 27, 2024 2:48 PM
To: Powell, Richard <[redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

Hi Richard

I've had another look through my emails and can't see anything.

Have you had any luck in checking?

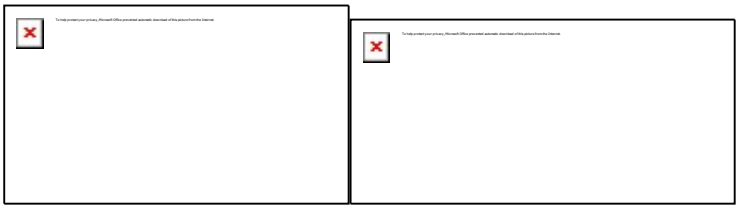
Thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning

South Staffordshire Council

Tel: 01902 [redacted]
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From: Powell, Richard <[redacted]>
Sent: Tuesday, June 11, 2024 5:22 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]; Kelly Harris <[redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

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Hi Alex,

I thought I had sorted this, but perhaps I hadn't. I will double-check and come back to you.

Regards,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]

From: Alex Evans [redacted]
Sent: Thursday, June 6, 2024 2:39 PM
To: Powell, Richard <[redacted]
Cc: Edward Fox <[redacted]>; Kelly Harris [redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

Hi Richard,

Apologies if I've missed an email from you but I was wondering how you were getting on with the SoCG?

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

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.

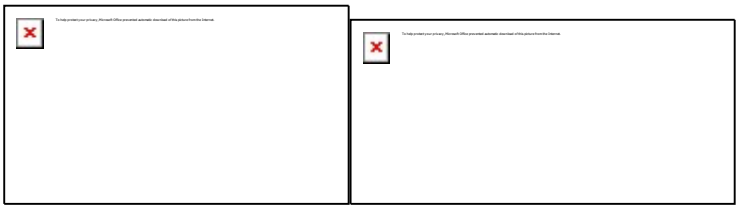
Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Powell, Richard <[redacted]
Sent: Friday, April 12, 2024 5:53 PM
To: Alex Evans <[redacted]>
Subject: RE: Tamworth-SSDC SoCG 2024

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Hi Alex,

Apologies, I forgot to follow it up this week. I have sent a reminder email and will get back to you next week.

Regards,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]

From: Alex Evans <[redacted]>
Sent: Tuesday, April 9, 2024 12:13 PM
To: Powell, Richard <[redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

You don't often get email from [redacted] Learn why this is important

Hi Richard

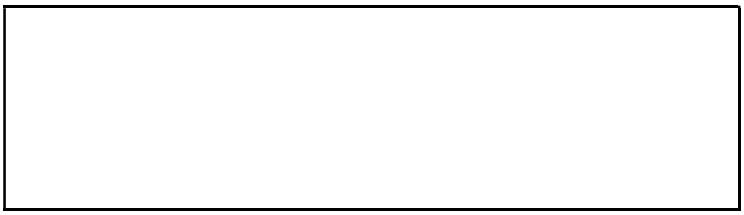
I was just wondering how you were getting on with this please? I'm trying to finish off our Duty to Cooperate Topic Paper over the next couple of days ready for the start of the consultation next week. It would be helpful if I can include in the Topic Paper that we have agreed an initial draft SoCG at officer level.

Cheers
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Powell, Richard <[redacted]
Sent: Friday, March 22, 2024 3:41 PM
To: Alex Evans <[redacted]>
Cc: Kelly Harris [redacted]; Edward Fox [redacted]
Subject: RE: Tamworth-SSDC SoCG 2024

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Hi Alex,

I can't see any issues with the changes. I will have to run it past my AD, but she's on leave until the 2nd of April. She might be able to just sign it, but I'm aware it was signed by the portfolio holder last time around.

Regards,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

Tel: 01827 709 274
Mobile: [redacted]
Email: [redacted]

From: Alex Evans <[redacted]>
Sent: Friday, March 8, 2024 2:27 PM
To: Powell, Richard <[redacted]>
Cc: Kelly Harris <[redacted]>; Edward Fox [redacted]>
Subject: Tamworth-SSDC SoCG 2024

You don't often get email from [redacted] Learn why this is important

Dear Richard

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

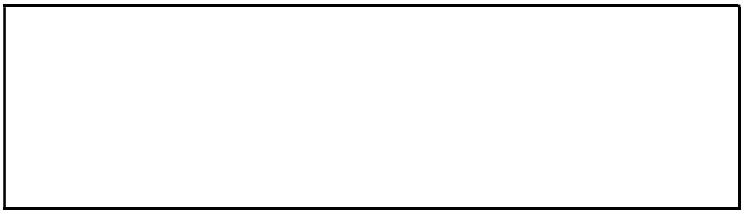
Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]





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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 Richard

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 Tamworth 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) & Tamworth Borough Council (TBC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Tamworth Borough Council (TBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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 Tamworth 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. 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 TBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities[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.

7.

8. TBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA 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 TBC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021. No further cross-boundary issues have been identified.

Cross boundary transport impacts

10. SSDC and TBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two~~four~~ strategic housing site allocations, however none

[2] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

are within close proximity to the Tamworth administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

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

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 1621~~21~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9~~7~~2 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 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.

15. TBC's most recent response to the August 2022 correspondence stated that it's joint GTAA in 2019 concluded that there was no identified need for pitches within Tamworth Borough. As a result of this, the TBC has not currently identified any potential sites within the Borough that would be suitable for accommodating pitches. The parties agree it is therefore currently

[3] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

unclear as to what extent TBC may or may not be able to assist in meeting unmet pitch need until work has been undertaken to identify additional potentially suitable public site options.

Natural Environment

16. SSDC and TBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

17. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: [redacted]

Date: ~~27th January 2023~~

Tamworth Borough Council

Name: ~~Stephen Doyle~~

Position: ~~Portfolio Holder for Skills, Planning, Economy & Waste~~

Signature: [redacted]

Date: ~~22 December 2022~~

Telford and Wrekin Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
7th November 2024	SSDC to T&WC	Email from SSDC providing a countersigned copy	Fully signed SoCG	No -same as final signed copy
7th November 2024	T&WC to SSDC	Email from T&WC providing a signed copy	SoCG signed by T&WC	No -same as final signed copy
29th October 2024	SSCD to T&WC	Email response from SSDC	N/A	N/A
29th October 2024	T&WC to SSDC	Email from T&WC acknowledging SSDC's email	N/A	N/A
29th October 2024	SSDC to T&WC	Email from SSDC with suggested amendments to facilitate T&WC's amendments	N/A	N/A
29th October 2024	T&WC to SSDC	Email from T&WC with additional change	N/A	N/A
22nd October 2024	SSDC to T&WC	Email from SSDC providing a clean copy for signing	Clean copy of SoCG	No -same as final signed copy
21st October 2024	T&WC to SSDC	Email from T&WC accepting the change	N/A	N/A
9th October 2024	SSDC to T&WC	Follow up email from SSDC with suggested change	N/A	N/A
17th September 2024	SSDC to T&WC	Email from SSDC accepting the majority of changes querying one change	N/A	N/A
13th September 2024	SSDC to T&WC	Email from SSDC with an acknowledging T&WC's previous email	N/A	N/A
12th August 2024	T&WC to SSDC	Email from T&WC with some amendments to the SoCG	SoCG with T&WC amendments	Yes
12th August 2024	SSDC to T&WC	Email from SSDC setting out the position in relation to the NPPF.	N/A	N/A
9th August 2024	T&WC to SSDC	Email from T&WC saying they are progressing the SoCG and asking about the implications of the changes to the NPPF	N/A	N/A

19th July 2024	SSDC to T&WC	Email from SSDC asking for an update on timescales	N/A	N/A
6th June 2024	SSDC to T&WC	Email from SSDC asking for the SoCH to be progressed following the Reg19 Local Plan consultation.	N/A	N/A
9th April 2024	SSDC to T&WC	Email from SSDC providing the answer (see previous email, answer in red)	N/A	N/A
9th April 2024	T&WC to SSDC	Email from T&WC asking about the 640 contribution and resulting shortfall (answers in red provided subsequently)	N/A	N/A
9th April 2024	SSDC to T&WC	Email from SSDC asking for an update on timescales	N/A	N/A
4th April 2024	SSDC to T&WC	Email from SSDC responding	N/A	N/A
4th April 2024	T&WC to SSDC	Email from T&WC providing an update on timescales	N/A	N/A
3rd April 2024	SSDC to T&WC	Email from SSDC asking for an update on timescales	N/A	N/A
8th March 2024	SSDC to T&WC	Initial email from SSDC to T&WC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

From: Alex Evans
Sent: 07 November 2024 09:37
To: Ashford, Gavin
Cc: Edward Fox; DevelopmentPlans
Subject: RE: Telford & Wrekin Statement of Common Ground
Attachments: Telford-SSDC SoCG 2024 - signed.pdf

Hi Gavin,

That's great thanks, much appreciated!

Please find attached a countersigned copy for your records.

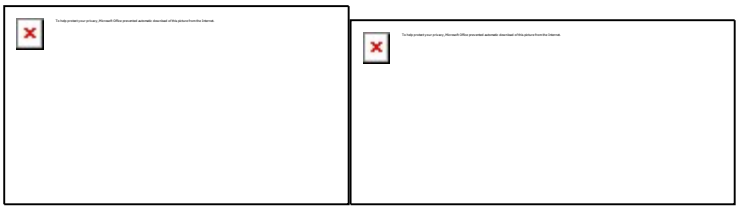
Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Ashford, Gavin <[redacted]
Sent: 07 November 2024 09:16

To: Alex Evans <[redacted]
Cc: Edward Fox <[redacted]; DevelopmentPlans <DevelopmentPlans@telford.gov.uk>
Subject: Telford & Wrekin Statement of Common Ground

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Alex,

Please see the signed Statement of Common Ground. I assume you will sign and send final version back to me? Can you cc in developmentplans@telford.gov.uk.

Thanks

Gavin

Gavin Ashford
Group Manager – Strategic Planning, Inward Ivestment & Business Support
Prosperity & Investment
Telford & Wrekin Council
[redacted] (Direct Line)
www.telford.gov.uk



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Alex Evans

Subject: FW: Telford-SSDC SoCG 2024

From: Alex Evans
Sent: 29 October 2024 15:49
To: 'Ashford, Gavin' [redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

Thanks Gavin, much appreciated.

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
www.sstaffs.gov.uk





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From: Ashford, Gavin <[redacted]>
Sent: 29 October 2024 14:56
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

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That should work I will be seeing Cabinet lead 8 Nov so will square off then.

Thanks

Gavin

From: Alex Evans <[redacted]>
Sent: 29 October 2024 14:41
To: Ashford, Gavin <[redacted]
Cc: Edward Fox <[redacted]>
Subject: RE: Telford-SSDC SoCG 2024

CAUTION: This email originated from outside Telford & Wrekin Council's network. Do not click links or open attachments unless you are sure the content is safe.

Hi Gavin,

Thanks for the email and progressing the SoCG. We are happy to amend this paragraph but would like to add in the below if that's agreeable please:

'SSDC wrote to T&WC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. T&WC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. In T&WC's view, as the Council have their own existing shortfall in pitches to prioritise, the position with the emerging Telford & Wrekin Local Plan means it is not possible for T&WC to accommodate any unmet need. SSDC will review T&WC's approach to meeting the needs of gypsy's and travellers when further details are published as part of T&WC's emerging Local Plan.'

This is because until we review all of the evidence, we are not in a position to agree yet.

I hope this is acceptable, but lease let me know if you have any concerns.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

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From: Ashford, Gavin <[redacted]
Sent: 29 October 2024 14:17
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

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Alex – we are going to share with Cabinet lead with the following changes from our end:

1. SSDC wrote to T&WC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. T&WC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. As the Council have their own existing shortfall in pitches to prioritise, the position with the emerging Telford & Wrekin Local Plan means it is not possible for ~~highly unlikely that~~ T&WC to ~~could~~ accommodate any unmet need. ~~In SSDC's view it is therefore currently unclear as to what extent T&WC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by T&WC.~~

It would be useful if you can agree to the change – our emerging plan is showing that we are looking unlikely to meet all our need from the 'off' so we will have further work to do moving forward to meet our own needs.

Thanks

Gavin

From: Alex Evans <[redacted]>
Sent: 22 October 2024 16:09
To: Ashford, Gavin <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

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Hi Gavin,

Thanks for this. Please find attached a clean copy with the wording removed as agreed for signing.

Please let me know if you need anything further from out end.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
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From: Ashford, Gavin <[redacted]
Sent: 21 October 2024 15:30
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

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Alex – make the change suggested below and remove the line 'without significant financial contributions from SSDC'.

Can you send me a 'clean' version without the tracked changes I can then share with my Cabinet members for agreement?

Thanks

Gavin

From: Alex Evans <[redacted]>
Sent: 09 October 2024 14:17
To: Ashford, Gavin <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: FW: Telford-SSDC SoCG 2024

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Hi Gavin,

I was wondering if you had any thoughts on my email below in relation to the SoCG? We are currently preparing for submission and would like the SoCG signed as soon as possible.

If there are no firm suggestions / plans in relation to a financial contribution to support gypsy and traveller provision, I'm wondering if you would be open to removing the following wording for now: 'without significant financial contributions from SSDC' so it would just read: 'As the Council have their own existing shortfall in pitches to prioritise it is highly unlikely that T&WC could accommodate any unmet need from South Staffordshire'.

If you are happy with the above, I can send you over a revised clean copy of the SoCG which we can both progress to get 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: Alex Evans
Sent: Tuesday, September 17, 2024 5:09 PM
To: 'Ashford, Gavin' <[redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

Hi Gavin,

Apologies again for the delay in getting back to you on this. We are happy with the majority of your proposed changes. I just had a query in relation to the additional wording you've added to the Gypsy and Travellers section which states:

'As the Council have their own existing shortfall in pitches to prioritise it is highly unlikely that T&WC could accommodate any unmet need without significant financial contributions from SSDC'.

I'm just wondering what the significant financial contributions would look like and how they would be used to provide additional pitches in Telford and Wrekin to meet South Staffordshire's need? I'm just anticipating that the Local Plan Inspector may want further details on this and how we have explored this option with you?

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

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From: Alex Evans
Sent: Friday, September 13, 2024 12:03 PM
To: Ashford, Gavin <[redacted]>
Cc: Edward Fox <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Telford-SSDC SoCG 2024

Hi Gavin

I'm really sorry - I must have missed this email previously with your suggested changes to the SoCG.

I'll get back to you asap next week with our thoughts and look to get the SoCG agreed.

Apologies again,

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]



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From: Ashford, Gavin <[redacted]>
Sent: Monday, August 12, 2024 6:14 PM
To: Kelly Harris <[redacted]>; Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: Telford-SSDC SoCG 2024

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Kelly / Alex / Ed,

We've relooked at the SoCG and made some alterations – can you have a look and let me know whether you agree and I can get this in front of a Cabinet member for Thursday.

Thanks

Gavin

Statement of Common Ground between Telford and Wrekin 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) & Telford and Wrekin Council (T&WC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Telford and Wrekin Council (T&WC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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;
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The~~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.

5. 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

6. SSDC and T&WC are within separate housing market areas (HMAs). Although T&WC are not within the GBBCHMA[1] they attend the Technical Officers Group in an observation capacity as a neighbouring planning authority. ~~The GBBCHMA Development Needs Group have been developing a Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA , T&WC has not yet confirmed if it will be a signatory to this.~~ 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.

7. No other housing related cross-boundary issues have been identified.

Employment

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

Cross boundary transport impacts

9. SSDC and T&WC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. This includes the shared ambition for the electrification of the Shrewsbury – Telford – Wolverhampton Rail Line. SSDC's are proposing two~~four~~ strategic housing site allocations, however none are within close proximity to the Telford and Wrekin administrative area. Both SSDC & T&WC support the proposals for the new M6 north junction connection as which will improve connectivity with the M54 and connections to the North West in general. No other cross-boundary transport issues have been identified.

Infrastructure

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

11. Necessary infrastructure (including school places) will be delivered ~~within South Staffordshir~~by the parties~~e~~. Therefore, no cross-boundary infrastructure issues have been identified.

[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
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

Gypsy & Traveller Provision

12. SSDC has an identified a 162~~21~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9~~7~~2 pitches within the first 5 year period[2]. 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.

Commented [AG1]: Does this position reflect the changes in the NPPF proposals – is there further scope to look at GB sites?

13. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (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.

14. SSDC wrote to T&WC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. ~~T&WC have not responded to these requests to date.~~ T&WC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. As the Council have their own existing shortfall in pitches to prioritise it is highly unlikely that T&WC could accommodate any unmet need without significant financial contributions from SSDC. ~~Until the Council understand how they will be able to plan for their own needs they are not in a position to respond to this request at this time.~~ In SSDC's view it is therefore currently unclear as to what extent T&WC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by T&WC. ~~T&WC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates~~

[2] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report ~~August 2021~~2024

~~that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. Until the Council understand how they will be able to plan for their own needs they are not in a position to respond to this request at this time.~~

Natural Environment

15. SSDC and T&WC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

16. No cross-boundary issues have been identified.

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature: [redacted]

Date: ~~27th January 2023~~

Telford and Wrekin Council

Name: ~~Gavin Ashford~~

Position: ~~Strategic Planning Team Leader~~

Signature:

[redacted]

Date: ~~15/05/23~~

Alex Evans

Subject: FW: Telford-SSDC SoCG 2024

From: Kelly Harris <[redacted]>
Sent: 12 August 2024 13:38
To: Ashford, Gavin [redacted]>; Alex Evans <[redacted]
Cc: Edward Fox [redacted]
Subject: RE: Telford-SSDC SoCG 2024

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Hi Gavin

[redacted] We are of the view (as it currently stands!) that our position on whether to continue to submission in accordance with the timescales in the proposed transitional arrangements is not an issue for our emerging SoCGs, as those facts and matters contained within the SoCG remain, at the date of agreement. We are in the process of arranging an AV from PINS to consider our next steps and how best to manage risk, and should anything change we will of course let you know. But for now, we are looking at formalising all SoCG as per the published NPPF and our plan to be submitted.

I hope this helps clarify our position.

Best wishes

Kelly Harris

Lead Planning Manager
Planning
South Staffordshire Council

Tel: [redacted]
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From: Ashford, Gavin <[redacted]>
Sent: Friday, August 9, 2024 10:08 AM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>; Kelly Harris <[redacted]>
Subject: RE: Telford-SSDC SoCG 2024

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Alex apologies I've not come back to you on this yet, I've had a change in director so will need to get their approval. Before I do that can you please let me know if you anticipate any substantial changes that would impact on the content of the SoCG as written following changes to the NPPF? I'm likely to get asked about the GB issues and whether that has an impact on SS. Although that's not a direct issue between us we're a little unclear at the moment around the knock impacts related to ABCA LPA's respective positions.

I will share the draft as is but let them know I've asked for a bit of clarity on NPPF changes.

Thanks for your patience.

Gavin

From: Alex Evans <[redacted]>
Sent: 19 July 2024 11:40
To: Ashford, Gavin <[redacted]>
Cc: Edward Fox [redacted] Kelly Harris <[redacted]>
Subject: FW: Telford-SSDC SoCG 2024

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Hi Gavin,

I hope you're doing well.

Further to my emails below, I was wondering we are now in a position to agree the attach SoCG at officer level and start progressing them through our respective Council's formal agreement process?

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: Thursday, June 6, 2024 2:47 PM
To: Gavin Ashford [redacted]>
Cc: Edward Fox <[redacted] Kelly Harris [redacted]
Subject: FW: Telford-SSDC SoCG 2024

Hi Gavin,

Apologies if I've missed an email from you but I was wondering how you were getting on with the SoCG?

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

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.

Kind regards

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: Tuesday, April 9, 2024 5:10 PM
To: Ashford, Gavin <[redacted]>
Subject: RE: Telford-SSDC SoCG 2024

Hi Gavin,

Thanks for your email and for organising to get this signed off. Please find the answers to your questions below in red.

Any further queries please let me know.

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Ashford, Gavin [redacted]
Sent: Tuesday, April 9, 2024 4:42 PM
To: Alex Evans <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

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Alex,

I have read through the SoCG and will discuss with my director tomorrow.

I don't foresee any issues with the wording. A couple of points of interest:

1) You mention in the cover letter 640 home contribution to ABCA / BC. How have you justified that figure? The 640 is the remining figure after we have met our own needs. We are now progressing a capacity based approached (rather than trying to meet a top down figure) involving allocating safeguarded land, open countryside sites and some green belt release adjacent to Tier 1 settlements which are within walking distance of a railway station.
2) I assume the contribution to ABCA / BC has reduced where you have taken out GB sites? If so by how much and what has been the reaction of the other LPA's. I'm interested as the more their shortfall is the more they are likely to challenge our approach. As a result of the new strategy the contribution has dropped from 4,000 to the 640 largely due to the removal of 2 large strategic sites and other green belt sites. To date we have had a mixed response from the authorities generating the need. Birmingham are initially happy with

our approach at an officer level. Wolverhampton and Dudley have not yet provided detailed comments (however their Reg18s don't propose Green Belt release) and Walsall have expressed some concerns.

I assume you could like a letter in return confirming that officers are happy with the SoCG. A letter or just email confirmation is fine at this stage.

Thanks

Gavin

From: Alex Evans <[redacted]>
Sent: 09 April 2024 12:14
To: Ashford, Gavin <[redacted]>
Subject: RE: Telford-SSDC SoCG 2024

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Hi Gavin

I was just wondering how you were getting on with this please? I'm trying to finish off our Duty to Cooperate Topic Paper over the next couple of days ready for the start of the consultation next week. It would be helpful if I can include in the Topic Paper that we have agreed an initial draft SoCG at officer level.

Cheers
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]

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From: Alex Evans
Sent: Thursday, April 4, 2024 11:36 AM
To: Ashford, Gavin <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

Hi Gavin,

That's great thanks. Yes they are just initial officer comments at this stage which can be subject to changes before any formal agreement.

Many thanks

Alex

From: Ashford, Gavin <[redacted]
Sent: Thursday, April 4, 2024 9:36 AM
To: Alex Evans <[redacted]
Subject: RE: Telford-SSDC SoCG 2024

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Alex – I have this on my to do list I will have a look and try and get back to you by Friday. I assume as this is officer comments only we can still make changes later on if we need to agree with our Cabinet lead?

Thanks

Gavin

From: Alex Evans <[redacted]
Sent: 03 April 2024 16:13
To: Ashford, Gavin <[redacted]>
Subject: FW: Telford-SSDC SoCG 2024

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Dear Gavin,

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: Friday, March 8, 2024 2:28 PM
To: Gavin Ashford <[redacted]>
Cc: Kelly Harris [redacted] Edward Fox [redacted]
Subject: Telford-SSDC SoCG 2024

Dear Gavin

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 Gavin

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 Telford and Wrekin 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) & Telford and Wrekin Council (T&WC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Telford and Wrekin Council (T&WC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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;
    - Employment land;
    - Transport and infrastructure matters;
    - Gypsy and traveller accommodation; and
    - Natural environment.

Geography covered by Statement of Common Ground

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

Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. 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.

5. 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

6. SSDC and T&WC are within separate housing market areas (HMAs). Although T&WC are not within the GBBCHMA[1] they attend the Technical Officers Group in an observation capacity as a neighbouring planning authority. ~~The GBBCHMA Development Needs Group have been developing a Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA , T&WC has not yet confirmed if it will be a signatory to this.~~ 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.

7. No other housing related cross-boundary issues have been identified.

Employment

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

Cross boundary transport impacts

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

Infrastructure

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

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

[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
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

Gypsy & Traveller Provision

12. SSDC has an identified a 16~~21~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9~~7~~2 pitches within the first 5 year period[2]. SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

13. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (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.

14. SSDC wrote to T&WC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. T&WC have not responded to these requests to date. In SSDC's view it is therefore currently unclear as to what extent T&WC may or may not be able to assist in meeting unmet pitch need arising from SSDC as there is no confirmation as to what options to explore additional public pitches have/have not been considered by T&WC. T&WC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. Until the Council understand how they will be able to plan for their own needs they are not in a position to respond to this request at this time.

Natural Environment

15. SSDC and T&WC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

16. No cross-boundary issues have been identified.

[2] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Signatures

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

South Staffordshire District Council

Name: ~~Kelly Harris~~

Position: ~~Lead Planning Manager~~

Signature [redacted]

Date: ~~27th January 2023~~

Telford and Wrekin Council

Name: ~~Gavin Ashford~~

Position: ~~Strategic Planning Team Leader~~

Signature:

[redacted]

Date: ~~15/05/23~~

Walsall Metropolitan Borough Council (WMBC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix**
8th November 2024	SSDC to WMBC	Email from SSDC providing a Countersigned copy of the SoCG	Fully signed SoCG	No -same as final version
6th November 2024	WMBC to SSDC	Email from WMBC providing a signed copy of the SoCG	SoCG signed by WMBC	No -same as final version
6th November 2024	SSDC to WMBC	Email from SSDC asking for an update on timescales for signing the SoCG	N/A	N/A
2nd October 2024	SSDC to WMBC	Email from SSDC taking into account WMBC's changes in the SoCG	Revised SoCG	No -same as final version
2nd October 2024	WMBC to SSDC	Email from WMBC confirming that the outstanding issue is moved to an area of disagreement	N/A	N/A
23rd September 2024	SSDC to WMBC	Email from SSDC agreeing the changes expect one and suggesting this is moved to an area of disagreement	Track Change copy of SoCG (same as previous email)	No – same as previous email
22nd July 2024	WMBC to SSDC	Email from WMBC with a track change copy of the SoCG with amendments	Track Change copy of SoCG	Yes
19th July 2024	SSDC to WMBC	Email from SSDC asking for an update on timescales	N/A	N/A
26th June 2024	SSDC to WMBC	Email from SSDC asking for more details on WMBC's timescales for agreeing the SoCG	N/A	N/A
20th June 2024	WMBC to SSDC	Email from WMBC with an update on timescales and saying they will progress the SoCG	N/A	N/A
6th June 2024	SSDC to WMBC	Email from SSDC asking for the SoCG to be progressed following the Reg19 consultation on the Local Plan	N/A	N/A

15th March 2024	WMBC to SSDC	Response from WMBC with a holding letter saying they are currently unable to progress the SoCG	Holding response from WMBC	Yes
8th March 2024	SSDC to WMBC	Initial email from SSDC to WMBC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter?	Yes

Alex Evans

From: Alex Evans
Sent: 08 November 2024 09:18
To: David Holloway
Cc: Edward Fox; Michael Brereton; Dave Brown; Neville Ball; Simon Tranter
Subject: RE: SoCG Walsall - S Staffs bilateral 2024_signed
Attachments: SoCG-Staffs_Walsall_signed.pdf

Hi David,

That's great thanks, much appreciated!

Please find attached a countersigned copy for your records.

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: David Holloway <[redacted]>
Sent: 06 November 2024 17:29
To: Alex Evans <[redacted]>

Cc: Edward Fox <[redacted]; Michael Brereton <[redacted] Dave Brown <[redacted]; Neville Ball [redacted] Simon Tranter <[redacted]>
Subject: SoCG Walsall - S Staffs bilateral 2024_signed

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Hi Alex,

Please find a copy of the bilateral SoCG between your council and ours which has been signed by us.

Please acknowledge receipt and inform me if there are any issues attaching.

Regards

David Holloway MRTPI
Planning Policy Manager
Walsall Council
[redacted]
www.walsall.gov.uk



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From: Alex Evans <[redacted]>
Sent: 06 November 2024 11:54
To: David Holloway <[redacted]
Cc: Edward Fox <[redacted]
Subject: RE: SoCG Walsall - S Staffs FEMA 2024_signed

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Hi David,

Hope all is well,

I was wondering how you were getting on with the signing of the Bilaterial SoCG 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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Alex Evans

From: Alex Evans
Sent: 02 October 2024 15:52
To: David Holloway
Cc: Neville Ball; Liz Forster; Michael Brereton; Edward Fox
Subject: RE: Walsall-SSDC SoCG 2024_response3
Attachments: Walsall-SSDC SoCG 2024 TC copy.docx

Hi David,

Many thanks for your email and confirming your position. I have attached a revised SoCG with the relevant paragraph moved under a new heading 'matters of disagreement' and the SSDC position added (see paras 30-32). We have amened the wording slightly to hopefully add clarity.

I have also dated the SoCG at September 2024.

Please let me know if you are happy with the attached version or have any further changes? Once you are satisfied with the SoCG I can send across a clean copy for signing.

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: David Holloway <[redacted]>
Sent: Wednesday, October 2, 2024 11:15 AM
To: Alex Evans <[redacted]
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted] Michael Brereton
<[redacted]>; Edward Fox <[redacted]>
Subject: Walsall-SSDC SoCG 2024_response3

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Hi Alex,

Thank you for sending the amended SoCG between our authorities across, and agreeing, in the main, to our suggested changes.

We would request that the issue set out in para 10 on the new government's proposed changes to the planning system on meeting the needs of neighbouring authorities, and the transitional arrangements pertaining be set out as a matter of disagreement between us in the SoCG, with your position added.

Please could you therefore send across an amended SoCG to reflect this.

Thanks

Regards

David Holloway MRTPI
Planning Policy Manager
Walsall Council
[redacted]
www.walsall.gov.uk



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From: Alex Evans <[redacted]
Sent: Monday, September 23, 2024 12:42 PM
To: David Holloway <[redacted]>
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted]>; Michael Brereton
<[redacted]>; Edward Fox <[redacted]>
Subject: RE: Walsall-SSDC SoCG 2024_response2

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username and password into an external link or open files attached to a suspicious email.

Hi David,

Many thanks for the proposed changes and apologies for the delay in getting back to you.

We are happy with most of the suggested changes.

The only one we can't agree to is the new proposed paragraph 10. We now have the consultation NPPF which may change your position on this, as South Staffordshire would be able to submit under the proposed transitional arrangements and be assessed under the 2023 NPPF?

However, if you would still like to keep this wording in or some revised wording along this line, I am happy to move this to an 'areas of disagreement' section and provide a South Staffs response?

We are hoping to have the SoCG signed off before we submit later this year.

Apologies again for the delay,

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]

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From: David Holloway <[redacted]
Sent: Monday, July 22, 2024 2:26 PM
To: Alex Evans [redacted]>
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted]>; Michael Brereton <[redacted]>; Edward Fox <[redacted]>
Subject: Walsall-SSDC SoCG 2024_response2

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Good afternoon, Alex,

Apologies for the delay in responding.

Please find a track-changes version of the draft SoCG between South Staffs and Walsall, for progression.

Regards

David Holloway MRTPI
Planning Policy Manager
Walsall Council
[redacted]
www.walsall.gov.uk



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From: Alex Evans <[redacted]
Sent: Friday, July 19, 2024 11:52 AM
To: David Holloway <[redacted]>
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted]>; Philippa Venables <[redacted]> Michael Brereton <[redacted]>; Edward Fox <[redacted]>
Subject: RE: Walsall-SSDC SoCG 2024_response1

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Hi David,

Further to my email below I was wondering if you had made any further progress on reviewing the SoCG? We are keen to agree the SoCG at officer level and then start to take them through our respective Council's agreement process.

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: Alex Evans
Sent: Wednesday, June 26, 2024 3:37 PM
To: David Holloway <[redacted]
Cc: Neville Ball <[redacted] Liz Forster <[redacted]>; Philippa Venables <[redacted]>; Michael Brereton <[redacted]>; Edward Fox <[redacted]
Subject: RE: Walsall-SSDC SoCG 2024_response1

Good afternoon David,

Thanks for letting me know. Are you able to provide me with a rough timescale of when you will be able to respond please? I appreciate that you can only make limit progress on this until after the election next week.

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: David Holloway <[redacted]
Sent: Thursday, June 20, 2024 2:21 PM
To: Alex Evans <[redacted]
Cc: Neville Ball <[redacted]z Forster [redacted]; Philippa Venables <[redacted]; Michael Brereton <[redacted]
Subject: Walsall-SSDC SoCG 2024_response1

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Dear Alex,

Thank you for your approach under duty to co-operate with a draft statement of common ground.

We will look to progress at our end in due course, but unfortunately will not be able to meet your deadline of tomorrow, as, as I am sure you are aware, even for an officer response, an appropriate degree of thoroughness, discussion and scrutiny is required, and I am also mindful that, as you have observed, we are in the depths of the pre-election period.

We hope to be in contact with you again shortly so that we can make progress on this matter.

Regards

David Holloway MRTPI
Planning Policy Manager
Walsall Council
[redacted]
www.walsall.gov.uk

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From: Alex Evans <[redacted]
Sent: Thursday, June 6, 2024 2:51 PM
To: David Holloway <[redacted]>
Cc: Neville Ball <[redacted]>; Alison Ives <[redacted]; Philippa Venables [redacted]; Dave Brown <[redacted]>; Edward Fox <[redacted]>; Kelly Harris [redacted]>
Subject: RE: Walsall-SSDC SoCG 2024_response

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Dear David

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]

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From: David Holloway <[redacted]
Sent: Friday, March 15, 2024 4:37 PM
To: Alex Evans <[redacted]>
Cc: Neville Ball <[redacted]>; Alison Ives <[redacted]; Philippa Venables [redacted]>; Dave Brown <[redacted]
Subject: Walsall-SSDC SoCG 2024_response

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Good afternoon, Alex,

Please find attached to this message a holding response to the request set out in your letter dated 8 March 2024 for Walsall LPA to sign a statement of common ground to be published alongside a revised Reg 19 stage of your local plan next month.

In summary, the draft response states that we are not in a position to properly address matters of such strategic planning significance, especially a reduction in the number of houses which S Staffs are intending to offer to neighbouring authorities - from 4000 under the previous Reg 19 plan to 640 under the revised Reg 19 plan – formally under DtC through a signed SOCG, and in such a short timeframe. Also, if we did as you have requested, given that there are conceivably sensitive political issues associated with this matter, our signed SOCG would be published on your webpages during our authority's pre-election period, and I hope that you can understand that this is something which, as a council, we would need to avoid.

Regards

David Holloway MRTPI
Planning Policy Manager
Walsall Council
[redacted]
www.walsall.gov.uk

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From: Alex Evans <[redacted]>
Sent: Friday, March 8, 2024 2:30 PM
To: David Holloway [redacted]>
Cc: Neville Ball <[redacted] Alison Ives <[redacted] Kelly Harris <[redacted]>; Edward Fox <[redacted]>
Subject: Walsall-SSDC SoCG 2024

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Dear David

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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Alex Evans

Subject: FW: Walsall-SSDC SoCG 2024_response2
Attachments: Walsall-SSDC SoCG 2024 TC copy.docx

From: Alex Evans
Sent: 23 September 2024 12:42
To: 'David Holloway' <[redacted]>
Cc: Neville Ball <[redacted] Liz Forster <[redacted] Michael Brereton <[redacted]; Edward Fox <[redacted]
Subject: RE: Walsall-SSDC SoCG 2024_response2

Hi David,

Many thanks for the proposed changes and apologies for the delay in getting back to you.

We are happy with most of the suggested changes.

The only one we can't agree to is the new proposed paragraph 10. We now have the consultation NPPF which may change your position on this, as South Staffordshire would be able to submit under the proposed transitional arrangements and be assessed under the 2023 NPPF?

However, if you would still like to keep this wording in or some revised wording along this line, I am happy to move this to an 'areas of disagreement' section and provide a South Staffs response?

We are hoping to have the SoCG signed off before we submit later this year.

Apologies again for the delay,

Many thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: David Holloway <[redacted]>
Sent: Monday, July 22, 2024 2:26 PM
To: Alex Evans <[redacted]>
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted]; Michael Brereton <[redacted]>; Edward Fox [redacted]
Subject: Walsall-SSDC SoCG 2024_response2

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Good afternoon, Alex,

Apologies for the delay in responding.

Please find a track-changes version of the draft SoCG between South Staffs and Walsall, for progression.

Regards

David Holloway MRTPI
Planning Policy Manager
[redacted]
www.walsall.gov.uk



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Statement of Common Ground between Walsall Metropolitan 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) & Walsall ~~Metropolitan Borough~~ Council ~~(WMBC)~~

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Walsall ~~Metropolitan Borough~~ Council ~~(WMBC)~~, hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 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 and Walsall ~~Metropolitan Borough~~ Council ~~(WMBC)~~

~~4.~~3. 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.~~4. The ~~local authorities~~parties 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

[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

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.~~5. 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.~~6. SSDC and WMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities have ~~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. 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~~ preparing individual local plans covering each authority respectively. In November 2022, Walsall Council resolved to produce its own [independent] local plan: the Walsall Borough Local Plan (WBLP). As~~Whilst~~ those plans are ~~now at an early stage~~being progressed, ~~it~~there is an ~~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. ~~WMBC~~Walsall Council 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. ~~WMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.~~ 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.

8. However, following a consultation on proposed changes to the NPPF published in December 2022, progress on the previous iteration of the SSDC 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

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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.

9. 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. SSDC consider that t~~T~~hese 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.~~10. However, the position which SSDC are proposing to adopt regarding meeting the housing needs of neighbouring authorities and the release of green belt land is now in question because of the new government's proposed changes to national planning policy and legislation. These potential changes may also affect local plans which are currently in preparation, such as the South Staffordshire Local Plan. Depending on the outcome of these proposed planning reforms, SSDC's position may need to be reviewed and revised SoCGs set before the parties as necessary.

~~9.~~11. Notwithstanding these circumstances, t~~T~~o date, there is no agreed approach between SSDC, Black Country authorities and Birmingham as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.

~~10.~~12. WMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ 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. ~~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 by SSDC to be the appropriate vehicle by which to ~~address~~ consider the issue holistically.

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Employment

~~11.~~13. SSDC and ~~WMBC~~Walsall Council both sit within the South Staffordshire ~~f~~Functional ~~e~~Economic ~~m~~Market ~~a~~Area (FEMA). ~~WMBC~~Walsall Council is also within the Black Country FEMA and SSDC is identified as being outside of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between ~~WMBC~~ Walsall Councilland SSDC on employment matters.

~~12.~~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 the West Midlands Interchange - 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.~~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[6] suggests it can provide additional surplus B8 use class 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

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

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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.

~~14.~~18. ~~WMBC~~Walsall Council with the other Black Country authorities ~~haves~~ prepared an Economic ~~Land~~Development Needs Assessment (EDNA) in 2021 ~~2020-2041 with the other Black Country authorities~~ examining employment land requirements across the Black Country FEMA for the period 2020-2039. This identifie~~d~~s a shortfall of ~~153h~~between 212 and 232ha ~~a~~ of employment land across the Black Country FEMA.~~ been part of the preparation of the Black Country Plan. Evidence from this suggested that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities~~ The Black Country EDNA recommends that in meeting this shortfall the Black Country authorities should engage with neighbouring ~~Local Plan areas~~authorities with a strong or moderate economic relationship to the Black Country FEMA through the duty to cooperate. ~~WMBC~~Walsall Council~~, as part of the Black Country authorities~~(and the three other Black Country authorities)~~,~~ ha~~s~~ve therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

~~15.~~19. The minimum proportion of employment land oversupply that can be attributed towards the Black Country ~~(including WMBC)~~ and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is ~~to be~~being addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and ~~WMBC~~Walsall Council consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whils~~t~~t~~e~~ acknowledging that the Black Country FEMA authorities (including ~~WMBC~~Walsall) 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's and ~~WMBC's~~Walsall Council's ~~stances~~positions on ~~the need for an updated evidence base regarding needs relating to the evidence base~~ on the results from the West Midlands Strategic Employment Sites study.

Cross boundary transport impacts

~~16.~~20. SSDC and ~~WMBC~~Walsall Council 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 Walsall administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~17.~~21. SSDC and ~~WMBC~~Walsall Council will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

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~~18.~~22. Necessary infrastructure (including school places and primary care provision) to serve the needs of residents of SSDC will be delivered within South Staffordshire. ~~Both authorities will continue to engage with health providers (e.g. Integrated Care Boards) to identify the most appropriate strategies for mitigating health impacts from each local authority area.~~ No other cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~19.~~23. SSDC has an identified a 162~~21~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9~~7~~2 pitches within the first 5 year period[7].
SSDC considers that the latest evidence from the ~~C~~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 ~~D~~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 ~~D~~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.~~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 ~~D~~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 ~~C~~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 ~~D~~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.~~25. 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

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report ~~August 2021~~2024

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to SSDC's subsequent August 2022 letter.

~~22.~~26. Subsequently, correspondence has confirmed that ~~WMBC's~~Walsall Council's permanent traveller site is full and that there is a temporary transit site but that only has a 3 year permission. Whil~~st~~ e the Walsall Site Allocation Document (SAD) (2019) allocates a new permanent (non-Green Belt) site, no funding has been identified to enable its delivery and no options have been considered for publicly run sites in the Green Belt. The only Green Belt sites proposed in the Black Country Plan within Walsall comprised the retention of two existing single family pitches.~~have had not yet been contacted to consider the inclusion of a traveller site and WMBC have not yet scoped out for the potential to be carried forward within Walsall's replacement plan: the Walsall Borough Local Plan (WBLP). issues that might be addressed by any replacement for the Black Country Plan~~. Finally, Walsall has very little publicly owned land that remains available for development either as a traveller site or for general housing.

~~23.~~27. Given this background, SSDC is of the view that it will need to continue to work with ~~WMBC~~Walsall Council to establish whether there is scope for new publicly run Green Belt sites (including as part of a wider housing allocation) which could address SSDC pitch needs as the ~~new WMBC local plan~~WBLP progresses.

Natural Environment

~~24.~~28. SSDC and ~~WMBC~~Walsall Council 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.~~29. Both ~~WMBC~~Walsall Council and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and WMBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. 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.

~~26.~~30. SSDC and ~~WMBC~~Walsall Council are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities, including the potential for cross-boundary local nature recovery networks and strategic wildlife corridors..

Signatures

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

DRAFT

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Walsall ~~Metropolitan Borough~~ Council

Name: Dave Brown

Position: Executive Director – Economy, Environment & Communities

Signature:

Date:

DRAFT

Alex Evans

Subject: FW: Walsall-SSDC SoCG 2024_response2

From: Alex Evans [redacted]
Sent: Friday, July 19, 2024 11:52 AM
To: David Holloway [redacted]
Cc: Neville Ball <[redacted]; Liz Forster <[redacted]>; Philippa Venables <[redacted]>; Michael Brereton <[redacted]; Edward Fox [redacted]
Subject: RE: Walsall-SSDC SoCG 2024_response1

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Hi David,

Further to my email below I was wondering if you had made any further progress on reviewing the SoCG? We are keen to agree the SoCG at officer level and then start to take them through our respective Council's agreement process.

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: Alex Evans
Sent: Wednesday, June 26, 2024 3:37 PM
To: David Holloway <[redacted]
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted] Philippa Venables <[redacted]; Michael Brereton <[redacted]; Edward Fox <[redacted]>
Subject: RE: Walsall-SSDC SoCG 2024_response1

Good afternoon David,

Thanks for letting me know. Are you able to provide me with a rough timescale of when you will be able to respond please? I appreciate that you can only make limit progress on this until after the election next week.

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: David Holloway <[redacted]
Sent: Thursday, June 20, 2024 2:21 PM
To: Alex Evans <[redacted]
Cc: Neville Ball <[redacted]>; Liz Forster <[redacted]; Philippa Venables

<[redacted]; Michael Brereton <[redacted]>
Subject: Walsall-SSDC SoCG 2024_response1

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Dear Alex,

Thank you for your approach under duty to co-operate with a draft statement of common ground.

We will look to progress at our end in due course, but unfortunately will not be able to meet your deadline of tomorrow, as, as I am sure you are aware, even for an officer response, an appropriate degree of thoroughness, discussion and scrutiny is required, and I am also mindful that, as you have observed, we are in the depths of the pre-election period.

We hope to be in contact with you again shortly so that we can make progress on this matter.

Regards

David Holloway MRTPI
Planning Policy Manager
[redacted]
[redacted]
www.walsall.gov.uk

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From: Alex Evans <[redacted]
Sent: Thursday, June 6, 2024 2:51 PM
To: David Holloway <[redacted]
Cc: Neville Ball <[redacted]>; Alison Ives <[redacted]; Philippa Venables <[redacted] Dave Brown <[redacted] Edward Fox <[redacted] Kelly Harris <[redacted]
Subject: RE: Walsall-SSDC SoCG 2024_response

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Dear David

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]



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From: David Holloway <[redacted]
Sent: Friday, March 15, 2024 4:37 PM
To: Alex Evans <[redacted]
Cc: Neville Ball <[redacted]>; Alison Ives <A[redacted]; Philippa Venables <[redacted]>; Dave Brown <[redacted]>
Subject: Walsall-SSDC SoCG 2024_response

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Good afternoon, Alex,

Please find attached to this message a holding response to the request set out in your letter dated 8 March 2024 for Walsall LPA to sign a statement of common ground to be published alongside a revised Reg 19 stage of your local plan next month.

In summary, the draft response states that we are not in a position to properly address matters of such strategic planning significance, especially a reduction in the number of houses which S Staffs are intending to offer to neighbouring authorities - from 4000 under the previous Reg 19 plan to 640 under the revised Reg 19 plan – formally under DtC through a signed SOCG, and in such a short timeframe. Also, if we did as you have requested, given that there are conceivably sensitive political issues associated with this matter, our signed SOCG would be published on your webpages during our authority's pre-election period, and I hope that you can understand that this is something which, as a council, we would need to avoid.

Regards

David Holloway MRTPI
Planning Policy Manager
[redacted]
www.walsall.gov.uk



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Walsall Council

Economy, Environment & Communities

Date: 15 March 2024
Our Ref: DSH/WBLP/SStaffsdtc2
Telephone: [redacted]
Email: [redacted]

Kelly Harris
South Staffordshire Council
Council Offices
Codsall
South Staffordshire
WV8 1PX

Via e-mail: [redacted]

Dear Kelly,

South Staffordshire District Council – statement of common ground (March 2024)

Thank you for your approach to Walsall Council with regard to a Statement of Common Ground (SOCG) under duty to cooperate (DtC) with South Staffordshire District Council (SSDC) on the South Staffordshire Local Plan (SSLP). I note that this formalises the approach proposed in your letter of 24 October 2023. We reported this to our planning committee on 15 January 2024 and advised you of the outcome on 22 January 2024.

Your letter advises that a Regulation 19 stage of the SSLP was published in November 2022, however work paused on the progression of that plan in January 2023, and you are now looking to publish a revised Reg 19 SSLP in April 2024, which particularly takes into account the revised NPPF (December 2023), especially the wording contained therein on the release of green belt land for development.

Walsall Council

You are requesting that Walsall Council sign a SOCG with yourselves on the strategic policies and relevant cross-boundary issues of the revised Reg 19 SSLP by Friday 22 March 2024. Albeit you would accept that this SOCG could be signed at officer level, potentially with a confirmatory LPA response later. The officer signed SOCG would then be published on your website to accompany, and inform under DtC, the publication of the Reg 19 SSLP plan in April 2024.

As a form of holding response, through the NPPF, Walsall Council are committed to engaging with SSDC under DtC in order to demonstrate effective and on-going joint working in addressing cross boundary strategic planning matters which are integral to the preparation of a positively prepared and justified strategy, with the maintenance of one or more SOCG, and that these SOCG be published to provide transparency as part of the plan-making process.

However and without prejudice to Walsall LPA's (final) position, it is contended that the extent, scale, significance and potential political sensitivities of the revisions to the strategic policies within the revised Reg 19 SSLP, with particular regard to the significant reduction in the number of homes you are proposing to offer the GBBCHMA over the plan period – from 4000 under the previous Reg 19 plan to 640 under the revised Reg 19 plan - coupled with the short deadline for a response, does not provide us with a reasonable opportunity to address these issues adequately and therefore be able to sign a SOCG. This is even at officer level and with the opportunity to amend the SOCG, potentially to provide a more generalised position.

Furthermore, the pre-election period for the West Midlands mayoral and local authority elections - for the Black Country authorities and others (but not South Staffs.) - begins on 21 March 2024. Given the political sensitivities that are likely to arise on this matter, it will therefore not be possible to provide any response even at officer level, especially as such a response would then be published on your website, until after the elections in May at the earliest.

Whilst I appreciate that you may not find this response satisfactory, we look forward to resuming, constructive engagement with SSDC under DtC in the future.

Yours sincerely

[redacted]

David Holloway
Planning Policy Manager

Walsall Metropolitan Borough Council, Civic Centre, Darwall Street, Walsall, WS1 1TP
Tel: 01922 650000
Web: www.walsall.gov.uk

Alex Evans

From: Alex Evans
Sent: 08 March 2024 14:30
To: David Holloway
Cc: [redacted]walsall.gov.uk; Alison Ives; Kelly Harris; Edward Fox
Subject: Walsall-SSDC SoCG 2024
Attachments: SSDC Covering Letter - SOCG March 2024 -Walsall.pdf; Walsall-SSDC SoCG 2024.docx

Dear David

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 David

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 Walsall Metropolitan 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) & Walsall Metropolitan Borough Council (WMBC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Walsall Metropolitan Borough Council (WMBC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 20231~~8~~-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~~8~~-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 (Special Areas of Conservation).

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Walsall Metropolitan Borough Council (WMBC)

4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)[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 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 WMBC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within 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. 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. WMBC and SSDC have constructively engaged on an ongoing basis to address the housing shortfalls of the HMA, including the shortfalls of the Black Country authorities[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. ~~WMBC supports the approach taken by SSDC in using the Strategic Growth Study to establish a contribution to unmet needs, but would like more detail to be given as to how the 4,000 dwelling contribution can be attributed to individual local authorities in the Black Country.~~ 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

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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.

~~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.~~11. To date, there is no agreed approach between SSDC, Black Country authorities and Birmingham as to how South Staffordshire's housing needs contribution should be attributed between these authorities generating housing shortfalls. SSDC considers that agreement from other local authorities generating shortfalls would be particularly important to ensure a co-ordinated approach to this issue.

~~10.~~12. WMBC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. ~~As such, both authorities are~~ 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. 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 ~~address~~ consider the issue holistically.

Employment

~~11.~~13. SSDC and WMBC both sit within the South Staffordshire functional economic market area (FEMA). WMBC is also within the Black Country FEMA and SSDC is identified as being outside of the Black Country FEMA but still having strong economic links to it despite this. There is therefore clearly a strong functional link between WMBC and SSDC on employment matters.

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~~12.~~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.

~~13.~~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[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, dependent on the stance of other authorities related to the site.

~~14.~~18. WMBC ha~~s~~ves 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

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

DRAFT

Country FEMA. ~~been part of the preparation of the Black Country Plan. Evidence from this suggested that the Black Country as a whole has a 210ha shortfall of employment land and that it would require assistance from other local authorities~~ 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 through the duty to cooperate. WMBC~~, as part of the Black Country authorities~~(and the three other Black Country authorities)~~,~~ ha~~s~~ve therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

~~15.~~19. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including WMBC) and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and WMBC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities (including WMBC) will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and WMBC's stances on ~~the need for an updated evidence base regarding~~ needs relating to the evidence base on West Midlands Strategic Employment Sites.

Cross boundary transport impacts

~~16.~~20. SSDC and WMBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two~~four~~ strategic housing site allocations, however none are within close proximity to the Walsall administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~17.~~21. SSDC and WMBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~18.~~22. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Both authorities will continue to engage with health providers (e.g. Integrated Care Boards) to identify the most appropriate strategies for mitigating health impacts from each local authority area. No other cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

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~~19.~~23. SSDC has an identified a 16~~22~~21 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9~~7~~2 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.~~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.

~~21.~~25. 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.~~26. Subsequently, correspondence has confirmed that WMBC's permanent traveller site is full and that there is a temporary transit site but that only has a 3 year permission. Whilst the Walsall Site Allocation Document allocates a new permanent (non-Green Belt) site, no funding has been identified to enable its delivery and no options have been considered for publicly run sites in the Green Belt. Green Belt sites proposed in the Black Country Plan had not yet been contacted to consider the inclusion of a traveller site and WMBC have not yet scoped out issues that might be addressed by any replacement for the Black Country Plan. Finally, Walsall has very little publicly owned land that remains available for development either as a traveller site or for general housing.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

DRAFT

~~23.~~27. Given this background SSDC is of the view that it will need to continue to work with WMBC to establish whether there is scope for new publicly run Green Belt sites (including as part of a wider housing allocation) which could address SSDC pitch needs as the new WMBC local plan progresses.

Natural Environment

~~24.~~28. SSDC and WMBC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.

~~25.~~29. Both WMBC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC, and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and WMBC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. 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.

~~26.~~30. SSDC and WMBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

Signatures

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

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Walsall Metropolitan Borough Council

Name:

Position:

DRAFT

Signature:

Date:

DRAFT

City of Wolverhampton Council (CWC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
29th October 2024	CWC to SSDC	Email from CWC with signed SoCG	Fully signed SoCG	No -same as final version
23rd September 2024	SSDC to CWC	Acknowledgement from SSDC	N/A	N/A
23rd September 2024	CWC to SSDC	Email from CWC saying they will action that week	N/A	N/A
23rd September 2024	SSDC to CWC	Email from SSDC asking for an update on timescales	N/A	N/A
17th July 2024	SSDC to CWC	Email from SSDC asking for the SOCG to be formally signed	SoCG signed by South Staffs	No -same as final version
10th July 2024	CWC to SSDC	Email from CWC saying they are happy with the SoCG	N/A	N/A
9th July 2024	SSDC to CWC	Email from SSDC asking for an update on timescales	N/A	N/A
3rd July 2024	CWC to SSDC	Email from CWC saying they will check through the SoCG	N/A	N/A
3rd July 2024	SSDC to CWC	Email from SSDC with a version of the SoCG taking into account CWC comment as discussed in the emails	SoCG taking into account CWC's comments	No -same as final version but track change version
3rd July 2024	CWC to SSDC	Email from CWC discussing CWC's comments	N/A	N/A
3rd July 2024	SSDC to CWC	Email from SSDC discussing CWC's comments	N/A	N/A
25th June 2024	CWC to SSDC	Email from CWC with additional comment on Gypsy and Travellers	SoCG with additional comment	Yes
24th June 2024	CWC to SSDC	Email from CWC with comments on the SoCG	SoCG with CWC comments	Yes

6th June 2024	SSDC to CWC	Email from SSDC asking for the SoCG to be progressed following the South Staffs Reg19 consultation.	N/A	N/A
21st March 2024	CWC to SSDC	Email from CWC saying they cannot progress the SoCG until seeing the South Staffs Reg19 Plan.	N/A	N/A
8th March 2024	SSDC to CWC	Initial email from SSDC to CWC the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter	Yes

Alex Evans

Subject: FW: Duty to Cooperate - Statements of Common Ground

From: Ian Culley <[redacted]>
Sent: 29 October 2024 09:29
To: Edward Fox <[redacted]>
Subject: Duty to Cooperate - Statements of Common Ground

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Morning Ed,

Pls see attached the 2x signed SoCGs.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

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Alex Evans

Subject: FW: Wolverhampton-SSDC SoCG 2024

From: Alex Evans
Sent: 23 September 2024 16:08
To: Ian Culley <[redacted]>
Subject: RE: Wolverhampton-SSDC SoCG 2024

Thanks Ian, much appreciated! Forgot to mention the FEMA SoCG as well if you are able to progress the signing of that one as well please?

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: Ian Culley <[redacted]>
Sent: Monday, September 23, 2024 4:05 PM
To: Alex Evans <[redacted]>
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Hi Alex – I'll action this week.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

From: Alex Evans <[redacted]>
Sent: Monday, September 23, 2024 4:02 PM
To: Ian Culley <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: FW: Wolverhampton-SSDC SoCG 2024

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Hi Ian,

I hope all is well,

I was just wondering how you were getting on with having the bilateral SoCG signed your end?

Many thanks

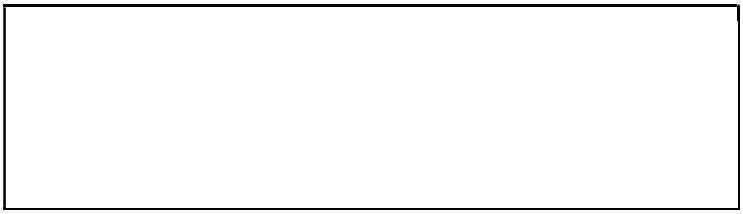
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]

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From: Alex Evans
Sent: Wednesday, July 17, 2024 12:46 PM
To: Ian Culley <[redacted]>
Cc: Edward Fox [redacted]>; Kelly Harris [redacted]>
Subject: RE: Wolverhampton-SSDC SoCG 2024

Hi Ian,

Thanks great, thanks for confirming. I have attached a clean copy of the SoCG which we have signed our end. 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.

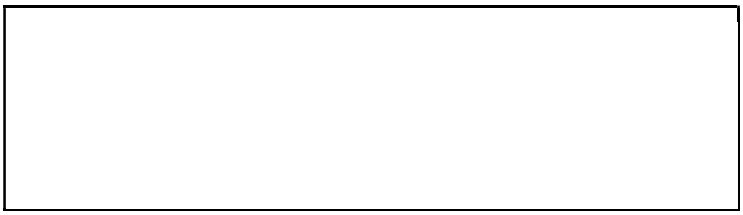
I look forward to receiving the comments on the FEMA SOCG shortly.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Ian Culley <[redacted]
Sent: Wednesday, July 10, 2024 10:29 AM
To: Alex Evans <[redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Hi Alex – yes, happy with the bilateral.

We had a meeting with BC colleagues yesterday and will get back to you with comments on the FEMA SoCG.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

From: Alex Evans <[redacted]
Sent: Tuesday, July 9, 2024 11:43 AM
To: Ian Culley <[redacted]>
Cc: Edward Fox [redacted]; Michele Ross <[redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Hi Ian,

I just wanted to check if you were now able to confirm that you are happy with the bilaterial SoCG? Also, if any progress had been made on the FEMA one?

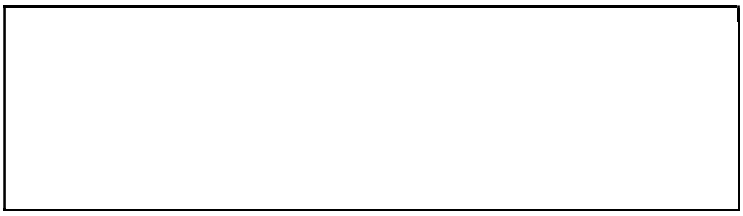
Thanks

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Ian Culley <[redacted]>
Sent: Wednesday, July 3, 2024 3:28 PM
To: Alex Evans <[redacted]>
Cc: Edward Fox <[redacted]>; Michele Ross [redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Thanks Alex – this should be fine but I'd like to double-check with Michele when she is back from leave on Monday.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

From: Alex Evans <[redacted]>
Sent: Wednesday, July 3, 2024 3:24 PM
To: Ian Culley <[redacted]>
Cc: Edward Fox <[redacted]>
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Hi Ian

Thanks for getting back to me so quickly on this.

I have amended the attached version to refer to the apportionment being picked up in an updated SoCG. I have also added a sentence saying that SSDC will review CWC's approach to meeting gypsy and traveller pitch provision when further details are published as part of CWC's Regulation 19 Plan.

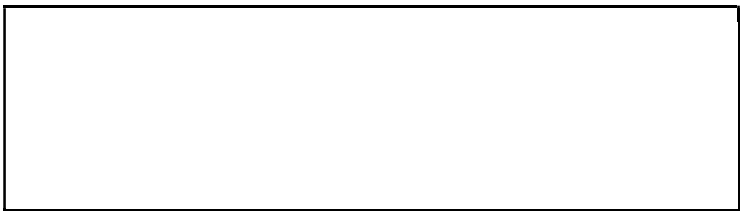
If you are happy with these amendments, I can provide a clean copy with the track changes accepted which we can take through our respective agreement processes.

Many thanks
Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Ian Culley <[redacted]>
Sent: Wednesday, July 3, 2024 1:52 PM
To: Alex Evans [redacted]>
Cc: Edward Fox [redacted]>
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Sensitivity: PROTECT

Hi Alex,

Pleased you are OK with most of the amends.

On the SoCG point yes that's fine – happy to refer to the apportionment being picked up in an updated SoCG.

And the G&T issues – no its not currently published but we will be providing further detail in the Wolverhampton Local Plan R19.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

From: Alex Evans <[redacted]
Sent: Wednesday, July 3, 2024 12:30 PM
To: Ian Culley <[redacted]>
Cc: Edward Fox <[redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

Sensitivity: PROTECT

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Ian,

Many thanks for the proposed amendments. We are happy with most of them, I just have a couple of queries below.

In relation to the GBBCHMA 2022 SoCG you added: 'including how contributions can be apportioned to meeting needs arising in individual areas where shortfalls arise'. I don't think that the 2022 SoCG does include details of apportionment? We can add in that an updated SoCG is underway which looks at this?

In relation to Gypsy and Travellers you've added: 'following a review of publicly owned land and privately-owned housing sites in Wolverhampton, no potential suitable new gypsy and traveller pitch sites have been identified which could address this shortfall'. This this review / work available to view? I can't find it on your website.

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: Ian Culley <[redacted]>
Sent: Tuesday, June 25, 2024 12:14 PM
To: Alex Evans <[redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Sensitivity: PROTECT

Hi again Alex,

Apologies but additional text added to the SoCG on Gypsy and Travellers.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

Statement of Common Ground between City of Wolverhampton 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) & City of Wolverhampton Council (CWC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and City of Wolverhampton Council (CWC), 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
    - Infrastructure;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and City of Wolverhampton.

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
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[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 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 CWC 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 shortfall arising from the Black Country authorities and that this requires discussion under the Duty to Cooperate. Following the cessation of work on the Black Country Plan in autumn 2022, CWC are now preparing a Wolverhampton Local Plan. (WLP). It is also common ground that there is likely to be a significant housing shortfall arising from the WLP alone.

8. CWC 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. 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 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

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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

~~9.~~11. CWC 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 an appropriate vehicle by which to ~~address~~ consider the issue holistically.

~~10. Site allocations proposed by SSDC at Land at Linthouse Lane, Land at Cross Green, and Langley Road lie either immediately adjacent, or in close proximity to South Staffordshire's border with Wolverhampton. Given the Council's 4,000 home contribution to unmet needs in the GBBCHMA, CWC have requested through representations to the Local Plan that a proportion of nomination rights for social rented properties on these three sites specifically should be afforded to CWC to contribute to meeting their local affordable housing need. CWC and SSDC agree that CWC will receive nomination rights for 50% of the social rented properties on these sites on initial let, with a proportion of nomination rights for subsequent lets to also be agreed at a later date.~~

Employment

~~11.~~12. SSDC and CWC both sit within the South Staffordshire functional economic market area (FEMA). CWC 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 CWC and SSDC on employment matters.

~~12.~~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) ~~DNA~~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. ~~2020-2040~~ 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. Additionally~~In addition~~, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver~~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.~~17. CWC ha~~ves~~ 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. ~~been part of the preparation of the Black Country Plan. The 2021 Black Country Plan Regulation 18 consultation confirmed 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. CWC (and the three other ~~, as part of the~~ Black Country authorities) ~~,~~ ha~~ves~~ therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

~~15.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including CWC) 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 CWC consider that these two ~~is FEMA-wide~~ statements of common ground ~~is~~ are the appropriate mechanism by which to address these strategic employment needs~~, whilst acknowledging that the Black Country FEMA authorities (including CWC) will also continue to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls, and other areas with which the FEMA authorities can demonstrate a functional relationship.~~. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CWC'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.~~19. SSDC and CWC 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. All parties have worked closely together to agree the scope, content and indicative mitigation measures relating to the strategic transport assessments undertaken on SSDC's proposed strategic housing and employment site allocations. As these sites progress towards the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate. The detail of cross-boundary transport issues is covered in a separate Transport Statement of Common Ground between CWC, SSDC, SSC and NH.

Infrastructure

~~17.~~20. SSDC and CWC are committed to continue working together in partnership, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable

growth across both administrative areas. To date, both authorities have undertaken cross-boundary work with their respective education authorities, health providers (e.g. Integrated Care System) and Sport England to identify any necessary mitigation to deliver planned housing growth in their respective areas. Both parties have also worked together closely to establish the feasibility of the rail-based park and ride scheme at Brinsford and will continue to work together to facilitate the next stages of the project's delivery should this be taken forward. Both parties will keep each other fully informed of any changes to infrastructure matters and will continue to liaise on this matter where appropriate.

Gypsy & Traveller Provision

~~18.~~21. SSDC has an identified a 16~~21~~ 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.

~~19.~~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.

~~20.~~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 Regulation 18 draft Black Country Plan consultation, previous call for sites or site identification work. However no details were given in this letter 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. CWCs response to SSDC letter of October 2023 dated 23 January 2024 confirmed CWCs position that it was premature to provide a City Council position on cross-boundary issues relating to gypsy and traveller pitch need and supply, as

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report ~~August 2021~~2024

this would need to be informed by progress on the Wolverhampton Local Plan (programmed for consultation early 2024) which would~~ill~~ consider gypsy and traveller pitch need and supply in Wolverhampton. This Issues and Preferred Options consultation subsequently confirmed that there is an unmet need for 19 gypsy and traveller pitches in Wolverhampton up to 2032, and that, following a review of publicly owned land and privately-owned housing sites in Wolverhampton, no potential suitable new gypsy and traveller pitch sites have been identified which could address this shortfall. The preferred growth option therefore included the export of 19 pitches through the Duty to Cooperate.

Natural Environment

~~21.~~24. SSDC and CWC 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.

~~22.~~25. Both CWC 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 CWC 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.

~~23.~~26. SSDC and CWC 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 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: 

Date: ~~27th January 2023~~

City of Wolverhampton Council

Name: ~~Councillor Stephen Simkins~~

Position: ~~Deputy Leader: Inclusive City Economy~~

Signature: 

Date: ~~8th March 2023~~

Alex Evans

Subject: FW: Wolverhampton-SSDC SoCG 2024

From: Ian Culley
Sent: Monday, June 24, 2024 12:46 PM
To: Alex Evans <[redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

Hi Alex,

Pls see attached our comments on the CWC / SSC SoCG.

The FEMA SoCG is taking a little longer to coordinate and may be the back end of this week.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: [redacted]
City of Wolverhampton Council

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

South Staffordshire Local Plan 2023~~18~~-2041~~39~~

Position at date~~November 2022~~

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

~~9.~~11. CWC 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 an appropriate vehicle by which to ~~address~~ consider the issue holistically.

~~10. Site allocations proposed by SSDC at Land at Linthouse Lane, Land at Cross Green, and Langley Road lie either immediately adjacent, or in close proximity to South Staffordshire's border with Wolverhampton. Given the Council's 4,000 home contribution to unmet needs in the GBBCHMA, CWC have requested through representations to the Local Plan that a proportion of nomination rights for social rented properties on these three sites specifically should be afforded to CWC to contribute to meeting their local affordable housing need. CWC and SSDC agree that CWC will receive nomination rights for 50% of the social rented properties on these sites on initial let, with a proportion of nomination rights for subsequent lets to also be agreed at a later date.~~

Employment

~~11.~~12. SSDC and CWC both sit within the South Staffordshire functional economic market area (FEMA). CWC 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 CWC and SSDC on employment matters.

~~12.~~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) ~~DNA~~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. ~~2020-2040~~ 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. Additionally~~In addition~~, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver~~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.~~17. CWC ha~~ves~~ 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. ~~been part of the preparation of the Black Country Plan. The 2021 Black Country Plan Regulation 18 consultation confirmed 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. CWC (and the three other ~~, as part of the~~ Black Country authorities) ~~,~~ ha~~ves~~ therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

~~15.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including CWC) 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 CWC consider that these two ~~is FEMA-wide~~ statements of common ground ~~is~~ are the appropriate mechanism by which to address these strategic employment needs~~, whilst acknowledging that the Black Country FEMA authorities (including CWC) will also continue to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls, and other areas with which the FEMA authorities can demonstrate a functional relationship~~. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CWC'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.~~19. SSDC and CWC 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. All parties have worked closely together to agree the scope, content and indicative mitigation measures relating to the strategic transport assessments undertaken on SSDC's proposed strategic housing and employment site allocations. As these sites progress towards the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate. The detail of cross-boundary transport issues is covered in a separate Transport Statement of Common Ground between CWC, SSDC, SSC and NH.

Infrastructure

~~17.~~20. SSDC and CWC are committed to continue working together in partnership, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable

growth across both administrative areas. To date, both authorities have undertaken cross-boundary work with their respective education authorities, health providers (e.g. Integrated Care System) and Sport England to identify any necessary mitigation to deliver planned housing growth in their respective areas. Both parties have also worked together closely to establish the feasibility of the rail-based park and ride scheme at Brinsford and will continue to work together to facilitate the next stages of the project's delivery should this be taken forward. Both parties will keep each other fully informed of any changes to infrastructure matters and will continue to liaise on this matter where appropriate.

Gypsy & Traveller Provision

~~18.~~21. SSDC has an identified a 16~~22~~21 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.

~~19.~~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.

~~20.~~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 Regulation 18 draft Black Country Plan consultation, previous call for sites or site identification work. However no details were given in this letter 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. CWCs response to SSDC letter of October 2023 dated 23 January 2024 confirmed CWCs position that it was premature to provide a City Council position on cross-boundary issues relating to gypsy and traveller pitch need and supply, as

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report ~~August 2021~~2024

this would need to be informed by progress on the Wolverhampton Local Plan (programmed for consultation early 2024) which will consider gypsy and traveller pitch need and supply in Wolverhampton.

Natural Environment

~~21.~~24. SSDC and CWC 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.

~~22.~~25. Both CWC 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 CWC 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.

~~23.~~26. SSDC and CWC 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 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~~

Alex Evans

Subject: FW: Wolverhampton-SSDC SoCG 2024

From: Alex Evans <[redacted]>
Sent: Thursday, June 6, 2024 2:07 PM
To: Ian Culley [redacted]
Cc: Kelly Harris <[redacted]; Edward Fox [redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

Sensitivity: PROTECT

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Ian

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.

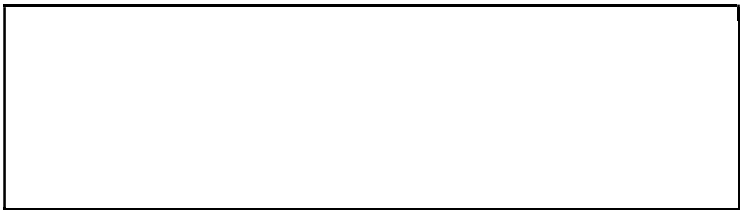
Kind regards

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: Ian Culley <[redacted]
Sent: Thursday, March 21, 2024 3:40 PM
To: Alex Evans <[redacted]
Cc: Kelly Harris <[redacted]>; Edward Fox <[redacted]
Subject: RE: Wolverhampton-SSDC SoCG 2024

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Sensitivity: PROTECT

Hi again Alex,

Firstly thanks again for sending this to us. It's a helpful statement on the direction of travel of the Plan and the approach to cross boundary issues.

Unfortunately, we cannot sign up to / endorse the draft at this stage, even on an 'informal' officer basis. This is because our comments on the previous draft of the Plan were of a detailed nature addressing a wide range of issues. In the absence of our having access to the complete version of the R19 Plan and associated evidence base then it is not possible to advise on whether the SoCG covers all of the issues that we may wish to raise in response to the updated document.

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

E-mail: I[redacted]
City of Wolverhampton Council

From: Alex Evans <[redacted]
Sent: Friday, March 8, 2024 2:13 PM
To: Ian Culley [redacted]>
Cc: Kelly Harris [redacted]; Edward Fox <[redacted]
Subject: Wolverhampton-SSDC SoCG 2024

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Dear Ian

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 Ian

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 City of Wolverhampton 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) & City of Wolverhampton Council (CWC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and City of Wolverhampton Council (CWC), 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
    - Infrastructure;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and City of Wolverhampton.

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 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 CWC 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 shortfall arising from the Black Country authorities and that this requires discussion under the Duty to Cooperate. Following the cessation of work on the Black Country Plan in autumn 2022, CWC are now preparing a Wolverhampton Local Plan. (WLP). It is also common ground that there is likely to be a significant housing shortfall arising from the WLP alone.

8. CWC 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. 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 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

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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

~~9.~~11. CWC 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 an appropriate vehicle by which to ~~address~~ consider the issue holistically.

~~10. Site allocations proposed by SSDC at Land at Linthouse Lane, Land at Cross Green, and Langley Road lie either immediately adjacent, or in close proximity to South Staffordshire's border with Wolverhampton. Given the Council's 4,000 home contribution to unmet needs in the GBBCHMA, CWC have requested through representations to the Local Plan that a proportion of nomination rights for social rented properties on these three sites specifically should be afforded to CWC to contribute to meeting their local affordable housing need. CWC and SSDC agree that CWC will receive nomination rights for 50% of the social rented properties on these sites on initial let, with a proportion of nomination rights for subsequent lets to also be agreed at a later date.~~

Employment

~~11.~~12. SSDC and CWC both sit within the South Staffordshire functional economic market area (FEMA). CWC 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 CWC and SSDC on employment matters.

~~12.~~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) ~~DNA~~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. ~~2020-2040~~ 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. Additionally~~In addition~~, the SSDC Local Plan will ~~release 232ha of Green Belt to deliver~~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,~~.~~ 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.~~17. CWC 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. ~~been part of the preparation of the Black Country Plan. The 2021 Black Country Plan Regulation 18 consultation confirmed 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. CWC (and the three other ~~, as part of the~~ Black Country authorities) ~~,~~ have~~s~~ therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

~~15.~~18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including CWC) 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 CWC 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 CWC) will also continue to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls, and other areas with which the FEMA authorities can demonstrate a functional relationship. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CWC'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.~~19. SSDC and CWC 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. All parties have worked closely together to agree the scope, content and indicative mitigation measures relating to the strategic transport assessments undertaken on SSDC's proposed strategic housing site allocations. As these sites progress towards the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate. The detail of cross-boundary transport issues is covered in a separate Transport Statement of Common Ground between CWC, SSDC, SSC and NH.

Infrastructure

~~17.~~20. SSDC and CWC are committed to continue working together in partnership, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas. To date, both authorities have undertaken cross-boundary work with their respective education authorities, health providers (e.g. Integrated Care System) and Sport England to identify any necessary mitigation to deliver planned housing growth in their respective areas. Both parties have also worked together closely to establish the feasibility of the rail-based park and ride scheme at Brinsford and will continue

to work together to facilitate the next stages of the project's delivery should this be taken forward. Both parties will keep each other fully informed of any changes to infrastructure matters and will continue to liaise on this matter where appropriate.

Gypsy & Traveller Provision

~~18.~~21. SSDC has an identified a 1622~~1~~ 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.

~~19.~~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.

~~20.~~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 Regulation 18 draft Black Country Plan consultation, previous call for sites or site identification work. However no details were given in this letter 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. CWCs response to SSDC letter of October 2023 dated 23 January 2024 confirmed CWCs position that it was 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 Wolverhampton Local Plan (programmed for consultation early 2024) which will consider gypsy and traveller pitch need and supply in Wolverhampton.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Natural Environment

~~21.~~24. SSDC and CWC 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.

~~22.~~25. Both CWC 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 CWC 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.

~~23.~~26. SSDC and CWC 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 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~~

Wyre Forest District Council (WFDC)				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
22nd July 2024	SSDC to WFDC	Email from SSDC with a counter-signed copy	Fully signed SoCG	No – same as final version
19th July 2024	WFDC to SSDC	Email from WFDC with Signed copy	SoCG signed by WFDC	No – same as final version
18th July 2024	SSDC to WFDC	Email from SSDC asking the SOCG to be formally signed off	Clean copy of the SoCG	No – same as final version
25th March 2024	SSDC to WFDC	Acknowledgement from SSDC	N/A	N/A
25th March 2024	WFDC to SSDC	Email from WFDC saying they are happy with the SoCG other than a typo	N/A	N/A
25th March 2024	SSDC to WFDC	Email from SSDC asking for an update on timescales	N/A	N/A
8th March 2024	SSDC to WFDC	Initial email from SSDC to WFDC with the draft SoCG requesting to be sign or provide any comments.	Draft SoCG Covering letter	Yes

Alex Evans

From: Alex Evans
Sent: 22 July 2024 10:14
To: Heather Stone
Cc: Edward Fox
Subject: RE: Wyre Forest SoCG
Attachments: Wyre Forest-SSDC SoCG 2024 signed.docx

Good morning Heather,

Thanks for getting this sorted so quickly, much appreciated.

Please find attached a counter signed copy for your records.

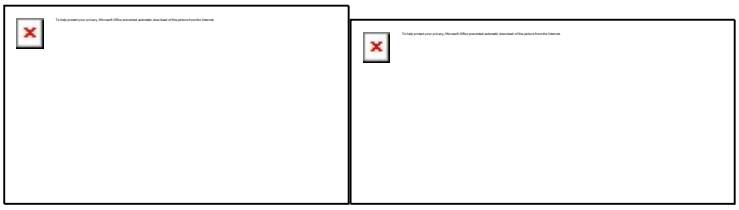
Thanks again,

Alex

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Heather Stone <[redacted]
Sent: Friday, July 19, 2024 3:33 PM

To: Alex Evans <[redacted]
Subject: Wyre Forest SoCG

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Hi Alex,
Please find attached the signed document.
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]

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Alex Evans

From: Alex Evans
Sent: 18 July 2024 12:42
To: 'Heather Stone'
Cc: Edward Fox
Subject: RE: Wyre Forest-SSDC SoCG 2024
Attachments: Wyre Forest-SSDC SoCG 2024 clean copy.docx

Good afternoon Heather,

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. I have attached a clean copy of the SoCG with the track changes accepted.

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.

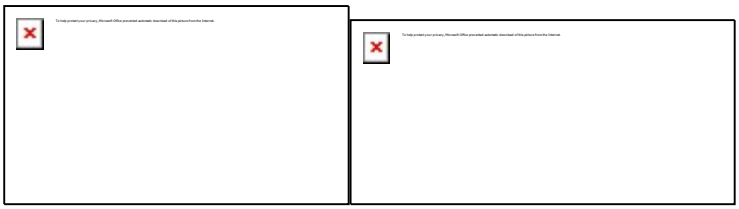
Many thanks
Alex

Alex Evans

Alex Evans

Strategic Planning Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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From: Alex Evans
Sent: Monday, March 25, 2024 4:02 PM
To: Heather Stone <[redacted]
Subject: RE: Wyre Forest-SSDC SoCG 2024

Hi Heather,

That's great, thanks for letting me know. I'll amend the typo.

Best wishes

Alex

From: Heather Stone <[redacted]>
Sent: Monday, March 25, 2024 3:47 PM
To: Alex Evans <[redacted]>
Subject: RE: Wyre Forest-SSDC SoCG 2024

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Hi Alex,
Sorry for the delay. I was on leave when the initial request came through and asked colleagues to look at it. Unfortunately, there was confusion as to who was going to respond.
I have now looked at the updated SOCG and have no comments other than to point out a typo under cross boundary transport impacts were Wyre is spelt incorrectly.
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]

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From: Alex Evans <[redacted]
Sent: Monday, March 25, 2024 2:13 PM
To: Heather Stone <[redacted]
Subject: FW: Wyre Forest-SSDC SoCG 2024

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 Heather

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 2:31 PM
To: Heather Stone <[redacted]
Cc: Kelly Harris [redacted]; Edward Fox [redacted]
Subject: Wyre Forest-SSDC SoCG 2024

Dear Heather

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

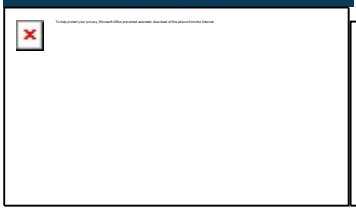
Alex

Alex Evans

Assistant Team Manager
Strategic Planning
South Staffordshire Council

Tel: 01902 [redacted]
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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 Heather

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 Wyre Forest District 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) & Wyre Forest District Council (WFDC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Wyre Forest District Council (WFDC), 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;
    - 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 Wyre Forest District Council.

Key Strategic Matters

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

5. The following issues are considered to 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

6. SSDC and WFDC are within separate housing market areas (HMAs). Although WFDC are not within the GBBCHMA[1] they are members of the Technical Officers Group as a related planning authority. Both authorities are party to the ~~emerging~~ 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA 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.

7. No other housing related cross-boundary issues have been identified.

Employment

8. SSDC and WFDC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.

9. The South Staffordshire Local Plan 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.

10. 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.

11. 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

[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

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.

~~10.~~12. ~~In addition~~Additionally, the SSDC will ~~release 232ha of Green Belt to deliver a~~ allocated 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

~~11.~~13. SSDC and WFDC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two~~four~~ strategic housing site allocations, however none are within close proximity to the Wrye Forest administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

~~12.~~14. SSDC and WFDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

~~13.~~15. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

~~14.~~16. SSDC has an identified a 1622~~1~~ pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 9~~7~~2 pitches within the first 5 year period[2]. 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

[2] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

~~15.~~17. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (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.

~~16.~~18. WFDC's most recent response to the August 2022 correspondence confirmed that their planned new allocated sites and the expansions of existing sites will only provide enough new pitches to meet the needs of Wyre Forest. WFDC also confirmed that the allocation of gypsy pitches on the proposed housing allocations was discussed through the Local Plan Inquiry and was not considered feasible. SSDC's view it is currently unclear as to what extent WFDC may or may not be able to assist in meeting unmet pitch need arising from SSDC due to public land within WFDC's administrative area needing to be assessed to see if there are any additional suitable sites for pitches to help meet SSDC's need.

~~17.~~19. WFDC disagree that it needs to conduct a further Gypsy and Traveller site assessment) at the current time. The WFDC Gypsy and Traveller Accommodation Assessment was completed in late 2020, as part of the now adopted Local Plan (adopted April 2022). The conclusion of the GTAA was that adequate provision was made for the duration of the plan period. There are no other public sites in WFDC ownership that can be allocated. Therefore, based on these factors, WFDC does not consider it necessary to revisit the site assessment as part of the SSDC SoCG process.

Natural Environment

~~18.~~20. SSDC and WFDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

~~19.~~21. No cross-boundary issues have been identified.

Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Wrye Forest 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:

[redacted]

Date: ~~27th January 2023~~

Wyre Forest District Council

Name: ~~**Kate Bailey**~~

Position: ~~**Head of Strategic Growth**~~

[redacted]

Signature:

Date: ~~3rd February 2023~~

Appendix 35 - Email correspondence, track changes and comments on HMA Statement of Common Ground (SoCG)

Birmingham City Council (BCC) – HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
10th February 2025	BCC to DMBC	Email from BCC providing a signed copy of the SoCG.	Signed copy of the SoCG	No – same as final SoCG
5th December 2024 – 3rd December 2024	Discussion between BCC and DMBC	Discussion on the shortfalls and track changes on SoCG.	Yes- track changes	Yes

Alex Evans

Subject: FW: [EXTERNAL EMAIL] FW: Housing Market Area Statement of Common Ground
Attachments: Officer agreed GBBCHMA SoCG - January 2025_Signed Philip Nell - Birmingham City Council .docx

From: [redacted]@birmingham.gov.uk>
Sent: 10 February 2025 09:13
To: [redacted]@dudley.gov.uk>
Subject: [EXTERNAL EMAIL] FW: Housing Market Area Statement of Common Ground

You don't often get email from [redacted]. Learn why this is important

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

Please see the attached signed document.

Kind regards,

Beth Kinvig
Personal Assistant to Philip Nell Strategic Director - Place, Prosperity & Sustainability
Corporate Services Directorate

Email: [redacted]birmingham.gov.uk
Visit: Birmingham City Council, Council House, Birmingham, B1 1BB
Web: www.birmingham.gov.uk



Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

From: [redacted]@birmingham.gov.uk>
Sent: 05 December 2024 16:25
To: [redacted]@birmingham.gov.uk>; V[redacted]@dudley.gov.uk>
Subject: RE: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

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Thanks Andy,

Yes, the latest shortfall is gross so everything should be counted against the old plan and set out in the position statement.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



OFFICIAL

From: Andrew Donnelly
Sent: 05 December 2024 16:15
To: Maria Dunn ; Vicki Popplewell (Planning)
Subject: RE: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

Hi both

Following discussions yesterday, my understanding is that the 3,790 contribution was for the 'old' BDP – it was calculated as 10% of the then shortfall. It should have been included in earlier position statements either as emerging or allocated capacity. I looked at the NWBC plan today and table 1 says that it is for Birmingham to 2031 as this was the date the Birmigham shortfall was calculated until, the plan goes to 2033.

What I'm less certain of is the Tamworth claims, which I'm assuming were for their 'old' plan too, and not the emerging one; they / NWBC would have to confirm that.This is confusing as Table 1 says some of the Tamworth contribution is accounted for by an additional economic development uplift, and some from the 3790.

My understanding is that the latest published Birmingham shortfall is gross, i.e. it makes no allowances for any external contributions.

OFFICIAL

From: [redacted]@birmingham.gov.uk>
Sent: 05 December 2024 16:04
To: [redacted]@dudley.gov.uk>; [redacted]@birmingham.gov.uk>
Subject: RE: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

Hi Vicki,

My understanding is that it is counted against the BDP shortfall in the latest monitoring statement. It is not counted in the emerging Birmingham Local Plan. I;ve copied in Andy who can clarify how it was counted in the monitoring statement.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]
Web: www.birmingham.gov.uk



OFFICIAL

From: [redacted]@dudley.gov.uk>
Sent: 05 December 2024 16:01
To: [redacted]@birmingham.gov.uk>
Subject: RE: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

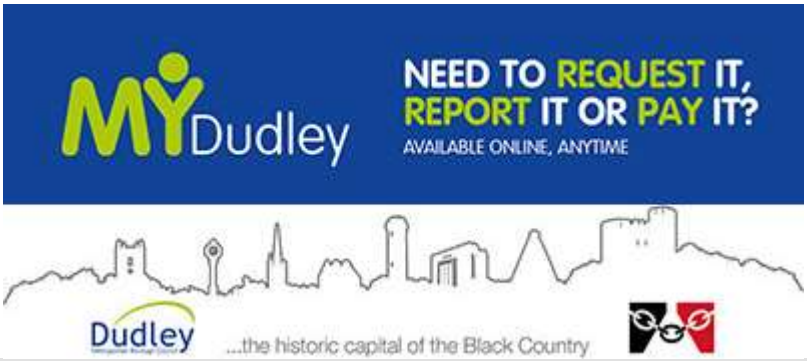
Hi Marie

Can you confirm if the North Warwickshire contribution to the Birmingham Development Plan shortfall has already been accounted for as I don't want to double count it in the SoCG

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
[redacted]
www.dudley.gov.uk



OFFICIAL

From: [redacted]@birmingham.gov.uk>
Sent: 03 December 2024 21:06
To: [redacted]@shropshire.gov.uk>; [redacted]@dudley.gov.uk>; [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]@wolverhampton.gov.uk>; [redacted]sstaffs.gov.uk>; [redacted]wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]annockchasedc.gov.uk; [redacted]solihull.gov.uk) [redacted]; [redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]tamworth.gov.uk; [redacted]@Shropshire.gov.uk>
Cc: [redacted]@wolverhampton.gov.uk>
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi,

Sorry for the delay. I've added some comments from BCC. I think we need to firm up the position post the Solihull plan and consider how we move forward. When is the next monitoring statement due? Is there sufficient delivery to mitigate the loss of the Solihull contribution. I appreciate authorities are moving forward with plans and need a position as it stands but things will move quickly, particularly once the new NPPF comes out and we're working to two different ones.

Thanks,

Maria Dunn MRTPI |Head of Development Policy| Planning and Development | Place, Prosperity, Sustainability

Call: [redacted]

Web: www.birmingham.gov.uk



GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

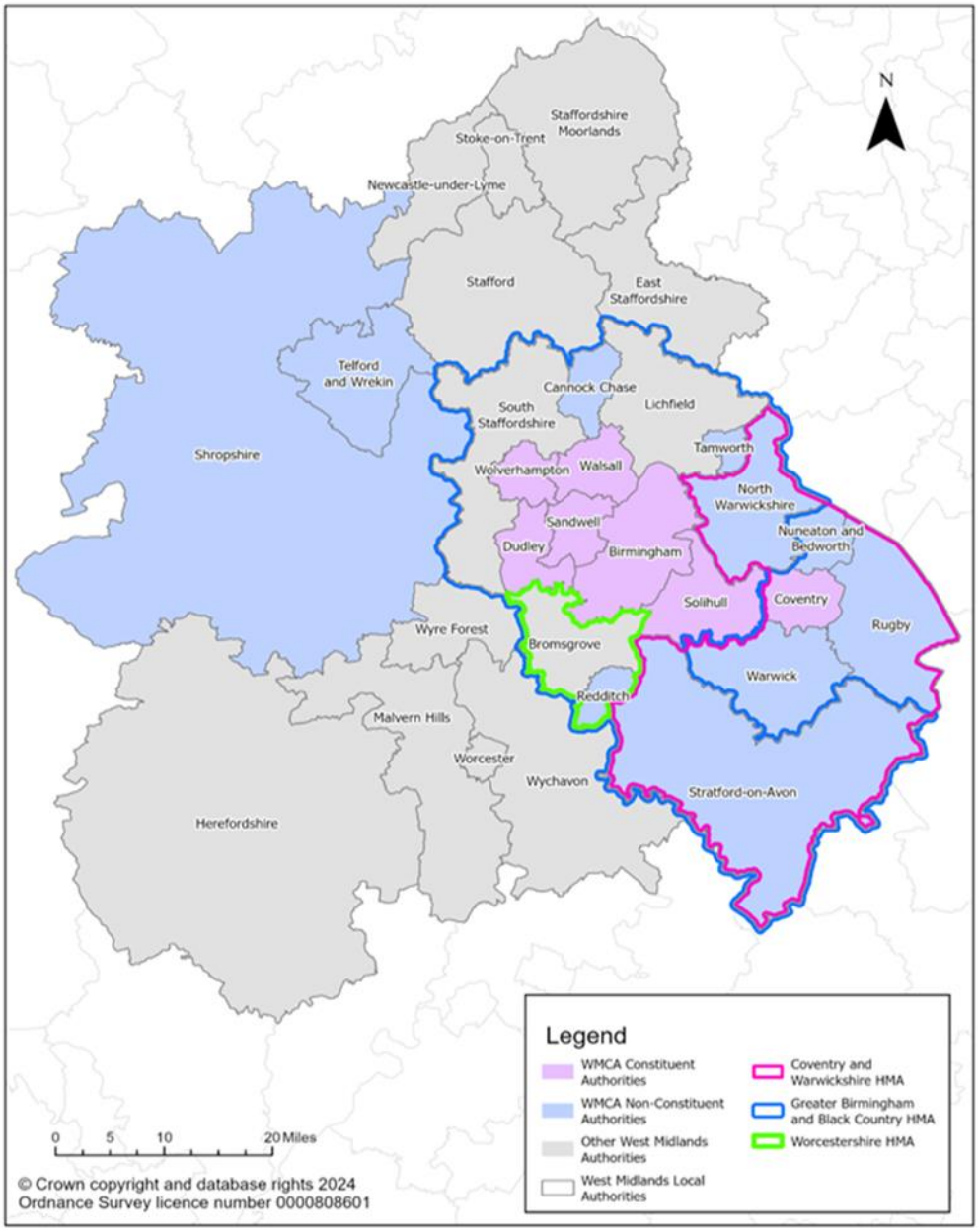
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 forecast to generate housinging 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 part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet 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 should need to be addressed in order to ensure compliance with through the Duty to Cooperate discussions. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell,

Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and, having regard to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local ~~and~~Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 ~~guidance~~.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was

withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in [2017****] and the Council submitted its local plan for examination in September 2021. This which made a contribution of 1,500 homes

towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 The Shropshire Council administrative area is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. 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.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	20168 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041

Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name: Position:	**Telford and Wrekin Council** Name: Position:

Date:	Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Bromsgrove District Council and Redditch Borough Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
25th March 2025	RBC to DMBC	Email from RBC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
24th March 2025	BDC to DMBC	Email from BDC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
27th November 2024	BDC and RBC to DMBC	Email from BDC and RBC with tracked changes on SoCG	Yes – track changes	Yes

Jennie Hadley

From: [redacted] - Strategic Planning and Conservation Manager <[redacted]bromsgroveandredditch.gov.uk>
Sent: 25 March 2025 11:04
To: Vicki Popplewell (Planning)
Subject: RE: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend
Attachments: GBBCHMA SoCG - January 2025 RBC.docx

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Hi Vicki

RBC version attached
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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Bromsgrove Redditch
Worcestershire Worcestershire
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www.bromsgrove.gov.uk www.redditchbc.gov.uk

From: Vicki Popplewell (Planning)
Sent: 25 March 2025 09:27
To: [redacted] - Strategic Planning and Conservation Manager
Subject: RE: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

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Thanks Mike

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: [redacted] - Strategic Planning and Conservation Manager <[redacted]@bromsgroveandredditch.gov.uk>
Sent: 24 March 2025 14:30
To: [redacted] <[redacted]l@dudley.gov.uk>
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

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Hi Vicki

BDC version attached should have the Redditch version by the end of the week.

Thanks
Mike

Mike Dunphy
Strategic Planning and Conservation Manager
Bromsgrove District and Redditch Borough Councils
Tel: [redacted]

Parkside Town Hall
Market Street Walter Stranz Square
Bromsgrove Redditch
Worcestershire Worcestershire
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From: [redacted]@dudley.gov.uk>
Sent: 14 March 2025 21:40
To: [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@solihull.gov.uk) [redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]tamworth.gov.uk; [redacted]@solihull.gov.uk) <[redacted]
Cc: [redacted]@wolverhampton.gov.uk>; [redacted]@birmingham.gov.uk>; [redacted]@stratford-dc.gov.uk>
Subject: RE: GBBCHMA SoCG - final amend

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Hi all,

I have received a number of signatures for the HMA SoCG. Can you confirm when you will be able to forward me the signed off version for your LA

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
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Dudley Council
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www.dudley.gov.uk





From: Vicki Popplewell (Planning)
Sent: 07 February 2025 13:38
To: [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]@wolverhampton.gov.uk>; [redacted]@sstaffs.gov.uk>; H[redacted]@wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]cannockchasedc.gov.uk; [redacted]@shropshire.gov.uk>; [redacted]solihull.gov.uk) <[redacted]; [redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]tamworth.gov.uk
Cc: [redacted]@wolverhampton.gov.uk>; [redacted]@birmingham.gov.uk>; [redacted]@stratford-dc.gov.uk>
Subject: RE: GBBCHMA SoCG - final amend

Hi all,

Thank you to those LAs who have returned a signed copy of the SoCG or indicated timescales for sign off.

I will be looking to published an “officer agreed” version when we submit the Dudley Local Plan at the end of next week with advice that this will be followed up with a formal signed off version as soon as all signatures have been received.

Regards,

Vicki Popplewell
Planning Policy Manager

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Jennie Hadley

From: [redacted] - Strategic Planning and Conservation Manager <[redacted]bromsgroveandredditch.gov.uk>
Sent: 27 November 2024 08:07
To: [redacted]
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_ (003).docx

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Hi Vicki

Please see comments attached

Thanks
Mike

Mike Dunphy
Strategic Planning and Conservation Manager
Bromsgrove District and Redditch Borough Councils
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From: [redacted]@dudley.gov.uk>
Sent: 21 November 2024 20:05
To: [redacted]walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]@wolverhampton.gov.uk>; [redacted]@sstaffs.gov.uk>; [redacted]@wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@cannockchasedc.gov.uk; [redacted]shropshire.gov.uk>; [redacted]@solihull.gov.uk) [redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]

[redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]birmingham.gov.uk; [redacted]@tamworth.gov.uk
Cc: [redacted]@wolverhampton.gov.uk>
Subject: Draft GBBCHMA SoCG

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Dear all,

As referred to at the GBBCHMA meeting on Tuesday, I have attached a draft/proposed SoCG for the HMA. This reflects the current position as of November 2024.

The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography and the degree to which Local Plans have an evidenced shortfall or surplus of housing land supply and contributions have been offered. The document sets out the proposed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities. The SoCG acknowledges where a contribution has been made to the GBBCHMA or specifically to the Black Country and seeks agreement on the apportionment methodology and the distribution, including agreement on the apportionment/distribution between the Black Country authorities.

I have left some highlighted text where I'm not sure of dates/figures and would welcome feedback for your LA.

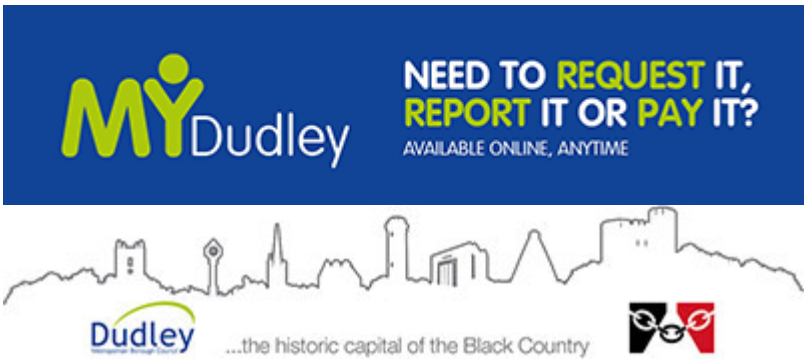
Please forward comments to me by Thursday next week so that I can amend and re-circulate.

Regards,

Vicki Popplewell
Planning Policy Manager

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GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

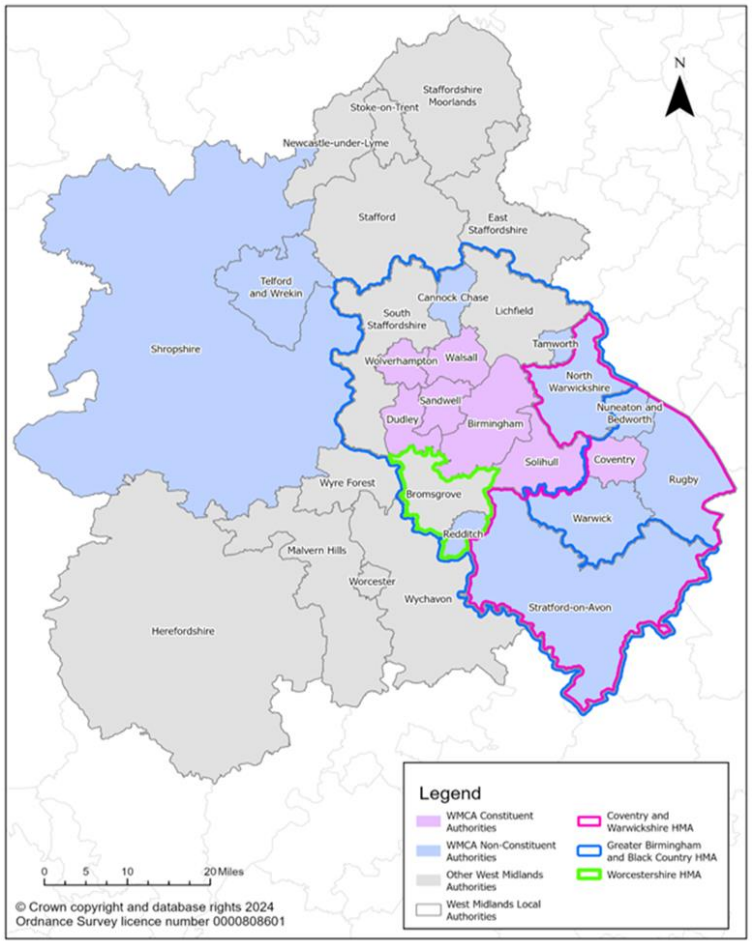
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



Commented [MD1]: This is incorrect there is no Worcestershire HMA

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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in

April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the

Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document

and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period

South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the

approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

~~5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.~~

5.9 Moving forward it is agreed that as other local plans progress, suitable apportionment methods will be agreed at that point with both the exporting authority and the receiving authority.

Commented [MD2]: We don't agree with this what happens in the future should be decided at that point and based on the evidence in play at that time and not predetermined now.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in ~~late 2024/~~early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities of Cannock Chase District Council, Shropshire Council, South Staffordshire District Council, Telford and Wrekin Council as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name:	**Telford and Wrekin Council** Name:

Position: Date:	Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Cannock Chase District Council (CCDC) – HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
6th March 2025	CCDC to DMBC	Email from CCDC with the signed SoCG	Signed SoCG	No – same as final version
3rd December 2024	CCDC to DMBC	Email with CCDC with updates and comments on the SoCG	Amended SoCG	Yes

Alex Evans

From: [redacted]@cannockchasedc.gov.uk>
Sent: 06 March 2025 14:27
To: Andrew Donnelly; Vicki Popplewell (Planning)
Cc: Sushil Birdi; Grace Lockley
Subject: [EXTERNAL EMAIL] CBBCHMA SoCG
Attachments: Officer agreed GBBCHMA SoCG - January 2025_.docx

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi both,

Please see signed version of SoCG for Cannock Chase. Our Inspector is formulating the MIQ's for our examination so we will likely be submitting this in draft form.
When do you think we will have a fully signed version?

Thanks,
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: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_ CCDC.docx

From: [redacted]@cannockchasedc.gov.uk>
Sent: 03 December 2024 16:33
To: [redacted]@dudley.gov.uk>; [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]wolverhampton.gov.uk>; [redacted]@sstaffs.gov.uk>; [redacted]@wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@shropshire.gov.uk>; [redacted]@solihull.gov.uk) <[redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]@tamworth.gov.uk
Cc: [redacted]@wolverhampton.gov.uk>; [redacted]@cannockchasedc.gov.uk>
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,
The Cannock Chase Local Plan status has been updated and we have added some comments to the draft document.

Kind regards
Sushil

Sushil Birdi|Planning Services Manager
Cannock Chase Council|Civic Centre|Beecroft Road|Cannock|WS11 1BG
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GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

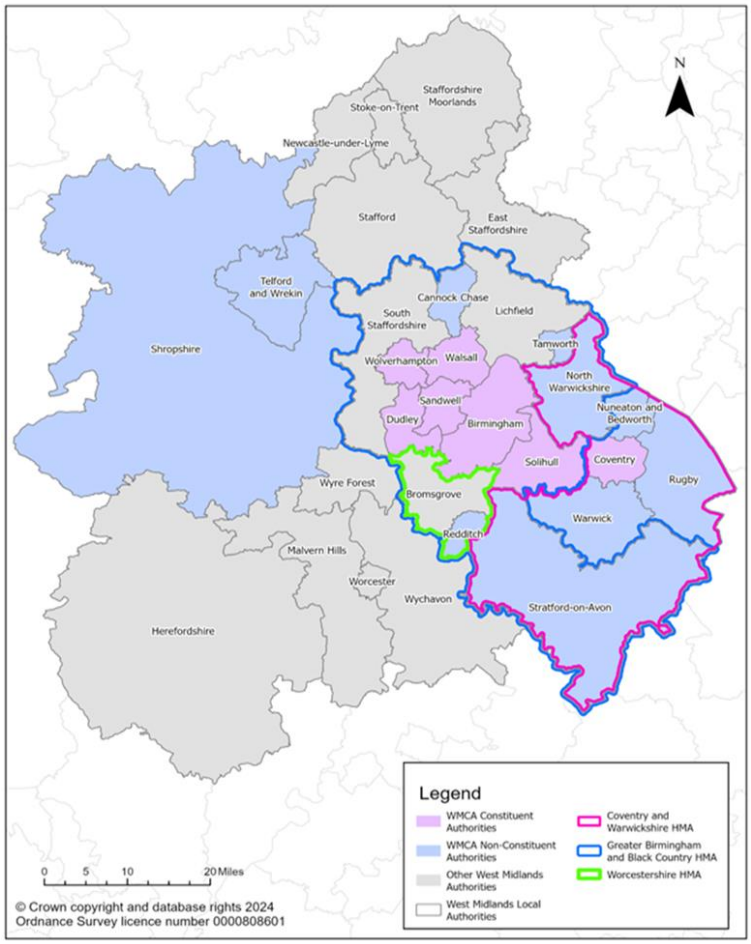
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: "Greater Birmingham and Black Country HMA"; "Coventry & Warwickshire HMA" and the "Worcestershire HMA"

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018, and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 –

2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council ~~is seeking to~~ submitted its Publication Plan for Examination ~~in late 2024~~on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Core Strategy Plan was adopted in 2012 and the Site Allocation Document adopted in 20188. T, and the Council are now progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Rregulation 19 Plan. This reflects following the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based ~~is no longer up to date~~ requires updating.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section 5x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country

Commented [JM3]: [redacted] we would prefer the term 'out of date' was not used in the SoCG in relation to the SGS because it forms the basis for CCDC's 500 contribution [redacted] We have agreed the alternative wording 'requires updating'

Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating

the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards

the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	**Status**	**Total contribution to GBBCHMA unmet needs (up to and beyond 2031)**	**Plan period**
South Staffordshire	Regulation 19 AprilMay 2024	+6450 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 2219 - Submission Submitted 29th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

5.9 Moving forward it is agreed that as other local plans progress, suitable apportionment methods will be agreed at that point with both the exporting authority and the receiving authority.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

Commented [JM6]: CCDC officers consider that the apportionment should be determined by the receiving authorities. If all parties are in agreement with this approach we will need to brief and review internally.

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities of Cannock Chase District Council, Shropshire Council, South Staffordshire District Council, Telford and Wrekin Council as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name:	**Telford and Wrekin Council** Name:

Position: Date:	Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Dudley Metropolitan Borough Council (DMBC) – Leading on the HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
17th January 2025	DMBC to HMA authorities	Email from DMBC asking for the SoCG to be signed	SoCG	No – same as final version
21st November 2024	DMBC to HMA authorities	Email from DMBC as asking for comments on the draft SoCG	Draft SoCG	Yes
12th November 2024	DMBC to Black Country Authorities	Email from DMBC as asking for comments on the draft SoCG	Draft SoCG	Yes

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

From: Vicki Popplewell (Planning)
Sent: 17 January 2025 14:43
To: [redacted]
Subject: GBBCHMA SoCG - final amend

CAUTION-THIS EMAIL WAS SENT FROM OUTSIDE THE COUNCIL. DONT OPEN LINKS OR ATTACHMENTS UNLESS YOURE SURE YOU CAN TRUST THIS SENDER!

Hi all,

I have recirculated a copy of the SoCG following comments received since that last GBBCHMA meeting in December.

Please note that the SoCG reflects the position at the end of November 2024 and will need to be updated/refreshed if there are any changes in terms of evidenced unmet needs, further evidence work and withdrawal of contributions.

Can I request that the statement be signed via your relevant processes and copies returned to me.

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: Vicki Popplewell (Planning)
Sent: Thursday, November 21, 2024 8:05 PM
To: [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]@wolverhampton.gov.uk>; [redacted]@sstaffs.gov.uk>; [redacted]@wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]cannockchasedc.gov.uk; [redacted]@shropshire.gov.uk>; [redacted]@solihull.gov.uk) <[redacted]'[redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]@tamworth.gov.uk
Cc: [redacted]@wolverhampton.gov.uk>
Subject: Draft GBBCHMA SoCG

Dear all,

As referred to at the GBBCHMA meeting on Tuesday, I have attached a draft/proposed SoCG for the HMA. This reflects the current position as of November 2024.

The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography and the degree to which Local Plans have an evidenced shortfall or surplus of housing land supply and contributions have been offered. The document sets out the proposed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities. The SoCG acknowledges where a contribution has been made to the GBBCHMA or specifically to the Black Country and seeks agreement on the apportionment methodology and the distribution, including agreement on the apportionment/distribution between the Black Country authorities.

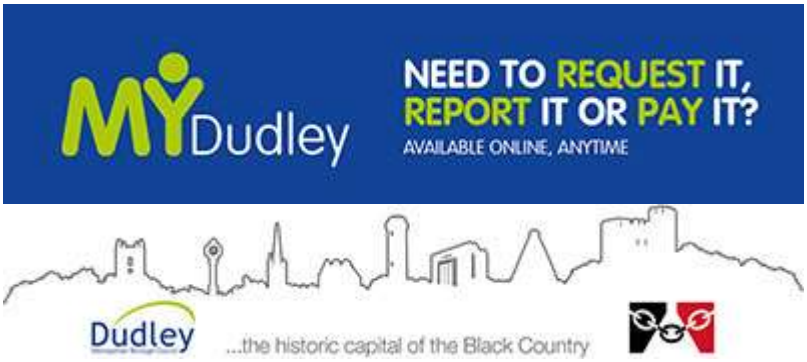
I have left some highlighted text where I'm not sure of dates/figures and would welcome feedback for your LA.

Please forward comments to me by Thursday next week so that I can amend and re-circulate.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
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GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

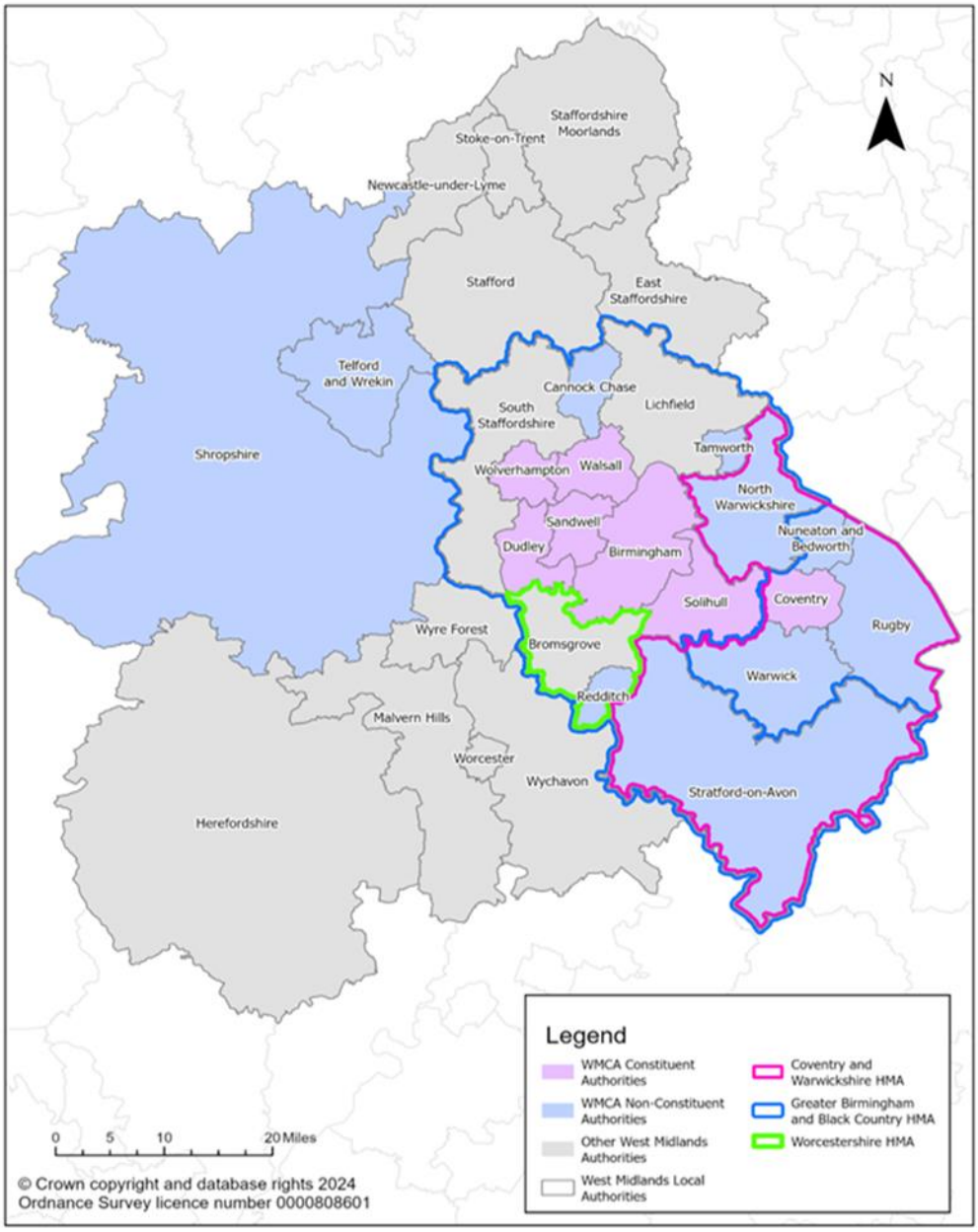
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in

April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the

Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document

and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period

South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the

approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name: Position:	**Telford and Wrekin Council** Name: Position:

Date:	Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: Draft HMA SoCG - apportionment of local plan contributions

From: Vicki Popplewell (Planning)
Sent: 12 November 2024 07:58
To: [redacted]
Subject: Draft HMA SoCG - apportionment of local plan contributions

CAUTION: STOP and THINK - This email originated from outside of the council. If it looks suspicious it probably is and YOU SHOULD NEVER enter your council username and password into an external link or open files attached to a suspicious email.

Hi all,

Please find attached a draft version of the suggested HMA SoCG which seeks agreement of the approach to apportion the contributions made specifically to the BC or GBBCHMA.

As previously discussed with Ian I have tried to focus on the position post Birmingham Development Plan 2017 and tailor it to the local plan reviews currently taking place. I've also tried to simply it compare to the previous HMA SoCG – not easy. There are still some sections to include but worth a discussion at Planning Leads before I work on this and share with other LAs.

Michele has suggested trying to include G&T shortfalls – we can discuss at PL meeting.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
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1976

GBBCHMA Development Needs Group

Draft

Statement of Common Ground

November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

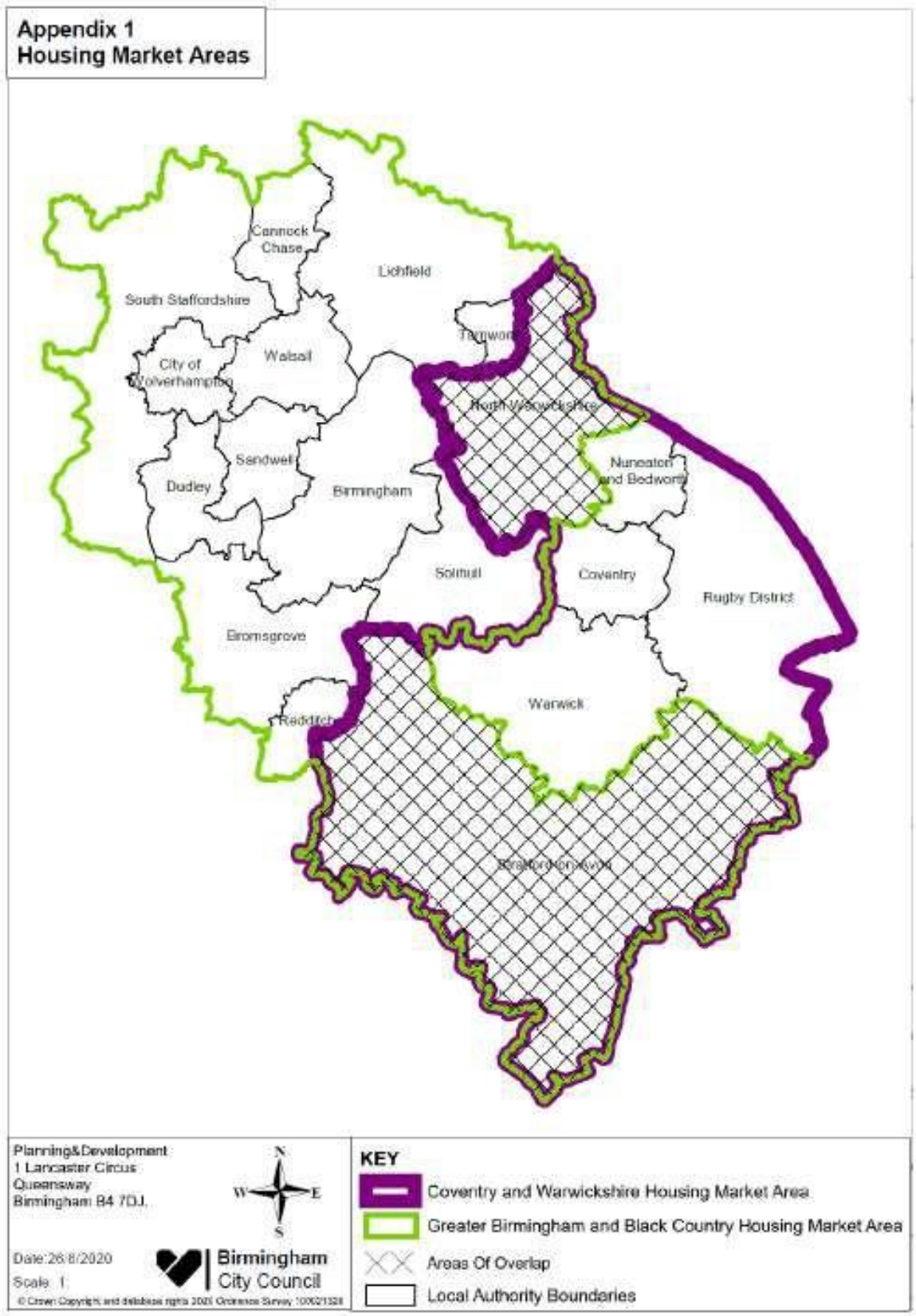
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: all LPAs, “Greater Birmingham and Black Country HMA”; and “Coventry & Warwickshire HMA” (4) “South Worcestershire HMA” i.e. Malvern Hills, Worcester City, Wychavon; (5) “GBBCHMA Development Needs Group”; (6) “other LPAs with a close functional relationship to the GBBCHMA” i.e. Worcester City and Coventry City]

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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 tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group, and through a recent Regulation 18 local plan consultation, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet needs within the GBBCHMA can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 As part of the review of the Birmingham Development Plan (2017), there was evidence of a significant shortfall in Birmingham's housing need 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011 -31. The most recent of these Position Statements was published in xxx with a base date of 1 April 2023. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the Birmingham Development Plan identifying additional capacity than anticipated when the plan was previously examined (additional capacity of 18,703 homes has been identified) as well

as additional capacity through other local plans (eg) and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of xxxx homes to 2033) reviews .

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced for the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the emerging new shortfall on the back of more recent local plan reviews to 2042, and the measures that are being taken to address this shortfall and agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities who are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall of 46,000 homes.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current plan adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 20xx – 2040 which is a make-up of the district's housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBCHMA is set out in Section x of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021. North Warwickshire sits within the Birmingham HMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of xxx homes towards Birmingham's unmet housing needs and xxx homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in xxxx and submitted the Plan for examination in…. This Plan included a

contribution of 2,100 homes towards the shortfall arising from the current Birmingham Development Plan 2017. The examination for the Solihull Plan commenced in 2021. In October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in . South Staffordshire reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in xxx. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Plan was adopted in xxx. 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. At the time of writing this statement of common ground the examination has been paused (October 2024) …. ……

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section x of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section x of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in xxx. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its xxxx adopted in 20xx.

Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of xxx was evidenced at the Regulation 18 stage of the Black County Plan.

4.25 Update on Walsall local plan prep dates

Wolverhampton Local Plan

4.26 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its xxxx adopted in 20xx. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.27 The City of Wolverhampton published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024 to April 2024. The Wolverhampton Local Plan (WLP) has a plan period to 2042. The Plan identified a housing requirement 16,100 extra households by 2042. In addition, Wolverhampton's housing need has been uplifted by an additional 35% providing a combined housing target of 21,700 homes. The WLP Regulation 18 made provision for 10,300 homes leaving a shortfall of 11,400 homes. At the time of writing this statement of common ground the Regulation 19 version of the WLP is due to be published for consultation in late November 2024. The Regulation 19 Plan confirms the shortfall as xx,xxx homes.

Wyre Forest Local Plan

4.28 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.29 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, is approximately 74,015 homes.

4.3- Alongside this a number of contributions (4,300 homes) have been made towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or Birmingham and Black Country's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Comments
South Staffordshire	Reg 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041 plan period
Cannock Chase	Reg 19	+500 Contribution specifically for Birmingham & Black Country unmet needs	Xxx plan period
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -38 plan period
Telford & Wrekin	Reg 18 Plan – Nov 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Reg 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Reg 19 Plan published September 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Reg 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Reg 18 Plan published	Shortfall of - 11,400 at Regulation 18 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan		

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the HMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

Table 3 Apportionment of housing contributions from each local plan contribution

Contributing LA	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	95	16	62	263	63
Shropshire	1500	0	431	257	219	593
South Staffordshire	640	21	153	71	161	234
Telford & Wrekin	1600	0	242	289	367	703
Total	4240	116	842	680	1011	1593

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham are seeking a contribution towards meeting their unmet needs.

5.10

6. Further work of the GBBCHMA

Include text on updated Strategic Housing Growth Study and monitoring

7. Areas of agreement

8. Areas where agreement is still being sought

9. Signatories to the Statement of Common Ground

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Lichfield District Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
3rd February 2025	LDC to DMBC	Email from LDC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
28th November 2024	LDC to DMBC	Email from LDC with tracked changes on SoCG	Yes – track changes	Yes

Jennie Hadley

From: [redacted]@lichfielddc.gov.uk>
Sent: 03 February 2025 11:28
To: Vicki Popplewell (Planning)
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend
Attachments: Officer agreed GBBCHMA SoCG - January 2025.docx

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Hi Vicky,
Please find attached signed by our cabinet member. I've added a scan of his signature but if you think it doesn't need that (or needs a better one) let me know,
Kind regards

Patrick Jervis MRTPI (he/him)
Principal Policy and Strategy Officer (Planning)

Core

Office: 01543 308132 | **Mobile:** [redacted]

Lichfield District Council

From: Vicki Popplewell (Planning)
Sent: 29 January 2025 16:31
To: [redacted]
Subject: RE: GBBCHMA SoCG - final amend

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Hi all,
As discussed at last week's GBBCHMA Development Needs Group could you please advise how soon you would be able to arrange for the sign off of the SoCG. There are a number of LAs who have already submitted their Plans or will be submitting over the next two months so it would be useful to have a copy with the majority of signatures by late Feb.

Regards,

Vicki Popplewell
Planning Policy Manager

Jennie Hadley

From: [redacted]@lichfielddc.gov.uk>
Sent: 28 November 2024 15:04
To: [redacted]
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_ (002).docx

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,
Please see attached with comments in track.
Kind regards

Patrick Jervis MRTPI (he/him)
Principal Policy and Strategy Officer (Planning)

Core

Office: 01543 308132 | [redacted]

Lichfield District Council

From: Vicki Popplewell (Planning)
Sent: Thursday, November 21, 2024 8:05 PM
To: [redacted]
Subject: Draft GBBCHMA SoCG

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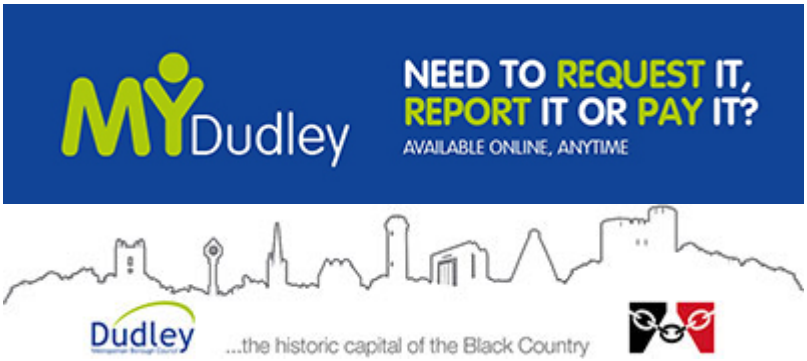
Dear all,
As referred to at the GBBCHMA meeting on Tuesday, I have attached a draft/proposed SoCG for the HMA. This reflects the current position as of November 2024.
The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography and the degree to which Local Plans have an evidenced shortfall or surplus of housing land supply and contributions have been offered. The document sets out the proposed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities. The SoCG acknowledges where a contribution has been made to the

GBBCHMA or specifically to the Black Country and seeks agreement on the apportionment methodology and the distribution, including agreement on the apportionment/distribution between the Black Country authorities.
I have left some highlighted text where I'm not sure of dates/figures and would welcome feedback for your LA. Please forward comments to me by Thursday next week so that I can amend and re-circulate.

Regards,

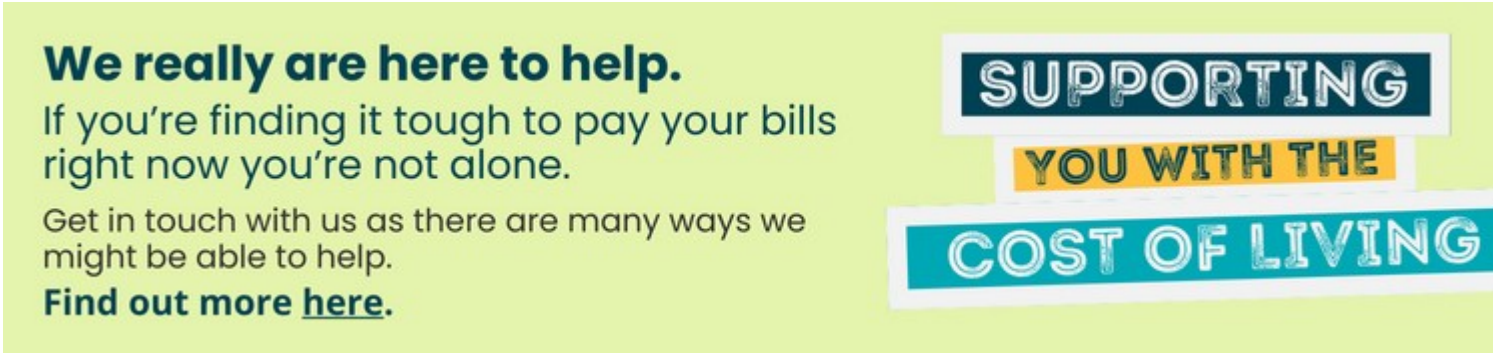
Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
01384 [redacted]
www.dudley.gov.uk



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Sensitivity: RESTRICTED

GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

Commented [PJ1]: Agree with Walsall's comments here RE making clear it is an informal group.

1.3 Local planning authorities within the GBBCHMA

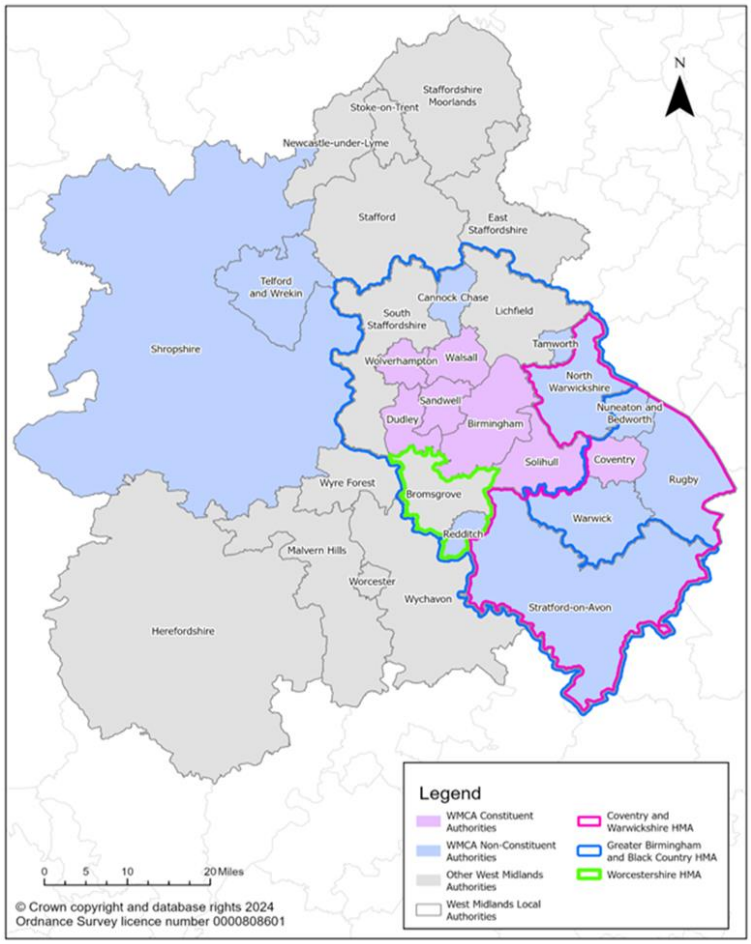
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: "Greater Birmingham and Black Country HMA"; "Coventry & Warwickshire HMA" and the "Worcestershire HMA"

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities ~~to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible)~~.

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously ~~submitted its Regulation 19~~progressed a review of its local plan ~~for~~ to submission for examination in 2022. ~~Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process.~~ At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan

commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs

of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs where possible. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could ~~increase~~ change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place,

each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 ~~Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs~~.

Commented [PJ2]: Agree with Mike's suggestion here - do not agree that this SoCG should set this as the approach for less advanced plans at this stage.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name: Position:	**Telford and Wrekin Council** Name: Position:

Date:	Date:
Wyre Forest District Council Name: Position: Date:	

2014

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

2015

North Warwickshire Borough Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
27th March 2025	NWBC to DMBC	Email from NWBC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
9th January 2025	NWBC to DMBC	Email from NWBC with tracked changes on SoCG	Yes – track changes	Yes
7th January 2025	NWBC to DMBC	Email from NWBC with discussion on potential changes to SoCG	No	N/A

From: [redacted]@NorthWarks.gov.uk>
Sent: 27 March 2025 17:03
To: [redacted]NorthWarks.gov.uk>; [redacted]@dudley.gov.uk>
Cc: [redacted]@wolverhampton.gov.uk>; [redacted]@dudley.gov.uk>; [redacted]@dudley.gov.uk>
Subject: [EXTERNAL EMAIL] RE: URGENT: GBBCHMA SoCG
Sensitivity: Confidential

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Kaleigh,

Apologies for delay, please see attached signed SoCG,

Best Regards,

Mike Dittman

Mike Dittman
Senior Planning Policy Officer
North Warwickshire Borough Council

Phone: 01827719451
Mobile: [redacted]

Web: www.northwarks.gov.uk

Social:



Jennie Hadley

From: [redacted]NorthWarks.gov.uk>
Sent: 09 January 2025 17:17
To: Vicki Popplewell (Planning)
Subject: RE: [EXTERNAL EMAIL] RE: HMA SoCG
Attachments: Officer agreed GBBCHMA SoCG 29 November 2024 NWBC Amendments.docx

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,
[redacted]

Please see the attached amended SoCG with our comments and any changes we are seeking for you info. Nothing really major just focussing on North Warwickshire's circumstances regarding our commitments to unmet need and differences this places us currently, as well as some clarifications/footnote sought thanks. The comments are a little lengthy to try and help explain why we are seeking them , so apologies for length and wordiness beforehand!.
See Page 7 (para 3.8), Table 2 page 13, and footnote page 17 (from para 6.2)
Any queries regarding changes please don't hesitate to get back to Dorothy or myself thanks,

Regards,
Mike Dittman

Mike Dittman
Senior Planning Policy Officer
North Warwickshire Borough Council

Phone: 01827719451
Mobile: [redacted]

Web: www.northwarks.gov.uk
Social:





Any opinions expressed in the email are those of the individual and not necessarily those of North Warwickshire Borough Council.
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Sensitivity: RESTRICTED

Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA

Officer Agreed Version

Statement of Common Ground Regarding Housing Shortfall

Position at 29 November 2024

2019

Sensitivity: RESTRICTED

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Dudley Local Plan 9

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North Warwickshire Local Plan 9

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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 the emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the governance arrangements in each authority.

1.3 Local planning authorities within the GBBCHMA

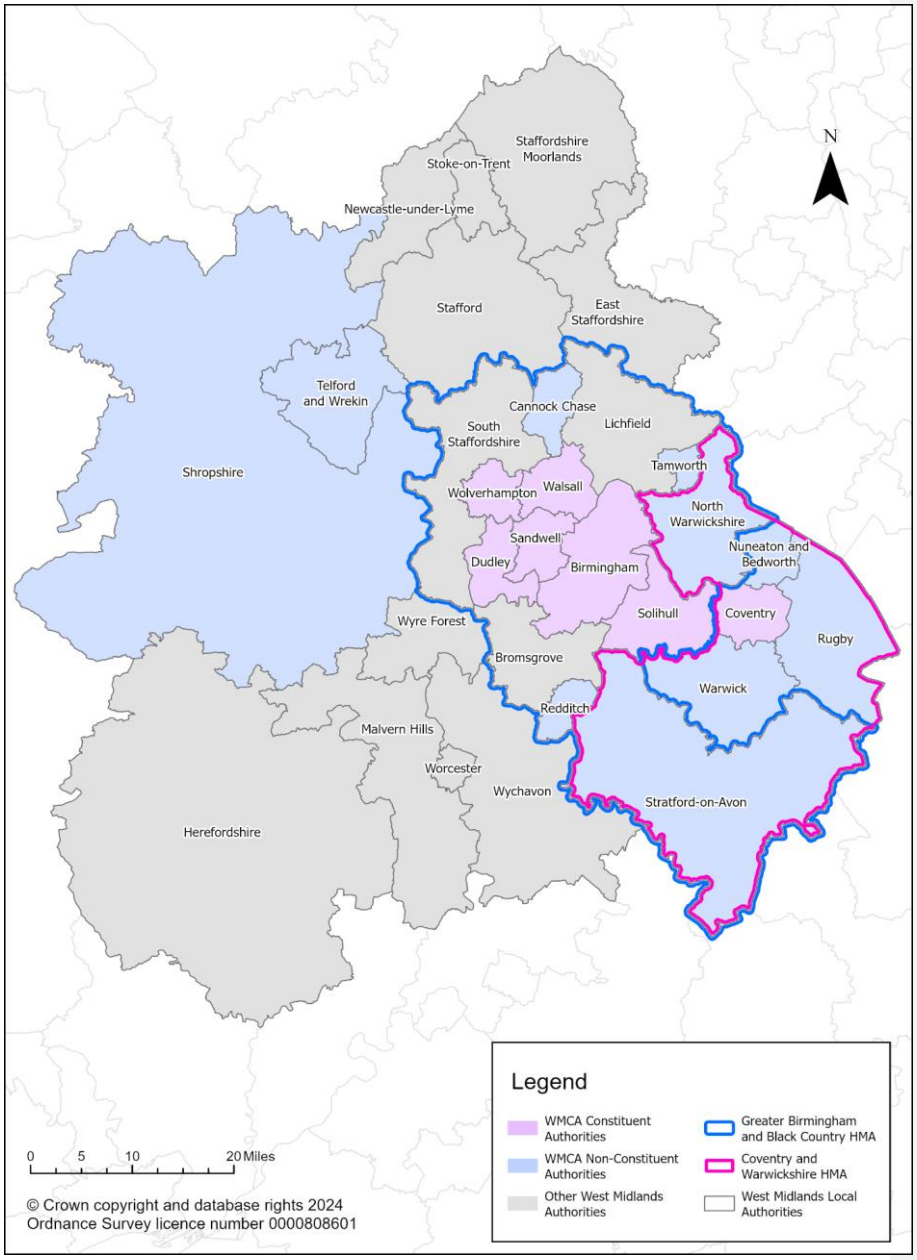
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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 the published study 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[2].

3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography

[2] Greater Birmingham and Black Country HMA Strategic Growth Study 2018 https://blackcountryplan.dudley.gov.uk/media/11537/greater-birmingham-hma_strategic-growth-study_lowres.pdf and Greater Birmingham and Black Country HMA Strategic Growth Study 2018 Appendices https://blackcountryplan.dudley.gov.uk/media/11538/greater-birmingham-hma_strategic-growth-study_appendices_lowres.pdf

is still valid. A Housing and Economic Development Needs Assessment (HEDNA) 2022[3] report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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, Telford & Wrekin and Wyre Forest Councils 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 forecast to generate housing 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 part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet 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 should be addressed through the Duty to Cooperate discussions.

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. Where relevant, this scope will be updated to reflect any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.

3.7 It should be noted that whilst both North Warwickshire and Stratford-on-Avon Councils fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA, the 2022 Coventry and Warwickshire HEDNA does state: "While at a strategic level these overlaps are based on the entire local authority in reality they will be mostly confined to those areas adjoining the Birmingham HMA. ~~such as Coleshill and Dorden~~Dordon ~~in North Warwickshire and Studley in Stratford~~." NOTE:

3.8 The adopted Birmingham Development Plan (2017) identified a shortfall in Birmingham's housing supply of 37,900 homes which could not be met in the plan area.

[3] https://www.birmingham.gov.uk/downloads/download/5184/evidence_base_blp_-_homes_and_neighbourhoods

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Commented [MD1]: Delete text as indicated. Concern that this text indicates these areas **will** be the areas to accommodate future growth. **This may not be the case and will be determined through the Local plan process, not through the growth options work or indication of a commitment in the SoCG.**
The SoCG should avoid specifying settlements or areas as having expectations of/commitments to accommodating growth unless adopted or emerging local plans clearly propose/allocate such growth.

Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is mainly a result of the City identifying more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the adopted North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

Commented [MD2]: By including reference to the fact the Plan is **adopted** leads into the later comment in Table 2, clearly indicating the **commitment** that the North Warwickshire Plan has made to the unmet need in distinction and difference to other emerging proposals/contributions to meet unmet need , yet to be agreed and adopted for which those Plans are progressing towards but have yet to be committed to through adoption. This change is sought not simply because we're seeking clarification of this point but as specific recognition of an actual commitment and avoiding any assumptions in Table 2 that this (agreed and accommodated) commitment is still a potential, or further assumptions that North Warwickshire is automatically identified as, or has agreed towards being a "Potential Contributing Authority" for any future local plan review without question.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and having regards to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, to provide certainty for local plan preparation, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

3.11 It is recognised that following the publication of a replacement NPPF expected in December 2024, that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future SoCG and/or plans.

4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042

4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 and therefore need to look forward to 2042.

4.2 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out

below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043. In respect of Stratford on Avon District Council, a joint local plan is being prepared with Warwick District Council and this plan has a proposed end date of 2050.

4.3 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.4 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.5 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023.

Bromsgrove Local Plan

4.6 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.8 The Council submitted its Publication Plan for Examination on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.9 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.10 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.11 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously progressed a review of its Regulation 19 local plan yp submission for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.12 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.13 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs, 500 towards Tamworth's unmet housing needs and 540 homes to Coventry's housing shortfall.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011, and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in 2017, and the Council submitted its local plan for examination in September 2021. This made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 The Shropshire Council administrative area is located outside the GBBCHMA and is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. 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.

Solihull Local Plan

4.19 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in 2015 and submitted the Plan for examination in May 2021. This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. This was on the basis that the Birmingham Development Plan (2017) was the only plan that had been adopted (and tested through examination) that generated a shortfall to be accommodated elsewhere. This position was used to support the exceptional circumstances needed to release land from the Green Belt to accommodate Solihull's own needs, and those arising from elsewhere in the HMA. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. Although the plan was withdrawn, the Inspectors carrying out the examination had confirmed that the duty-to-cooperate had been complied with. A

revised Local Development Scheme is being pursued that would see an accelerated process for drawing up a new plan, including publication of a Regulation 18 Preferred Option Plan in autumn 2025 and a Regulation 19 Draft Submission Plan in summer 2026.

South Staffordshire Local Plan

4.20 The current Core Strategy was adopted in 2012, and the Site Allocation Document adopted in 2018. The Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Regulation 19 Plan. This reflects the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based requires updating.

4.21 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.22 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBC HMA local authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.23 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan (SWLP) in 2021 and consulted on the Issues and Options in January – March 2023. The Issues and Options document sought views on the most appropriate spatial growth option for accommodating future growth needs, including unmet housing needs arising within GBBCHMAs and the Coventry & Warwickshire HMA. Consultation on the Preferred Options (Regulation 18) is planned for January – March 2025.

Tamworth Local Plan

4.24 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils.

4.25 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the issues and options document did not identify its housing land supply for the plan period,

it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the new local plan is ongoing.

Telford & Wrekin Local Plan

4.26 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.27 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Walsall Local Plan

4.28 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.29 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.30 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.31 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.32 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes.

4.33 Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA's unmet needs (e.g. from South Staffordshire and Cannock Chase Councils). In the case of North Warwickshire, the contribution is towards meeting the unmet needs of the adopted Birmingham Development Plan 2017 and has not been accounted for in the (4,290 homes) contribution figures.

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
Contributing Authorities			
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014-2033
Potential Contributing Authorities			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
Cannock Chase	Regulation 22 - Submission 29th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022.	+1,500 Contribution specifically for Black Country unmet needs	2016 - 2038

Commented [MD3]: (Note NWBC should not be classed as a 'potential CA' as the Borough Council is actively contributing now through the Adopted Local Plan allocations, hence inclusion in a revised classification/title of "**Contributing Authorities"**

2031

	Ongoing at the time of this SoCG		
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,414 Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs were possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (the end year for some plans is earlier) as demonstrated in Table 2 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBBCHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.5 As shown in Appendix One, the data is published over an extended period covering 2001-19 in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.6 It is acknowledged that this approach has been used to apportion an already agreed contribution and the same methodology is not necessarily appropriate for establishing the scale of a contribution.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited when the updated Growth Study is published and has been agreed. [4]

Commented [MD4]: Please add footnote indicating that NWBC circumstances (re: Growth Study) are that they aren't currently agreeing to involvement as we're focussing on delivery of current contributions to BCC needs

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name:	**Dudley Metropolitan Borough Council** Name:

[4] Note: North Warwickshire Borough Council are not a funding partner in the updated Growth Study as the Council is currently focussed on delivery of their current contributions to BCC needs through their adopted Plan.

Position: Date	Position: Date
Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:

Shropshire Council Name: Position: Date:	**Telford and Wrekin Council** Name: Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Jennie Hadley

From: [redacted]@NorthWarks.gov.uk>
Sent: 07 January 2025 17:29
To: Vicki Popplewell (Planning)
Subject: [EXTERNAL EMAIL] RE: HMA SoCG

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Hi Vicki,

There are a couple of minor points I wanted to raise but am just waiting confirmation from Dot before I send them off.
Are you ok to receive comments by Wed or Thursday morning?
One of issues was around table 2 and a couple of minor changes we think should be considered/included, but will get back to you once Dot has confirmed she's happy with the potential changes.

Regards,
Mike Dittman

Mike Dittman
Senior Planning Policy Officer
North Warwickshire Borough Council

Phone: 01827719451
Mobile: [redacted]

Web: www.northwarks.gov.uk

Social:





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From: Vicki Popplewell (Planning)
Sent: Monday, January 6, 2025 5:11 PM

To: Mike Dittman
Subject: HMA SoCG

> **Caution:** Warning external email

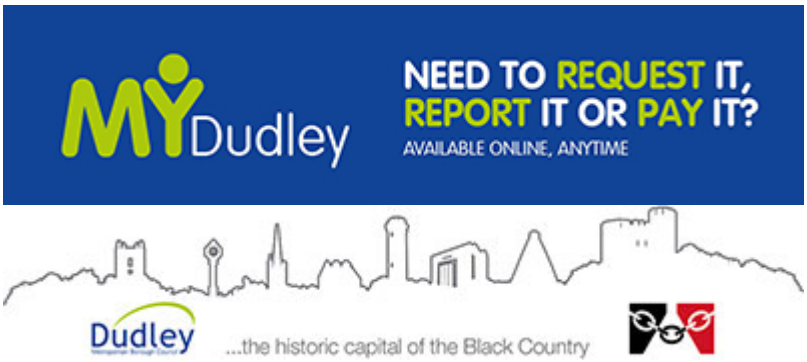
Hi Mike

Could you advise if you/Dot have any comments on the HMA SoCG that was discussed at the HMA meeting on 17th Dec. I have previously circulated it to Dot.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL
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Sandwell Metropolitan Borough Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
23rd January 2025	SMBC to DMBC	Email from SMBC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
12th December 2024	SMBC to DMBC	Email from SMBC with amendment to Table 2 of SoCG	Yes – track changes	Yes
13th November 2024	SMBC to DMBC	Email from SMBC with tracked changes to SoCG	Yes – track changes	Yes

Jennie Hadley

From: [redacted]@sandwell.gov.uk>
Sent: 23 January 2025 09:17
To: Vicki Popplewell (Planning)
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

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Hi Vicki

Please find attached signed SoCG.

Regards
Trisha

From: Vicki Popplewell (Planning)
Sent: 17 January 2025 14:43
To: [redacted]
Subject: GBBCHMA SoCG - final amend

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Hi all,

I have recirculated a copy of the SoCG following comments received since that last GBBCHMA meeting in December.

Please note that the SoCG reflects the position at the end of November 2024 and will need to be updated/refreshed if there are any changes in terms of evidenced unmet needs, further evidence work and withdrawal of contributions.

Can I request that the statement be signed via your relevant processes and copies returned to me.

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

Jennie Hadley

From: [redacted]@sandwell.gov.uk>
Sent: 12 December 2024 10:20
To: [redacted]
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG

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One amendment to table 2

From: Vicki Popplewell (Planning)
Sent: Wednesday, December 11, 2024 2:07 PM
To: [redacted]
Subject: GBBCHMA SoCG

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Hi all,

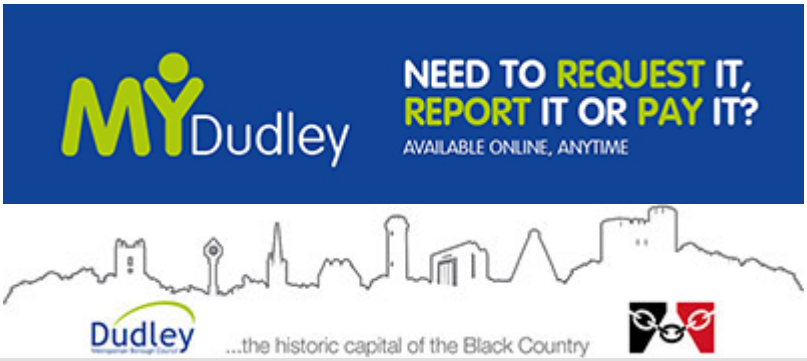
Thank you to everyone who sent comments. I've updated the SoCG document and recirculated – see attached.

This will be discussed under an item at next week's HMA Development Group meeting on 17th Dec and the process/timescales for sign off.

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: Vicki Popplewell (Planning)
Sent: 05 December 2024 17:23
To: Neville Ball <Neville.Ball@walsall.gov.uk>; Patricia Mccullagh <patricia_mccullagh@sandwell.gov.uk>; Michele Ross <Michele.Ross@wolverhampton.gov.uk>; Edward Fox <E.Fox@sstaffs.gov.uk>; Heather Stone <Heather.Stone@wyreforestdc.gov.uk>; Alison grimmett <alison.grimmett@bromsgroveandredditch.gov.uk>; Mike Dunphy <m.dunphy@bromsgroveandredditch.gov.uk>; SushilBirdi@cannockchasedc.gov.uk; Edward West <edward.west@shropshire.gov.uk>; Gary Palmer (gpalmer@solihull.gov.uk) <gpalmer@solihull.gov.uk>; 'Barratt, Dorothy' <dorothybarratt@northwarks.gov.uk>; Jo Bozdoganli <joanne.bozdoganli@stratford-dc.gov.uk>; Gavin Ashford - Telford <gavin.ashford1@telford.gov.uk>; Patrick Jervis <patrick.jervis@lichfielddc.gov.uk>; maria.dunn@birmingham.gov.uk; Richard-Powell@tamworth.gov.uk
Cc: Ian Culley <Ian.Culley@wolverhampton.gov.uk>; Andrew Donnelly <Andrew.Donnelly@birmingham.gov.uk>
Subject: Amended GBBCHMA SoCG

Hi all,

Thank you for the comments provided. I have amended the SoCG. I'm still awaiting an amended Map (Via WMCA) to replace the existing map in the document which removes the reference to Worcestershire HMA

Following discussion with Ian, I confirm that the SoCG position is at November 2024.

Could those LAs who have not yet responded with any comments please email me by Monday 9th December so that the final version can be circulated.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
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Dudley Council
4 Ednam Road, Dudley, DY1 1HL
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Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA

Officer Agreed Version

Statement of Common Ground Regarding Housing Shortfall

Position at 29 November 2024

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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 the emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the governance arrangements in each authority.

1.3 Local planning authorities within the GBBCHMA

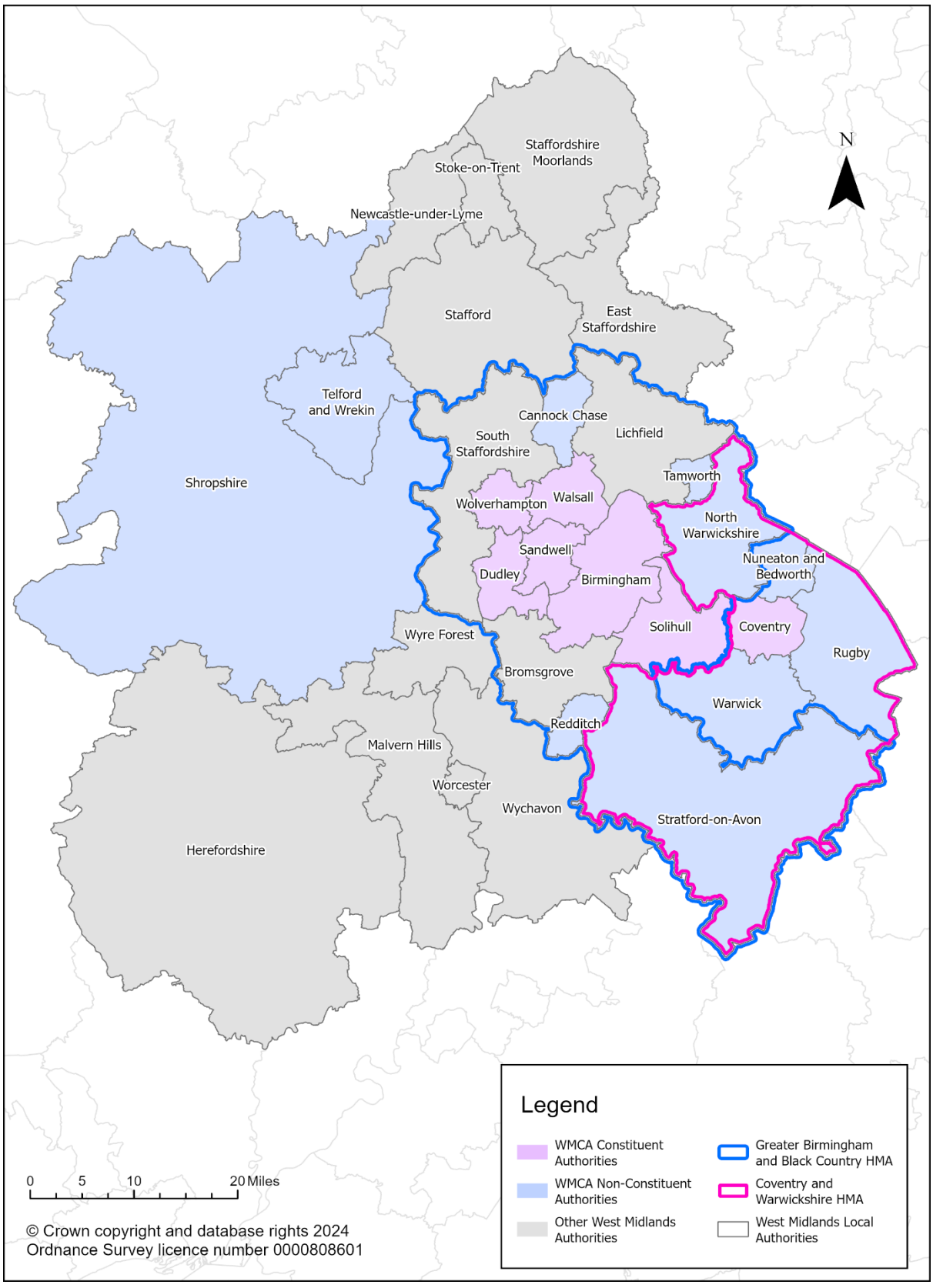
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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 the published study 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[2].

3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography

[2] Greater Birmingham and Black Country HMA Strategic Growth Study 2018 https://blackcountryplan.dudley.gov.uk/media/11537/greater-birmingham-hma_strategic-growth-study_lowres.pdf and Greater Birmingham and Black Country HMA Strategic Growth Study 2018 Appendices https://blackcountryplan.dudley.gov.uk/media/11538/greater-birmingham-hma_strategic-growth-study_appendices_lowres.pdf

is still valid. A Housing and Economic Development Needs Assessment (HEDNA) 2022[3] report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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, Telford & Wrekin and Wyre Forest Councils 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 forecast to generate housing 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 part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet 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 should be addressed through the Duty to Cooperate discussions.

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. Where relevant, this scope will be updated to reflect any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.

3.7 It should be noted that whilst both North Warwickshire and Stratford-on-Avon Councils fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA, the 2022 Coventry and Warwickshire HEDNA does state: “While at a strategic level these overlaps are based on the entire local authority in reality they will be mostly confined to those areas adjoining the Birmingham HMA such as Coleshill and Dorden in North Warwickshire and Studley in Stratford.”

3.8 The adopted Birmingham Development Plan (2017) identified a shortfall in Birmingham’s housing supply of 37,900 homes which could not be met in the plan area.

[3] https://www.birmingham.gov.uk/downloads/download/5184/evidence_base_blp_-_homes_and_neighbourhoods

Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is mainly a result of the City identifying more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and having regards to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, to provide certainty for local plan preparation, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

3.11 It is recognised that following the publication of a replacement NPPF expected in December 2024, that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future SoCG and/or plans.

4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042

4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 and therefore need to look forward to 2042.

4.2 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out

below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043. In respect of Stratford on Avon District Council, a joint local plan is being prepared with Warwick District Council and this plan has a proposed end date of 2050.

4.3 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.4 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.5 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023.

Bromsgrove Local Plan

4.6 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.8 The Council submitted its Publication Plan for Examination on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.9 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.10 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.11 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously progressed a review of its Regulation 19 local plan yp submission for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.12 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.13 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs, 500 towards Tamworth's unmet housing needs and 540 homes to Coventry's housing shortfall.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011, and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in 2017, and the Council submitted its local plan for examination in September 2021. This made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 The Shropshire Council administrative area is located outside the GBBCHMA and is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. 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.

Solihull Local Plan

4.19 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in 2015 and submitted the Plan for examination in May 2021. This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. This was on the basis that the Birmingham Development Plan (2017) was the only plan that had been adopted (and tested through examination) that generated a shortfall to be accommodated elsewhere. This position was used to support the exceptional circumstances needed to release land from the Green Belt to accommodate Solihull's own needs, and those arising from elsewhere in the HMA. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. Although the plan was withdrawn, the Inspectors carrying out the examination had confirmed that the duty-to-cooperate had been complied with. A

revised Local Development Scheme is being pursued that would see an accelerated process for drawing up a new plan, including publication of a Regulation 18 Preferred Option Plan in autumn 2025 and a Regulation 19 Draft Submission Plan in summer 2026.

South Staffordshire Local Plan

4.20 The current Core Strategy was adopted in 2012, and the Site Allocation Document adopted in 2018. The Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Regulation 19 Plan. This reflects the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based requires updating.

4.21 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.22 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBC HMA local authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.23 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan (SWLP) in 2021 and consulted on the Issues and Options in January – March 2023. The Issues and Options document sought views on the most appropriate spatial growth option for accommodating future growth needs, including unmet housing needs arising within GBBCHMAs and the Coventry & Warwickshire HMA. Consultation on the Preferred Options (Regulation 18) is planned for January – March 2025.

Tamworth Local Plan

4.24 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils.

4.25 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the issues and options document did not identify its housing land supply for the plan period,

it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the new local plan is ongoing.

Telford & Wrekin Local Plan

4.26 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.27 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Walsall Local Plan

4.28 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.29 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.30 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.31 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.32 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes.

4.33 Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA's unmet needs (e.g. from South Staffordshire and Cannock Chase Councils). In the case of North Warwickshire, the contribution is towards meeting the unmet needs of the adopted Birmingham Development Plan 2017 and has not been accounted for in the (4,290 homes) contribution figures.

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	**Status**	**Total contribution to GBBCHMA unmet needs (up to and beyond 2031)**	**Plan period**
Potential Contributing Authorities			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 22 - Submission 29th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2016 -2038

Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	~~2022~~2024-2041
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,414 Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs were possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (the end year for some plans is earlier) as demonstrated in Table 2 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBBCHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.5 As shown in Appendix One, the data is published over an extended period covering 2001-19 in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.6 It is acknowledged that this approach has been used to apportion an already agreed contribution and the same methodology is not necessarily appropriate for establishing the scale of a contribution.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited when the updated Growth Study is published and has been agreed.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position:	**Dudley Metropolitan Borough Council** Name: Position:

Date	Date
Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name:	**Telford and Wrekin Council** Name:

Position: Date:	Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Sensitivity: RESTRICTED

GBBCHMA Development Needs Group

Draft

Statement of Common Ground

November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 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

1.4 Other related local planning authorities outside of the GBBCHMA

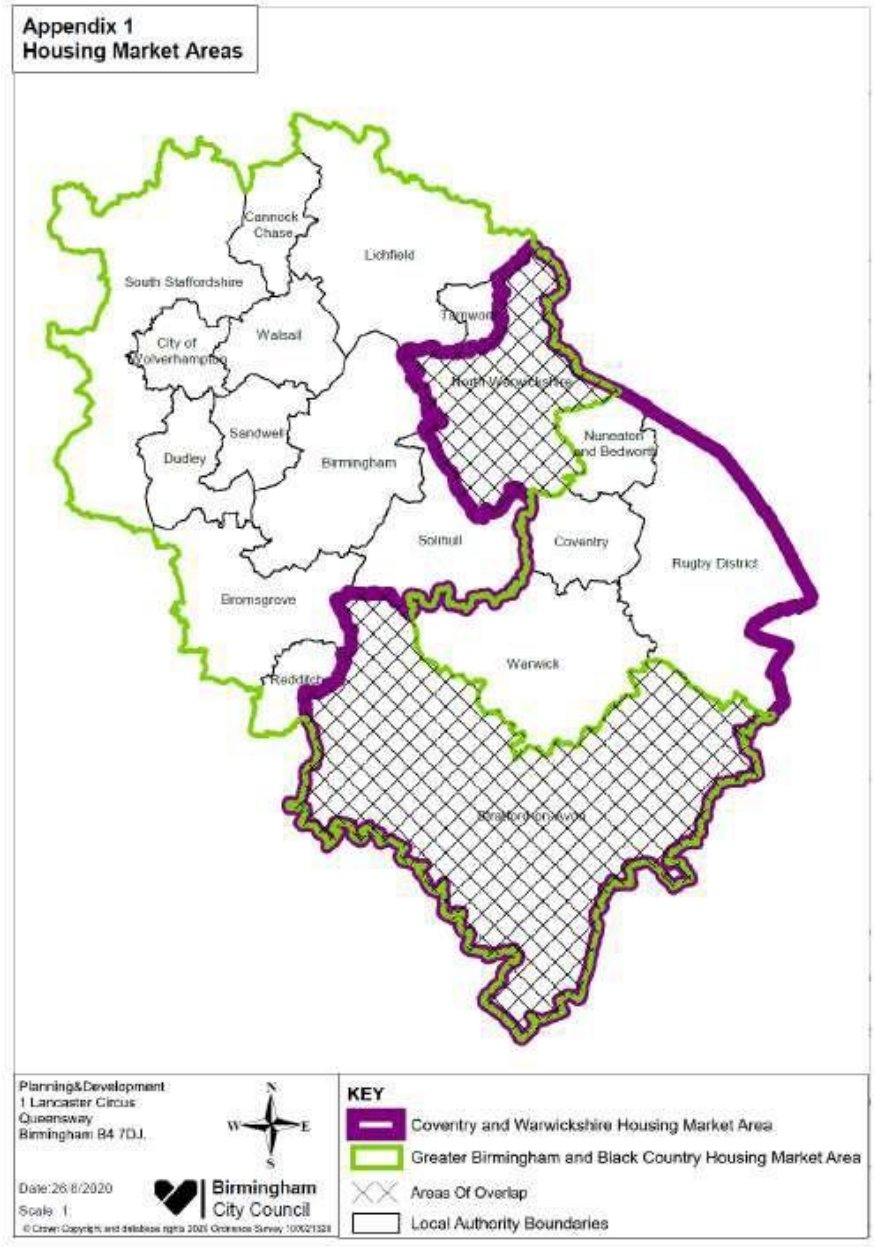
- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

[1] Figure 1 – map showing boundaries of: all LPAs, "Greater Birmingham and Black Country HMA"; and "Coventry & Warwickshire HMA" (4) "South Worcestershire HMA" i.e. Malvern Hills, Worcester City, Wychavon; (5) "GBBCHMA Development Needs Group"; (6) "other LPAs with a close functional relationship to the GBBCHMA" i.e. Worcester City and Coventry City]

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Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)

Commented [NB1]: Map needs to include Shropshire and Telford (plus Stafford and Wyre Forest?) as well as South Worcestershire



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 tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group, and through a recent Regulation 18 local plan consultation, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet needs within the GBBCHMA can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 ~~As part of the review of the~~The adopted Birmingham Development Plan (2017) identified ~~, there was evidence of a significant~~ shortfall in Birmingham's housing ~~need~~ supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011 -31. The most recent of these Position Statements was published in xxx with a base date of 1 April 2023. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the ~~Birmingham Development Plan~~City identifying additional capacity than was anticipated when the plan was ~~previously~~ examined (additional

capacity of 18,703 homes has been identified) as well as additional capacity through other local plans (eg) and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of xxxx homes to 2033) reviews .

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced ~~for~~ of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the current housing supplies and shortfalls for the period to 2042. It is recognised that some current and emerging local plans have different end dates, but a common end date allows comparison between plans. The statement seeks to take account of changes in national planning policy relating to the calculation of housing need and how this need should be addressed. It includes details of ~~emerging new shortfall on the back of more recent local plan reviews to 2042, and the measures that are being taken to address this shortfall and~~ agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities who are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a

shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall of 46,000 homes.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current plan adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 20xx – 2040 which is a make-up of the district's housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBCHMA is set out in Section x of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021. North Warwickshire sits within the Birmingham HMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of xxx homes towards Birmingham's unmet housing needs and xxx homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in xxxx and submitted the Plan for examination in…. This Plan included a contribution of 2,100 homes towards the shortfall arising from the current Birmingham Development Plan 2017. The examination for the Solihull Plan commenced in 2021. In October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in . South Staffordshire reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in xxx. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Plan was adopted in xxx. 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. At the time of writing this statement of common ground the examination has been paused (October 2024) …. ……

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section x of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section x of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in xxx. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the ~~publication of its xxxx adopted in 20xx~~adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of xxx was evidenced at the Regulation 18 stage of the Black County Plan.

4.25 Update on Walsall local plan prep dates

Wolverhampton Local Plan

4.26 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its xxxx adopted in 20xx. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.27 The City of Wolverhampton published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024 to April 2024. The Wolverhampton Local Plan (WLP) has a plan period to 2042. The Plan identified a housing requirement 16,100 extra households by 2042. In addition, Wolverhampton's housing need has been uplifted by an additional 35% providing a combined housing target of 21,700 homes. The WLP Regulation 18 made provision for 10,300 homes leaving a shortfall of 11,400 homes. At the time of writing this statement of common ground the Regulation 19 version of the WLP is due to be published for consultation in late November 2024. The Regulation 19 Plan confirms the shortfall as xx,xxx homes.

Wyre Forest Local Plan

4.28 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.29 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, is approximately 74,015 homes.

4.3- Alongside this a number of contributions (4,300 homes) have been made towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards

the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or Birmingham and Black Country's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage
More detail is needed in this table to allow a

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Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Comments
South Staffordshire	Reg 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041 plan period
Cannock Chase	Reg 19	+500 Contribution specifically for Birmingham & Black Country unmet needs	Xxx plan period
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -38 plan period
Telford & Wrekin	Reg 18 Plan – Nov 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Reg 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Reg 19 Plan published September 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Reg 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Reg 18 Plan published	Shortfall of - 11,400 at Regulation 18 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan		

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the HMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the

Commented [PM2]: Need to understand how this will work, will contributions be 'held' for LA to get to adoption and then when can demonstrate a shortfall 'receive' their share? Or at that stage if no shortfall distributed between the other LA with outstanding shortfall? How long can they be held?
Or on adoption of contributing LA, those authorities that adopt their plan within a specified time period – e.g. 1 year split the contributions? So if only one LA adopts plan in year they get all contributions?
Is the trigger adoption of contributor and receiving LA?

approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based on net flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhamp
		% Net Flow	Example Contribution	% Net Flow	Example Contribution	% Net Flow	Example Contribution			
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	703
Total	4240		116		842		680		1011	1593

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5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

Commented [PM3]: See previous comment

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham are seeking a contribution towards meeting their unmet needs.

5.10

6. Further work of the GBBCHMA

Include text on updated Strategic Housing Growth Study and monitoring

7. Areas of agreement

8. Areas where agreement is still being sought

9. Signatories to the Statement of Common Ground

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Shropshire Council (SC) – HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
24th February 2024	SC to DMBC	Email from SC providing a signed copy of the SoCG	Signed SoCG	No – same as previous version
3rd December 2024	SC to DMBC	Email from SC providing track changes and comment.	SoCG with track changes and comments	Yes

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend
Attachments: Officer agreed GBBCHMA SoCG - January 2025_ (002) - Shropshire Council signed .docx

From: [redacted]@shropshire.gov.uk>
Sent: 24 February 2025 16:10
To: [redacted]@dudley.gov.uk>
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

See attached. If you need the actual signature let me know, but have assumed not.

Eddie

Eddie West
Planning Policy and Strategy Manager
Growth and Development
Shropshire Council

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_SC comments .docx

From: [redacted]@shropshire.gov.uk>
Sent: 03 December 2024 18:03
To: V[redacted]@dudley.gov.uk>; [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]wolverhampton.gov.uk>; [redacted]sstaffs.gov.uk>; [redacted]@wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]bromsgroveandredditch.gov.uk>; [redacted]@cannockchasedc.gov.uk; [redacted]@solihull.gov.uk) <[redacted]@northwarks.gov.uk>; J[redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]l@tamworth.gov.uk; D[redacted]@Shropshire.gov.uk>
Cc: [redacted]@wolverhampton.gov.uk>
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

Apologies for the delay. Please see attached Shropshire Council's track changes and one comment.

Kind regards,

Eddie

Eddie West
Planning Policy and Strategy Manager
Growth and Development
Shropshire Council

Sensitivity: RESTRICTED

GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

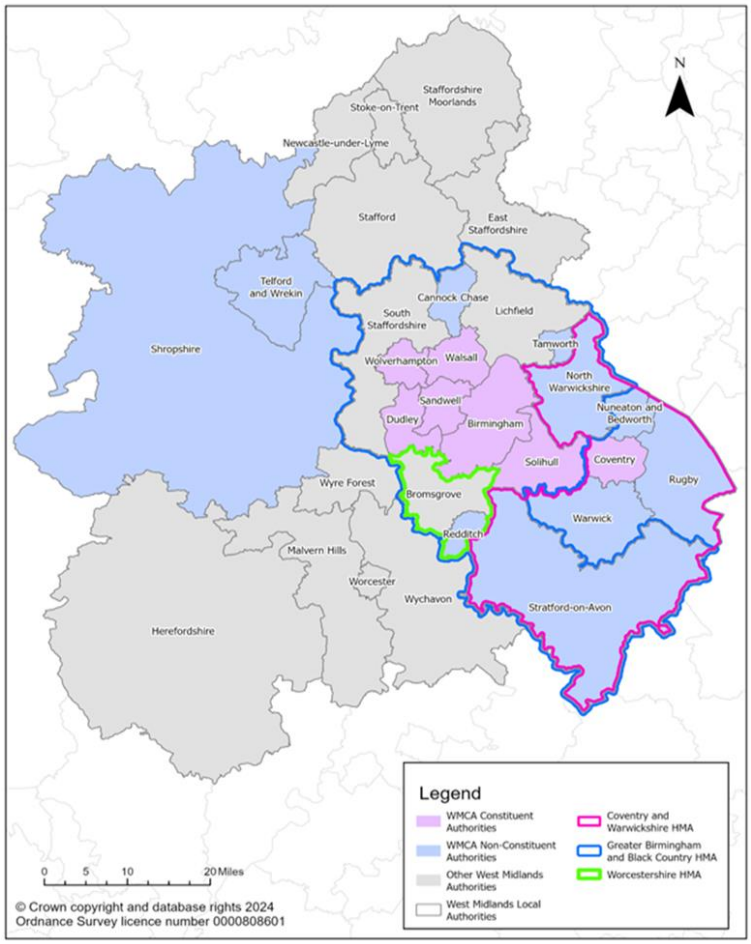
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 forecast to generate housing~~ing~~ 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 part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet housing needs of the GBBCHMA.

Commented [CC1084971]: Presume there would still be Statements of Common Ground prepared for DtC purposes?

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 should ~~need to~~ be addressed ~~in order to ensure compliance with~~ through the Duty to Cooperate discussions. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell,

Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and, having regard to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. ~~surplus of housing land supply.~~ A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was

withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in [2017****] and the Council submitted its local plan for examination in September 2021. This ~~which~~ made a contribution of 1,500 homes

towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 The Shropshire Council administrative area is located outside the GBBCHMA and ~~Shropshire~~ is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached ~~-~~to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. ~~-~~An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. 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.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	**Status**	**Total contribution to GBBCHMA unmet needs (up to and beyond 2031)**	**Plan period**
South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	20168 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041

Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name: Position:	**Telford and Wrekin Council** Name: Position:

Date:	Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Solihull Metropolitan Borough Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
19th March 2025	SMBC to DMBC	Email from SMBC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
10th December 2024	SMBC to DMBC	Email from SMBC with tracked changes to SoCG	Yes – track changes	Yes

Jennie Hadley

From: [redacted]@solihull.gov.uk>
Sent: 19 March 2025 16:33
To: Elizabeth Vesty (Planning)
Cc: [redacted]
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG
Attachments: Final GBBCHMA SoCG November 2024 - Signed_.docx

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

[redacted]

Mark has now reviewed and signed the SoCG, as attached.
We would just add the caveat that the agreement is signed in the context of its date being November 2024. As we know, the circumstances around calculating housing need and impact on consequent supply will have significantly changed following the new Standard Method (SM) in December 2024. Whilst the SoCG notes the new NPPF as a trigger for review it doesn't explicitly mention the new SM – although we accept that reference to the new NPPF could be perceived as incorporating the new SM.
Any other queries, let us know.
Kind regards,

Charlene Jones (she/her)
Team Leader – Planning Policy
Policy and Delivery
Economy & Infrastructure Directorate
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From: Elizabeth Vesty (Planning)
Sent: 19 March 2025 11:39
To: [redacted]Planning Policy – Team Leader, Solihull MBC)
Cc: [redacted]
Subject: GBBCHMA SoCG
Importance: High
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Hi Charlene,
[redacted]
As requested in the meeting, please find attached a copy of the GBBCHMA SoCG – partly signed. The document is dated November 24 but as you'll see signatures have been added since then.
Please can you arrange for Solihull to sign.

Regards,

Elizabeth Vesty
Principal Planning Officer

Planning - Development Control
Regeneration & Enterprise
Dudley Council
Council House, Priory Road, Dudley, DY1 1HF
01384 [redacted]
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Jennie Hadley

From: [redacted]@solihull.gov.uk>
Sent: 10 December 2024 17:53
To: Vicki Popplewell (Planning)
Cc: [redacted]
Subject: [EXTERNAL EMAIL] RE: Amended GBBCHMA SoCG
Attachments: Amended GBBCHMA SoCG 29 November 2024 .docx

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Hi Vicki
Attached are some tracked changes from Solihull.
Our revised LDS is being reported to Cabinet next week. See Solihull Council Report Template and LDS.
Hope this is helpful.
Regards
Gary

From: Vicki Popplewell (Planning)
Sent: 05 December 2024 17:23
To: [redacted]
Subject: Amended GBBCHMA SoCG
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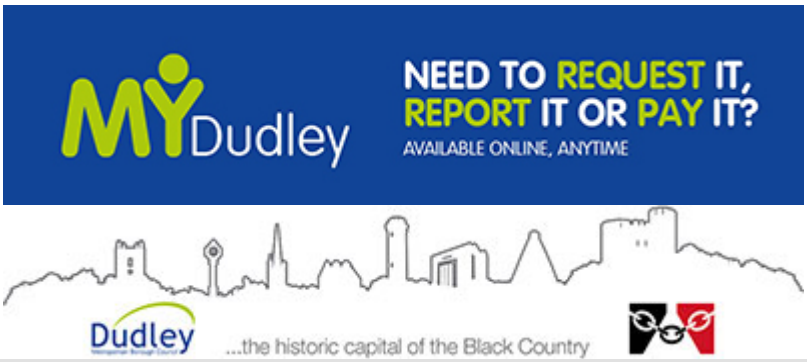
Hi all,
Thank you for the comments provided. I have amended the SoCG. I'm still awaiting an amended Map (Via WMCA) to replace the existing map in the document which removes the reference to Worcestershire HMA
Following discussion with Ian, I confirm that the SoCG position is at November 2024.
Could those LAs who have not yet responded with any comments please email me by Monday 9th December so that the final version can be circulated.

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: Vicki Popplewell (Planning)
Sent: 21 November 2024 20:05
To: [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]@wolverhampton.gov.uk>; [redacted]@sstaffs.gov.uk>; [redacted]@wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]@cannockchasedc.gov.uk; [redacted]@shropshire.gov.uk>[redacted]@solihull.gov.uk) <[redacted]northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]@tamworth.gov.uk
Cc: [redacted]@wolverhampton.gov.uk>
Subject: Draft GBBCHMA SoCG

Dear all,

As referred to at the GBBCHMA meeting on Tuesday, I have attached a draft/proposed SoCG for the HMA. This reflects the current position as of November 2024.

The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography and the degree to which Local Plans have an evidenced shortfall or surplus of housing land supply and contributions have been offered. The document sets out the proposed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities. The SoCG acknowledges where a contribution has been made to the GBBCHMA or specifically to the Black Country and seeks agreement on the apportionment methodology and the distribution, including agreement on the apportionment/distribution between the Black Country authorities.

I have left some highlighted text where I'm not sure of dates/figures and would welcome feedback for your LA. Please forward comments to me by Thursday next week so that I can amend and re-circulate.

Regards,

Vicki Popplewell
Planning Policy Manager

Planning - Development Control
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4 Ednam Road, Dudley, DY1 1HL
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Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA

Draft

Statement of Common Ground Regarding Housing Shortfall

Position at 29 November 2024

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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 the emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the governance arrangements in each authority.

1.3 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

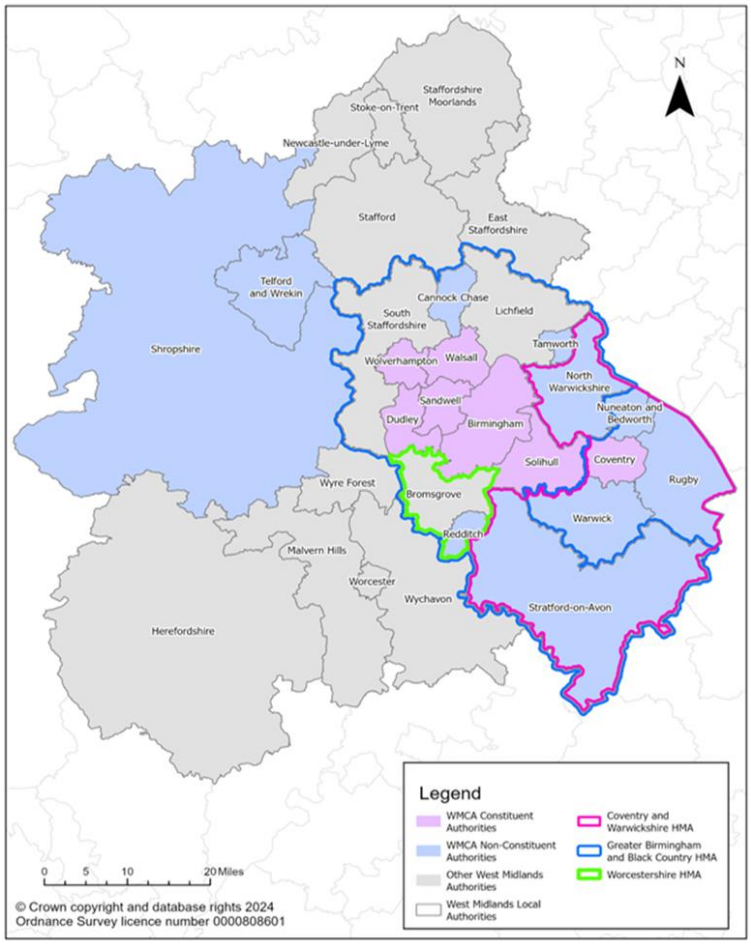
1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)

Commented [VP1]: To be amended to remove Worcestershire Hma



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 the published study 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[2].

3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) 2022[3] report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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

[2] Greater Birmingham and Black Country HMA Strategic Growth Study 2018 https://blackcountryplan.dudley.gov.uk/media/11537/greater-birmingham-hma_strategic-growth-study_lowres.pdf and Greater Birmingham and Black Country HMA Strategic Growth Study 2018 Appendices https://blackcountryplan.dudley.gov.uk/media/11538/greater-birmingham-hma_strategic-growth-study_appendices_lowres.pdf

[3] https://www.birmingham.gov.uk/downloads/download/5184/evidence_base_blp_-_homes_and_neighbourhoods

- Worcester City
- Coventry City

3.4 Based on the findings of this report, Shropshire, Telford & Wrekin and Wyre Forest Councils 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 forecast to generate housing 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 part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet 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 should be addressed through the Duty to Cooperate discussions.

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. Where relevant, this scope will be updated to reflect any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.

3.7 It should be noted that whilst both North Warwickshire and Stratford-on-Avon Councils fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA, the 2022 Coventry and Warwickshire HEDNA does state: "While at a strategic level these overlaps are based on the entire local authority in reality they will be mostly confined to those areas adjoining the Birmingham HMA such as Coleshill and Dorden in North Warwickshire and Studley in Stratford."

3.8 The adopted Birmingham Development Plan (2017) identified a shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is mainly a result of the City identifying more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the

time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and having regards to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, to provide certainty for local plan preparation, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

3.11 It is recognised that following the publication of a replacement NPPF expected in December 2024 that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future SCG and/or plans.

4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042

4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 and therefore need to look forward to 2042.

4.2 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043. In respect of Stratford on Avon District Council, a joint local plan is being prepared with Warwick District Council and this plan has a proposed end date of 2050.

4.3 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.4 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the

Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.5 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023.

Bromsgrove Local Plan

4.6 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.8 The Council submitted its Publication Plan for Examination on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.9 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.10 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.11 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously progressed a review of its Regulation 19 local plan yp submission for examination in 2022. Following the submission of its Regulation 19 Plan,

Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.12 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.13 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs, 500 towards Tamworth's unmet housing needs and 540 homes to Coventry's housing shortfall.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011, and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in 2017, and the Council submitted its local plan for examination in September 2021. This made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 The Shropshire Council administrative area is located outside the GBBCHMA and is acknowledged as a separate housing market area. Shropshire's approach to assisting

with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. 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.

Solihull Local Plan

4.19 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in ~~[****]~~ 2015 and submitted the Plan for examination in ~~[****]~~ May 2021. This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. This was on the basis that the Birmingham Development Plan (2017) was the only plan that had been adopted (and tested through examination) that generated a shortfall to be accommodated elsewhere. This position was used to support the exceptional circumstances needed to release land from the Green Belt to accommodate Solihull's own needs, and those arising from elsewhere in the HMA. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. Although the plan was withdrawn, the Inspectors carrying out the examination had confirmed that the duty-to-cooperate had been complied with. ~~At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.~~A revised Local Development Scheme is being pursued that would see an accelerated process for drawing up a new plan, including publication of a R18 Preferred Option Plan in autumn 2025 and a R19 Draft Submission Plan in summer 2026.

South Staffordshire Local Plan

4.20 The current Core Strategy was adopted in 2012, and the Site Allocation Document adopted in 2018. The Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Regulation 19 Plan. This reflects the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based is no longer up to date.

4.21 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.22 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBC HMA local authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.23 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan (SWLP) in 2021 and consulted on the Issues and Options in January – March 2023. The Issues and Options document sought views on the most appropriate spatial growth option for accommodating future growth needs, including unmet housing needs arising within GBBCHMAs and the Coventry & Warwickshire HMA. Consultation on the Preferred Options (Regulation 18) is planned for January – March 2025.

Tamworth Local Plan

4.24 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils.

4.25 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the issues and options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the new local plan is ongoing.

Telford & Wrekin Local Plan

4.26 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.27 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have

requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Walsall Local Plan

4.28 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.29 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.30 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.31 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.32 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes.

4.33 Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA's unmet needs (e.g. from South Staffordshire and Cannock Chase Councils). In the case of North Warwickshire, the contribution is towards meeting the unmet needs of the adopted Birmingham Development Plan 2017 and has not been accounted for in the (4,290 homes) contribution figures.

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	**Status**	**Total contribution to GBBCHMA unmet needs (up to and beyond 2031)**	**Plan period**
Potential Contributing Authorities			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 22 - Submission 29th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2016 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041

Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,414 Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs were possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (the end year for some plans is earlier) as demonstrated in Table 2 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBBCHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of

administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.5 As shown in Appendix One, the data is published over an extended period covering 2001-19 in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.55.6 It is acknowledged that this approach has been used to apportion an already agreed contribution and the same methodology is not necessarily appropriate for establishing the scale of a contribution.

5.65.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.75.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

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Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited when the updated Growth Study is published and has been agreed.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position:	**Dudley Metropolitan Borough Council** Name: Position:

Date	Date
Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name:	**Telford and Wrekin Council** Name:

Position: Date:	Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

South Staffordshire District Council (SSDC) – HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
7th February 2025	SSDC to DMBC	Email from SSDC with signed SoCG	Signed SoCG	No – same as final version
29th November 2024	SSDC to DMBC	Email from SSDC with comments on the SoCG	SoCG with comments	Yes

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend
Attachments: Officer agreed GBBCHMA SoCG - January 2025_SSDC signed.docx

From: [redacted]@sstaffs.gov.uk>
Sent: 07 February 2025 08:46
To: [redacted]@dudley.gov.uk>
Cc: [redacted]@sstaffs.gov.uk>
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

Please find attached signed SoCG for South Staffs. It is signed in Kelly's name as she has delegated authority to sign SoCGs for the Council, following review by our Cabinet member.

Please keep us updated on signing by others, as it may be appropriate for us to table as an examination document through our EiP once we have the final signed version.

Many thanks

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
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Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_ SSDC.docx

From: [redacted]sstaffs.gov.uk>
Sent: 29 November 2024 14:34
To: [redacted]dudley.gov.uk>; [redacted]walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]@wolverhampton.gov.uk>; [redacted]wyreforestdc.gov.uk>; A[redacted]@bromsgroveandredditch.gov.uk>; M[redacted]@bromsgroveandredditch.gov.uk>; [redacted]cannockchasedc.gov.uk; [redacted]@shropshire.gov.uk>; [redacted]@solihull.gov.uk) [redacted]northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]@tamworth.gov.uk
Cc: [redacted]olverhampton.gov.uk>; [redacted]sstaffs.gov.uk>; [redacted]@sstaffs.gov.uk>
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

Please see attached our comments on the SoCG.

Kind regards

Ed

Edward Fox

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

Tel: [redacted]
[redacted]k

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GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

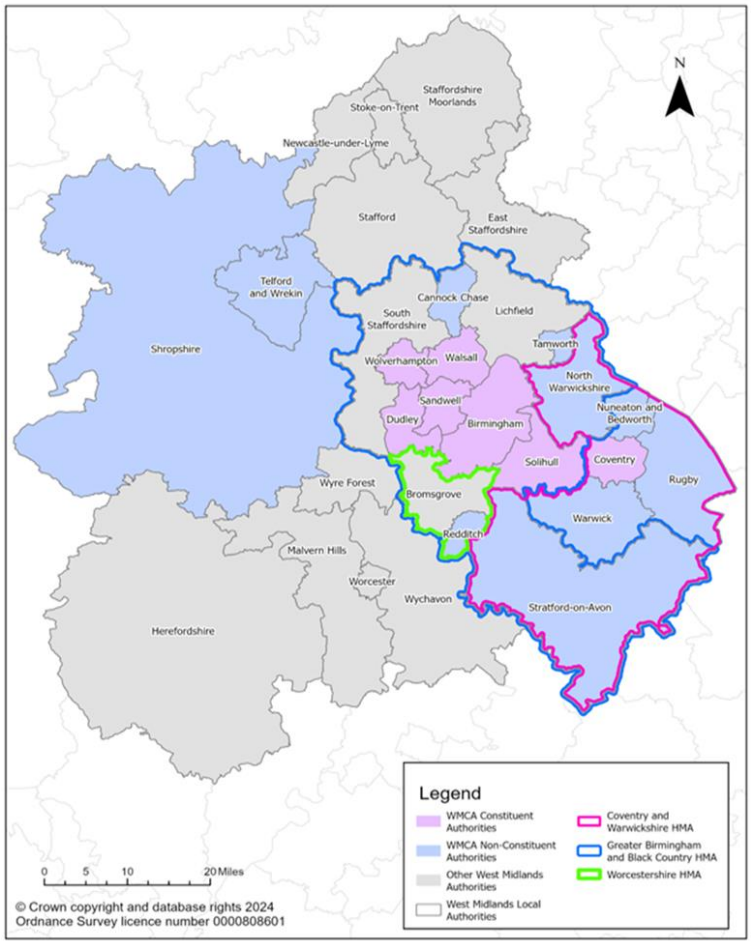
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Core Strategy ~~Plan~~ was adopted in 2012 and the Site Allocation Document adopted in 2018~~8~~. T~~, and t~~he Council are now progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in

Commented [EF2]: The list of authorities is not in alphabetical order.

2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 R~~r~~egulation 19 Plan. This reflects ~~following~~ the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based is no longer up to date.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024~~/early 2025~~. An agreed approach to how the contribution will be apportioned amongst the GBBCH-HMA local authorities is set out in Section 5~~x~~ of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
South Staffordshire	Regulation 19 April~~May~~ 2024	+6450 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which

are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

5.9 Moving forward it is agreed that as other local plans progress, suitable apportionment methods will be agreed at that point with both the exporting authority and the receiving authority.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

Commented [EF4]: Can I confirm that all the receiving authorities are signed up to the approach to apportionment set out in the table, and its output for each receiving authority?

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities of Cannock Chase District Council, Shropshire Council, South Staffordshire District Council, Telford and Wrekin Council as set out in Section 5 and Table 3 of this statement.

Commented [EF5]: These are not the receiving authorities but contributing authorities,

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name:	**Telford and Wrekin Council** Name:

Position: Date:	Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Stratford-on-Avon Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
26th March 2025	SoAC to DMBC	Email from SoAC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
21st January 2025	SoAC to DMBC	Email from SoAC regarding further amendment	None	N/A
17th January 2025	DMBC to SoAC	Email from DMBC answering queries raised	None	N/A
23rd December 2024	SoAC to DMBC	Email from SoAC with tracked changes to SoCG	Yes – track changes	Yes
28th November 2024	SoAC to DMBC	Email from SoAC with tracked changes to SoCG	Yes – track changes	Yes

Jennie Hadley

From: [redacted]@stratford-dc.gov.uk>
Sent: 26 March 2025 10:24
To: Vicki Popplewell (Planning)
Cc: [redacted]
Subject: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend
Attachments: 2025.01 Officer agreed GBBCHMA SoCG from SoADC.docx

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Hi Vicki,

Please find attached the signed version of the Nov 2024 GBBCHMA SoCG from Stratford on Avon DC which has now received endorsement from the Leader of the Council.

I'm sure you'll keep Jo and the wider GBBCHMA officer group updated of the progress with signatories to the SoCG, but I'd be grateful if you could share the final version with all signatures when you have it.

Many thanks,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

[redacted]

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: [redacted]

South Warwickshire *Together*

From: Vicki Popplewell (Planning)
Sent: 19 March 2025 07:31
To: Gemma Hawkesford
Subject: RE: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

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Thanks Gemma

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: [redacted]@stratford-dc.gov.uk>
Sent: 18 March 2025 18:19
To: [redacted]@dudley.gov.uk>
Cc: [redacted]@stratford-dc.gov.uk>
Subject: RE: [EXTERNAL EMAIL] RE: GBBCHMA SoCG - final amend

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Hi Vicki,

Sorry for the delay in responding on this. As [redacted] outlined at today's GBBCHMA officer's meeting, we wanted to double check the wider context due to potential implications of the scale of unmet need on a number of reserve sites in Stratford District.

I will progress with getting Leader sign off of the SoCG asap, and would hope to be able to get the signed version to you next week (subject to the Leader being available).

Thanks,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

[redacted]

Stratford-on-Avon District Council, Elizabeth House, Church Street,

Jennie Hadley

From: [redacted]@stratford-dc.gov.uk>
Sent: 21 January 2025 12:05
To: Vicki Popplewell (Planning)
Subject: RE: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

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Hi Vicki,

Thank you for providing the detailed explanation in response to my previous comments. [redacted] has just forwarded the final draft SoCG and after a quick review I can see that you have incorporated our points as detailed below, so thank you for this. Regarding the conflicting comment from North Warks, we are happy with this amendment.

Just one minor point at this stage though – the quotation marks closing the quote from the C&W HEDNA in para 3.7 are missing.

We will give the SoCG one final read through and then proceed to get sign off from our Leader and return a copy to you as requested. Do you have a deadline for this?

Many thanks for your work on this

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

[redacted]

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: g[redacted]

South Warwickshire *Together*

From: Vicki Popplewell (Planning)
Sent: Friday, January 17, 2025 1:19 PM
To: Gemma Hawkesford
Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

Jennie Hadley

From: [redacted]@dudley.gov.uk>
Sent: 17 January 2025 13:19
To: [redacted]
Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

Hi Gemma

Apologies for not responding sooner as I was waiting for comments from other LAs on the SoCG before I picked up the further amends.

- With regards to your question on the approach to apportionment and the data used. The Black Country Authorities, in liaison with Birmingham CC and the ' contributing LAs', put forward a suggested approach to apportioning of the HMA contributions some time ago.

  It is essential that the apportionment approach is evidence based and reflects the likelihood that new homes built in the contributing authority will directly address the needs arising in the receiving authority. On this basis, it was felt that this likelihood could be estimated by considering historic patterns of migration between different areas, giving the apportionment figure credibility and a strong degree of certainty. The level of apportionment should be proportionate to the actual functional relationship between the exporting area and the individual LA where the shortfall arises. The most robust dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency.

  When we were working out the apportionment approach we used data based over an extended period of time 2001 – 2019 in the form of net flows – ie the difference between outflows and inflows. We used this information and time period as it is the most consistent and comparable dataset currently available over an extended period to support this initiative.

- In terms of updates to the migration data – I suggest that this will be updated the next time the SoCG is refreshed.

- I will add in a link to the dataset and have asked the person who pulled together the data to provide this.

- I will add in the comments you picked up under areas of agreement

- Please note. North Warwickshire have now provided their comments. They have asked that part of the sentence which I think you included in your previous comments be removed

  such as Coleshill and Dordon in North Warwickshire and Studley in Stratford."

I will amend the SoCG and recirculate to the Planning Managers in each LA.

Regards,

Vicki Popplewell
Planning Policy Manager

Jennie Hadley

From: [redacted]@stratford-dc.gov.uk>
Sent: 23 December 2024 08:30
To: Vicki Popplewell (Planning)
Cc: [redacted]
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG 29.11.24 - SDC.docx

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Hi Vicki,

Jo has forwarded the latest version of the draft SoCG (dated 29th November 2024) and I have attached a version from Stratford DC with a few comments on it. A couple of the points I make are the same as I made previously on the version dated 21st Nov (see email below). Re my specific point on the date of the data being used - we are not aware of the detailed discussions regarding the use ONS migration flows data so would appreciate a brief explanation of the rationale behind this, even if a change to the SoCG is not deemed necessary.

Many thanks and have a good Christmas,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

[redacted]

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: [redacted]

South Warwickshire *Together*

[redacted]

Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA

Officer Agreed Version

Statement of Common Ground Regarding Housing Shortfall

Position at 29 November 2024

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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 the emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the governance arrangements in each authority.

1.3 Local planning authorities within the GBBCHMA

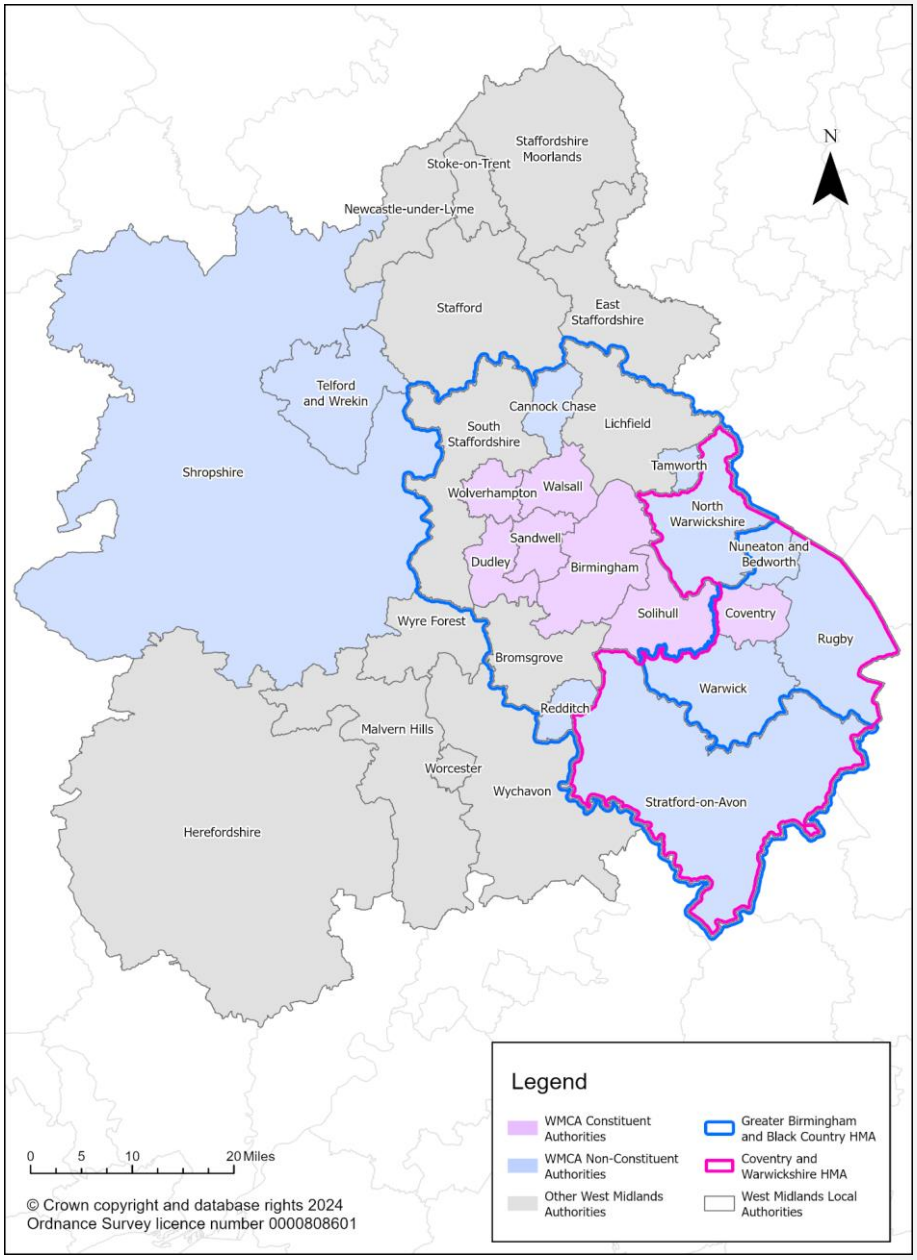
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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 the published study 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[2].

3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography

[2] Greater Birmingham and Black Country HMA Strategic Growth Study 2018 https://blackcountryplan.dudley.gov.uk/media/11537/greater-birmingham-hma_strategic-growth-study_lowres.pdf and Greater Birmingham and Black Country HMA Strategic Growth Study 2018 Appendices https://blackcountryplan.dudley.gov.uk/media/11538/greater-birmingham-hma_strategic-growth-study_appendices_lowres.pdf

is still valid. A Housing and Economic Development Needs Assessment (HEDNA) 2022[3] report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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, Telford & Wrekin and Wyre Forest Councils 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 forecast to generate housing 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 part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet 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 should be addressed through the Duty to Cooperate discussions.

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. Where relevant, this scope will be updated to reflect any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.

3.7 It should be noted that whilst both North Warwickshire and Stratford-on-Avon Councils fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA, the 2022 Coventry and Warwickshire HEDNA does state: "While at a strategic level these overlaps are based on the entire local authority in reality they will be mostly confined to those areas adjoining the Birmingham HMA such as Coleshill and Dorden in North Warwickshire and Studley in Stratford."

3.8 The adopted Birmingham Development Plan (2017) identified a shortfall in Birmingham's housing supply of 37,900 homes which could not be met in the plan area.

[3] https://www.birmingham.gov.uk/downloads/download/5184/evidence_base_blp_-_homes_and_neighbourhoods

Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is mainly a result of the City identifying more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and having regards to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, to provide certainty for local plan preparation, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

3.11 It is recognised that following the publication of a replacement NPPF expected in December 2024, that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future SoCG and/or plans.

4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042

4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 and therefore need to look forward to 2042.

4.2 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out

below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043. In respect of Stratford on Avon District Council, a joint local plan is being prepared with Warwick District Council and this plan has a proposed end date of 2050.

4.3 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.4 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.5 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023.

Bromsgrove Local Plan

4.6 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.8 The Council submitted its Publication Plan for Examination on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.9 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.10 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.11 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously progressed a review of its Regulation 19 local plan yp submission for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.12 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.13 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs, 500 towards Tamworth's unmet housing needs and 540 homes to Coventry's housing shortfall.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011, and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in 2017, and the Council submitted its local plan for examination in September 2021. This made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 The Shropshire Council administrative area is located outside the GBBCHMA and is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. 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.

Solihull Local Plan

4.19 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in 2015 and submitted the Plan for examination in May 2021. This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. This was on the basis that the Birmingham Development Plan (2017) was the only plan that had been adopted (and tested through examination) that generated a shortfall to be accommodated elsewhere. This position was used to support the exceptional circumstances needed to release land from the Green Belt to accommodate Solihull's own needs, and those arising from elsewhere in the HMA. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. Although the plan was withdrawn, the Inspectors carrying out the examination had confirmed that the duty-to-cooperate had been complied with. A

revised Local Development Scheme is being pursued that would see an accelerated process for drawing up a new plan, including publication of a Regulation 18 Preferred Option Plan in autumn 2025 and a Regulation 19 Draft Submission Plan in summer 2026.

South Staffordshire Local Plan

4.20 The current Core Strategy was adopted in 2012, and the Site Allocation Document adopted in 2018. The Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Regulation 19 Plan. This reflects the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based requires updating.

4.21 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.22 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBC HMA local authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.23 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan (SWLP) in 2021 and consulted on the Issues and Options in January – March 2023. The Issues and Options document sought views on the most appropriate spatial growth option for accommodating future growth needs, including unmet housing needs arising within GBBCHMAs and the Coventry & Warwickshire HMA. Consultation on the Preferred Options (Regulation 18) is planned for January – March 2025.

Tamworth Local Plan

4.24 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils.

4.25 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the issues and options document did not identify its housing land supply for the plan period,

it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the new local plan is ongoing.

Telford & Wrekin Local Plan

4.26 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.27 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Walsall Local Plan

4.28 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.29 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.30 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.31 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.32 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes.

4.33 Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA's unmet needs (e.g. from South Staffordshire and Cannock Chase Councils). In the case of North Warwickshire, the contribution is towards meeting the unmet needs of the adopted Birmingham Development Plan 2017 and has not been accounted for in the (4,290 homes) contribution figures.

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
Potential Contributing Authorities			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 22 - Submission 29th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2016 -2038

Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,414 Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs were possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (the end year for some plans is earlier) as demonstrated in Table 2 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBBCHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

Commented [GH1]: Link to ONS dataset for clarity

Commented [GH2]: If it is updated annually, why was the period 2011-2019 chosen for calculating migration flows?

Commented [GH3R2]: If it's updated every year, how frequently will the data be reviewed? (or will this be considered through the SGS refresh?)

5.5 As shown in Appendix One, the data is published over an extended period covering 2001-19 in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.6 It is acknowledged that this approach has been used to apportion an already agreed contribution and the same methodology is not necessarily appropriate for establishing the scale of a contribution or future apportionment.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited when the updated Growth Study is published and has been agreed.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

Commented [GH4]: Whilst it is noted that you have incorporated our amendment to para 6.2 commit to revisiting the SoCG after the Growth Study has been updated, I do think it would be helpful to reiterate this point here in this concluding para, alongside stating that the SoCG will be reviewed if other authorities demonstrate an unmet need/or offer a contribution to the wider HMA's need, as a way of future proofing the SoCG.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position:	**Dudley Metropolitan Borough Council** Name: Position:

Date	Date
Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name:	**Telford and Wrekin Council** Name:

Position: Date:	Position: Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Jennie Hadley

From: [redacted]@stratford-dc.gov.uk>
Sent: 28 November 2024 16:52
To: Vicki Popplewell (Planning)
Cc: [redacted]
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November2024 211124 SDC.docx

You don't often get email from [redacted]@stratford-dc.gov.uk. Learn why this is important

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

Please find attached comments and suggested changes on the draft GBBCHMA SoCG from Stratford DC.

Regards,

Gemma

Gemma Hawkesford BA MSc MRTPI
Senior Policy Planner

[redacted].

Stratford-on-Avon District Council, Elizabeth House, Church Street,
Stratford-upon-Avon, Warwickshire, CV37 6HX
Tel: [redacted] Switchboard: 01789 267575
Email: [redacted]

South Warwickshire Together

[redacted]

Tamworth Borough Council (TBC) – HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
12th May 2025	TBC to DMBC	Email from TBC with a signed copy of the SoCG	Signed SoCG	No – same as final version
29th November 2024	TBC to DMBC	Email from TBC with proposed changes	SoCG with changes	Yes

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: GBBCHMA SoCG
Attachments: Officer agreed GBBCHMA SoCG - January 2025_.docx

Sensitivity: Confidential

From: [redacted]@tamworth.gov.uk>
Sent: 12 May 2025 15:59
To: [redacted]@dudley.gov.uk>
Cc: [redacted]@dudley.gov.uk>
Subject: RE: [EXTERNAL EMAIL] RE: GBBCHMA SoCG
Sensitivity: Confidential

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

I've had confirmation today that I can sign it, so please find attached version with my details on.

Thanks,
Richard

Richard Powell
Planning Policy and Delivery Team Leader
Tamworth Borough Council
Marmion House
Lichfield Street
Tamworth
Staffordshire
B79 7BZ

[redacted]

Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_ (002).docx

From: [redacted]@tamworth.gov.uk>
Sent: 29 November 2024 14:44
To: [redacted]@dudley.gov.uk>; [redacted]@walsall.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]wolverhampton.gov.uk>; [redacted]sstaffs.gov.uk>; [redacted]@wyreforestdc.gov.uk>; [redacted]bromsgroveandredditch.gov.uk>; [redacted]y@bromsgroveandredditch.gov.uk>; [redacted]@cannockchasedc.gov.uk; [redacted]@shropshire.gov.uk>; G[redacted]@solihull.gov.uk) <[redacted]northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk
Cc: [redacted]wolverhampton.gov.uk>
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,

See attached with updated Tamworth section.

Thanks,
Richard

Richard Powell
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[redacted]

Sensitivity: RESTRICTED

GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 Local planning authorities within the GBBCHMA

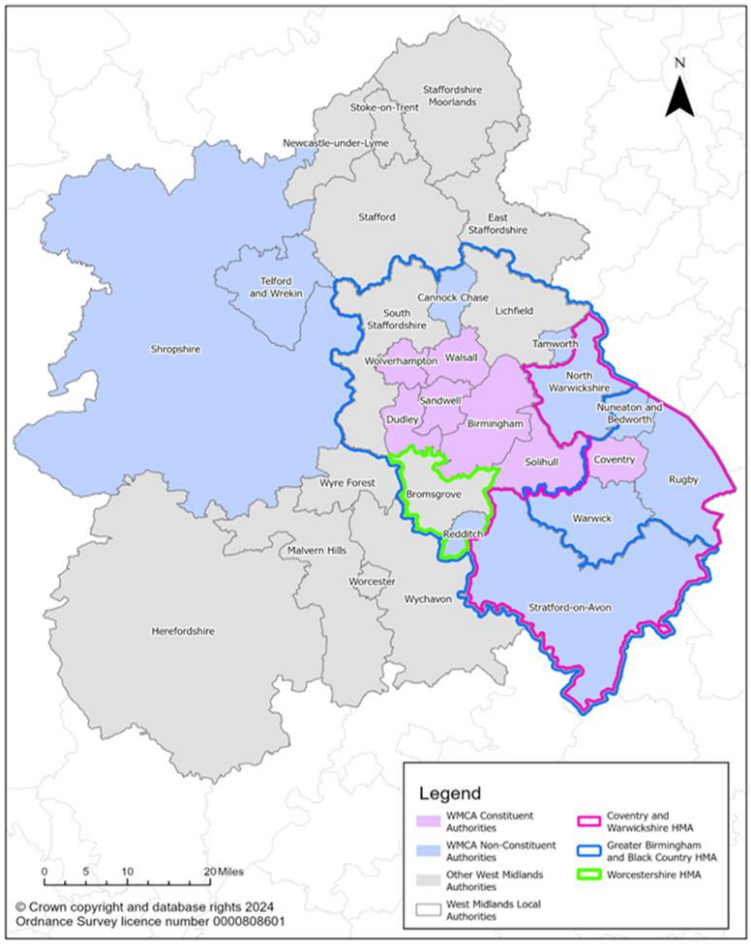
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the City identifying additional capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously submitted its Regulation 19progressed a review of its local plan for to submission for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan

commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs

of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils. ~~The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.~~

4.23 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the

issues and options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited.

At the time of writing this statement of common ground, work on the new local plan is ongoing.~~At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.~~

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of [****] was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 74,015 homes.

4.29 Alongside this a number of contributions (4,300 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041

Commented [RP2]: Tamworth is likely to need to be included on this list if the proposed changes to the standard method are taken forward.

Commented [RP3]: I think some of Tamworth's need is also included in this number.

Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of (figure tbc)	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs where possible. Based on the published evidence to date, there is evidence of a shortfall of 74,015 homes to 2042 as demonstrated in Table 2 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could increase change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a

proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name: Position:	**Telford and Wrekin Council** Name: Position:

Date:	Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Walsall Metropolitan Borough Council (WMBC) – HMA SoCG				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
5th March 2025	WMBC to DMBC	Email from WMBC providing a signed copy of the SoCG	Signed copy of SoCG	No – same as final version
22nd November 2024	WMBC to DMBC	Email from WMBC with suggested changes	SoCG with changes	Yes

Alex Evans

Subject: FW: [EXTERNAL EMAIL] GBBCHMA SoCG - final amend-Walsall sign
Attachments: Greater Birmingham Black Country Housing Market Area SoCG_Wal.pdf

From: [redacted]@walsall.gov.uk>
Sent: 05 March 2025 17:07
To: V[redacted]@dudley.gov.uk>
Cc: [redacted]@walsall.gov.uk>; [redacted]@walsall.gov.uk>; [redacted]@walsall.gov.uk>; [redacted]@dudley.gov.uk>
Subject: [EXTERNAL EMAIL] GBBCHMA SoCG - final amend-Walsall sign

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Hi Vicki,

Please find our executive director's – Dave Brown's - signature on a copy of the final GBBCHMA SoCG.

Thanks

Kind Regards

Dave

David Holloway MRTPI
Planning Policy Manager
Walsall Council
[redacted]v.uk



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Alex Evans

Subject: FW: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG
Attachments: GBBCHMA SoCG November 2024 211124_NB.docx

From: [redacted]@walsall.gov.uk>
Sent: 22 November 2024 17:22
To: [redacted]@dudley.gov.uk>; [redacted]@sandwell.gov.uk>; [redacted]wolverhampton.gov.uk>; [redacted]sstaffs.gov.uk>; [redacted]wyreforestdc.gov.uk>; [redacted]@bromsgroveandredditch.gov.uk>; [redacted]bromsgroveandredditch.gov.uk>; [redacted]@cannockchasedc.gov.uk; [redacted]@shropshire.gov.uk>; [redacted]solihull.gov.uk) <[redacted]@northwarks.gov.uk>; [redacted]@stratford-dc.gov.uk>; [redacted]@telford.gov.uk>; [redacted]@lichfielddc.gov.uk>; [redacted]@birmingham.gov.uk; [redacted]@tamworth.gov.uk
Cc: [redacted]@wolverhampton.gov.uk>; [redacted]@walsall.gov.uk>
Subject: [EXTERNAL EMAIL] RE: Draft GBBCHMA SoCG

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Thanks Vicki,

I've made a couple of changes as per the attached.

[redacted]

I've added Walsall's figures from the BCP to table 2. These are now out of date but they're the most recent published statement of our shortfall. The stated total shortfall of 74,015 doesn't seem to match the figures in the table however.

The apportionment proposals in table 3 would seem to match the migration evidence. [redacted]

[redacted]

Regards,

Neville Ball BA(Hons) MRTPI
Principal Planning Policy Officer
Planning & Building Control, Economy, Environment & Communities
[redacted]

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GBBCHMA Development Needs Group

Draft

Statement of Common Ground

Position at November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) ~~Development Needs Group~~ comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the political arrangements in each authority.

1.3 Local planning authorities within the GBBCHMA

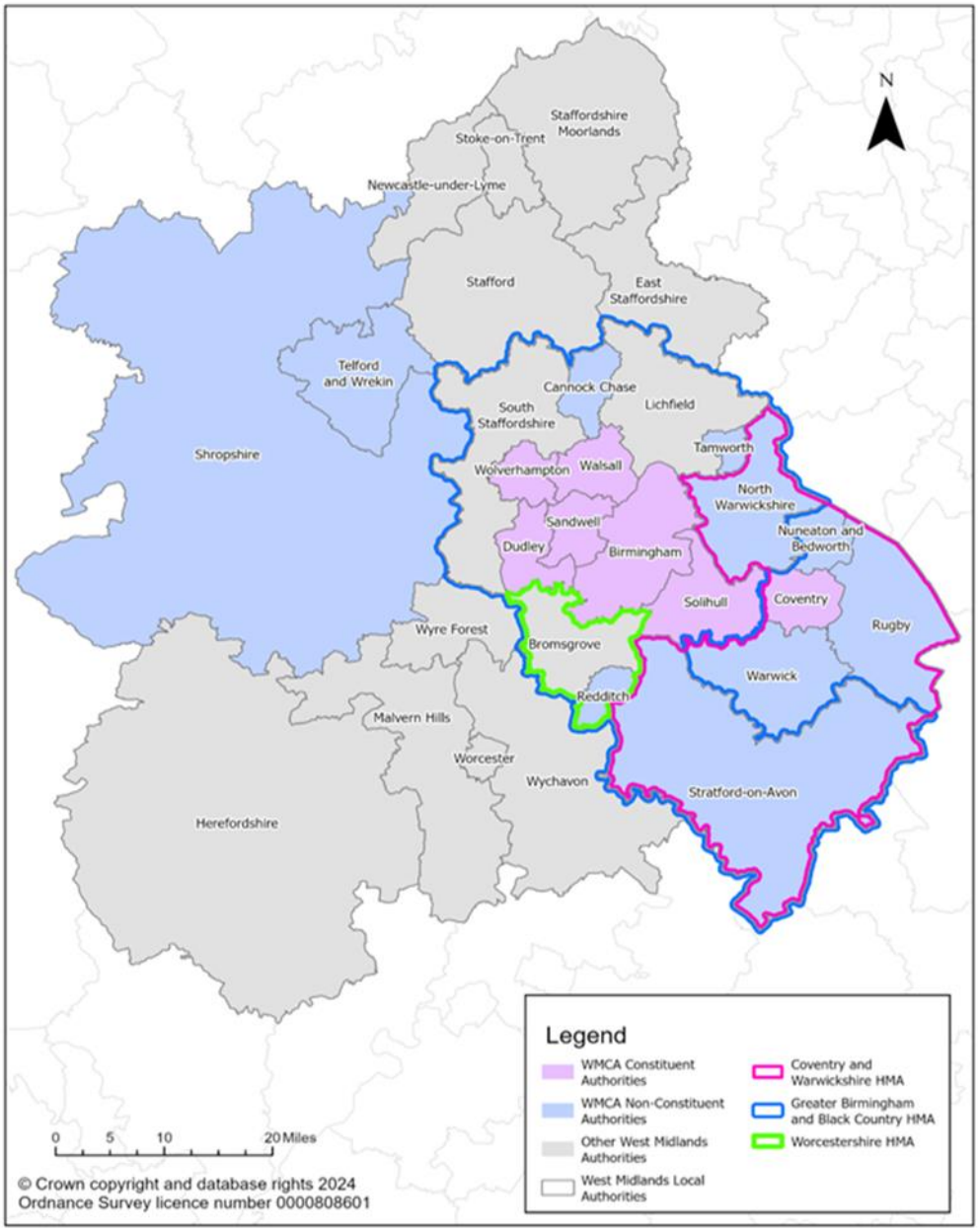
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

[1] Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA” and the “Worcestershire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



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), Birmingham City Council tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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 unmet 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. ~~The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet development needs within the GBBCHMA, predominately housing needs can be satisfactorily addressed (where possible).~~

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 The adopted Birmingham Development Plan (2017) identified shortfall in Birmingham's housing supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is ~~a~~ mainly a result of the City identifying ~~additional~~ more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell,

Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Current Status of Local Plan ~~Reviews~~ and the newly emerging shortfall to 2042

4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 therefore need to look forward to 2042.

~~Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.~~

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023 guidance including the standard method introduced in 2018.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current Plan was adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs arising in its current adopted Development Plan and [****] homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in [****] and submitted the Plan for examination in [****] This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in 2018, and the Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 regulation 19 Plan following the December 2023 changes to the National Planning Policy Framework.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA local authorities is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall

of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Core Strategy was adopted in 2011 and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review commenced in [****] and the Council submitted its local plan for examination in September 2021 which made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed specifically towards meeting the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in 2016. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and

Options) in October – November 2022. The new Plan period is 2020-2043. Once it has been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes ~~[****]~~ was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

4.25 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.26 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

4.27 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Local Plan Reviews shortfalls and contributions

4.28 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately ~~74,015~~68,337 homes.

4.29 Alongside this a number of contributions (~~4,300~~8,090 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or GBBCHMA's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	**Status**	**Total contribution to GBBCHMA unmet needs (up to and beyond 2031)**	**Plan period**
South Staffordshire	Regulation 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014- 2033
Cannock Chase	Regulation 19 - Submission November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041

Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of ~~(figure tbc~~3,414~~)~~	2020 - 2039

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of ~~74,015~~68,337 homes to 2042 (the end years for some plans are earlier) as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the GBBCHMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a

proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One, the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham City Council are seeking a contribution towards meeting their unmet needs.

Table 3 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in late 2024/early 2025.

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the methodology used to determine how the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 3 of this statement.

8. Signatories to the Statement of Common Ground

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

Birmingham City Council Name: Position: **Date**	**Bromsgrove District Council** Name: Position: **Date**
Cannock Chase District Council Name: Position: Date	**Dudley Metropolitan Borough Council** Name: Position: Date

Lichfield District Council Name: Position: Date	**North Warwickshire Borough Council** Name: Position: Date
Redditch Borough Council Name: Position: Date	**Sandwell Metropolitan Borough Council** Name: Position: Date
Solihull Metropolitan Borough Council Name: Position: Date:	**South Staffordshire District Council** Name: Position: Date:
Stratford-on-Avon District Council Name: Position: Date:	**Tamworth Borough Council** Name: Position: Date:
Walsall Metropolitan Borough Council Name: Position: Date:	**City of Wolverhampton Council** Name: Position: Date:
Shropshire Council Name: Position:	**Telford and Wrekin Council** Name: Position:

Date:	Date:
Wyre Forest District Council Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

City of Wolverhampton Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
12th March 2025	CWC to DMBC	Email from CWC with a countersigned copy	Fully signed SoCG	No – same as final SoCG
21st November 2024	CWC to DMBC	Email from CWC with tracked changes to SoCG	Yes – track changes	Yes

[redacted]

[redacted]

From: [redacted]@wolverhampton.gov.uk>
Sent: 12 March 2025 15:20
To: [redacted]@dudley.gov.uk>
Cc: [redacted]@wolverhampton.gov.uk>
Subject: [EXTERNAL EMAIL] FW: Signatures of Statements of Common Ground

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Sensitivity: PROTECT

Hi Vicki,

Please find attached the signed Dudley / Wolverhampton SoCG and completed HMA SoCG (name only).

Thanks,

Michele Ross
Lead Planning Manager
Tel: [redacted]

[redacted]
City of Wolverhampton Council

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@wolverhampton.gov.uk>
Sent: 21 November 2024 09:30
To: [redacted]@dudley.gov.uk>
Subject: RE: [EXTERNAL EMAIL] RE: Draft HMA SoCG - apportionment of local plan contributions

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Sensitivity: PROTECT

Hi Vicki,

I'd keep it simple using the approach that SStaffs used for the SoCG that we have all previously signed up to. So to me the existing approach is fine – the principal purpose being to conform those LAs that have an evidenced shortfall over what period, who is making an offer to whom over what period, and how this offer should be apportioned. Suggested text attached.

[redacted]

Kind regards

Ian

Ian Culley
Lead Planning Manager (Regional Strategy)
Tel. Office: [redacted]

[redacted]
City of Wolverhampton Council

GBBCHMA Development Needs Group

Draft

Statement of Common Ground

November 2024

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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 emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). 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 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1[1]. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.

1.3 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

1.4 Other related local planning authorities outside of the GBBCHMA

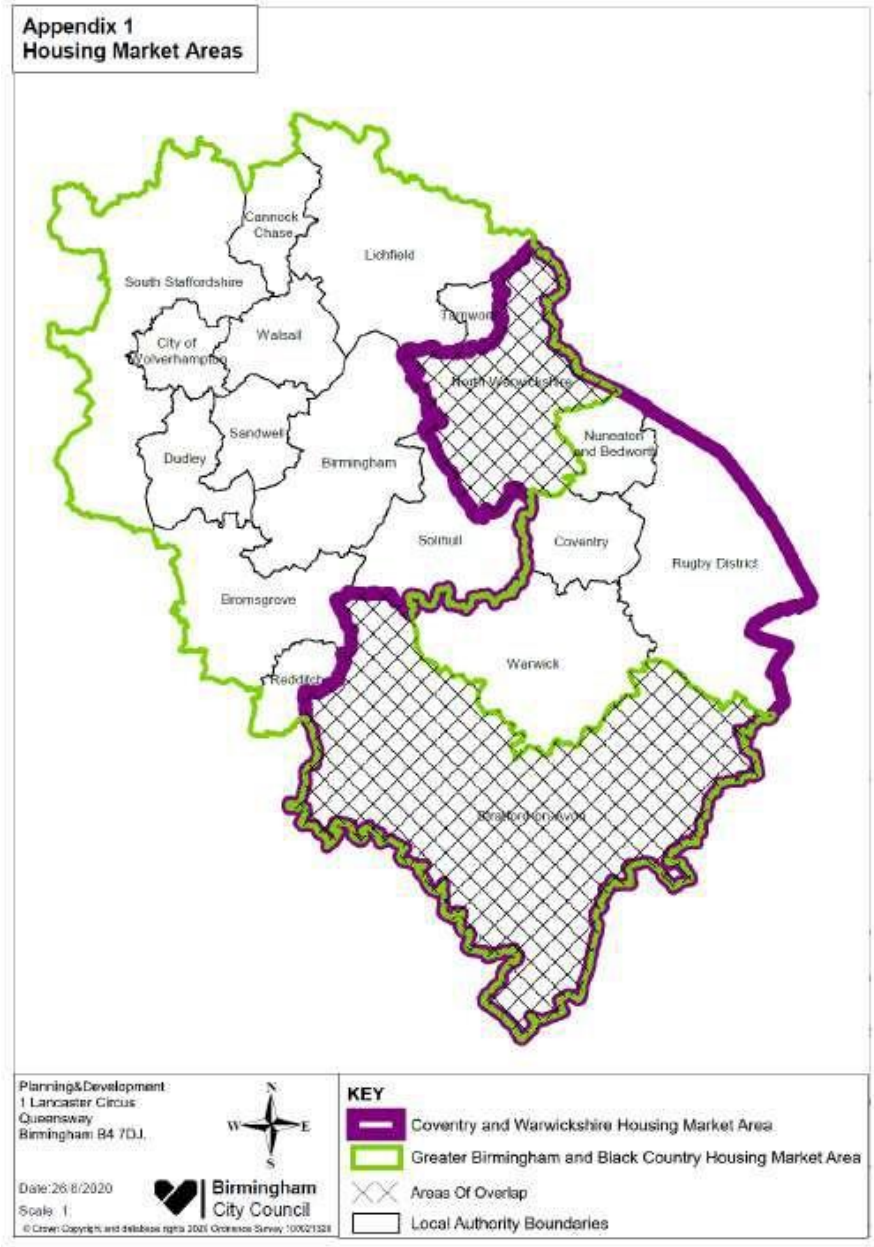
- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

[1] Figure 1 – map showing boundaries of: all LPAs, "Greater Birmingham and Black Country HMA"; and "Coventry & Warwickshire HMA" (4) "South Worcestershire HMA" i.e. Malvern Hills, Worcester City, Wychavon; (5) "GBBCHMA Development Needs Group"; (6) "other LPAs with a close functional relationship to the GBBCHMA" i.e. Worcester City and Coventry City]

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Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)

Commented [NB1]: Map needs to include Shropshire and Telford (plus Stafford and Wyre Forest?) as well as South Worcestershire



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
- Stafford Borough 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 tested whether this geography is still valid. A Housing and Economic Development Needs Assessment (HEDNA) report which has been subject to engagement with neighbouring authorities through the GBBCHMA group, and through a recent Regulation 18 local plan consultation, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an 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. The GBBCHMA Development Needs Group is a local authority officer group, with representatives from each local planning authority, and which meets at least bi-monthly to provide a framework for coordination between local authorities to ensure that unmet needs within the GBBCHMA can be satisfactorily addressed (where possible).

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. Where relevant, this scope will be updated to reflect 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 Councils 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.

3.8 ~~As part of the review of the~~The adopted Birmingham Development Plan (2017) identified ~~, there was evidence of a significant~~ shortfall in Birmingham's housing ~~need~~ supply 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. A monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011 -31. The most recent of these Position Statements was published in xxx with a

base date of 1 April 2023. This suggests that the shortfall to 2031 is now 2,053 homes. This is a mainly a result of the ~~Birmingham Development Plan~~City identifying additional capacity than was anticipated when the plan was ~~previously~~ examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans (eg) and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031) and the North Warwickshire Local Plan (contribution of xxxx homes to 2033) reviews .

3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced ~~for~~ of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.

3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and the degree to which those Local Plans have an evidenced shortfall or surplus of housing land supply. A number of local plans have planned for a level of growth designed to meet not only local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, including reflecting the ~~current housing supplies and shortfalls for the period to 2042. It is recognised that some current and emerging local plans have different end dates, but a common end date allows comparison between plans. The statement seeks to take account of changes in national planning policy relating to the calculation of housing need and how this need should be addressed. It includes details of emerging new shortfall on the back of more recent local plan reviews to 2042, and the measures that are being taken to address this shortfall and~~ agreements reached to date between the local authorities who sit within the GBBCHMA.

4. Local Plan Reviews and the newly emerging shortfall to 2042

4.1 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most authorities beyond 2031 to 2041 or in some cases to 2042 or 2043.

4.2 An update on the status of local plans for each local authority within the HMA, including details of those local authorities who are carrying out a local plan review, is set out below. In addition, Table 2 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or shortfall has been evidenced.

Birmingham Local Plan

4.3 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

4.3 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall of 46,000 homes.

Bromsgrove Local Plan

4.4 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

4.4 The current plan adopted in 2014. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 20xx – 2040 which is a make-up of the district's housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

4.4 The Council is seeking to submit its Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBCHMA is set out in Section x of this statement of common ground.

Dudley Local Plan

4.5 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.6 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

4.7 Lichfield's current Plan was adopted in 2015. The Council previously submitted its Regulation 19 local plan for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

4.8 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

4.9 The current Plan was adopted in 2021. North Warwickshire sits within the Birmingham HMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of xxx homes towards Birmingham's unmet housing needs and xxx homes to Coventry's housing shortfall.

Solihull Local Plan

4.10 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in xxxx and submitted the Plan for examination in…. This Plan included a contribution of 2,100 homes towards the shortfall arising from the current Birmingham Development Plan 2017. The examination for the Solihull Plan commenced in 2021. In October 2024 the Solihull Plan was withdrawn from examination. At the time of writing this statement of common ground there is no timetable for the preparation of a replacement Plan.

South Staffordshire Local Plan

4.11 The current Plan was adopted in . South Staffordshire reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA.

4.12 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.

4.13 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024/early 2025. An agreed approach to how the contribution will be apportioned amongst the GBBCH HMA is set out in Section x of this statement of common ground.

Redditch Local Plan

4.14 The current Plan was adopted in xxx. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

4.17 The current Plan was adopted in xxx. 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. At the time of writing this statement of common ground the examination has been paused (October 2024) …. …...

4.18 Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section x of this statement of common ground.

South Warwickshire Joint Local Plan

4.19 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan in 2021 and consulted on the Issues and Options in January – March 2023.

Telford & Wrekin Local Plan

4.20 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.

4.21 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section x of this statement of common ground.

Tamworth Local Plan

4.22 The current Local Pan was adopted in xxx. The review of the Tamworth Local Plan (TLP) commenced in 2022. The Council consulted on the first stage of its plan (Issues and Options) in October – November 2022. The new Plan period is 2020-2043. Once it has

been adopted, it will replace the current Tamworth Local Plan which was adopted in 2016.

4.23 At the time of the Issues and Options consultation, the TLP identified a housing need of 2,961 dwellings, which represented a minimum local housing figure (as calculated using the standard method for local housing needs). Whilst the TLP Issues and Options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the Regulation 18 Draft TLP is ongoing.

Walsall Local Plan

4.24 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the ~~publication of its xxxx adopted in 20xx~~adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of xxx was evidenced at the Regulation 18 stage of the Black County Plan.

4.25 Update on Walsall local plan prep dates

Wolverhampton Local Plan

4.26 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its xxxx adopted in 20xx. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

4.27 The City of Wolverhampton published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024 to April 2024. The Wolverhampton Local Plan (WLP) has a plan period to 2042. The Plan identified a housing requirement 16,100 extra households by 2042. In addition, Wolverhampton's housing need has been uplifted by an additional 35% providing a combined housing target of 21,700 homes. The WLP Regulation 18 made provision for 10,300 homes leaving a shortfall of 11,400 homes. At the time of writing this statement of common ground the Regulation 19 version of the WLP is due to be published for consultation in late November 2024. The Regulation 19 Plan confirms the shortfall as xx,xxx homes.

Wyre Forest Local Plan

4.28 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan 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.

Stafford Local Plan

Local Plan Reviews shortfalls and contributions

4.29 Table 2 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, is approximately 74,015 homes.

4.3- Alongside this a number of contributions (4,300 homes) have been made towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. Shropshire and Telford & Wrekin) or Birmingham and Black Country's unmet needs (e.g. South Staffordshire and Cannock Chase).

Table 2: Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

More detail is needed in this table to allow a

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Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Comments
South Staffordshire	Reg 19 May 2024	+650 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041 plan period
Cannock Chase	Reg 19	+500 Contribution specifically for Birmingham & Black Country unmet needs	Xxx plan period
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2018 -38 plan period
Telford & Wrekin	Reg 18 Plan – Nov 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040
Birmingham	Reg 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Reg 19 Plan published September 2024	Shortfall of - 699 at Regulation 19 Stage	2023-2041

Sandwell	Reg 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2022-2041
Wolverhampton	Reg 18 Plan published	Shortfall of - 11,400 at Regulation 18 Stage	2024-2042
Walsall	Regulation 18 Black Country Plan		

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs. Based on the published evidence to date, there is evidence of a shortfall of 74,015 to 2042 as demonstrated in Table 2 above. This shortfall could increase as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 2. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

5.4 The current housing 'offers' have the potential to provide homes towards either the Black Country's shortfall and/or Birmingham's shortfall. Some of these offers have been made expressly to the Black Country, whereas others are made to meet a shortfall arising in the HMA as a whole (as shown in Table 2 above).

5.5 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been

made to the wider GBGBHMA. The agreed dataset to base this approach on is migration data available on an annual basis from ONS, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One.

5.6 As shown in Appendix One the data is published over an extended period (2001-19) in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 3 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.

Table 3 Apportionment of housing contributions from each local plan contribution

Contributing LA	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	95	16	62	263	63
Shropshire	1500	0	431	257	219	593
South Staffordshire	640	21	153	71	161	234
Telford & Wrekin	1600	0	242	289	367	703
Total	4240	116	842	680	1011	1593

5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.

5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 2 above.

5.9 Moving forward it is agreed that this process be applied to other, less progressed Local Plans, where the Black Country authorities or Birmingham are seeking a contribution towards meeting their unmet needs.

5.10

6. Further work of the GBBCHMA

Include text on updated Strategic Housing Growth Study and monitoring

7. Areas of agreement

8. Areas where agreement is still being sought

9. Signatories to the Statement of Common Ground

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019							Percentage (%) Total Net Migration					Net Migration Flows based Distribution				
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS

Wyre Forest District Council				
Date	**Sender and recipient**	**Correspondence summary**	**Attachment**	**Attachment included in appendix?**
26th March 2025	WFDC to DMBC	Email from WFDC with a countersigned copy	Fully signed SoCG	No – same as final SoCG

Jennie Hadley

From: [redacted]wyreforestdc.gov.uk>
Sent: 26 March 2025 17:02
To: Vicki Popplewell (Planning)
Subject: [EXTERNAL EMAIL] FW: Officer agreed GBBCHMA SoCG - January 2025
Attachments: Officer agreed GBBCHMA SoCG - January 2025 .docx

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Vicki,
Please see attached and comment from our Members.
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

www.wyreforestdc.gov.uk

Wyre Forest District Council

LGC Awards 2025
Wednesday 11 June 2025 • Grosvenor House, London
FINALIST

[redacted]

Subject: Officer agreed GBBCHMA SoCG - January 2025
Hi Heather
Members have requested that you ask that "officers will request that an updated statement of common ground will be prepared to take account of the new standardised housing methodology" as part of our agreement to sign this.
Thanks
Kate

[redacted]

[redacted]

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Appendix 36 – Initial method note on apportioning cross boundary housing contributions

Apportioning neighbouring LA housing contributions – emerging thoughts

1. What's the issue?

How are the existing / emerging contributions from neighbouring LAs towards the BC housing shortfall distributed between the BCLAs in the event of the BCLAs progressing individual Local Plans?

Current housing 'offers' have the potential to provide between 3,500 and 10,000 homes towards the BC shortfall as detailed in the April 2022 ABCA DtC letter as set out in Appendix 1. Further contributions could be secured from emerging Local Plans including Bromsgrove, Stafford and Telford & Wrekin, bring the total DtC housing contribution to between some 11,400 and 14,600 homes. Some of these offers have been made expressly to the Black Country (Shropshire and Lichfield), whereas others are made to meet a shortfall arising in the HMA as a whole.

For each BCLA to progress individual Local Plans, and show how housing needs are being met, then this BC 'offer' needs to be broken down by BCLA.

2. What is the size of the shortfall

The most recently published housing shortfall figures, which are based on April 2020 data, are set out in the Reg18 Plan and BC UCR Update 2020 . This shortfall is not divided equally between the BCLAs as shown in Table 1 below:

Table 1 – housing balance between BCLAs

BCLA	Housing need	Housing land supply	Balance
Dudley	11,989	13,235	1,246
Sandwell	27,873	9,158	-18,715
Walsall	16,568	13,344	-3,224
Wolverhampton	19,646	12,100	-7,546
Total	**76,076**	**47,837**	**-28,239**

Since the publication of the Reg18 Plan, the land supply situation has changed through:

- Additional capacity in Walsall as set out in the additional Reg18 consultation July 2022. This identifies land for a further [800] homes.
- Removal of capacity in Dudley [Council owned sites]

Further work associated with the preparation of the BCP Reg19 including revisiting site assessments is likely to result in additional changes:

- Implications of urban capacity work
- Other site re-evaluation

The land supply situation is therefore fluid and is likely to remain so as this work progresses up to and even following the Reg19 consultations on the constituent Local Plans. However,

if it remains the case that Dudley are able to meet housing needs in full within their administrative area, then there is no 'call' on the DtC offers.

Housing need figures also change on an annual basis, and the whole method for calculating housing need is likely to change in the coming year or so. The individual Local Plans will also have a slightly later adoption date than anticipated for the BCP, requiring an end date of 2040 rather than 2039 and therefore adding c.3000 homes to the BC shortfall.

3. Proposed approach to apportionment

The proposed apportionment is based on net migration flows between the exporting LA and each of the BCLAs. This method involves the apportionment being based on the quantum of net migration between the exporting LA and the individual BCLAs as a proportion of net migration between the exporting LA and all BCLAs. The method uses data on net migration flows 2011-19 as set out in Appendix 2 and summarised below which shows a level of net out-migration from the BCLAs to the potential exporting LAs of 2,335 persons over that period.

The approach is therefore applied across the whole LA area and so the proposed apportionment does not have regard to the proximity of site allocations in the exporting LAs to the BCLAs. For example, the strategic housing sites included in the emerging South Staffordshire Local Plan have a much closer relationship with Wolverhampton than with Dudley or Walsall. The apportionment approach should therefore be seen as a baseline, with the scope for further adjustments reflecting the development strategy of the exporting LA Local Plan.

Table 2 – net migration between the BCLAs and potential exporting LAs 2011-19

Exporting LA	Total BC	Dudley	Sandwell	Walsall	W'ton
		% of BC total	% of BC total	% of BC total	% of BC total
Bromsgrove	160	67.5	29.4	1.9	1.3
Cannock	261	0.0	2.3	82.8	14.9
Lichfield	291	1.0	3.4	94.2	1.4
Shropshire	262	29.0	6.5	4.6	59.9
Solihull	45	20.0	46.7	0.0	33.3
S Staffs	893	26.4	2.7	22.2	48.7
Stafford	22	4.5	4.5	13.6	77.3
T&W	212	12.3	7.5	7.1	73.1
W. Forest	189	82.5	17.5	0.0	0.0
Total	2,325				

Strongest relationship with exporting LA highlighted

The functional relationship between the individual BCLAs and the potential exporting LAs varies, with Walsall having a closer relationship with Cannock and Lichfield and Wolverhampton with South Staffordshire, Shropshire and Telford & Wrekin. Dudley's strongest relationships are with Bromsgrove, South Staffordshire, Stafford and Wyre Forest. For Sandwell, the strongest relationship is with Solihull followed by Bromsgrove, and relationships with the exporting LAs are generally much weaker than is the case for the other BCLAs.

However, if Dudley does not have a shortfall (as was the case in 2020) then there is no need for the exporting LA offers to be attributed to Dudley, which would instead be available to the other BCLAs, using the same approach to apportionment. This is illustrated in Table 3.

Table 3 – net migration between the BCLAs and potential exporting LAs 2011-19 with no Dudley apportionment

Exporting LA	Total BC	Dudley	Sandwell	Walsall	W'ton
		% of BC total	% of BC total	% of BC total	% of BC total
Bromsgrove	160	0	90.4	5.8	3.8
Cannock	261	0	2.3	82.8	14.9
Lichfield	291	0	3.5	95.1	1.4
Shropshire	262	0	9.1	6.5	84.4
Solihull	45	0	58.3	0.0	41.7
S Staffs	893	0	3.7	30.1	66.2
Stafford	22	0	4.8	14.3	81.0
T&W	212	0	8.6	8.1	83.3
W. Forest	189	0	100.0	0.0	0.0
Total	2,325	0			

Strongest relationship with exporting LA highlighted

The main beneficiaries of this approach being Sandwell in relation to Bromsgrove and Wolverhampton in relation to Shropshire and South Staffordshire. This approach would also apply to any BCA once their shortfall became zero – notably Walsall, which had a shortfall of 3,224 homes in 2020. In the case of Solihull, the anticipated BC contribution is zero due to Solihull having a much stronger relationship with Birmingham. The Cannock offer has also been discounted to reflect the Birmingham relationship.

With the exception of Solihull and Cannock, this approach does not have regard to a shortfall arising elsewhere in the Housing Market Area which could have a potential 'claim' on the non-attributed BC offers. The most likely source of such an additional shortfall is Birmingham, which is at a much earlier stage in the Local Plan review process. However, it is highly probable that Birmingham will have a shortfall equivalent to that of the Black Country, and so it is prudent to understand what the impact would be of factoring in Birmingham to the HMA expressed offers.

The impact of including Birmingham on Table 2 is set out in Table 3 below, showing the relationship with Bromsgrove and Solihull in particular. This approach has the most significant impact on Sandwell who would effectively lose the major potential source of their anticipated contribution (Bromsgrove) to Birmingham. However, Sandwell could be the main beneficiary of any surplus arising in Dudley, Sandwell having by far the strongest link with Dudley of all the BCLAs.

Table 3 – net migration between the BCLAs and Birmingham with potential exporting LAs 2011-19

Exporting LA	Total BC+B'ham	Dudley	Sandwell	Walsall	W'ton	B'ham
		% of total	% of total	% of total	% of total	% of total
Bromsgrove	1,320	8.2	3.6	0.2	0.2	87.9
Cannock	330	0.0	1.8	65.5	11.8	20.9
Lichfield	n/a (BC specific offer)					
Shropshire	n/a (BC specific offer)					
Solihull	2,617	0.0	0.8	0.0	0.6	98.3
S Staffs	925	25.5	2.6	21.4	47.0	3.5
Stafford	n/a (BC specific offer)					
T&W	235	11.1	6.8	6.4	66.0	9.8
W. Forest	279	55.9	11.8	0.0	0.0	32.3
Total	5,706					

Strongest relationship with exporting LA highlighted

4. What are the implications of the approach

The implications of the approach is set out in Table 3 at Appendix 2 and summarised in Table 4 below. This assumes a mid-range figure of a total of 12,900 homes for the range of potential contributions.

Table 4 – implications of apportionment options

Apportionment	Total BC 'offer'	Dudley apportionment	Sandwell apportionment	Walsall apportionment	W'ton apportionment
Apportionment.	12,900	0	1,961	3,998	6,941
Discounted for B'ham share.	13,000	0	638	3,838	6,578

Table 3 confirms that the approach benefits Wolverhampton in the main due to the scale of the 'offers' from those exporting LPAs with which Wolverhampton has the strongest relationship.

Building on this analysis Table 5 shows the impact of the approaches on the shortfalls identified in Table 1.

Table 4 – impact of the apportionment Options on Table 1 shortfalls (negative figure denotes shortfall of supply

Apport. Option	Dudley		Sandwell		Walsall		W'ton	
	Reg18 balance	Resid. balance	Reg18 balance	Resid. balance	Reg18 balance	Resid. balance	Reg18 balance	Resid. balance
Apportionment.	1,246	1,246	-18,715	-16.728	-3,224	774	-7,546	-605
Discounted for B'ham share.	1,246	1,246	-18,715	-16,051	-3,224	614	-7,546	-968

Table 4 shows that the apportionment would address the shortfall in Walsall and result in a modest shortfall in Wolverhampton. For Sandwell a significant shortfall remains. This would increase further if the potential Bromsgrove HMA apportionment were to have regard to the relationship with Birmingham. The surplus of housing in Dudley and Walsall would be available to meet the shortfalls arising in Sandwell and Wolverhampton.

As set out above, this provides a baseline apportionment and further work could be progressed having regard to the development strategy of the exporting Local Plans to either uplift or reduce the apportionment to each BCLA.

Appendix 1 – DtC 'offers' from Neighbouring LAs, April 2022.

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**	

Appendix 2 – Detailed apportionment implications (no Birmingham allowance)

Approach implications

Exporting LA	Total BC 'offer'	Dudley apportionment	Sandwell apportionment	Walsall apportionment	W'ton apportionment
Bromsgrove	1,500	1,103	441	28	19
Cannock	400	0	9	331	60
Lichfield	2,000*	21	69	1,883	17
Shropshire	1,500*	435	97	69	899
Solihull	0	0	0	0	0
S Staffs	4,000	1,057	108	887	1,948
Stafford	1,500*	68	68	205	1,159
T&W	2,000	245	151	142	1,462
W. Forest	0	0	0	0	0
Total	**12,900**	**2,389**	**943**	**3,544**	**5,575**

* offers specific to the Black Country

Approach implications no Dudley apportionment

Exporting LA	Total BC 'offer'	Dudley apportionment	Sandwell apportionment	Walsall apportionment	W'ton apportionment
Bromsgrove	1,500	0	1,356	87	58
Cannock	400	0	9	331	60
Lichfield	2,000*	0	69	1,903	28
Shropshire	1,500*	0	137	97	1,266
Solihull	0	0	0	0	0
S Staffs	4,000	0	146	1,205	2,648
Stafford	1,500*	0	71	214	1,214
T&W	2,000	0	172	161	1,667
W. Forest	0	0	0	0	0
Total	**12,900**	**0**	**1,961**	**3,998**	**6,941**

* offers specific to the Black Country

Appendix 37 – Bilateral SoCG between South Staffordshire District Council and City of Wolverhampton Council (November 2022)

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

South Staffordshire Local Plan 2018-2039

Position at November 2022

Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & City of Wolverhampton Council (CWC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and City of Wolverhampton Council (CWC), hereafter referred to as "the parties" to inform the submission of the South Staffordshire Local Plan 2018-2039.

2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2018-2039 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:

    - Housing (including housing needs across the GBBCHMA);
    - Employment land;
    - Transport
    - Infrastructure;
    - Gypsy and traveller accommodation; and
    - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and City of Wolverhampton.

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 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 CWC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs. The Black Country authorities[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 authorities and that this requires discussion under the Duty to Cooperate. Following the cessation of work on the Black Country Plan in autumn 2022, CWC are now preparing a Wolverhampton Local Plan. (WLP). It is also common ground that there is likely to be a significant housing shortfall arising from the WLP alone.

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

9. CWC 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

[4] City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

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

10. Site allocations proposed by SSDC at Land at Linthouse Lane, Land at Cross Green, and Langley Road lie either immediately adjacent, or in close proximity to South Staffordshire's border with Wolverhampton. Given the Council's 4,000 home contribution to unmet needs in the GBBCHMA, CWC have requested through representations to the Local Plan that a proportion of nomination rights for social rented properties on these three sites specifically should be afforded to CWC to contribute to meeting their local affordable housing need. CWC and SSDC agree that CWC will receive nomination rights for 50% of the social rented properties on these sites on initial let, with a proportion of nomination rights for subsequent lets to also be agreed at a later date.

Employment

11. SSDC and CWC both sit within the South Staffordshire functional economic market area (FEMA). CWC 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 CWC and SSDC on employment matters.

12. The South Staffordshire Local Plan 2018-2039 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.

13. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI[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. The remaining land supply from WMI aside from the South Staffordshire and Black Country apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could be apportioned towards the Black Country unmet needs.

14. CWC has been part of the preparation of the Black Country Plan. The 2021 Black Country Plan Regulation 18 consultation confirmed 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. CWC, as part of the Black Country authorities, has therefore been in duty to cooperate discussions with SSDC and other local authorities to identify whether SSDC could contribute towards its employment land shortfall.

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

15. The minimum proportion of employment land oversupply that can be attributed towards the Black Country (including CWC) 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 CWC 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 CWC) will also continue to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls, and other areas with which the FEMA authorities can demonstrate a functional relationship. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CWC's stances on the need for an updated evidence base regarding West Midlands Strategic Employment Sites.

Cross boundary transport impacts

16. SSDC and CWC 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. All parties have worked closely together to agree the scope, content and indicative mitigation measures relating to the strategic transport assessments undertaken on SSDC's proposed strategic housing site allocations. As these sites progress towards the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate. The detail of cross-boundary transport issues is covered in a separate Transport Statement of Common Ground between CWC, SSDC, SSC and NH.

Infrastructure

17. SSDC and CWC are committed to continue working together in partnership, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas. To date, both authorities have undertaken cross-boundary work with their respective education authorities, health providers (e.g. Integrated Care System) and Sport England to identify any necessary mitigation to deliver planned housing growth in their respective areas. Both parties have also worked together closely to establish the feasibility of the rail-based park and ride scheme at Brinsford and will continue to work together to facilitate the next stages of the project's delivery. Both parties will keep each other fully informed of any changes to infrastructure matters and will continue to liaise on this matter where appropriate.

Gypsy & Traveller Provision

18. SSDC has an identified a 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period[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.

[7] South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

19. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites.

20. 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 Regulation 18 draft Black Country Plan consultation, previous call for sites or site identification work. However no details were given in this letter 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.

Natural Environment

21. SSDC and CWC 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.

22. Both CWC 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 CWC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs.

23. SSDC and CWC 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 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:

Date: 27th January 2023

City of Wolverhampton Council

Name: Councillor Stephen Simkins

Position: Deputy Leader: Inclusive City Economy

Signature: 

Date: 8th March 2023

Appendix 38 - Extracts from Black Country Leads Meeting Minutes (June 2024 - November 2024)

Black Country Planning Leads - Duty to Co-operate Meeting - 6th June 2024

Present:

Ian Culley (Chair), Michele Ross – Wolverhampton	Vicki Popplewell - Dudley	
Patricia McCullagh, Philippa Smith – Sandwell	Liz Forster - Walsall	
Apologies:		
Andy Miller - Sandwell		
Neville Ball, Dave Holloway - Walsall		

		Actions
1.	**Black Country DtC meeting notes – 09/04/24** Employment – SSES has identified potential broad locations in adjacent boroughs for more detailed assessment though Local Plan preparation that could contribute to BC needs. BNG Governance – see item 4. HMA Growth Study – IC has emailed all HMA LAs to confirm participation and contributions	
2.	**Black Country Local Plans** Dudley – Reg19 – September Cabinet and October Council Sandwell - Reg19 – September Cabinet and October Council Walsall – Call for Sites until later in 2024, awaiting new Regs before producing a new timetable. Wolverhampton – Reg18 closed in April, Reg19 – November Cabinet and December Council	
3.	**Evidence and Cross Boundary Issues** **Transport** – Transport Study – consultants are awaiting info from various sources. **Employment** – WMSESS – Draft Final Report has been received. Looking to publish in September. **EDNA update** – commissioned by CWC. **Centres** – CWC working on brief and quote. **Waste and Minerals** – Walsall and CWC have not yet received their reports. Sandwell to chase. **Housing** – Homes and Jobs Alignment Study – the proposal for the work has been received from consultant. **HRA** – Awaiting the results of the Regional Air Quality Modelling work. **HMA Growth Study** – HMA LAs have been asked to participate and contribute – awaiting responses.	
4.	**BNG** Agreed that BNG Governance should be a regular item on the agenda. Walsall are leading on this for the BC.	Discussion at next meeting

	Further discussion at next BC meeting. Strategic Significance Guidance for BNG – EcoRecord has requested the info be held on their website. CWC and Sandwell need to agree.	 MR and PMc
5.	**HMA and DtC** **HMA Growth Study** – email sent to all HMA authorities asking for confirmation that they will take part in the Study – asking for response by 14th June. **South Staffs Local Plan** South Staffs consultation – all BC responses submitted. **SoCGs** Discussed an approach to DtC for the BC. The main aim is to have a housing SoCG covering the wider HMA area. This was agreed as a way forward for DtC in BC and will seek approval for the approach across the wider HMA area. **DtC Letter** – discussed the draft letter to be sent out from Sandwell as part of the DtC process. BCLAs have agreed in principle but have time to send specific comments to Sandwell. **BC Apportionment** – agreed to use the most up-to-date migration figures for BC apportionment. Andy Donnelly is reviewing the previous paper prepared by IC using the most up to date data.	IC
6.	**AOB** Strategic Significance Guidance for BNG – EcoRecord has requested the info be held on their website	

Black Country Planning Leads - Duty to Co-operate Meeting - 9th July 2024

Present:

Ian Culley (Chair), Michele Ross – Wolverhampton	Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith – Sandwell	Neville Ball, Dave Holloway - Walsall
Apologies:	
Andy Miller - Sandwell	
Liz Forster - Walsall	

		Actions
1.	**Black Country DtC meeting notes – 06/06/24** Agreed that BNG Governance should be a regular item on the agenda. Walsall are leading on this for the BC. Further discussion at next BC meeting.	Discussion still needs to take place
2.	**Black Country Local Plans** Dudley – Reg19 – September Cabinet and October Council Sandwell - Reg19 – September Cabinet and October Council Walsall – Call for Sites until later in 2024, awaiting new Regs before producing a new timetable. Wolverhampton – Reg18 closed in April, Reg19 – November Cabinet and December Council	No change
3.	**Evidence and Cross Boundary Issues** **Transport** – Transport Study – timetable will be delayed due to waiting for information. There will be a three-week delay on the original SWECO work. **Employment** – WMSESS – Final Report will be discussed at Next HMA meeting. Discussion ongoing to confirm publication date and arrangements but provisionally September 2024. **EDNA update** – Findings will be fed into the Jobs and Alignment Study. **Centres** – currently awaiting approvals from Sandwell to commence the work. **Waste and Minerals** – Walsall and CWC have not yet received their reports. Sandwell to chase. **Housing** – Homes and Jobs Alignment Study – awaiting approvals from Sandwell to commence the work. **HRA** – Cannock Extension Canal is potentially the only area likely to be impacted by air quality issues. However, there are some concerns over the methodology, particularly the housing numbers, which may have been under-estimated.	
5.	**HMA and DtC** **HMA Growth Study** – sufficient local authorities have been engaged to enable the work to begin. The next stage is to confirm the	IC

	arrangements for commissioning the work, considering any changes to the NPPF. Work to be commissioned by WMCA. **Birmingham Plan** – agreed to prepare a BC response to the Reg18 consultation. **Solihull** – a BC response is required. Propose to revisit the previous draft response and recirculate**.** **SoCGs** **South Staffs** – agreed to undertake individual bi-lateral SoCGs with SStaffs.: **FEMA** – Neville to produce comments on the draft South Staffs FEMA SoCG for employment land and circulate. This to form the basis of the Black Country FEMA SoCG which IC will draft and circulate. **WM Interchange** – Email has been sent to all relevant LAs. The information from this SoCG will inform the Black Country FEMA SoCG. **Sandwell DtC Letter – BC Responses** CWC – briefing Cabinet Member on 2nd August and then will send a formal response. Walsall – response sent. Dudley – to brief Leader and Cabinet. **BC Apportionment** VP to update the HMA SoCG once information on migration figures is received from Andy D.	VP ALL NB / IC IC IC VP VP
6.	**AOB**	

Black Country Planning Leads - Duty to Co-operate Meeting - 5th September 2024

Present:

Ian Culley (Chair) – Wolverhampton	Vicki Popplewell - Dudley
Andy Miller, Philippa Smith – Sandwell	Neville Ball, Dave Holloway - Walsall
Apologies:	
Patricia McCullagh - Sandwell	
Michele Ross - Wolverhampton	

		Actions
1.	**Black Country DtC meeting notes – 09/07/24** None	None
2.	**Black Country Local Plans** Dudley – Reg19 – 25 September Cabinet and consult in October – November Sandwell - Reg19 – 11 September Cabinet and consult in Sept – October Walsall – tbd – may decide to progress a Plan under current guidance given the extension to submit until December 2025. Wolverhampton –– November Cabinet and consult in December-January	
3.	**Evidence and Cross Boundary Issues** **Transport** – Transport Study – timetable has been delayed but SWECO will complete prior to Sandwell consultation commencing. AM advised that there were no showstoppers flagged up by the modelling particularly when proposed mitigation/transport improvements and proposals were factored in. **Employment** – WMSESS – Final Report to be published on 9th September by Nuneaton & Bedworth as part of the EiP submission. Report will be presented to WMCA Board in November. **EDNA update** – Work currently being reviewed to address concerns over the robustness of the forecasting data. **Centres** – work commenced and nearing completion. The updated report is not expected to have any major changes from previous Centre's work. **Waste and Minerals** – CWC has now received their reports. Walsall to follow up with WSP. **Housing** – Homes and Jobs Alignment Study – awaiting clarification on the economic modelling and agreed employment land data approach. **HRA** – Ongoing	
5.	**HMA and DtC**	

	HMA Growth Study – sufficient local authorities have been engaged to enable the work to begin. The next stage is to confirm the arrangements for commissioning the work, considering any changes to the NPPF. Work to be commissioned by WMCA. **Birmingham Plan** – agreed to prepare a BC response to the Reg18 consultation. **Solihull** – a BC response is required. Propose to revisit the previous draft response and recirculate**.** **SoCGs** **Shropshire Updated SoCG** - to be signed off by each LA to reflect the identification of sites in the Shropshire Plan to meet the BC housing needs. **Agreed HMA wider SoCG** to agree apportionment on the contributions and those LAs receiving the contributions. This will need to be based on migration data which Andy Donnelly is currently pulling together. **South Staffs** – agreed to undertake individual bi-lateral SoCGs with SStaffs. **FEMA** – BC FEMA SoCG to be produced for agreement. **WM Interchange** – Email has been sent to all relevant LAs. The information from this SoCG will inform the Black Country FEMA SoCG. **Bilateral SoCG** between individual LAs were required on cross boundary matters. **Sandwell DtC Letter – Responses** Still awaiting three responses. **BC Apportionment** VP to update the HMA SoCG once information on migration figures is received from Andy D.	IC VP ALL VP IC IC ALL VP
6.	**AOB**	

Black Country Planning Leads - Duty to Co-operate Meeting - 16th October 2024

Present:

Ian Culley (Chair), Michele Ross – Wolverhampton	Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith – Sandwell	Neville Ball, Dave Holloway - Walsall
Apologies:	
Andy Miller - Sandwell	

		Actions
1.	**Black Country DtC meeting notes – 05/09/24** None	None
2.	**Black Country Local Plans** Dudley – Reg19 – Reg19 consultation begins on 18th October. Sandwell - Reg19 – Reg19 consultation began on 23rd September until 11th November (extended by one week). Walsall – tbd Wolverhampton –– November Cabinet and consult in December-January	
3.	**Evidence and Cross Boundary Issues** **Transport** – Transport Study – completed. Dudley has some concerns with how the Active Travel Measures have been written into the Plan, i.e. their impacts on the movement of traffic. There are also some issues around Burnt Tree that needed to be addressed. **Employment** – WMSESS – Final Report has been published. Only queries so far have related to Nuneaton and Bedworth. **EDNA update** – the final demand figures have been agreed. We are now only waiting for the demand vs supply paper. This will enable the Jobs and Homes Study to be completed. There are also issues around offices to be addressed which will have some cross over with the Centres Study. **Centres** – work commenced and nearing completion. **Waste and Minerals** – Walsall still to follow up with WSP **Housing** – Homes and Jobs Alignment Study – can progress once the demand vs supply paper has been received (EDNA). **AQ HRA** – Work on two of the sites is ongoing. All parties have agreed to produce a SoCG containing a mitigation plan. NE need to be happy with the mitigation measures to enable them to sign the SoCG.	
5.	**HMA and DtC**	IC IC

	HMA Growth Study – Brief is currently being prepared in line with the current NPPF. The next stage is to confirm the arrangements for commissioning the work with the WMCA. **SoCGs** **Shropshire Updated SoCG** - signed and completed **Wider HMA SoCG** - agree apportionment of any contributions and those LAs receiving the contributions, including th apportionment between the BCAs. This will include the contribution from Telford to the BC. VP to provide draft early in November. **South Staffs** – CWC and Sandwell have signed, DMBC & WMBC will sign after Cabinet approval. **BC FEMA SoCG** – 4 BCAs, SStaffs, Birmingham, Bromsgrove, Wyre Forest, Shropshire This can now be produced using the EDNA figures WMI apportionment table will be included. **Bilateral SoCG** between individual LAs were required on cross boundary matters.	VP ALL IC ALL
6.	**AOB** BNG – BNG meetings to be held every 6 weeks. Invitation to a discussion session with Warwickshire Council – LAs to identify attendees.	

Black Country Planning Leads - Duty to Co-operate Meeting - 12th November 2024

Present:

Ian Culley (Chair), Michele Ross – Wolverhampton	Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell	Neville Ball, Dave Holloway - Walsall
Apologies:	

		Actions
1.	**Black Country DtC meeting notes – 12/11/24** BNG - No action as yet. IC to discuss with AD	None
2.	**Black Country Local Plans** Dudley – Reg19 consultation ends on 29th November. Sandwell - Reg19 consultation ended on 11th November Walsall – tbd Wolverhampton –– November Cabinet with Reg19 consultation in December- January. Hope to submit by end of January 2025.	
3.	**Evidence and Cross Boundary Issues** **Transport** – Transport Study – completed. SWECO have produced a response to technical queries raised by National Highways on the modelling. This response can be used by all BCAs and will be published. **Employment** – WMSESS – Final Report has been published. **EDNA update** – final document has been received and circulated to employment leads **Centres** – work completed **Waste and Minerals** – Walsall still to follow up with WSP. CWC – checking queries. **Housing** – Homes and Jobs Alignment Study – still to be completed. **AQ HRA** – Meeting this week to discuss further findings. Hoping to agree a way forward for local plans this week.	
5.	**HMA and DtC** **HMA Growth Study** – Brief is currently being prepared in line with the current NPPF. The next stage is to confirm the arrangements for commissioning the work with the WMCA. **SoCGs**	IC

	Shropshire Updated SoCG - still uncertainty about Shropshire contribution to BC housing shortfall due to pause in EiP. Still awaiting a letter from the Inspectors as to the issues to be addressed. **Wider HMA SoCG** - VP has circulated a first draft for comment. It contains the approach to apportionment and confirmation of the shortfalls. There are also lots of gaps. Need comments before it can progress any further. To be discussed at the next HMA meeting. **BC FEMA SoCG** – 4 BCAs, SStaffs, Birmingham, Bromsgrove, Wyre Forest, Shropshire Still to do. **Bilateral SoCG** between individual LAs were required on cross boundary matters.	VP ALL IC ALL
6.	**AOB** None	