

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

## **1) Introduction**

Under the National Planning Policy Framework (NPPF, 2019), strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the emerging Wyre Forest District Local Plan Review. It sets out how Wyre Forest District Council has engaged with South Staffordshire Council in order to fulfil its Duty to Cooperate requirements.

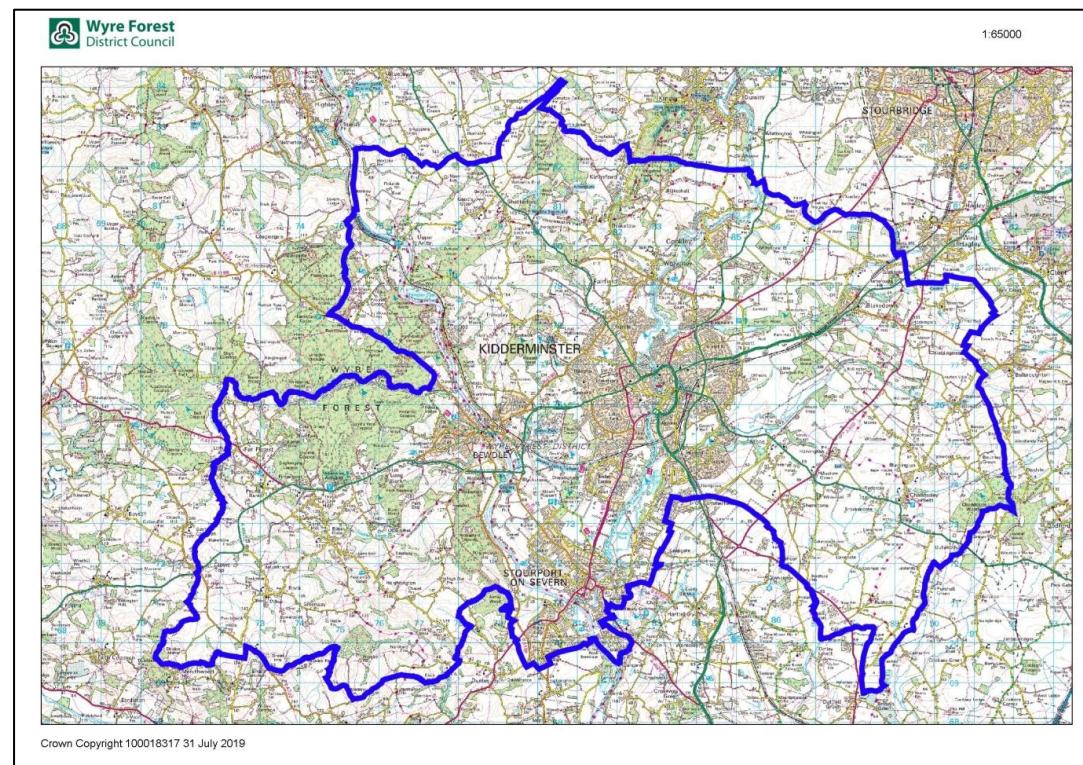
## **2) Parties Involved**

This Statement of Common Ground (SofCG) has been prepared jointly by Wyre Forest District Council (WFDC) and South Staffordshire Council (SSC). South Staffordshire Council shares a boundary with Wyre Forest District Council to the north of the Wyre Forest District.

## **3) Strategic Geography**

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan 2016-2036, which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

**Figure 1: Map of Wyre Forest District**



#### **4) Background / Duty to Cooperate**

There has been ongoing engagement between WFDC and SSC throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with SSC at every stage of plan making. The Local Plan Review consultation periods were as follows:-

- Issues and Options Consultation – September / October 2015
- Preferred Options Consultation – June / August 2017
- Pre-Submission Consultation – November / December 2018
- Pre-Submission Consultation (re-opened) – September / October 2019

Duty to Cooperate meetings have also taken place on the following dates:-

- 9<sup>th</sup> February 2018
- 14<sup>th</sup> March 2019

Minutes of the above meetings can be viewed in Appendix 1.

The above meetings were jointly held with the Black Country Authorities and Birmingham City Council so that cross boundary duty to cooperate discussions could be had together to discuss strategic issues jointly. South Staffordshire Council were also invited to the following duty to cooperate meetings that WFDC held with the Black Country Authorities and Birmingham City Council. South Staffordshire Council sent their apologies for these meetings and did not attend:-

- 18<sup>th</sup> May 2018
- 25<sup>th</sup> September 2018
- 18<sup>th</sup> July 2019

#### **5) Strategic Matters Identified**

South Staffordshire Council responded to the WFDC Local Plan Pre-Submission consultation that was undertaken in November / December 2018. Table 1 shows a summary of the responses received from SCC (the full response can be viewed in Appendix 4).

Table 1: South Staffordshire Council response to WFDC Local Plan Pre-Submission (October 2018)

	<b>Issues</b>
South Staffordshire Council	South Staffordshire Council does not consider the plan as proposed to be ‘unsound’ however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South

	Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current local plan review process.
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## 6) Matters that parties agree on

Table 2 below shows the matters that both parties agree on.

Table 2: Matters that both parties agree on

	<b>Issues</b>	<b>WFDC Response</b>
South Staffordshire Council	<p>South Staffordshire Council does not consider the plan as proposed to be ‘unsound’ however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current local plan review process.</p>	<p>WFDC has made an amendment to the Local Plan in light of these comments and further discussions with South Staffordshire Council at the Duty to Co-operate meeting on 14<sup>th</sup> March 2019. The amendments to Policy 6A(B) are as follows:</p> <p>“As required by the Duty to Co-operate, due consideration will be given, through a future <b><u>early</u></b> review of the WFDC Local Plan where <b><u>appropriate necessary and in accordance with the NPPF</u></b>, to the housing needs of neighbouring local authorities (Footnote 2) in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area. <b><u>The review will consider the need for additional growth and plan appropriately for this if the need has been clearly evidenced and justified.”</u></b></p> <p>Footnote 2 added as</p>

	<p>follows: <b><u>This includes the Black Country Local Authorities who are currently preparing a joint Local Plan Review.</u></b></p> <p>These amendments were consulted on by WFDC during the Pre-Submission consultation held in September/October 2019.</p>
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## 7) Matters that parties disagree on

Table 3 below shows matters that parties disagree on.

Table 3: Matters that parties disagree on

	<b>Issues</b>	<b>WFDC Response</b>
South Staffordshire Council	<p>South Staffordshire Council does not consider the plan as proposed to be ‘unsound’ however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current local plan review process.</p>	<p>Wyre Forest District does not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Therefore, the Black Country Authorities and Birmingham City Council need to produce sufficient evidence that they cannot accommodate their shortfall within their own Housing Market Area, and to justify why they need WFDC to accommodate some of their shortfall. WFDC is a Green Belt local authority and therefore exceptional circumstances are required to release land from the green belt. To date sufficient evidence has not been produced by the Black Country Authorities and/or Birmingham City Council.</p>

## **8) Other Strategic Matters**

As WFDC is a green belt local authority, the question of whether neighbouring local authorities can help to meet the housing need for Wyre Forest in the emerging and future local plans needs to be considered. South Staffordshire Council, who is also a Green Belt authority, has already agreed to helping the Black Country Authorities with their housing and employment shortfall (as South Staffordshire is located within the same HMA as Black Country Authorities), and therefore would not be in a position to help Wyre Forest District with their housing need.

The emerging WFDC Local Plan is intending to accommodate all of its housing need within its own district area; however this will involve some green belt release which will need to be considered at examination stage by the Planning Inspector.

## **9) Governance Arrangements**

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

<b>Local Authority</b>	<b>Method of Approval</b>
Wyre Forest District Council	SofCG to be agreed by Council Members
South Staffordshire Council	Formal Cabinet Member agreement.

## **10) Timetable for agreement**

The table below sets out the timetable arrangement for the Statement of Common Ground to be agreed.

<b>Local Authority</b>	<b>Timetable for approval</b>
Wyre Forest District Council	- Overview & Scrutiny – 6 <sup>th</sup> February 2020 - Cabinet Meeting – 11 <sup>th</sup> February 2020 - Full Council Meeting – 26 <sup>th</sup> February 2020
South Staffordshire Council	- 1 month required.

## **11) Conclusions**

The parties agree that:

- i) WFDC has fulfilled its Duty to Cooperate with SSC.
- ii) Whilst SSC's view is that the WFDC Local Plan Review should more proactively seek to address the GBBCHMA housing shortfall, SSC is satisfied that all matters raised in its representations to the WFDC Local Plan Review (2016-2036) have been addressed by WFDC's responses.
- iii) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.

## **12) Signatories**

This Statement of Common Ground has been agreed and signed by the following:-

<b><u>South Staffordshire Council</u></b>	<b><u>Wyre Forest District Council</u></b>
Name: _____	Name: _____
Position: _____	Position: _____
Date agreed: _____	Date agreed: _____
Signature: _____	Signature: _____

## **Appendices**

- Appendix 1 – Duty to Cooperate Meeting Minutes between WFDC and SSC
- Appendix 2 – SSC response to the WFDC Issues and Options consultation (Sept / Oct 2015)
- Appendix 3 – SSC response to the WFDC Preferred Options consultation (June – Aug 2017)
- Appendix 4 – SSC response to the WFDC Pre-Submission Consultation (Nov/Dec 2018)

## Appendix 1

### Duty to Co-operate Meeting

9<sup>th</sup> February 2018

#### Present:

Martin Dando (Dudley)	Ian Culley (Wolverhampton)
Kelly Harris (South Staffs)	Uyen-Phan Han (BCC)
Andy Donnelly (WM Metropolitan Authorities)	Mike Parker (WFDC)
Helen Smith (WFDC)	Kate Bailey (WFDC)
	<b>Actions</b>
1. <b>Local Plan Timetables</b>	<p>HS ran through the LP timetable for WFDC. Full Council in November and EIP in 2019 and adoption July 2019.</p> <p>Black Country – Issues and Options (Summer 2017). Preferred Options due out at end of this year. Draft plan summer / autumn 2019. Unmet need of 22k (still subject to testing) until 2036.</p> <p>South Staffs – site allocations examination end 2017 and now out to consultation on modifications and hope to have the plan found sound. Want to adopt by August 2018 and also started work on LP review. Have started drafting Issues &amp; Options and aim to finish this by Summer 2018. New Local Plan aiming to be submitted by 2021.</p> <p>Birmingham – adopted development plan Jan 2017. The Plan is providing 51,000. Housing shortfall to be met by other LPAs in the housing market – 38k approx, against an OAHN of 89,000.</p>
2 <b>Green Belt Review</b>	<p>MD explained that the GB review hasn't been commissioned yet. Wanted to tie it in to the GL Hearn Housing Study so was put on hold.</p> <p>Now also waiting for Issues &amp; Options consultation responses to be published before GB review can be commissioned – will publish without a response from the Council in March 2018. Approximately 1800 consultation responses were received.</p> <p>Combined Authority (CA) are looking at developing an overarching Investment and Spatial Delivery Framework which will not have any statutory planning making powers but will support delivery of existing plans. Therefore not involved in the GL Hearn study (HMS).</p> <p>CA – officers discussed the constituent and non-constituent members and mismatch in the geographies with the HMA.</p> <p>Spatial Investment and Delivery Framework – enables Mayor to have a discussion about priorities for the CA.</p> <p>Discussed timings around the household projections / standardised methodology being published and how this links to the pre-submission consultation timelines in context of WFDC timetable.</p>

## Appendix 1

3	<b>Strategic Growth Locations Study (GL Hearn &amp; Wood plc)</b>  Leaders meeting 20th February 2018 to consider the study and should be available publically after that.	
4	<b>Duty to co-operate meeting on 14<sup>th</sup> February 2018 (Black Country)</b>  The Black Country LAs will outline the main consultation responses and timetable and discuss any DTC issues that are likely to arise. Further meetings will follow.	
5	<p><b>Ongoing engagement with DTC partners</b></p> <p>Discussed the previous comments given at the DTC. WFDC figures aren't over-provided but meet the range identified by Amion (199 – 332) and we then selected 300 to meet the economic growth aspirations at the time. The DCLG standardised methodology was 246 so waiting on this to be finalised and 2016 population data to be available to then update to OAHN. BCC would be keen if we agreed to a MoU to take some of their numbers on the grounds that we are close to their HMA.</p> <p>The final WFDC OAHN number and the site technical evaluation will highlight whether there is over-provision or not and therefore what the Black Country might say at DTC.</p> <p>The GL Hearn study will then inform us as to whether there is a shortfall or not and as BC work continues will know whether they can meet that shortfall or not by their own GB.</p> <p>Unlikely that the Planning Inspector will have clarity on the BC position when they conduct the WFDC EIP in early 2019.</p> <p>Discussed the role of Solihull in meeting the needs of the conurbation. North Warwickshire is planning for in excess of OAHN and demographic need, with the surplus contributing to wider HMA shortfall. MP advised that it was unlikely that WFDC would be in this position.</p> <p>Issue raised that if a HMA planning for economic led migration above that reflected in trend based projections, then logically it needed to come from somewhere else, otherwise there was a risk of double counting e.g. Telford.</p> <p>Discussed the WFDC Housing Market Area and where the inward migration to the district was coming from.</p>	WFDC will arrange a meeting again April / May 2018 to hold further DTC.

## Appendix 1

### Duty to Co-operate Meeting

14<sup>th</sup> March 2019

#### Present:

Vicki Popplewell (Dudley)	Ian Culley (Wolverhampton)
Kelly Harris (South Staffs)	Kate Bailey (WFDC)
Helen Smith (WFDC)	
<b>Apologies:</b>	
Mike Parker (WFDC)	Uyen-Phan Han (BCC)
Andy Donnelly (WM Metropolitan Authorities)	

		Actions
1.	<b>Introductions</b>  Vicki Popplewell from Dudley Council was welcomed to the group. Vicki has replaced Martin Dando for Duty to Cooperate meetings.	
2.	<b>Local Plan Timetables</b>  HS ran through the LP timetable for WFDC. The pre-submission consultation was held last year in November/December 2018. The team has since been working through the consultation responses received and checking for any soundness issues for the plan. The EiP is expected to commence in late 2019 and adoption in 2020, based on the current LDS timetable which was approved by Cabinet on 12 <sup>th</sup> June 2018.  Black Country – Issues and Options (Summer 2017). The draft Black Country Plan to be published for consultation in Autumn 2019. The Publication stage will be published in 2020 and Submission in early 2021. It is hoped that adoption would be in Autumn 2021. The current housing shortfall for the Black Country LAs is 26,000.  Black Country LAs have had encouraging engagement with South Staffs and also Shropshire. Telford is not willing to help with the shortfall at this stage. The Black Country LAs have done some more work on the urban capacity in terms of employment areas, open spaces, growing population, economy and the need for more land for housing and employment.  South Staffs – local elections being held in May 2019. The Issues & Options document was published at end of last year. South Staffs are now preparing the preferred spatial distribution document and intend to consult on this during Summer 2019. The Preferred Options document is planned for 2020. South Staffs hope that they will submit to Planning Inspectorate by end of 2021.  Black Country LAs and South Staffs will have more clarity with their plans by early 2020.  GBSLEP – the housing delivery target and the housing deal was also discussed. A target of 215,000 homes to be delivered. An expectation that LAs within the LEP geography will help to meet this housing target, but this is dependent on suitable sustainable locations being found. We also discussed how the LEP geography is likely to change and it is currently unclear which LEP Wyre Forest District will fall within. Ian Culley referred	

## Appendix 1

	<p>us all to the West Midlands Combined Authority 'Spatial Investment and Delivery Plan' as the revised draft was published February 2019. See link to revised draft:</p> <p><a href="https://governance.wmca.org.uk/documents/s2639/2019.02.13%20HLDB%20Revised%20SIDP%20appendix%20to%20covering%20paper%20-%20Public%20paper%20-%20FINAL.pdf">https://governance.wmca.org.uk/documents/s2639/2019.02.13%20HLDB%20Revised%20SIDP%20appendix%20to%20covering%20paper%20-%20Public%20paper%20-%20FINAL.pdf</a></p>	
3.	<p><b>Black Country Green Belt Review</b></p> <p>The Black Country LAs have appointed Land Use Consultants (LUC) to undertake the Green Belt review. The first draft of the Green Belt Review has been completed by the consultants and is currently being checked by officers. The Green Belt review is being done jointly with South Staffs.</p>	
4.	<p><b>Consultation Responses to WFDC Pre-Submission Local Plan</b></p> <p>The consultation responses received by WFDC from Black Country LAs and South Staffs to the WFDC Pre-Submission Local Plan were discussed.</p> <p>Black Country LAs - A discussion was had about the standardised methodology for calculating housing need and the use of either 2014 or 2016 figures. If Wyre Forest is looking to provide above their 2014 needs then the Black Country LAs would want WFDC to consider attributing any surplus to meeting wider needs of BC and the broader HMA. The Black Country LAs would also want commitment from Wyre Forest for an early Local Plan Review with the purpose of identifying sites to accommodate unmet housing needs arising in the Black Country. WFDC would need clear evidence that the housing/employment shortfall could not be accommodated elsewhere in the HMA. It was also pointed out that Wyre Forest is not the most sustainable location as it does not have a motorway network running through the district, unlike some of the LAs already located within the HMA.</p> <p>South Staffs – They are not objecting to the WFDC Local Plan but think that Wyre Forest should revise wording in draft Local Plan to commit to an early Local Plan Review in light of the Black Country LAs shortfall.</p>	
5.	<p><b>Revised NPPF and Statement of Common Ground</b></p> <p>We discussed the need for a Statement of Common Ground and how this could be used to iron out any issues before the Wyre Forest Local Plan examination.</p> <p>As South Staffs are not objecting to the WFDC Local Plan, a separate SofCG would be prepared instead of a joint one with the Black Country LAs.</p> <p>It was agreed that the SofCGs should be prepared ready for Submission Stage of the Wyre Forest Local Plan.</p>	
6.	<p><b>Ongoing engagement with DTC partners</b></p> <p>It was agreed that the next meeting should be in July 2019, after the local</p>	WFDC will arrange a meeting in

## Appendix 1

	elections in May.	July 2019 to hold further DTC.
7.	<b>AOB</b>  The Black Country LAs have been undertaking some migration analysis. It was agreed that this information could be shared with WFDC.	Migration analysis to be sent by Vicki Popplewell to WFDC when this information is available.

## Appendix 2



Date: 15 October 2015

Andy Johnson

Our Ref: AJ/JF

Tel:

Your Ref: RB/HET/FP-LPRIO

Fax: 01902 696403

Sent by e-mail

Ms Rebecca Brown  
Planning Policy Manager  
Economic Prosperity & Place Directorate  
Wyre Forest House  
Finepoint Way  
KIDDERMINSTER  
Worcestershire  
DY11 7WF

Dear Ms Brown

### **Wyre Forest Local Plan Review – Issues & Options Consultation**

South Staffordshire Council would like to respond to the Cross Boundary Issues that have been identified in the Issues & Options Paper. We agree with the list of strategic planning issues set out in the Issues and Options Paper. We are pleased to see that one of the strategic issues identified is that housing provision needs to take account of Housing Market Areas (HMAs) such as the Worcestershire HMA and the Greater Birmingham HMA.

The scale of the unmet need identified in the Main Modifications of the Birmingham Development Plan 2031, is considerable. A shortfall of 37,900 dwellings has been identified as arising from the administrative area of Birmingham alone. We request that the Council makes reference to this Identified Housing Shortfall in the neighbouring Greater Birmingham HMA and if possible, assists in accommodating an element of 'export' from this neighbouring HMA, when arriving at the future housing requirement for the plan-period of the new Wyre Forest Local Plan.

## Appendix 2

Yours sincerely

Andy Johnson  
**Director (Planning & Strategic Services)**

Cc Mrs Kelly Harris – Team Leader (Local Plans)

## Appendix 3

### Elaine Wilcox

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**From:** Johnson, Andrew  
**Sent:** 15 August 2017 1  
**To:** LPR Consultation  
**Subject:** Preferred Options Reps  
**Attachments:** Planning Policy Wyre Forest DC re Local Plan Preferred Option.pdf

**Categories:**

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Dear Sir/Madam

### **Wyre Forest Local Plan Review Preferred Option**

Please find attached comments from South Staffs Council in respect of your Local Plan Review Preferred Option Consultation.

Kind Regards

Andy

Andrew Johnson

**Chief Planning Officer  
South Staffordshire Council**

**Tel**

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## Appendix 3



Date: 15 August 2017

Please ask for: Andy Johnson

Our Ref: AJ/JF

Direct Dial:

Your Ref:

Direct Fax: 01902 696403

E-mail:

Planning Policy  
Wyre Forest  
Wyre Forest House  
Finepoint Way  
KIDDERMINSTER  
DY11 7WF

Dear Sir/Madam

### **Wyre Forest Local Plan Preferred Option 2014**

Thank you for the opportunity to comment on the above document.

As a member of the GBSLEP, Wyre Forest District Council (WFDC) participated in the initial PBA Strategic Housing Needs Study work. Stage 2 of the SHNS was published in November 2014 and confirmed that whilst WFDC did not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), it had close links with it. Based on the earlier housing market areas, work undertaken for the National Housing and Planning Advisory Unit and published by DCLG in 2010, WFDC was a best fit with the Worcester HMA along with the three South Worcestershire Authorities (Worcester, Malvern Hills and Wychavon), but as these authorities have an adopted plan, it follows that for the purpose of this round of local plan making, WFDC is a free-standing HMA.

The Preferred Options document summarises the responses to the Issues and Options consultation noting support for additional in-migration, particularly of working age people, due to the ageing population in WFDC. The Amion / Edge Analytics 2017 Objective Assessment of Need Report, verifies the ageing population and also identifies internal migration as being the principal source of population growth. Figure 2.3 and table 2.2 in this Report show that the principal source of this is conurbation authorities within the GBBC MA.

## Appendix 3

In considering economic factors, the Amion / Edge Analytics Report suggests an OAN of 300 dwellings per annum, compared to a demographically driven figure derived from the 2014 household projections of 199 dwellings per annum. The situation in the South Worcestershire Authorities mirrors that of WFDC in that they too are seeking economic led growth, which requires more people than demographic projections suggest and is reflected in the adopted plan. It follows therefore, that the same must apply in WFDC.

It is now formally acknowledged in the adopted Birmingham Development Plan, that there is a shortfall of 37,900 dwellings in the GBBCHMA arising from the city alone and evidence emerging from the Black Country Core Strategy may lead to the overall HMA shortfall increasing further. In the light of these growth pressures in the GBBCHMA and the established migration patterns with WFDC, it is logical to conclude that increased supply in WFDC is likely to be met by additional migration from the GBBCHMA; this is reflected in 8.12 of the Amion / Edge Analytics Report. The recently published proposed modifications into the Telford and Wrekin Local Plan are relevant in this context in that the Inspector has acknowledged interactions between HMAs, PM 1 states that:

***Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBC HMA.***

As a consequence, we (together with our partner authorities within the GBBCHMA) would welcome the opportunity to discuss this matter with you further, with a view to signing a Duty to Cooperate Statement / Memorandum of Understanding between the relevant local authorities.

Yours sincerely

Andy Johnson  
**Chief Planning Officer**

## Appendix 4

**From:** Fox, Edward  
**Sent:** 14 December 2018 09:51  
**To:** LPR Consultation  
**Cc:** Harris, Kelly  
**Subject:** RE: Local Plan Pre Submission Publication (October 2018) consultation

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Dear Sir/Madam,

### **South Staffordshire Council's interim response to the Wyre Forest Local Plan Pre-submission consultation**

Thank you for providing South Staffordshire Council the opportunity to comment on your Local Plan Pre-submission publication.

South Staffordshire Council does not consider the plan as proposed to be ‘unsound’ however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current local plan review process.

The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.

Kind regards

Ed

Ed Fox

## **Appendix 4**

**Assistant Team Manager (Local Plans)  
Enterprise & Growth  
South Staffordshire Council**

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