

## NOTICE OF DECISION OF CABINET MEMBER


Pursuant Section 15(4) of the Local Government Act 2000, as amended by section 63 of the Local Government and Public Involvement in Health Act 2007, the senior executive member may discharge any of the functions that are the responsibility of the Cabinet or may arrange for them to be discharged by another member of the Cabinet or Officer. On 1<sup>st</sup> December 2010, the Council adopted the Strong Leader Model for Corporate Governance 2011 as required under Part 3 of The Local Government and Public Involvement in Health Act 2007 (The 2007 Act).

In accordance with the authority delegated to me by the Leader, I have made the following decision:

Subject	Decision	Reason for decision	Date for Decision to be taken
GBBCHMA Statement of Common Ground	Agree the Statement of Common Ground prepared by officers of the Greater Birmingham and Black Country Housing Market Area Development Needs Group for Submission	The Greater Birmingham and Black Country authorities have requested that fourteen local authorities including Wyre Forest sign their statement of common ground as part of the plan making process	14 <sup>th</sup> November 2022

**I confirm that the appropriate statutory officer consultation has taken place with regard to this decision.**

Dated: 14<sup>th</sup> November 2022

Signed: 

Councillor: Helen Dyke  
Cabinet Member

**WYRE FOREST DISTRICT COUNCIL****CABINET****Greater Birmingham and Black Country Housing Market Area Draft Statement of Common Ground August 2022**

<b>OPEN</b>	
<b>CABINET MEMBER:</b>	The Leader of the Council and Cabinet Member for Economic Regeneration, Planning and Localism
<b>RESPONSIBLE OFFICER:</b>	Head of Strategic Growth
<b>CONTACT OFFICER:</b>	Heather Stone
<b>APPENDICES:</b>	Letter to GBBCHMA August 2022 Draft GBBCHMA shortfalls SOCG for signing

**1. PURPOSE OF REPORT**

- 1.1 To seek agreement to the content of the draft Statement of Common Ground appended which has been prepared to facilitate and record cross-boundary engagement between local authorities in addressing existing and emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

**2. RECOMMENDATION****2.1 The Leader of the Council is asked to:**

Agree the Statement of Common Ground prepared by officers of the Greater Birmingham and Black Country Housing Market Area Development Needs Group for Submission

**3. BACKGROUND**

- 3.1 South Staffordshire Council hosted a Duty to Cooperate meeting for Cabinet Members and officers on 15<sup>th</sup> December 2021 where it was agreed that officers would work collaboratively to draft a Statement of Common Ground (SoCG) for the wider housing geography.
- 3.2 Although Wyre Forest District Council does not form part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), its immediate neighbours do and thus regular duty to cooperate meetings have been held throughout our own Local Plan process and now with other local planning authorities as they progress their Local Plans. The Development Needs Group comprises of the 14 authorities within the Greater Birmingham and Black Country Housing Market Area together with Shropshire Council, Telford and Wrekin Council and Wyre Forest District Council as it is recognised that these adjoining councils have very close functional relationships with the Housing Market Area.
- 3.3 A number of Statements of Common Ground were submitted as background documents to the Wyre Forest District Local Plan Inquiry. These clearly demonstrated how the Council had worked with the neighbouring authorities within the Greater Birmingham and Black Country Housing Market Area to achieve positive outcomes on key strategic matters, including putting forward suggested main modifications to the Plan. Policy SP.1 – Spatial

development Strategy 2016-2036 at point 2 reflects Wyre Forest District Council's commitment to an early review of the Plan if it becomes clear that the housing needs of neighbouring authorities, which includes the Black Country and Birmingham, cannot be met within their boundaries.

- 3.4 If assistance with meeting housing requirements is sought, as Wyre Forest does not form part of the Greater Birmingham and Black Country Housing Market Area, the Black Country Authorities and Birmingham City Council need to produce sufficient evidence that they cannot accommodate their housing shortfall within their own Housing Market Area and then to justify why they need Wyre Forest District Council to accommodate some of this shortfall. Wyre Forest District Council is a Green Belt authority and therefore exceptional circumstances are required to release land from the Green Belt. The recently adopted Wyre Forest District Local Plan (2016-2036) has required the release of 2% of the Green Belt to meet Wyre Forest's own housing requirement.
- 3.5 The draft Statement of Common Ground proposed by the Greater Birmingham and Black Country Housing Market Area Development Needs Group is now at a stage where it can be considered by all included councils and agreed. It records progress made to date in addressing the housing shortfall within the Housing Market Area and demonstrates that the participating authorities have engaged in constructive discussions under the Duty to Cooperate regulations. It is a snapshot in time and reflects the position in August 2022.

#### **4. KEY ISSUES**

- 4.1 In the case of Wyre Forest, evidence shows that internal migration, much of it from the Black Country and dominated by young retirees, has been a driver of population growth this century. These young retirees have been mostly 1 and 2 person households which has resulted in a much greater increase in the number of households than would be expected from the population increase alone.
- 4.2 The Birmingham Development Plan 2011-2031 (adopted January 2017) identified a shortfall of 37,900 homes which would need to be met elsewhere. Two studies have since been commissioned by the Greater Birmingham and Black Country Housing Market Area to find solutions to address these shortfalls. A position statement published in 2021 with a base date of April 2020 suggested that the shortfall had reduced by 10,000 as a result of additional capacity being identified within the Birmingham Development Plan.
- 4.3 The Black Country has now reached Regulation 18 stage with its Local Plan and have identified a shortfall of over 28,000 homes over the period 2020-2039 (just over 16,000 by 2031 and nearly 12,000 over the period 2031-2039). These figures are based on the up-to-date local housing need including a 35% uplift for Wolverhampton. Birmingham is only at the initial stages of Plan Review and the extent of any post 2031 shortfall is yet to be established.
- 4.4 A number of authorities within the GBBCHMA have offered to accommodate some of the shortfall arising from Birmingham and the Black Country Authorities through their Local Plans, often based on the broad areas identified in the GL Hearn/Wood Strategic Growth Study of 2018. South Staffordshire Council are of the opinion that if all authorities within the GBBCHMA delivered housing at the locations proposed by the Strategic Growth Study, the shortfall (including up to 2036) would be met. The proposed Spatial Strategy for South Staffordshire in 2019 delivered both a 4,000-dwelling contribution to the shortfall, as well as growth in the broad locations. This strategy was followed in their 2021 Preferred Options consultation. It should be noted that South Staffordshire, like Wyre Forest, is also tightly constrained by Green Belt.
- 4.5 If this shortfall cannot be accommodated within the HMA, there is a distinct possibility that the GBBCHMA authorities will look beyond its boundaries for help. Shropshire is currently

undergoing examination of its Local Plan. The Submission Plan of September 2021 makes a contribution of 1,500 homes towards meeting the specific needs of the Black Country Authorities. This approach is based largely on migratory trends. Telford and Wrekin Council has not ruled out the potential apportionment of some of its Local Plan housing requirement towards meeting the needs of the GBBCHMA. Discussions are continuing. As a neighbouring authority with evidence of some cross boundary migration of population moving into Wyre Forest, particularly from the Black Country, Wyre Forest District Council may be asked to consider taking up some of the shortfall in a subsequent Local Plan Review.

- 4.6 It should be noted that this draft Statement of Common Ground was prepared before the decision was taken to disband the Black Country Plan. As Local Plans progress further, more detail on the potential housing shortfall figures will become available as this is still subject to further testing and consultation. It is the role of the emerging plans within the GBBCHMA to seek the best way to meet this shortfall.

## **5. FINANCIAL IMPLICATIONS**

- 5.1 Any costs will be met by existing budgets.

## **6. LEGAL AND POLICY IMPLICATIONS**

- 6.1 The duty to co-operate is enshrined in legislation (Localism Act 2011) but it does not require local authorities to reach agreement where this is not possible.

## **7. EQUALITY IMPACT NEEDS ASSESSMENT**

- 7.1 Not applicable

## **8. RISK MANAGEMENT**

- 8.1 Not to participate in the preparation of a Statement of Common Ground with the Greater Birmingham and Black Country Authorities or to approve one would make it difficult for Wyre Forest District Council to demonstrate in any future Local Plan Review that it has met the statutory Duty to Cooperate. Also, these neighbouring authorities are less likely to be willing enter into discussions during any review if we have not shown willingness to discuss issues arising from their Local Plans.

## **9. CONCLUSION**

- 9.1 Wyre Forest District Council is being requested to sign a working document which sets out the key issues around housing shortfall in the Greater Birmingham and Black Country area and how this may be accommodated going forward.
- 9.2 Wyre Forest District are not currently offering to take any of this shortfall within its own boundaries as it lies outside the HMA and is constrained by Green Belt. Any decision to accommodate a housing need from outside our District would require a review of the Local Plan.

## **10. CONSULTEES**

- 10.1 Statutory officers and the Planning Manager

**11. BACKGROUND PAPERS**

11.1 Not applicable

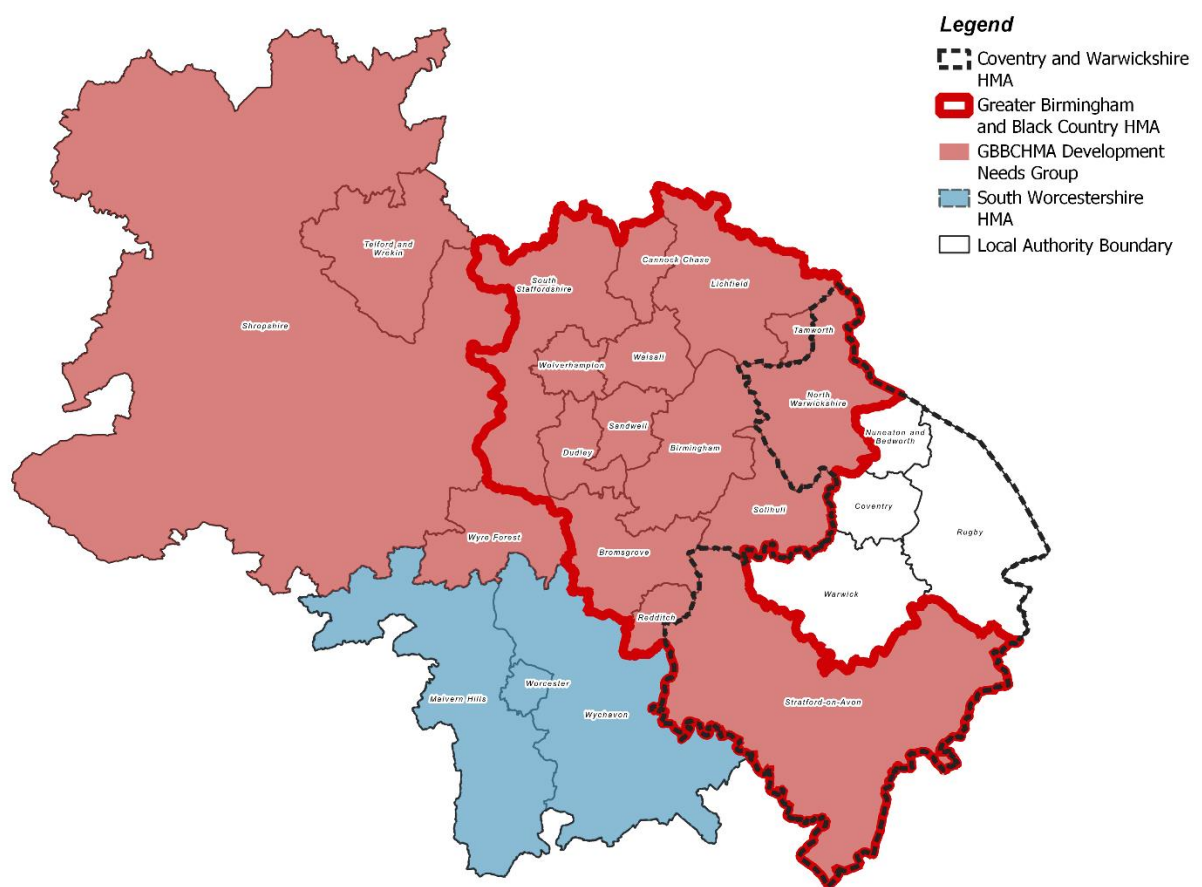
# **GBBCHMA Development Needs Group**

## **Draft Statement of Common Ground**

**August 2022**

## 1. Purpose and list of Parties involved in this Statement of Common Ground

- 1.1 This Statement of Common Ground (SoCG) has been prepared to facilitate and record cross-boundary engagement between local authorities in addressing existing and emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It records cooperation and progress to date in addressing this strategic issue, demonstrating that the participating authorities have engaged constructively, actively and on an ongoing basis under the Duty to Cooperate.
- 1.2 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises the local planning authorities set out below. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities.



### Local planning authorities within the GBBCHMA

- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council

- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council

Other related local planning authorities outside of the GBBCHMA

- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

**2. Signatories to this Statement of Common Ground:**

- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council
- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

**3. Strategic Geography**

3.1 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) comprises 14 local authorities: Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford-on-Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council.

3.2 This geography was defined through two published studies commissioned from Peter Brett Associates (now Stantec) in accordance with guidance at the time based on



analysis of migration flows and commuting patterns and was subsequently endorsed by all authorities.

- 3.3 As part of the review of the Birmingham Development Plan (BDP), the City Council has tested whether this geography is still valid. A draft Housing and Economic Development Needs Assessment (HEDNA) report, which has been subject to engagement with neighbouring authorities through the GBBCHMA group, confirms that this is still a reliable geography using more recent data where available. The draft HEDNA has yet to be tested through examination in public. It also confirms that other authorities beyond the GBBCHMA have close functional relationships with it, based on commuting and migration flows, as listed below:
- Shropshire
  - Telford & Wrekin
  - Wyre Forest
  - Worcester City
  - Coventry City
- 3.4 Based on the findings of this report, Shropshire Council, Telford & Wrekin and Wyre Forest were invited to be signatories to this Statement of Common Ground, recognising the close functional relationships these areas have with the GBBCHMA (or parts of it) and authorities generating shortfalls within it. Worcester City Council and Coventry City Council were not invited to be signatories, because these are constrained urban areas that have historically relied on other neighbouring authorities to meet their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the housing needs of the GBBCHMA.
- 3.5 At this time, expansion of the GBBCHMA is not advocated but it is acknowledged that there are potentially cross boundary matters, particularly in relation to migration patterns, which need to be addressed in order to ensure compliance with the Duty to Cooperate.
- 3.6 The strategic geography and scope of this Statement of Common Ground reflects current emerging evidence regarding the functional relationships between the GBBCHMA and surrounding areas. This scope will be updated to reflect the finalised Birmingham HEDNA report and any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.
- 3.7 It should be noted that both North Warwickshire and Stratford-on-Avon fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA. In respect of Stratford-on-Avon District, the Fosse Way is an accepted boundary between the two HMAs reflecting the geographic proximity to the HMAs of this large rural district.

#### 4. Strategic Matter - Meeting Housing Need

##### 2011 – 2031 period

- 4.1 All post NPPF adopted development plans for the GBBCHMA authorities which cover the period 2011-2031 sought to meet their own Objectively Assessed Need (OAN). Those unable to meet their own needs are as follows:

Plan	Adopted	Details of shortfall
Birmingham Development Plan, 2011-2031	January 2017	The Birmingham Development Plan identified an Objectively Assessed Need of 89,000 homes with a shortfall of 37,900 homes which could not be met in the plan area. Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with.
Cannock Chase Local Plan, 2012-2028	June 2014	The Cannock Chase Local Plan identified a shortfall of 500 homes, which was met in the Lichfield Local Plan (adopted 2015). The Cannock Chase Local Plan review identifies no shortfall over the period 2018-38 therefore this shortfall does not now need to be addressed.
Redditch Local Plan, 2011 – 2030	January 2017	The Redditch Plan identified a shortfall of 3,400 homes. The plan was prepared and examined in parallel with the Bromsgrove Local Plan (adopted 2017), which identified capacity to accommodate all of this shortfall.
Tamworth Local Plan, 2006 – 2031	February 2016	The Tamworth Plan identified a shortfall of 1,825 homes. The North Warwickshire Local Plan (adopted 2021) meets 913 homes of this shortfall. The Lichfield Local Plan (adopted 2015) meets 500 homes of this shortfall and a statement of common ground signed in 2018 agreed to increase this contribution to 912 homes. The Lichfield Local Plan review does not make a specific contribution to Tamworth.

##### Birmingham Policy context

- 4.2 Policy TP48 of the Birmingham Development Plan (BDP) states that:

*“The Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city. This will focus on:*

- *The progress of neighbouring Councils in undertaking Local Plan reviews to deliver housing growth to meet Birmingham’s needs.*
- *The progress of neighbouring Councils in delivering the housing targets set out in their plans.*

- *The extent to which a 5-year housing land supply is maintained in neighbouring areas.”*

4.3 Policy TP48 goes on to state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham’s capacity by means of a full or partial BDP review after three years. In acknowledgement of the BDP shortfall, those authorities that preceded it included review mechanisms to address the shortfall. Commitments to review in adopted plans are set out in Appendix 1.

4.4 January 2020 signalled three years since adoption of the BDP. In December 2019 Birmingham City Council published an updated Local Development Scheme (LDS)<sup>1</sup> which concluded that an early review was not required. This stated that:

*“...the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022’*

4.5 The Birmingham LDS was updated in June 2021, providing a timetable for the BDP review. That review has now commenced, and technical work is being undertaken. An Issues and Options document is due to be published in Autumn 2022.

#### Joint studies commissioned to address strategic housing shortfalls

4.6 Work commissioned to date by the GBBCHMA to find solutions to address these strategic housing shortfalls consists of the following two studies:

- Peter Brett Associates - Strategic Housing Needs Study
- GL Hearn / Wood – Strategic Growth Study 2018 (SGS)

4.7 As well as updating the position regarding the shortfall both up to 2031 and 2036, the Strategic Growth Study identified potential broad areas which each authority could explore and test through their plan-making processes to potentially accommodate the shortfall. Three broad development typologies were identified:

New settlements – 10,000 – 15,000 dwellings  
Employment led – 1,500 – 7,500 dwellings  
Urban Extensions – 1,500 – 7,500 dwellings

4.8 Potential locations were placed in two categories, a short list warranting further consideration and a long list. A full schedule of locations by development typology and potential capacity is shown in Appendix 2.

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<sup>1</sup> <https://www.birmingham.gov.uk/lds>

4.9 These strategic options were accompanied by five smaller areas where potential for a proportionate distribution pattern of development (500 – 2,500 dwellings) should be examined further.

#### Monitoring the GBBCHMA Shortfall

4.10 A monitoring framework was established based on the Strategic Growth Study and progress towards meeting this shortfall has been reflected in a series of position statements for the period 2011 – 2031. The most recent of these position statements was published in 2021 with a base date of 1 April 2020. This suggests that the shortfall to 2031 is some 10,000 homes fewer than when the Strategic Growth Study was published. This is mainly as a result of the Birmingham Development Plan identifying additional capacity over that anticipated when the plan was examined.

4.11 The summary of GBBCHMA housing supply and need below in Table 1 includes capacity identified through the Solihull and North Warwickshire local plan reviews. In the case of Solihull, a contribution of 2,104 homes has been identified as coming forward before 2031 and in North Warwickshire a contribution of 3,790 by 2033. Further contributions may come forward pre 2031 as identified in Table 2, which may close the gap further.

4.12 As North Warwickshire and Stratford-on-Avon straddle the GBBCHMA and the Coventry and Warwickshire Housing Market Area, their contribution is shared and this is set out in an agreed Memorandum of Understanding<sup>2</sup>, consequently an adjustment is made in Tables 1 & 2.

*Table 1: GBBCHMA Housing Supply and Need as at 2019/20*

	SGS Baseline (2011 – 31)	2017 update published (2011 - 31)	2017 Update revised (2011 - 31)	2019 (2011 - 31)	2020 (2011 -31)
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099	205,099	205,099	205,099
Contribution to CWHMA	-2880	-2880	-2880	-2880	-2880
Minimum housing requirement	207,979	207,979	207,979	207,979	207,979
Supply baseline	191,654	197,283	199,238	205,382	201,677
<b>Total shortfall</b>	<b>16,325</b>	<b>10,696</b>	<b>8,741</b>	<b>2,597</b>	<b>6,302</b>

Source: GBBCHMA Position Statement update

4.13 The Position Statement and Table 1, however, do not include capacity coming forward in South Staffordshire, Lichfield, Shropshire and Cannock Chase through sources of supply not formally identified in April 2020, which have important implications for the overall position and may provide capacity pre-2031.

<sup>2</sup> Available here:

<http://democracy.stratford.gov.uk/documents/s35727/Appendix%201%20MoU%20CW%20HMA.pdf&TxtOnly=1>

4.14 They also do not fully reflect the latest Black Country Plan position as set out in the Regulation 18 Plan, published for consultation in August 2021, which will further adjust supply based on more up to date urban capacity evidence, capacity from potential Green Belt releases and through seeking to address housing needs beyond the 2031 monitoring date. The implications of the total changes in supply arising are set out in Table 2.

*Table 2: Local Plan Reviews – Shortfalls and Contributions*

<b>Local Plan</b>	<b>Status</b>	<b>Total contribution to GBBCHMA unmet needs (up to and beyond 2031)</b>	<b>Comments</b>
South Staffordshire	Reg 18 October 2021	+4,000	2018-2038 plan period
Cannock	Reg 18 March 2021	+500	2018-2039 plan period
Shropshire	Examination July 2022	+1,500 Contribution specifically for Black Country unmet needs	2016 -2038 plan period
Black Country	Reg 18 Draft Plan August 2021	-28,000	2020 – 2039 plan period
Lichfield	Reg 19 July 2021	+2,655 2,000 contribution specifically for Black Country unmet needs	2018-2040 plan period  Agreement in 2018 to contribute 912 towards the Tamworth shortfall.

### **Housing Need and capacity post-2031**

4.15 The Black Country is the only plan area in the GBBCHMA that does not have a post NPPF local plan which has been adopted or reached examination. However, the Black Country Plan has reached Regulation 18 stage, and this is significant because it identifies a shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 over the period 2031-2039). These shortfall figures are based on up-to-date local housing need (including the 35% uplift for Wolverhampton). These figures, however, are subject to further consultation and examination. The Birmingham Development Plan review is at its formative stages and the extent of any post 2031 shortfall has yet to be established.

4.16 The 2018 Strategic Growth Study did consider unmet housing needs across the whole GBBCHMA up to 2036, concluding that there was an approximate 60,000 dwelling shortfall. In general, however, at the time of publication, plans looking beyond 2031 were not far enough advanced so capacity beyond this date would be limited by implication.

## 5. Timetable for review and ongoing cooperation

5.1 Table 3 sets out progress on local plan reviews across the Statement of Common Ground geography. Where plans have not yet reached Preferred Options Regulation 18 stage, the adopted plan is included. There is clear evidence to show that the shortfall has reduced significantly up to 2031. There is, however, evidence of an as yet untested gap emerging post 2031.

*Table 3: Local plan review progress*

Area	Plan Period	LHN as of 2022 (homes per annum)	Plan Requirement (homes per annum)	Shortfall / Surplus over Plan Period (total homes)	Plan Status
Birmingham	2011-2031	6,750	2,555	-37,900	Adopted (2017)
Black Country	2020 -2039	4004	2278	-28,239	Regulation 18 (2021)
Bromsgrove	2011-2030	383	368	+ 3,400 <sup>3</sup>	Adopted (2017)
Cannock Chase	2018-2038	276	301	+ 500	Regulation 18 (2021)
Lichfield	2018 - 2040	303	422	+2655 <sup>4</sup>	Examination (2022)
North Warwickshire	2014-2033	169	454	+ 3790 <sup>5</sup>	Adopted (2021)
Redditch	2011-2030	165	337	-3,400 <sup>6</sup>	Adopted (2017)
Solihull	2016-2036	807	939	+2,105	Examination (2022)
South Staffordshire	2018-2038	243	444	+4,000	Regulation 18 (2021)
Stratford-on-Avon	2011-2031	567	730		Adopted (2016)
Tamworth	2006-2031	145	177	-1825 <sup>7</sup>	Adopted (2016)
<b>Non-HMA</b>					
Shropshire	2016-38	1,147	1,430	+1,500 <sup>8</sup>	Examination (2022)
Telford and Wrekin	2011-31	491	864		Adopted (2018)
Wyre Forest	2016-36	276	276		Adopted (2022)

5.2 Whilst the full extent of the post 2031 shortfall is not yet established and not all plans within the GBBCHMA have agreed to make a contribution towards a GBBCHMA shortfall, there appears to be evidence that it will be difficult to meet the entire GBBCHMA shortfall within its collective boundaries. Shropshire has acknowledged this

<sup>3</sup> 3,400 contribution specifically towards the 2011-30 Redditch shortfall

<sup>4</sup> 2,000 contribution specifically towards the 2020-38 Black Country shortfall

<sup>5</sup> 913 contribution specifically towards the 2006-31 Tamworth shortfall

<sup>6</sup> 3,400 met by Bromsgrove Local Plan (2017)

<sup>7</sup> 500 met by Lichfield Local Plan (adopted 2015) and 913 homes met by North Warwickshire Local Plan (adopted 2021)

<sup>8</sup> Shropshire contribution towards Black Country shortfall specifically post 2031

and proposed a contribution of 1,500 dwellings towards the Black Country shortfall accordingly.

### **Approach taken in local plans to date**

- 5.3 The purpose of this section is to set out how local plan reviews intend addressing the GBBCHMA shortfall and how they have used the shared evidence base, namely the GL Hearn / Wood Strategic Growth Study 2018. The wording provided for each authority represents the views of the authority concerned.

#### Birmingham

- 5.4 Birmingham City Council has commenced an update of the Birmingham Development Plan. It is likely that there will be a shortfall arising from this Plan update, however this has not yet been quantified. The Issues and Options consultation programmed for Autumn 2022 will provide an initial indication of the scale of the shortfall, however the City's capacity will evolve as the Plan update progresses. Housing need has increased since last plan so it is likely that the shortfall will be at least as severe as last time round.

#### Black Country

- 5.5 The Strategic Growth Study made several recommendations of relevance to the Black Country, including examining potential additional urban supply, and identifying and allocating additional land elsewhere for developments of 1500+ homes. The Black Country Urban Capacity Review Update 2021 examines the potential to increase densities in the urban area, and Policy HOU2 of the Draft Black Country Plan proposes increased housing densities compared with those required by current policy.
- 5.6 The Strategic Growth Study also identified areas of search for sites beyond and within the Green Belt. These included land for an urban extension North of Walsall around Brownhills (Walsall, Lichfield, Cannock) and South of Dudley (within Dudley). The Draft Black Country Plan proposes allocations in both of these locations, although the detailed assessment carried out for the Plan has shown that the total capacity of individual sites at each location is less than 1500 homes.

#### Bromsgrove

- 5.7 The Bromsgrove District Plan review is considering over 400 possible sites for inclusion in the plan. In some instances, these sites correspond with those areas suggested for consideration by the Strategic Growth Study. The assessment process the Council is undertaking is significantly more detailed than the Strategic Growth Study. Therefore, all realistic options including those in the Strategic Growth Study have been considered. A July 2022 Memorandum of Understanding between Redditch and Bromsgrove Councils confirms that the surplus of housing currently allocated for the needs for Redditch Borough (currently approximately 2241 dwellings) is handed back to BDC for BDC to consider in its plan making.

### Cannock Chase

- 5.8 The Strategic Growth Study is being used to inform local plan review process. The Preferred Options report set out a strategy to meet own needs and provide a contribution to GBBCHMA shortfall of 500 dwellings, recognising the proportionate dispersal option in the Strategic Growth Study. This will require Green Belt release and there are infrastructure constraints. The Strategic Growth Study is the only independent document providing GBBCHMA shortfall evidence, so the local plan is seeking to test its recommendations. Cannock Chase is not aware of alternative evidence and is keen to make use of existing evidence and work with partners on that.

### North Warwickshire

- 5.9 The Strategic Growth Study was used as a piece of evidence to inform recently adopted plan. CWHMA used commuting patterns as a consistent methodology for distributing needs and used a version of this as a basis for taking 10% of Birmingham's shortfalls. Tamworth and CWHMA unmet needs were also provided for. The Strategic Growth Study was relied upon for market capacity evidence to support the stance in local plan.

### Lichfield

- 5.10 The Strategic Growth Study is used as a piece of evidence to inform the Local Plan review process. All potential options identified within Lichfield District within the Strategic Growth Study have been considered through the plan-making process. The Strategic Growth Study directly informed the identification of one of the key areas for growth within the draft Local Plan. Other options identified within the SGS have been discounted through the plan-making process, having had consideration of wider evidence base. The draft Local Plan proposes to provide 2,000 homes to the Black Country and 665 homes to the wider GBBCHMA. The existing adopted Local Plan provides 500 towards the previous Cannock Chase Local Plan shortfall (which does not now exist) and 500 homes towards the Tamworth Local Plan shortfall. Lichfield District Council signed a Statement of Common Ground with Tamworth Borough Council in 2018 agreeing to meet 912 homes of the Tamworth Local Plan shortfall.

### Redditch

- 5.11 Redditch Borough Council is at the start of the plan review process. The Strategic Growth Study will be one of many pieces of evidence that will be considered proportionately as plan making progresses. A July 2022 Memorandum of Understanding between Redditch and Bromsgrove Councils confirms that the surplus of housing currently allocated for the needs for Redditch Borough (currently approximately 2241 dwellings) is handed back to BDC for BDC to consider in its plan making



## Solihull

- 5.12 The local plan was submitted for examination in May 2021. Hearings took place from September 2021 to February 2022. Solihull Metropolitan Borough Council's (SMBC) approach was to make a contribution to the GBBCHMA based on the shortfall created by the 2017 Birmingham Development Plan as this represented a tested and established position, which is not yet the position for the Black Country Plan. Other LPAs made the case that SMBC should be doing more now. The Inspector's [interim] report is not yet published, but they have confirmed their conclusion "*that the Council has complied with the duty to co-operate in the preparation of the Local Plan.*"
- 5.13 As a piece of evidence, the Strategic Growth Study options were considered during the preparation of the plan and helped inform further evidence (e.g. testing a new settlement proposal through the Sustainability Appraisal for the plan). Whilst the SA did not support a new settlement in the Balsall Common area, the Local Plan has been able to treat the settlement as an appropriate location for what is effectively an urban extension. The plan includes growth at other options identified in the Strategic Growth Study e.g. land south of the airport/NEC and land south of Birmingham around Hollywood, Whitlock's End and Cheswick Green. This represents a balanced approach and reflects the tensions in the Strategic Growth Study which identified the Green Belt in these locations as making a 'principal contribution'.

## South Staffordshire

- 5.14 South Staffordshire first established its 4,000 dwelling contribution towards GBHMA unmet needs in its Local Plan Review 2018 Issues and Options consultation. This contribution was in addition to the district's own housing needs and represented the sum of the minimum indicative capacities of the following four strategic growth locations recommended in the GBHMA Strategic Growth Study 2018:
- Urban extension (1,500 dwellings minimum) north of Penkridge
  - Employment-led strategic development (1,500 dwellings minimum) in vicinity of i54/J2 of M54
  - Proportionate dispersal (500 dwellings minimum) north of Codsall/Bilbrook
  - Proportionate dispersal (500 dwellings minimum) on the western edge of the conurbation
- 5.15 The Council's position was that if all authorities in the GBBCHMA delivered the locations proposed by the Strategic Growth Study, the shortfall (including up to 2036) would be met, in line with paragraph 1.102 of the Study.
- 5.16 There was also a need to consider other locations in the district alongside the locations listed above, due to the district's own increasing housing needs. The Council then proposed a Spatial Strategy in 2019 which delivered both the 4,000 dwelling contribution and growth in the broad locations identified in the Strategic Growth Study. These were then translated into proposed site allocations in the 2021 Local

Plan Review Preferred Options consultation, whilst being refined to take account of local constraints.

- 5.17 South Staffordshire took this approach to ensure that its contribution towards the GBBCHMAs unmet housing needs was based upon the recommendations of the Strategic Growth Study, which it considers to be the only consistent assessment of Green Belt purposes, market capacity, deliverability and sustainability prepared by the GBBCHMA authorities to date. To date it has not received direct objections to the 4,000 dwelling contribution figure from GBBCHMA authorities, although some planning authorities have indicated they would not consider it appropriate to follow a similar methodology to determine their contribution to unmet needs.

#### Stratford-on-Avon

- 5.18 Stratford-on-Avon is continuing to progress its Site Allocations Plan which will identify reserve sites to contribute to the GBBCHMA shortfall to 2031. In addition, SDC is working with Warwick District on the South Warwickshire Local Plan (SWLP) running to 2050. The SWLP is being prepared with work on the strategic Part 1 already underway. Issues and Options consultation is due late summer 2022 with adoption of Part 1 expected by the end of 2025. The SWLP will have to address both Birmingham and Coventry City shortfalls. The Strategic Growth Study will form part of the evidence base to inform plan preparation, but no decisions have yet been made. Stratford-on-Avon are keen to agree a GBBCHMA-wide approach, such as commuting flows, to act as a benchmark for contributions.

#### Tamworth

- 5.19 The adopted Local Plan makes up 1,825 of GBBCHMA unmet need. 913 of this shortfall is met through the recently adopted North Warwickshire Local Plan. The adopted Lichfield Local Plan meets 500 of the shortfall and Lichfield District Council signed a Statement of Common Ground in 2018 agreeing to meet 912 homes of the shortfall. The Lichfield Local Plan review does not propose to make a specific contribution towards Tamworth. The Tamworth Local Plan review statement issued in 2020 stated that: *“given the existing development constraints within Tamworth’s border, it is unlikely that a significant contribution to the HMA shortfall could be made.”* The Tamworth Local Plan review is programmed to commence in 2022.

#### Shropshire

- 5.20 Shropshire submitted a local plan in September 2021 which makes a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the Black Country Plan review. The examination is underway and questions have been asked regarding the rationale for Shropshire’s contribution to unmet needs. Shropshire’s approach is largely based on migratory trends. Shropshire is located outside the GBBCHMA and Shropshire is acknowledged as a separate housing market area. Shropshire has engaged with the Association of Black

Country Authorities constructively and have agreed a separate Statement of Common Ground to support its approach towards unmet needs.

### Telford & Wrekin

5.21 The Council has considered the representations made to the local plan received from local authorities. It is acknowledged by all parties that Telford & Wrekin functions as a separate housing market area, based on an analysis of the relevant indicators presented in supporting evidence to the Local Plan. This is consistent with the decision of the Greater Birmingham and Solihull Local Enterprise Partnership (GB&S LEP) to exclude Telford & Wrekin from their assessment of housing needs within the GB&S LEP area. Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the GBBCHMA has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBCHMA. Discussions will therefore continue to progress on this basis.

### Wyre Forest

5.22 The Wyre Forest District Local Plan 2016-2036 was adopted in April 2022. Policy SP1 Spatial Development Strategy 2016-2036 clearly states that due consideration will be given, through a future early review of the Wyre Forest District Council Local Plan where necessary and in accordance with the NPPF, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area.

## **6. Summary of Current Position**

### **Summary of key issues**

- There remains a shortfall of 6,302 homes between 2011 and 2031 based on April 2020 information. Contributions towards addressing the shortfall have thus far been by local authorities within the GBBCHMA. The shortfall may reduce further as a result of plans progressing through the review process.
- There is evidence of a shortfall post-2031 based on published evidence, specifically the Black Country Regulation 18 Plan, although authorities have different positions on whether this currently warrants contributions from other authorities. The shortfall identified is also subject to further testing and consultation.
- This post-2031 shortfall is likely to increase in the future, principally from Birmingham in the light of progress with the Birmingham Plan.
- It is the role of emerging plans to seek to best meet any defined unmet needs in a sustainable manner.

- The Strategic Growth Study recommended testing several strategic opportunities through Local Plan reviews, which it indicated could meet the shortfall if delivered. Some of these opportunities have been reviewed through Local Plan work to date; but these opportunities, plus those which are yet to be tested are unlikely to be sufficient to address the post-2031 shortfall, although work to formally examine this in light of new housing needs has not been commenced.
- Duty to Cooperate engagement and evidence commissioned since the Strategic Growth Study has identified other closely related Local Planning Authorities, that can accommodate unmet need in a sustainable manner where a functional relationship between areas is defined and agreed through Duty to Cooperate engagement.
- Engagement to date has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA officer group. Proposed governance arrangements are intended to supplement and support the Duty to Cooperate process across the GBBCHMA and beyond

### **Summary of key areas of agreement**

- Cross boundary unmet housing needs are acknowledged as a strategic matter.
- The GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs.
- The proposed Officer Working Group and Member Board offers a complementary process to other Duty to Cooperate engagement and is agreed as the preferred means to cooperating across the strategic geography as a whole in order to ensure housing delivery, and terms of reference will be established to support this.
- Joint working will be employed where circumstances warrant (e.g., BC LP etc).
- Agreement in principle to the plan making value of the existing evidence base, including the 2018 Strategic Growth Study, whilst acknowledging that this is not a policy document it is part of an evidence base to take matters forward through the local plan review process<sup>9</sup>.
- Parties to this Statement of Common Ground will commission funding of shared evidence bases, where practicable to do so, to inform cooperation on housing delivery, including any necessary updates to the 2018 Strategic Growth Study.

### **Summary of key areas where agreement is still being sought**

- There is, as yet, no agreed approach to accommodating the shortfall across the GBBCHMA or other closely related Local Planning Authorities with an agreed functional relationship, that can accommodate unmet need in a sustainable manner.
- Despite the findings of the Strategic Growth Study, there is no current agreed position on the scale of the shortfall to be planned for post-2031, with individual

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<sup>9</sup> [https://www.birmingham.gov.uk/downloads/file/9405/february\\_2018\\_glhwood\\_position\\_statement](https://www.birmingham.gov.uk/downloads/file/9405/february_2018_glhwood_position_statement)

local authorities taking different positions on the Black Country's emerging post - 2031 housing shortfall for example.

- The relative weight given to the Strategic Growth Study varies, all local authorities utilising the Strategic Growth Study have tested and supplemented it with more local evidence, but the manner in which this has been done varies.

## **7. Future objectives and work streams to address key issues and areas where an agreement is still being sought**

### Objectives of the Development Needs Group

7.1 There is considerable variety in the progress and status of local plans across the GBBCHMA. Notwithstanding this complexity, the signatories to this statement will seek to deliver the following objectives:

- coordinate housing delivery to meet identified needs.
- maximise agreement on the approach towards strategic housing distribution.
- identify a transparent minimum level of housing need across the GBBCHMA that is consistent with national policy; and
- develop shared evidence bases where feasible and proportionate to inform the approach to meeting housing needs.

### Review the position to date and the deliverability of the 2018 Strategic Growth Study

7.2 The existing evidence base is in urgent need of review in light of the lack of a clear and up-to-date picture on unmet housing needs beyond 2031 and the differing positions of authorities on the recommendations made in the original 2018 Strategic Growth Study. Further work is required to develop and agree the scope and sequencing of this review, but key next steps should include:

- Confirming how current contributions to meet GBBCHMA wide needs will be apportioned between the current and emerging unmet needs of the Black Country and Birmingham. This work is essential in order to show how the anticipated, but not yet tested, Black Country housing shortfall in particular is being addressed to support the next stages of the Plan.
- To confirm the scale of the housing shortfall across the whole of the GBBCHMA over a period of at least 15 years, using the standard method as the starting point for addressing housing needs, to inform the approach taken by current emerging Local Plan reviews<sup>10</sup>. This should attempt to take a consistent approach to identifying capacity within the study area, particularly in areas generating housing shortfalls.
- A review of whether the growth locations identified in the 2018 Strategic Growth Study remain appropriate and whether further work is needed to identify new growth areas for testing through Local Plan preparation.

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<sup>10</sup> Where plans have reached an advanced stage then this will be addressed via the review cycle.

- A market analysis which can advise at a strategic level on market absorption rates (including reference to previous build out rates), in particular for areas that may be identified as potential locations for strategic growth.
- Consider the extent to which the shortfall will be addressed within the GBBCHMA before seeking options beyond it.
- Consider the extent to which major job creating and infrastructure projects e.g. West Midland Interchange and UK Central / HS2 can be supported by labour supply from within the GBBCHMA
- A review of existing SHELAA evidence, including Green Belt assessments and viability/deliverability expectations across the GBBCHMA

7.3 This is not necessarily an exhaustive list and may need to be updated to consider findings from local plan examinations within and adjoining the GBBCHMA.

Prepare an updated set of strategic growth recommendations to address any residual housing shortfalls

7.4 Subject to the outcome of the work set out above there may be a need for additional work to identify additional strategic growth locations to meet any residual unmet needs. The exact scope of this work will depend on the findings of the review and the extent of any remaining shortfall, but could examine matters including:

- Potential options for strategic growth locations beyond and within the Green Belt.
- The comparative suitability and deliverability of strategic growth locations using a consistent methodology.
- Opportunities to align future growth locations with existing planned and potential future transport infrastructure improvements.
- Clear conclusions on the level of strategic growth locations required to meet residual housing shortfalls, leading into a range of different growth distributions (e.g., combinations of different strategic growth locations) across the study area which could address these needs.
- Potential transport carbon emission implications and sustainability impacts of different growth distributions to meet the area's unmet needs.
- The degree to which different growth distributions align with functional relationships between shortfall authorities and the surrounding area.

7.5 The detailed scope of this work will be prepared by the GBBCHMA officer group. It is intended that this work, once completed, would provide a range of potential future growth distributions to be considered by the GBBCHMA and any other functionally linked authorities under the proposed governance structures set out in this Statement of Common Ground.

Delivering ongoing engagement going forward

7.6 The GBBCHMA authorities will establish an advisory Member Board of local elected members to address housing solutions across the GBBCHMA and beyond. The

structure of the Board will be agreed through future iterations of this Statement of Common Ground.

- 7.7 Future Duty to Cooperate engagement through the Member Board on the scale and apportionment of housing shortfalls will be informed by the programme of work set out in 7.2-7.4 to review and (if necessary) update the Strategic Growth Study, although the final decision on how such matters will be addressed is a matter for individual local authorities' local plans. The principles which will inform the identification and distribution of housing shortfalls within the GBBCHMA will be further developed in future iterations of this Statement of Common Ground.
- 7.8 The final scope of the revised Strategic Growth Study work and future iterations of this Statement of Common Ground will be informed by best practice from similar statements of common ground covering other large housing market areas, whilst having regard to the differing political structures, combined authority roles and functional geographies across such areas.

## **8. Future governance arrangements for the GBBCHMA Development Needs Group**

- 8.1 At present cross boundary matters are dealt with through an officer group, the details and Terms of Reference are set out below:

### GBBCHMA Development Needs Group – Officer Working Group

#### *Terms of Reference*

- 8.2 The GBBCHMA Development Needs Group provides a framework for coordination between local authorities to ensure that unmet needs within the GBBCHMA can be satisfactorily addressed (where possible). These Terms of Reference set out how the Development Needs Group - Officer Working Group will work together and report to the Member Board of the GBBCHMA.
- 8.3 The objective of the GBBCHMA Development Needs Group – Officer Working Group (OWG) is to prepare evidence and monitoring information to inform recommendations made by the GBBCHMA Development Needs Group – Member Board.

#### *Status*

- 8.4 Each local planning authority is individually responsible for meeting its legal duties under the Duty to Cooperate, working together constructively, actively and on an ongoing basis to address strategic matters, such as cross-boundary housing shortfalls and strategic employment sites. Given the existing and emerging housing pressures facing the GBBCHMA, the local planning authorities listed in this Statement of Common Ground have formed an advisory partnership, overseen by the Member Board with the OWG co-ordinating evidence preparation to support this role. The Member Board and OWG have no additional powers but serve to provide a

mechanism for all local authorities involved in the GBBCHMA Development Needs Group, to work constructively together in a co-ordinated manner to address housing shortfalls and strategic employment sites, resolving (as far as possible) differences in position on this matter and make advisory recommendations.

#### *Composition*

- 8.5 The membership of the OWG will comprise representatives of all the local planning authorities involved in the GBBCHMA Development Needs Group, as defined through signatories to this statement of common ground (set out in Section 2 of this document).
- The OWG will comprise suitable officers of the GBBCHMA Development Needs Group local authorities.
  - Officers or technical / professional representatives of stakeholder organisations, by invitation.

#### *Structure and Procedures*

- 8.6 The following structures and procedures will be observed:
- The OWG will meet, as a minimum, on a quarterly basis.
  - Meetings of the OWG will be chaired by each member local authority in turn.
  - Officer support and secretariat services will be provided by a nominated participant in the OWG.
  - Agendas, reports, and minutes of meetings will be circulated to relevant facilitators in advance of any meetings.
  - Officer support will be provided for each local authority as necessary.
  - With the agreement of members of the OWG members, advisory members (such as the West Midlands Combined Authority or relevant County Councils) may be co-opted to represent a specific area of interest or issue of consideration, especially where this will assist with the delivery of sites and support the group in evidence gathering to address housing shortfalls.

#### *Remit*

- 8.7 The OWG will be responsible, with external support, where agreed with the Member Board, for undertaking the following:
- Advise the Member Board as necessary on issues relating to unmet housing needs and strategic employment sites from the GBBCHMA.
  - Provide technical support to the Member Board, prepare reports for the Member Board's consideration, and carry out such actions as may be instructed by the Member Board.
  - Co-ordinate quarterly updates on local plan progress and evidence base gathering relevant to the GBBCHMA housing shortfall and strategic employment sites for the Member Board.



- The OWG may agree to establish small project or working groups, resourced as necessary, to progress specific work areas where appropriate.

#### GBBCHMA Development Needs Group - Member Board

8.8 To steer and respond to the activities of the Development Needs Group (DNG) an appropriate Member Board is required. A suitable structure will be drawn up based on the following principles:

- The Member Board will be supported by the OWG and convene at regular intervals to consider relevant matters.
- The chair of the group will rotate annually with support and secretarial services provided from within the OWG.
- All local authorities that are signatories to the Statement of Common Ground will be represented.
- The Member Board will be advisory in nature and will not override local authority decision making or local plan preparation.

8.9 In terms of its remit the Member Board will:

- Work positively and constructively to address cross boundary strategic matters especially those relating to housing and employment to meet the legal Duty to Cooperate and National Planning Policy Framework requirements.
- Will oversee the development, implementation, and monitoring of joint work to quantify and address existing and emerging housing shortfalls arising from the GBBCHMA.
- Oversee and steer the commission of key studies to inform the evidence base for policy development.
- Will advise/steer the DNG on changing priorities based on changes to the legal and policy framework and commit to new actions where required.
- Will rely on input from the OWG to help inform their advisory decisions and will direct the DNG where additional/different actions are required.
- Receive and review quarterly reports from the OWG, summarising evidence base gathering and local plan progress relevant to the GBBCHMA housing shortfalls and strategic employment sites.
- Receive and consider regular reports from the DNG including the Statement of Common Ground and its regular updates.

## **Appendix 1: Local Plan Commitments to review**

This appendix sets out commitments in post NPPF local plans (or Site Allocations Documents) to review policies to consider the wider HMA shortfalls.

### **Bromsgrove Local Plan 2011 – 2030, Adopted January 2017**

#### **Policy BDP4: Green Belt**

BDP4.1 The Green Belt as indicated on the Policies Map will only be maintained as per BDP 4.2. BDP4.2 A Local Plan Review including a full Review of the Green Belt will be undertaken in accordance with BDP 3 in advance of 2023 to identify:

- a) Sufficient land in sustainable locations to deliver approximately 2,300 homes in the period up to 2030 to deliver the objectively assessed housing requirement for Bromsgrove District.
- b) Safeguarded land for the period 2030-40 to meet the development needs of Bromsgrove District and adjacent authorities based on the latest evidence; and
- c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period i.e. up to 2030.

The timing of the Green Belt Review will be determined by updated evidence such as the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory. The outcomes of the Green Belt Review will then be incorporated into the Local Plan Review. BDP4.3 The Green Belt boundary review will follow sustainable development principles and take into account up to date evidence and any proposals in Neighbourhood Plans. Where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development

### **Lichfield Local Plan Strategy 2008 - 29, Adopted February 2015 and Local Plan Allocations 2008-2029, Adopted July 2019**

#### Local Plan Strategy

4.6 Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirements for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. A similar situation applies, albeit on a lesser scale, in relation to Tamworth. Lichfield District Council will work collaboratively with Birmingham, Tamworth and other authorities and with the GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review or partial review of the Lichfield District Local Plan will be brought forward to address this

matter. Should the matter result in a small scale and more localised issue directly in relation to Tamworth then this will be dealt with through the Local Plan Allocations document.

### Local Plan Allocations

2.1 The Council is aware and is committed to reviewing its Plan in full to assist in addressing strategic issues which cross local authority boundaries. The Council continues to work proactively with partners to identify the appropriate amount of growth to be accommodated within the boundaries of Lichfield District. In addition, as part of this review the Council will continue work with other Neighbouring Authorities through the Duty to Cooperate (DTC), as well as undertaking a comprehensive review of its evidence base.

2.2 The Local Plan Review has already commenced with the publication of and consultation on a Scope, Issues and Options document in April 2018. Through a Local Plan Review, changes to the spatial strategy, policies and proposals within the current local plan may be required in response to emerging evidence or to reflect strategic issues being dealt with through the DTC. It is through this review process that consideration of such strategic matters, including the spatial strategy, are most appropriately considered.

2.3 Policy LPR Local Plan Review sets a review mechanism for the Lichfield District Local Plan.

### **Policy LPR: Local Plan Review**

Lichfield District Council shall carry out an early review of the Local Plan for Lichfield that will be submitted to the Secretary of State for Examination in accordance with the latest Local Development Scheme or no later than the end of December 2021. This review shall replace the adopted Local Plan Strategy (LPS) 2008-2029 in all aspects and therefore be a comprehensive review. This Plan will extend the existing plan period to at least 5 years beyond the end of the current LPS and it shall review as a minimum the following matters:

- The housing requirement for Lichfield and the potential for housing land supply to meet this need.
- Any unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), inclusive of any unmet housing need arising from Tamworth Borough and the appropriate level of contribution within the District of Lichfield in line with ongoing technical work and the requirements of policy TP48 of the adopted Birmingham Development Plan (BDP).
- Employment land requirements for Lichfield as identified through a comprehensive evidence basis.
- Lichfield's potential role in meeting any wider unmet employment needs through the Duty to Co-operate (DtC).
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing, employment and other service/infrastructure needs.
- Gypsy, Traveller and Travelling Showpeople (GTTS) provision.

- A comprehensive Green Belt Review either in partnership with relevant neighbouring authorities or in close consultation with these authorities through the DtC, to inform any further Green Belt release to accommodate new development within the District.
- An evidence-based assessment of highways infrastructure needs, in partnership with the highways authorities.

### **Explanation**

2.4 The Local Plan Strategy identified that following on from discussions falling under the DTC it had been identified through evidence emerging at that time that indicated Birmingham would not be able to accommodate its housing requirement within its administrative boundary and that a similar situation applied to Tamworth, although on a much reduced scale. The Local Plan Strategy recognised that, in the event of further housing provision would be needed within Lichfield District, such issues could be addressed through a review of the Lichfield District Local Plan.

2.5 It has been established through the examination and adoption of the Birmingham Development Plan that there is a significant unmet housing need arising from Birmingham and the wider Housing Market Area (HMA) within which it sits. Policy PG1 of the Birmingham Development Plan identifies an unmet need of approximately 37,900 dwellings in the period to 2021. It should be noted that further consideration of this need has been undertaken and it is considered to be a lower need than established within the Birmingham Development Plan. Lichfield District is part of the Greater Birmingham and Black Country HMA along with Birmingham, the Black Country authorities, South Staffordshire, Cannock Chase, Tamworth, North Warwickshire, Stratford-upon-Avon, Solihull, Bromsgrove and Redditch.

2.6 Additionally, Tamworth Borough Council's adopted Local Plan notes that it cannot meet its housing requirement within its own administrative area and requires a further 1,825 dwellings to be accommodated outside of the Borough. Tamworth is located within the Greater Birmingham and Black Country HMA and this additional shortfall of 1,825 dwellings is part of the overall shortfall within the HMA. It is considered most appropriate to consider how to address such shortfall as part of the wider HMA shortfall through the review of the Local Plan. Furthermore, since the above shortfall was identified, the early stages of the review of the Black Country Core Strategy indicate a further shortfall of approximately 22,000 dwellings.

2.7 To assist with discussion between the authorities within the HMA a significant evidence base has been produced by the authorities. This includes the Strategic Housing Needs Study (stage 2 and stage 3) and the Strategic Growth Study (2018). These studies provide a number of strategic recommendations and examine a number of strategic locations for housing growth which could assist in meeting unmet needs. Ultimately the study sets out a range of options which it concludes could be considered through the review of authorities' respective local plans. At this time no decisions upon the apportionment of such unmet need have been made. A recommendation of the Strategic Housing Needs Studies was that there needed to be a consistent evidence base across the HMA authorities in relation to the Green Belt. The Strategic Growth Study includes a high level strategic green belt review all

of which assists in providing a consistent evidence base for the authorities to consider and upon which future memorandums of understanding (MOU) and/or statements of common ground (SCG) apportioning unmet growth can be based.

2.8 Alongside the strategic Green Belt Review within the Strategic Growth Study, Lichfield District will prepare a comprehensive Green Belt Review to assess, in further detail, the capacity of the Green Belt across the authority as part of the evidence base supporting the review of the Local Plan.

2.9 Although unmet housing need remains the largest cross-boundary issue, there are other associated issues which may need consideration, including provision for Gypsy and Travellers and employment land provision.

2.10 The Council will continue work with other Neighbouring Authorities through the DTC, as well as undertaking a comprehensive review of its evidence base. The District Council is committed to working positively with its partners to address these strategic issues and where appropriate prepare MOU or SCG with respect of the issues above.

#### **Redditch Local Plan, 2011 – 30, Adopted January 2017**

1.11 In addition, Redditch has worked with other Local Authorities, which although are not directly adjacent to Redditch may have strategic matters that have implications for the preparation of BORLP4. In particular, Redditch Borough Council and Birmingham City Council have jointly acknowledged there is a strategic planning matter with regard to Birmingham being unable to accommodate all of its own housing needs. As required by the Duty to Cooperate, due consideration will be given, including through a review of the BORLP4, to the housing needs of another local planning authority in circumstances when it has been clearly established through collaborative working that those needs must be met through provision in Redditch. With regard to Birmingham City Council, the mechanism for resolving this potential strategic matter of Birmingham's unmet housing needs will be through the Greater Birmingham and Solihull Local Enterprise Partnership (LEP) and Redditch's subsequent review of the BORLP4.

#### **Tamworth Local Plan 2006 -31, adopted February 2016**

Agreements have been reached with Lichfield and North Warwickshire for the delivery of housing. In addition to this Tamworth Borough Council is actively involved with the Greater Birmingham and Solihull Local Economic Partnership. The GBSLEP Spatial Framework looks to present options for delivering strategic planning across the LEP, one of which is the delivery of housing. Tamworth recognises that there is a current under provision of housing to meet objectively assessed needs across the LEP and that part of this arises from within Tamworth, but to a much greater extent from Birmingham. It has been established that Tamworth cannot fully meet its own housing or employment needs, any future development which goes beyond the levels of development set out in this Local Plan will be to meet needs arising from Tamworth. Through the preparation of Birmingham City Council's Local Plan and Tamworth's it has been agreed between the two authorities that Tamworth is unable to assist in meeting Birmingham's unmet needs.

## **Local Plan Review**

6.7 The Localism Act 2011, and specifically Section 110, introduced a legal requirement known as Duty to Co-operate (DtC). The DtC is important when issues arise that cross the boundaries of local authority areas. Dialogue between neighbouring local authorities should be constructive, active and on-going to ensure that it can be demonstrated that plans have been positively prepared, having regard to cross boundary issues of strategic importance. Further information on the Duty to Cooperate can be found in paragraphs 4.4-4.8.

6.8 Through a Local Plan review, changes to the spatial strategy in the adopted Core Strategy may be necessary in response to emerging evidence, or to reflect cross boundary issues of strategic importance under the DtC. Whilst the SAD is not considered to be the appropriate place at which to revise the strategic approach established in the adopted Core Strategy, it is considered necessary now, to provide a narrative on significant cross boundary issues that have arisen since the Core Strategy was adopted in December 2012. Greater Birmingham Housing Market Area (GBHMA).

6.9 There is a primary Housing Market Area (HMA) comprising Birmingham, the Black Country and nine neighbouring local authorities defined in a Strategic Housing Needs Study (SHNS); commissioned by the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Authorities. South Staffordshire is one of the nine local authorities within the HMA, together with Cannock Chase, Lichfield, Tamworth, North Warwickshire, Stratford--on-Avon, Solihull, Bromsgrove and Redditch.

6.10 The adopted Birmingham Development Plan (Policy PG1) identifies an unmet housing need of 37,900 dwellings up to 2031, for which provision is to be made elsewhere within the GBHMA. Furthermore, since this shortfall was identified, a further additional 22,000 dwelling unmet need has been identified through early stages of the review of the Black Country Core Strategy. For this reason, the distribution of the unmet housing need across the HMA is yet to be agreed. South Staffordshire Council is working positively towards a Memorandum of Understanding (MoU) or Statement of Common Ground (SoCG) with all local planning authorities within the GBHMA.

6.11 To assist discussions between the HMA authorities with regard to the apportionment of housing needs, a Strategic Growth Study is being prepared across all fourteen GBHMA authorities. This examines strategic locations for housing growth which could assist in meeting the identified HMA unmet needs across the GBHMA, having regard to high-level Green Belt Review, assessment of infrastructure capacity, sustainability criteria and deliverability assessments. The study re-examines the potential urban capacity of GBHMA authorities and options for strategic development past the Green Belt, and ultimately sets out options for strategic growth locations to be tested through the Local Plan Review. This provides a Site Allocations Document (SAD) September 2018 20 consistent evidence base upon which a future MoU/SoCG apportioning housing growth can be based.

6.12 In addition to this, South Staffordshire Council and the Black Country authorities have agreed to prepare a joint Green Belt Review to assess, in further detail, the capacity of the Green Belt across the five authorities. This may provide a basis for identifying future housing and employment sites, where exceptional circumstances demonstrate these are required. Given the changing nature of cross-boundary housing growth pressures, additional evidence may be required to review the District's housing capacity. For example, an update of the evidence base in respect of the Cannock Chase Special Area of Conservation (SAC), including mitigation measures and assessment of existing rural settlements' infrastructure capacity, and services and facilities. This evidence will inform the framework for a new spatial strategy which seeks to meet the District's own objectively assessed housing needs and, subject to discussion with other local authorities, could potentially meet a proportionate contribution towards unmet housing needs from the wider housing market area.

### **Stratford-on-Avon Core Strategy, adopted July 2016**

#### **Explanation**

**Policy CS.17 Accommodating Housing Need Arising from outside Stratford-on-Avon District** The existence of unmet housing need arising outside Stratford-on-Avon District will not render this Plan out of date. However, the Plan will be reviewed if evidence demonstrates that significant housing needs arising outside the District should be met within the District and cannot be adequately addressed without a review. To establish this, the Council will work with other local authorities in the Coventry and Warwickshire Housing Market Area to:

1. prepare and maintain a joint evidence base including housing need and housing land availability;
2. take part in a process to agree the strategic approach to address any shortfall of land availability to deliver in full the Housing Market Area's Objectively Assessed Housing Need or other evidenced housing need arising outside the District; and
3. where the evidence and the duty to co-operate process clearly indicates that there is a housing need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within Stratford-on-Avon District, the Council will seek to identify the most appropriate sites to meet this need and will review the Local Plan to do this, should it be required.

#### **Explanation**

5.3.1 The six local planning authorities within the Coventry and Warwickshire Housing Market Area (HMA) have agreed to cooperate together to ensure the HMA's housing need of at least 4,277 dwellings per annum is met in full. It is recognised that this is important in supporting the growth ambitions of Coventry and Warwickshire as well as ensuring local plans and core strategies within the sub-region comply with national policy and guidance.

5.3.2 However, it is recognised that there may be physical or policy constraints which make it difficult for one or more of the local planning authorities within the sub-region to meet their local objectively assessed housing need in full. In these circumstances it will be

necessary for the six authorities to work closely together to address this potential shortfall and to ensure the HMA's overall housing need is met in full.

5.3.3 The process for doing this has been set out and agreed by the Coventry and Warwickshire Shadow Joint Committee. The starting point of this process is a shared evidence base relating to strategic issues. It is recognised that the following assessments/studies are likely to be the key elements of this shared evidence base:

- a Joint Strategic Housing Market Assessment: it is important to ensure that the objectively assessed housing need of the HMA and each of the Councils within the HMA is understood and that the evidence to support this is kept up to date.
- a Joint Approach to Strategic Housing Land Availability Assessments: it is important that housing land availability is assessed consistently across the HMA so that the overall and local supply of potential housing sites is understood. Stratford-on-Avon District Council - July 2016 100 Stratford-on-Avon Core Strategy 2011-31 Section 5 Development Strategy – 5.3 Accommodating Housing Need from outside the District
  - Joint Employment Land Assessment: it is important to ensure that employment land requirements and supply are understood, and planned for, alongside housing. A shared evidence base will help to understand the sub-regional and local employment land requirements as well as the availability of sub-regional and local sites to meet these requirements.
  - a Green Belt Study: the West Midlands Green Belt covers significant parts of the Coventry and Warwickshire HMA. The Green Belt study needs to be up to date to inform a sub-regional approach.

5.3.4 In the event that there is a shortfall arising from one or more District within the HMA, and in the context of a shared evidence base, the six local planning authorities have agreed to work together to develop and maintain a strategy to meet the HMA's housing requirement. This process will seek to identify the most suitable available sites to meet any shortfall. Stratford-on-Avon District Council will participate actively in the process on an on-going basis.

5.3.5 Should this strategy identify that sites within Stratford-on-Avon District are required to meet some or all of a housing need arising from outside the District, the Council will undertake work to establish the most appropriate sites to do this and if this indicates that significant modifications are required to the Local Plan, the Council is committed to undertaking an early review of the Plan to address this.

5.3.6 A further issue that may need to be addressed through this process is the potential for a shortfall in housing land arising from outside the Coventry and Warwickshire HMA, in particular from the Greater Birmingham area. In the event that such a shortfall may need to be partially addressed within the Coventry and Warwickshire HMA, the six local planning authorities have agreed to work together using the process described above.



## **North Warwickshire Reviewed Plan 2011 -33, adopted September 2021 (rolled forward from 2029)**

The Localism Act 2011 introduced a requirement for the Borough Council to co-operate with other local authorities as well as organisations and agencies to ensure the effective discussion of issues of common concern to develop sound plans. This Duty is an ongoing process and does not stop with the production of a plan. The Borough Council has a proven track record in cooperating with neighbouring authorities in strategic planning matters and has been working with neighbouring authorities to consider their future development needs and if they can accommodate them. The Borough Council has reached an agreement on the amount of development that can be accommodated can be delivered with local authorities from the Coventry and Warwickshire area as well as the Greater Birmingham and Black Country area (including Tamworth). It is considered there is sufficient information to progress this Plan taking into account these needs and providing for them where possible within this Plan. In addition, the Borough Council continues to commit to working collaboratively with relevant authorities and bodies to refine the scale and distribution of housing and employment needs within the housing market areas and functional economic market areas in which the Borough falls, the levels that it is appropriate for the Borough to seek to accommodate, and to working collaboratively with infrastructure providers to ensure that any impacts of growth are suitably mitigated. In the event that evidence, monitoring indicators (set out below) or events identify that a significant change in provision is needed compared to that set out in the Local Plan (or the evidence upon which it is based) an early partial/ full review, depending on the issue, will be brought forward to address this. In any event the Council is required by statute to complete a review of the plan every five years, starting from the date of adoption

### **Solihull Local Plan – Adopted December 2013**

8.4.5 Following discussions falling under the Duty to Cooperate Solihull Council recognise that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. Solihull Council will work collaboratively with Birmingham and other relevant neighbouring local authorities and with the GBS LEP to establish objectively the level of long term growth through jointly commissioning a Strategic Housing Needs Study and work to establish the scale and distribution of any emerging housing shortfall. This may require a review of the Green Belt in relevant locations.

8.4.6 It is anticipated that a Strategic Housing Needs Study will be commissioned and prepared during 2013 as evidence to inform the development of a GBS LEP strategy (Strategic Spatial Framework). This would provide a high-level context for reviewing the Solihull Strategic Housing Market Assessment (SHMA) during 2014. In the event that the work identifies that further provision is needed in Solihull, a review of the Solihull Local Plan will be brought forward to address this.

## **Telford and Wrekin Local Plan, adopted January 2018**

1.3.2.2 Telford & Wrekin Council has arrived at this version of the Local Plan following extensive discussion on cross-boundary planning issues including with other councils across the West Midlands. A full account of the Council's approach to the Duty to Co-operate is set out in a 'Duty to Co-operate' Statement. Matters were raised at Regulation 18 stage by a number of local authorities in an adjacent, but separate, housing market area (Greater Birmingham and the Black Country authorities, and South Staffordshire). This specifically relates to issues of housing delivery within the West Midlands conurbation, as well as matters relating to waste management.

1.3.2.3 The Council has considered the representations made to the local plan received from these local authorities. It is acknowledged by all parties that Telford & Wrekin functions as a separate housing market area, based on an analysis of the relevant indicators presented in supporting evidence to the Local Plan. This is consistent with the decision of the Greater Birmingham and Solihull Local Enterprise Partnership (GB&S LEP) to exclude Telford & Wrekin from their assessment of housing needs within the GB&S LEP area. Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBC HMA. Discussions will therefore continue to progress on this basis.

## Appendix 2: Strategic Growth Study 2018 Areas of Search

### Recommended strategic development areas

<b>Development type / General Location /</b>	<b>Local Authority</b>	<b>Potential capacity</b>
<b>New Settlements</b>		
South of Birmingham	Stratford-on-Avon	10,000 – 15,000
between Birmingham and Bromsgrove / Redditch	Bromsgrove	10,000 – 15,000
Around Shenstone	Lichfield	10,000 – 15,000
Around Balsall Common	Solihull	10,000 – 15,000
<b>Urban Extensions</b>		
South of Dudley	Dudley	1,500 – 7,500
North of Tamworth	Lichfield	1,500 – 7,500
East of Lichfield	Lichfield	1,500 – 7,500
North of Penkridge	South Staffordshire	1,500 – 7,500
<b>Employment Led</b>		
North of Wolverhampton (I54)	South Staffordshire	1,500 – 7,500
East of Birmingham	North Warwickshire	1,500 – 7,500
South of Birmingham Airport/ NEC	Solihull	1,500 – 7,500

### Long list of alternative strategic development areas

<b>Development type / General Location /</b>	<b>Local Authority</b>	<b>Potential capacity</b>
<b>New Settlements</b>		
Between Wolverhampton and Penkridge	South Staffordshire	10,000 – 15,000
Around Dunston	South Staffordshire	10,000 – 15,000
Around New Arley	North Warwickshire	10,000 – 15,000
Around Fradley and Alrewas	Lichfield	10,000 – 15,000
South West of Stratford-on-Avon District	Stratford-on-Avon	10,000 – 15,000
Around Wellsbourne	Stratford-on-Avon	10,000 – 15,000
<b>Urban Extensions</b>		
South of Penkridge	South Staffordshire	1,500 – 7,500
North west of Tamworth	Lichfield	1,500 – 7,500
East of Polesworth	North Warwickshire	1,500 – 7,500
South of Stratford-on-Avon town	Stratford-on-Avon	1,500 – 7,500
South East of Redditch	Stratford-on-Avon	1,500 – 7,500
North of Walsall around Brownhills	Walsall, Lichfield, Cannock	1,500 – 7,500

Recommended areas of proportionate dispersal

<b>Proportionate Distribution area</b>	<b>Local Authority</b>	<b>Potential capacity</b>
Western edge of the conurbation between Stourbridge and Wolverhampton	Dudley/ South Staffordshire / Wolverhampton	500 – 2,500
To the north of Codsall/Bilbrook	South Staffordshire	500 – 2,500
The vicinity of Cannock, Great Wyrley, Burntwood, Brownhills and Aldridge	Walsall / Cannock / South Staffordshire	500 – 2,500
To the west / southwest of Tamworth	Lichfield/Tamworth	500 – 2,500
To the south of Birmingham around Hollywood, Whitlock's End and Cheswick Green	Solihull / Bromsgrove	500 – 2,500
To the south and southeast of Redditch	Redditch?	500 – 2,500

**Signatories (Senior Officer and Councillor)**

**Birmingham City Council**

Name:

Position:

Name:

Position:

**Bromsgrove District Council**

Name:

Position:

Name:

Position:

**Cannock Chase District Council**

Name:

Position:

Name:

Position:

**Dudley Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**Lichfield District Council**

Name:

Position:

Name:

Position:

**North Warwickshire Borough Council**

Name:

Position:

Name:

Position:

**Redditch Borough Council**

Name:

Position:

Name:

Position:

**Sandwell Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**Solihull Metropolitan Borough Council**

Name:

Position:

Name:

Position:

**South Staffordshire District Council**

Name:

Position:

Name:

Position:

**Stratford-on-Avon District Council**

Name:

Position:

Name:

Position:

**Tamworth Borough Council**

Name:

Position:

Name:

Position:

**Walsall Metropolitan Borough Council**

Name:

Position:

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Position:

**City of Wolverhampton Council**

Name:

Position:

Name:

Position:

**Shropshire Council**

Name:

Position:

Name:

Position:

**Telford and Wrekin Council**

Name:

Position:

Name:

Position:



**Wyre Forest District Council**

Name:

Position:

Name:

Position: