

Duty to Cooperate Topic Paper – response to Inspectors Questions

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Appendix 1 - Greater Birmingham Black Country Housing Market Area (GBBCHMA) Statement of Common Ground Regarding Housing Shortfall Position at 29 November 2024.

**Greater Birmingham Black Country Housing Market Area
(GBBCHMA) HMA**

**Statement of Common Ground Regarding Housing Shortfall
Position at 29 November 2024**

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

1.1 This statement of common ground (SoCG) has been prepared to facilitate and record cross boundary engagement between local authorities in addressing the emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It records co-operation and progress to date in addressing this strategic issue, demonstrating that the participating authorities have engaged constructively, actively and on an ongoing basis under the Duty to Cooperate.

1.2 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1¹. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the governance arrangements in each authority.

1.3 Local planning authorities within the GBBCHMA

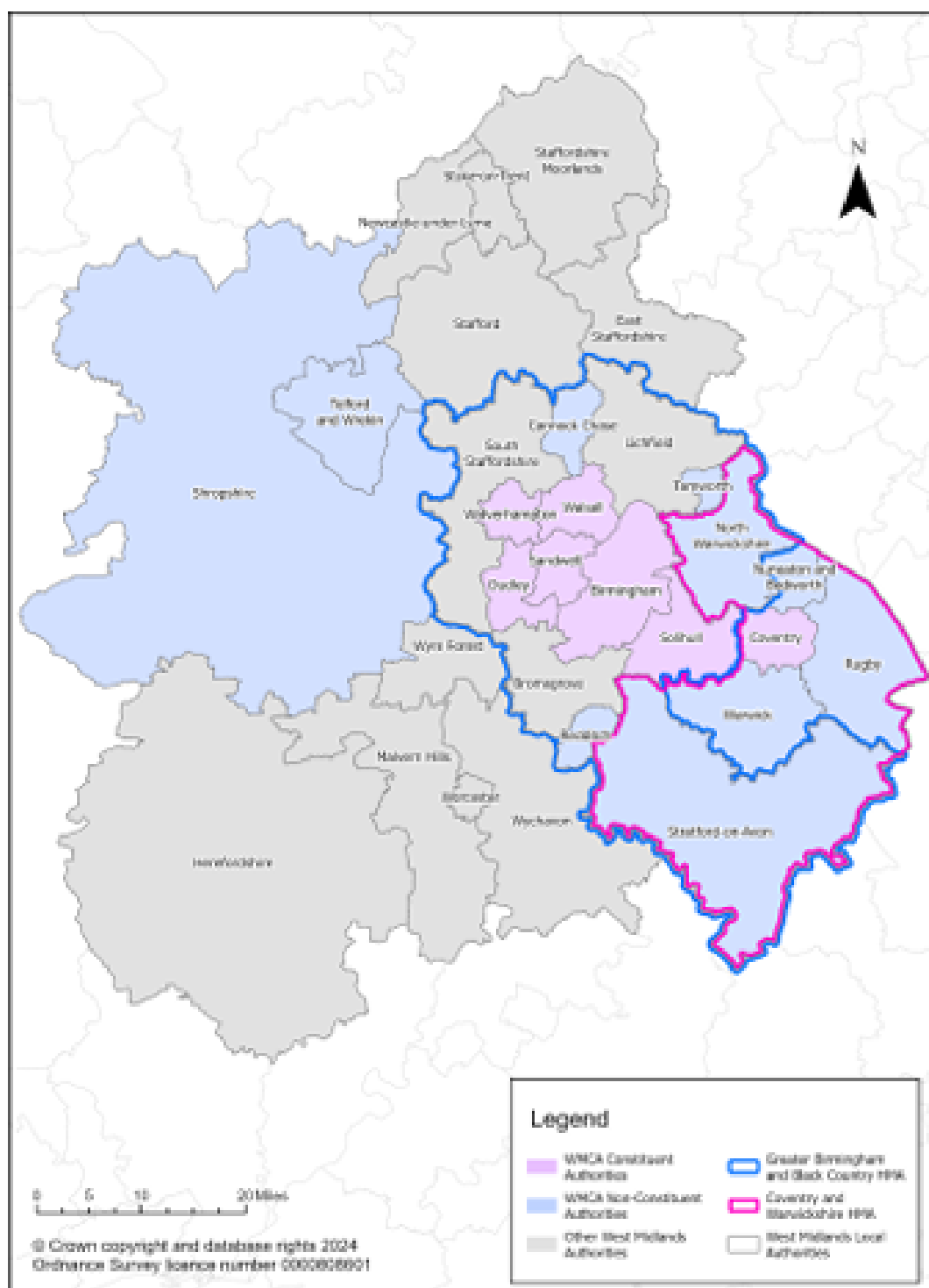
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
-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

1.4 Other related local planning authorities outside of the GBBCHMA

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

¹ Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



2. Signatories to this Statement of Common Ground:

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

3. Strategic Geography

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

3.2 This geography was defined through the published study commissioned from Peter Brett Associates (now Stantec) in accordance with guidance at the time based on analysis of migration flows and commuting patterns and was subsequently endorsed by all authorities².

3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography

² Greater Birmingham and Black Country HMA Strategic Growth Study 2018 https://blackcountryplan.dudley.gov.uk/media/11537/greater-birmingham-hma_strategic-growth-study_lowres.pdf and Greater Birmingham and Black Country HMA Strategic Growth Study 2018 Appendices https://blackcountryplan.dudley.gov.uk/media/11538/greater-birmingham-hma_strategic-growth-study_appendices_lowres.pdf

is still valid. A Housing and Economic Development Needs Assessment (HEDNA) 2022¹ report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an examination in public it also confirms that other authorities beyond the GBBCHMA have close functional relationships with it based on commuting and migration flows, as listed below:

- Shropshire
- Telford & Wrekin
- Wyre Forest
- Worcester City
- Coventry City

3.4 Based on the findings of this report, Shropshire, Telford & Wrekin and Wyre Forest Councils were invited to be signatories to this statement of common ground, recognising the close functional relationships these areas have with the GBBCHMA (or parts of it) and authorities forecast to generate housing shortfalls within it. Worcester City Council and Coventry City Council were not invited to be signatories, because these are constrained urban areas that have historically relied on other neighbouring authorities to meet part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet housing needs of the GBBCHMA.

3.5 At this time, expansion of the GBBCHMA is not advocated but it is acknowledged that there are potentially cross boundary matters, particularly in relation to migration patterns, which should be addressed through the Duty to Cooperate discussions.

3.6 The strategic geography and scope of this statement of common ground reflects current emerging evidence regarding the functional relationships between the GBBCHMA and surrounding areas. Where relevant, this scope will be updated to reflect any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.

3.7 It should be noted that whilst both North Warwickshire and Stratford-on-Avon Councils fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA, the 2022 Coventry and Warwickshire HEDNA does state: "While at a strategic level these overlaps are based on the entire local authority in reality, they will be mostly confined to those areas adjoining the Birmingham HMA.

3.8 The adopted Birmingham Development Plan (2017) identified a shortfall in Birmingham's housing supply of 37,900 homes which could not be met in the plan area. Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with. A

¹ https://www.birmingham.gov.uk/downloads/download/5184/evidence_base_blo_-_homes_and_neighbourhoods

monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is mainly a result of the City identifying more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the adopted North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

- 3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.
- 3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and having regards to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, to provide certainty for local plan preparation, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.
- 3.11 It is recognised that following the publication of a replacement NPPF expected in December 2024, that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future SoCG and/or plans.

4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042

- 4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 and therefore need to look forward to 2042.
- 4.2 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most

authorities beyond 2031 to 2041 or in some cases to 2042 or 2043. In respect of Stratford on Avon District Council, a joint local plan is being prepared with Warwick District Council and this plan has a proposed end date of 2050.

- 4.3 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 1 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

[Birmingham Local Plan](#)

- 4.4 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

- 4.5 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023.

[Bromsgrove Local Plan](#)

- 4.6 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

[Cannock Chase Local Plan](#)

- 4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

- 4.8 The Council submitted its Publication Plan for Examination on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

[Dudley Local Plan](#)

- 4.9 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley

Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

- 4.10 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

[Lichfield Local Plan](#)

- 4.11 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously progressed a review of its Regulation 19 local plan for submission for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

- 4.12 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

[North Warwickshire Local Plan](#)

- 4.13 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs, 500 towards Tamworth's unmet housing needs and 540 homes to Coventry's housing shortfall.

[Redditch Local Plan](#)

- 4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

[Sandwell Local Plan](#)

- 4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.
- 4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall

of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

- 4.17 The current Core Strategy was adopted in 2011, and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in 2017, and the Council submitted its local plan for examination in September 2021. This made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.
- 4.18 The Shropshire Council administrative area is located outside the GBBCHMA and is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. Subject to its ongoing Examination, should Shropshire's Local Plan not proceed to adoption, the agreed position will need to be reviewed. Any consideration of further contributions from Shropshire as part of future Local Plan Reviews will need to reflect updates to Shropshire's own housing need and its ability to accommodate these needs within its administrative boundary.

Solihull Local Plan

- 4.19 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in 2015 and submitted the Plan for examination in May 2021. This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. This was on the basis that the Birmingham Development Plan (2017) was the only plan that had been adopted (and tested through examination) that generated a shortfall to be accommodated elsewhere. This position was used to support the exceptional circumstances needed to release land from the Green Belt to accommodate Solihull's own needs, and those arising from elsewhere in the HMA. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. Although the plan was withdrawn, the Inspectors carrying out the examination had confirmed that the duty-to-cooperate had been complied with. A revised Local Development Scheme is being pursued that would see an accelerated process for drawing up a new plan, including publication of a Regulation 18 Preferred Option Plan in autumn 2025 and a Regulation 19 Draft Submission Plan in summer 2026.

South Staffordshire Local Plan

- 4.20 The current Core Strategy was adopted in 2012, and the Site Allocation Document adopted in 2018. The Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Regulation 19 Plan. This reflects the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based requires updating.
- 4.21 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.
- 4.22 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBCHMA local authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

- 4.23 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan (SWLP) in 2021 and consulted on the Issues and Options in January – March 2023. The Issues and Options document sought views on the most appropriate spatial growth option for accommodating future growth needs, including unmet housing needs arising within GBBCHMAs and the Coventry & Warwickshire HMA. Consultation on the Preferred Options (Regulation 18) is planned for January – March 2025.

Tamworth Local Plan

- 4.24 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils.
- 4.25 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the issues and options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the new local plan is ongoing.

[Telford & Wrekin Local Plan](#)

- 4.26 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.
- 4.27 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country's unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

[Walsall Local Plan](#)

- 4.28 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes was evidenced at the Regulation 18 stage of the Black Country Plan.

[Wolverhampton Local Plan](#)

- 4.29 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.
- 4.30 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

[Wyre Forest Local Plan](#)

- 4.31 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan states that due consideration will be given, through a future early review of the Wyre Forest

District Council Local Plan where necessary and in accordance with the NPPF, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area.

Local Plan Reviews shortfalls and contributions

- 4.32 Table 1 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes.
- 4.33 Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA's unmet needs (e.g. from South Staffordshire and Cannock Chase Councils). In the case of North Warwickshire, the contribution is towards meeting the unmet needs of the adopted Birmingham Development Plan 2017 and has not been accounted for in the (4,290 homes) contribution figures.

Table 1 Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
Contributing Authorities			
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014-2033
Potential Contributing Authorities			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
Cannock Chase	Regulation 22 - Submission 29 th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2016 - 2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040

Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2024-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2024-2041
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,414 Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs were possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (the end year for some plans is earlier) as demonstrated in Table 1 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 1. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

- 5.4 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black Country authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBBCHMA. The agreed dataset to base this approach on is migration data available from ONS⁴, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One. Any update of this dataset will be considered through the next update/refresh of this SoCG.
- 5.5 As shown in Appendix One, the data is published over an extended period covering 2001-19 in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 2 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.
- 5.6 It is acknowledged that this approach has been used to apportion an already agreed contribution and the same methodology is not necessarily appropriate for establishing the scale of a contribution or future apportionment.
- 5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.
- 5.8 This statement of common ground confirms agreement to this approach and the 'share' of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 1 above.

⁴ [Internal migration in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Table 2 Percentage Apportionment of housing contributions from each local plan contribution based upon net in-flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

- 6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.
- 6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited and refreshed when the updated Growth Study is published and has been agreed.⁵

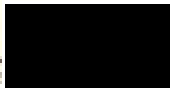
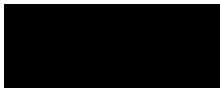
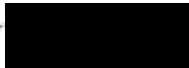
7. Areas of agreement

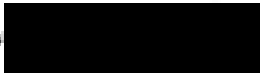
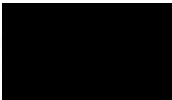
- 7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 2 of this statement.
- 7.2 The GBBCHMA has agreed to progress a programme of evidence base work (including an update of the 2018 Housing Growth Study to be commissioned in 2025) to inform the work of the HMA and further updates/refresh of this statement of common ground.
- 7.3 This SoCG will be reviewed and updated subject to any other local authority demonstrating an unmet need or where a new contribution is made to the wider HMA needs or where a withdrawal of an existing contribution to the wider HMAs need is made.

8. Signatories to the Statement of Common Ground

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

⁵ Note: North Warwickshire Borough Council are not a funding partner in the updated Growth Study as the Council is currently focussed on delivery of their current contributions to BCC needs through their adopted Plan.

<u>Birmingham City Council</u> Name: Philip Nell  Position: Strategic Director, Place, Prosperity & Sustainability Date: 10/02/25	<u>Bromsgrove District Council</u> Name:  Position: Leader Bromsgrove District Council Date: 24.03.25
<u>Cannock Chase District Council</u> Name: Dean Piper  Position: Head of Economic Development & Planning Date: 06 March 2025	<u>Dudley Metropolitan Borough Council</u> Name: Helen Martin  Position: Director of Regeneration and Enterprise Date: 04/03/2025
<u>Lichfield District Council</u> Name: Alex Farrell  Position: Cabinet Member for Housing & Local Plan Date: 22/01/2025	<u>North Warwickshire Borough Council</u> Name: Steve Maxey  Position: Chief Executive Date: 27/3/2025
<u>Redditch Borough Council</u> Name:  Position: Leader of the Council and Portfolio Holder for Planning, Regeneration and Governance Date: 25.03.25	<u>Sandwell Metropolitan Borough Council</u> Name: Councillor Peter Hughes Position: Cabinet Member for Regeneration & Infrastructure

	 Date: 23/01/2025
<u>Solihull Metropolitan Borough Council</u> Name: Mark Andrews  Position: Head of Service – Planning, Design and Engagement Date: 19 th March 2025	<u>South Staffordshire District Council</u> Name: Kelly Harris  Position: Lead Planning Manager Date: 7 th February 2025
<u>Stratford-on-Avon District Council</u> Name: Jo Bozdoganli  Position: Policy Manager Date: 18/03/2025	<u>Tamworth Borough Council</u> Name: Richard Powell Position: Planning Policy & Delivery Team Leader Date: 12/05/25
<u>Walsall Metropolitan Borough Council</u> Name: Dave Brown Position: Executive Director Date: 5 March 2025	<u>City of Wolverhampton Council</u> Name: Councillor Christopher Burden  Position: Cabinet Member for City Development, Jobs and Skills Date: 12/03/2025
<u>Shropshire Council</u> Name: Cllr Chris Schofield	<u>Telford and Wrekin Council</u> Name:

Position: Portfolio Holder for Planning and Regulatory Services Date: 24 February 2025	Position: Date:
<u>Wyrn Forest District Council</u> Name: Kate Bailey Position: Head of Strategic Growth Date: 25/03/2025	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019						Percentage (%) Total Net Migration						Net Migration Flows based Distrib			
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	96	16	62	263
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011

Source: Migration flows 2011 – 2019 ONS [Internal migration in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/internal-migration-in-england-and-wales)

Appendix 2 – Letter from Telford & Wrekin Council regarding GBBCHMA statement of Common Ground



Telford & Wrekin
Co-operative Council

**Protect, care and invest
to create a better borough**

[Redacted]
Planning Policy Manager
Planning - Development Control
Regeneration & Enterprise
Dudley Council
4 Ednam Road, Dudley, DY1 1HL

[Redacted]
[Redacted]
telford.gov.uk /Policy
facebook.com /TelfordWrekin
twitter.com /TelfordWrekin
[Redacted]

Date: 10/04/25

Our ref:

Your ref:

Dear [Redacted]

Ref: GBBCHMA Statement of Common Ground

The Telford and Wrekin Local Plan is now at Regulation 19 stage of the plan making process and as part of that the Council have confirmed the contribution towards the unmet development needs to the Black Country Local Planning Authorities of Wolverhampton, Sandwell, Walsall and Dudley.

On the basis of the contribution contained within the Regulation 19 version of the Local Plan the Council will, in principle, be in a position to sign an updated Statement of Common Ground once this becomes available.

I can also confirm that outside of the request to contribute towards unmet housing needs it is the Council's opinion that, in light of the submission of the Dudley Local Plan, there are no further duty to cooperate matters to be addressed in a unilateral Statement of Common Ground.

Yours sincerely

[Redacted Signature]

[Redacted]
Strategic Planning Team Leader

Appendix 3 - Black Country Functional Economic Market Area (FEMA) and locations with an economic relationship with the Black Country FEMA SoCG

**Black Country Functional Economic Market Area
(FEMA) and locations with an economic relationship
with the Black Country FEMA**

Statement of Common Ground

Position at January 2025

V5 13/2/25

1 | Page

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

1.1 This Statement of Common Ground (SoCG) facilitates and records cross-boundary engagement to address the unmet employment land needs arising within the Black Country Functional Economic Market Area (FEMA).

1.2 This SoCG is agreed between local authorities within the FEMA, local authorities which have a strong or moderate economic transaction with the Black Country, and other local authorities where evidence shows there is a functional economic relationship with the Black Country. This SoCG records their co-operation and progress towards addressing the strategic matter of the unmet employment land needs arising in the FEMA.

1.3 This SoCG demonstrates how the participating local authorities have engaged constructively, actively and on an ongoing basis to comply with their Duty to Cooperate.

1.4 The parties to this SoCG comprise of the local authorities identified below.

Local planning authorities within the Black Country FEMA

- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council

Local Planning Authorities with strong or moderate economic transactions with the Black Country FEMA

- South Staffordshire District Council
- Birmingham City Council
- Cannock Chase District Council
- Lichfield District Council
- Tamworth Borough Council
- Solihull Metropolitan Borough Council
- Bromsgrove District Council
- Wyre Forest District Council

Other Local Planning Authorities with evidence of functional relationship with the Black Country FEMA

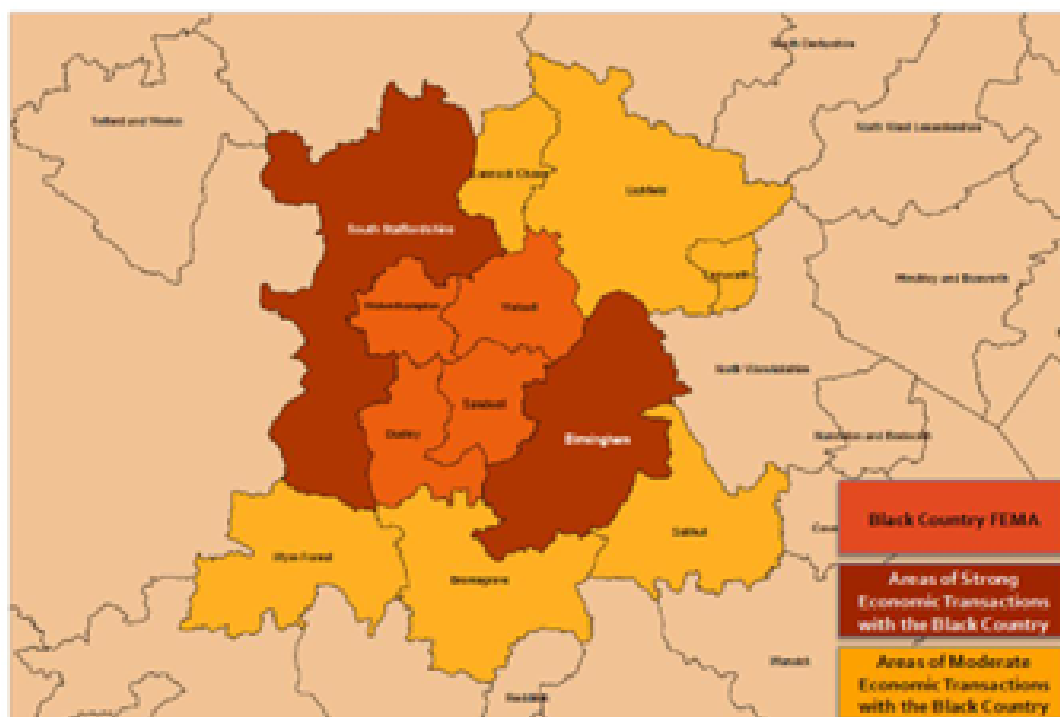
- Shropshire Council
- Stafford Borough Council

2. Strategic Geography

2.1 The Black Country FEMA was originally established in the Black Country Economic Development Needs Assessment (EDNA) 2017. The extent of the FEMA in 2017 was subsequently reviewed and confirmed in the EDNA update 2022¹. This work shows the Black Country FEMA primarily comprised the four Black Country Local Authorities (BCLAs), based on the established socio-economic, market and administrative relationships between these four local authorities. These close relationships also include Birmingham and South Staffordshire which have strong economic interactions with the four authorities within the Black Country. The EDNA 2017 also recognised other economic interactions with additional local authorities located around the Black Country including - Wyre Forest, Bromsgrove, Solihull, Tamworth, Lichfield, and Cannock Chase.

2.2 The geography of these relationships is shown on the map below.

Figure 1: Black Country FEMA authorities



2.3 In addition to these local authorities, work undertaken as part of the Shropshire Draft (Submission) Local Plan identified the economic relationship between Shropshire and the Black Country. This is confirmed in the Shropshire Economic Development Needs Assessment (2021) and justified in the Shropshire Employment Strategy Topic Paper (GC4n)(2022).

¹ It should be noted at the date of this SoCG the evidence which establishes the Black Country FEMA and those areas with strong or moderate economic transactions has not been tested through examination.

2.4 . The Stafford Borough Economic and Housing Development Needs Assessment (EHDNA) 2020 identifies the overlap with the Wolverhampton Travel to Work Area. This is recognised in joint responses by the BCLAs to the emerging Stafford Borough Local Plan Issues and Options in 2020, and further identified by the individual BCLA councils in 2022 at the Preferred Options stage.

3. Strategic Matter - Meeting Employment Needs

3.1 All adopted or emerging development plans for local authorities involved in this SoCG are identified below, showing whether there are any shortfalls in any of these areas.

Table 1: Authorities Local Plan progress

Local authority	Plan status	Most recent published evidence on surplus/shortfall
Dudley MBC	Dudley Local Plan Regulation 19 (October 2024)	The 2024 Black Country Economic Development Needs Assessment (tables 12 and 13) identifies a total level of demand of 634.7ha to 2041 and 661.9ha to 2042 for the four Local Plan areas including replacement of employment land 'lost' to non-employment uses.. Supply is identified as 377.35ha to 2041 and 381.45ha to 2042. The forecast employment land shortfall is 257.35ha to 2041 and 280.45ha to 2042.
Sandwell MBC	Sandwell Local Plan Regulation 22 (December 2024)	
Walsall MBC	The Walsall Borough Local Plan is intended to be submitted under the existing legislation by December 2026, with a Regulation 18 plan published in Autumn 2025	
City of Wolverhampton Council	Wolverhampton Local Plan Regulation 19 (November 2024)	
South Staffordshire District Council	South Staffordshire Local Plan Regulation 22 (December 2024)	The South Staffordshire EDNA update (2024) indicates that South Staffordshire can meet its own labour demand derived needs, whilst providing a surplus of 45.2ha to the unmet needs of other local authorities. The EDNA also recommends that 18.8ha of the consented West Midlands Interchange (WMI) is required to meet needs arising in South Staffordshire and that the balance of 174.2ha at WMI is available to meet needs arising in the wider market area. The Stantec Report 2021 on the apportionment of the consented land at WMI recommends that 67ha could be allocated to meet needs arising in the Black Country. The total quantum of land identified in the Regulation 22 Plan and consented at WMI that is available to meet Black Country FEMA needs is therefore 112.2ha.

Local authority	Plan status	Most recent published evidence on surplus/shortfall
Birmingham City Council	Birmingham Local Plan Regulation 18 (Issues and Options November 2022, Preferred options) July 2024.	The Regulation 18 Report identifies an employment land need of 295.6ha to 2042 and a shortfall of 83.5ha. The Preferred Options Document shows that there is sufficient industrial development land in the city to meet the identified needs up to 2042, but that further work is required to engage with landowners to ensure the deliverability of all of this land. It is therefore not appropriate at this stage to say that the shortfall will need to be exported to neighbouring areas.. The Council recognise the apportionment of 53ha of land at WMI towards needs arising in Birmingham as recommended in the 2021 Stantec Report. This would reduce the shortfall to 30.5ha.
Cannock Chase District Council	Cannock Chase Local Plan Regulation 22 (December 2024)	The Regulation 22 Plan proposes an employment land requirement of 74ha. The Plan provides for 64ha within the District and it has been agreed with South Staffordshire Council through a Statement of Common Ground that 10ha of CCDC employment land supply from the West Midland Strategic Rail Freight Interchange located in South Staffordshire District is attributable to CCDC. This approach ensures that the employment land needs of Cannock Chase District are met in full.
Wyre Forest	Wyre Forest Local Plan (adopted April 2022)	The Local Plan provides for 29ha of employment land to be brought forward over the Plan period. This is sufficient to meet local needs only.
Bromsgrove	Bromsgrove Local Plan (adopted January 2017)	The Local Plan establishes an employment land need of 28ha to 2030 to meet local needs only. This is met in full.
Solihull	Solihull Local Plan (adopted 2013)	The Local Plan includes allocations for employment land of 41.5ha which is sufficient to meet local needs only.
Tamworth	Tamworth Borough Council Local Plan 2006-2031 (adopted February 2016)	The Local Plan sets an employment land need of 32ha of employment land to 2031, of which 18ha will be delivered within the Borough and 14ha delivered outside in neighbouring areas. This is secured through a Memorandum of Understanding and Statement of Common

Local authority	Plan status	Most recent published evidence on surplus/shortfall
		Ground between Lichfield, North Warwickshire and Tamworth Councils.
Lichfield	Lichfield Local Plan Strategy (adopted 2015) and Local Plan allocations document (adopted July 2019). Local Plan 2043 Issues and Options (October 2024)	The adopted Local Plan meets local employment land needs of 79.1 ha including an allowance of 10ha. Lichfield District Council could require the 8ha share of West Midlands Interchange attributed to the borough through the 2021 Stantec Report to assist in meeting future needs.
Shropshire	Shropshire Local Plan Regulation 22 (September 2021)	The Local Plan provides for high growth above the meeting of local employment land needs for 250ha with and an additional contribution of the delivery of 30ha towards unmet employment land of land to meet needs arising in the Black Country. This is confirmed in a Statement of Common Ground between Shropshire Council and the BCLAs.
Stafford Borough Council	Regulation 18 Preferred Options consultation (October to December 2022)	The preferred options consultation sought views on the development strategy, draft policies and proposed sites, including at least 80 hectares of new employment land and two new proposed allocations north of Stafford and at Ladfordfields. Recognised Industrial Estate. No surplus or shortfall to be exported through the Duty to Co-operate is identified by this consultation. Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the Borough through the 2021 Stantec Report ²

Work to date on the Black Country FEMA employment land shortfall

3.2 The Black Country Plan began its preparation process in summer 2017, with the publication of an Issues and Options consultation to commence the review of the Plan. This initial document, based upon the Black Country EDNA 2017, identified a gap between employment land needs and supply of up to 300ha across the Black Country. Since then the

² West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

employment land shortfall identified by the Black Country authorities has altered in its exact amount, but remains significant at around 280ha to 2042 in 2024.

3.3 The Association of Black Country Authorities sent further correspondence in August 2020 (Appendix 1) to neighbouring local authorities and those within the GBBC housing market area, outlining a shortfall of employment land from the Black Country.

3.4 The evidence which informed the Draft Black Country Plan consultation in 2021 indicated that the employment land shortfall had fallen since 2017 but remained significant at around 210ha of land to be exported through the Duty to Cooperate process. The Draft Plan suggested this should be informed through an update to the Black Country EDNA and distributed to authorities with a strong existing or potential functional economic relationship with the Black Country, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway links.

3.5 In April 2022 the Association of Black Country Authorities wrote to neighbouring local authorities and those within the GBBC housing market area (Appendix 2). This letter requested clarification that all opportunities to accommodate unmet employment land needs had been explored through the preparation of their local plans. The letter also asked these local authorities to participate in an update to the West Midlands Strategic Employment Sites Study 2021. This letter also indicated that the Black Country employment land shortfall had fallen to around 108ha, through the contributions to the BCLAs from the West Midlands Interchange and the proposed contribution from Shropshire Regulation 19 Local Plan. This letter asked the local planning authorities to enter into a Statement of Common Ground with the BCLAs to regularise their positions on their agreement to contribute towards unmet employment needs arising in the Black Country.

3.6 In October 2022, the Black Country Councils confirmed that work on the Black Country Plan had ceased, and that the four Council's would be preparing individual Local Plans. Evidence to support these individual Local Plans has been updated through the Black Country EDNA 2022, the Employment Land Need Assessment 2020-2041 (October 2023) and the Black Country Economic Development Needs Assessment Update (November 2024). This most recent update confirms an employment land shortfall of 257.35ha to 2041 and 280.45ha to 2042 (not taking into account contributions from neighbouring areas). For employment land, due to the strong economic relationships evidenced through the studies outlined above, the BCLAs will continue to work together so that any surpluses of land against locally generated need within one BCLA will contribute towards meeting needs across the FEMA as a whole, and contributions from local authorities outside the FEMA similarly apportioned to meeting FEMA wide needs and not 'allocated' to the individual BCLAs.

Contributions to date to the Black Country authorities shortfall from areas with strong or moderate economic transactions with the Black Country

3.7 The Black Country EDNA 2017 and 2021 concluded that the four Black Country local authorities comprise a separate and self-contained FEMA. It also identifies eight local authority areas outside of the Black Country's FEMA with strong or moderate functional

economic links with the Black Country. And these are listed in paragraph 1.2. As noted in paragraph 2.1 this evidence has yet to be tested at examination.

3.8 Through the preparation of the Black Country Plan, and the individual Local Plan preparation undertaken by each of the Council's, the BCLAs have engaged with those eight local authorities to secure contributions towards the Black Country employment land shortfall, where possible.

3.9 In the case of South Staffordshire, the district has historically had an oversupply of employment land which has contributed towards the unmet needs of the wider region. This has been reflected in historic local plans, such as the district's Site Allocations Document 2018, which allocated modest extensions to the district's strategic employment sites to address regional unmet needs from beyond the district. South Staffordshire's emerging Local Plan Review also identified a surplus employment land supply against South Staffordshire's own needs, as set out in the South Staffordshire Regulation 19 Publication Plan consultation in 2022. South Staffordshire formally indicated to the Black Country through their Duty to Co-operate correspondence that their 36.6ha oversupply could contribute to the unmet employment land needs arising within the Black Country FEMA. This position was subsequently set out in the Statement of Common Ground (SoCG) in November 2022 which was signed by Cannock, Dudley, South Staffordshire and Wolverhampton. The August 2024 SoCG covering the South Staffordshire FEMA superseded this previous November 2022 SoCG.

3.10 Since South Staffordshire Council consulted on its Publication Plan 2022, the Council paused its plan preparation to await clarity on proposed changes to national planning policy. This pause meant that it was no longer possible to submit the 2022 plan for examination given elements of it were no longer supported by up to date evidence and the plan's end date (2039) would be inconsistent with national policy requiring Local Plans to cover 15 years post adoption. Given this, in September 2023 South Staffordshire Council published an updated Local Development Scheme setting out its intention to undertake a further Regulation 19 consultation in Spring 2024, which facilitated a need to update a number of evidence-based documents, including an update to the South Staffordshire EDNA which means that the supply/demand balance for employment land in the district was revisited. This updated evidence confirms that South Staffordshire has a surplus of 27.6ha which increases to 45.2ha of employment land when incorporating a new proposed allocation at Junction 13 of M6. This surplus land is available to meet needs arising in the Black Country, and was reflected in Policy DS4 of South Staffordshire Council's April 2024 Regulation 19 Local Plan. This plan was subsequently submitted for examination on 12th December 2024..

3.11 In addition, the submitted Regulation 22 Plan allocates the consented land at the West Midlands Strategic rail freight Interchange. Though situated in South Staffordshire, WMI serves a wider market area including the Black Country. The South Staffordshire EDNA recommends that 18.8ha of WMI is required to meet needs arising in South Staffordshire and that the balance of 174.2ha is available to meet needs arising in the wider market area. The Stantec Report 2021 on the apportionment of the consented land at WMI recommends that a minimum of 67ha should be allocated to meet needs arising in the Black Country.

3.12 This 67ha figure could increase if other local authorities within the WMI travel to work area do not require their 'share' of the site's considerable land supply. The Black Country Council's are working with other local authorities within the WMI travel to work area to understand whether more land from WMI might contribute towards Black Country FEMA shortfalls. Hence this 67ha is considered to be the minimum contribution at this stage.

3.13 The total quantum of land identified in the South Staffordshire Regulation 22 Plan and consented at WMI that is an 'oversupply' against local needs and available to meet Black Country FEMA needs is therefore a minimum of 112.2ha. This is confirmed in the August 2024 Statement of Common Ground between the South Staffordshire Functional Economic Area authorities (South Staffordshire, Stafford, Cannock Chase, Wolverhampton, Walsall and Dudley) and Sandwell Council which is the only local authority in the Black Country FEMA located outside the South Staffordshire FEMA.

3.14 To date none of the other seven local authority areas with which the Black Country has strong or moderate economic transactions have proposed surplus employment land contributions towards the Black Country's employment land shortfalls. The reasoning and context for these positions is set out in Section 4 below.

Contributions to date from areas outside of the Black Country FEMA and areas of strong / moderate economic transactions

3.15 The Black Country EDNA 2021 also identifies Shropshire Council as having strong labour market linkages with the Black Country. Shropshire Council has proposed a contribution of 30ha to the Black Country's employment land shortfall in their emerging Local Plan. This is identified in the SoCG 2021 with the BCLAs

3.16 The emerging Stafford Borough Local Plan does not identify any surplus of employment land to be exported through the Duty to Co-operate.

3.17 Currently there are no other contributions proposed from other local authorities related to the Black Country, although this is a matter of ongoing Duty to Co-operate discussions between the Black Country authorities and those areas.

4. Current position of signatory authorities on the Black Country FEMA shortfall

4.1 The purpose of this section is to set out the position of individual local authorities as to how they intend to address the emerging shortfalls within the Black Country FEMA and areas which have an evidenced functional economic relationship with the Black Country through their local plan reviews, including the work undertaken by each local authority to date. The wording provided for each authority represents the views of the authority concerned.

South Staffordshire District Council's position

4.2 South Staffordshire has been clear in Duty to Co-operate correspondence since 2018 that it will contribute surplus employment supply above its own needs to reduce the unmet needs of the Black Country authorities.

4.3 Given the context outlined in paras 3.8-3.11, South Staffordshire Council considers that there is a minimum of 112.2ha of surplus employment land within South Staffordshire which could contribute to addressing the Black Country's employment land shortfall. As set out in previous Duty to Co-operate correspondence the District Council does not consider there is further suitable employment land to reduce this shortfall further within its administrative area, which reflects the findings of the Employment Site Assessment Topic Paper 2024.

4.4 South Staffordshire now expects that the Black Country authorities, either collectively or individually, must continue to approach the other seven local authority areas identified as having strong or moderate economic links with the Black Country in the Black Country EDNAs 2017 and 2021. It must do this to identify how these authorities can now increase their land supply contribution to address the Black Country's employment land shortfall.

4.5 South Staffordshire Council is one of the partner authorities for the West Midlands Strategic Employment Sites Study 2024. Given the stage of plan making when this study was finalised, the Council will consider the reports findings and respond to them through future local plan reviews.

Cannock Chase District Council's position

4.6 Throughout the development of the emerging Cannock Chase Local Plan, it was communicated through Duty to Cooperate discussions that it was uncertain whether the employment needs of the District could be met within the Districts boundary. CCDC explored whether other authorities could address the shortfall in employment land need. Working with South Staffordshire District Council, it was determined that 10ha of the West Midlands Strategic Rail Freight Interchange Site could be apportioned to the employment land supply for Cannock Chase. No additional capacity from other local authority areas was identified.

4.7 The 2024 update to the Employment Development Needs Assessment informed the final target of 74ha employment land need in the Local Plan covering the period to 2040. In order to meet the employment need of the District in full; two strategic employment sites have been proposed for release from the Green Belt in the Reg. 19 Local Plan. There is no surplus capacity to accommodate unmet need for the Black Country through the emerging plan, which was submitted for examination in November 2024.

Stafford Borough Council's position

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

Midlands Interchange attributed to the borough in the work to apportion land from that site³.

Birmingham City Council's position

4.9 The Birmingham Local Plan Preferred Options Report identifies a shortfall of land to meet identified employment land needs. It is possible that the City will be able to meet its needs in full and it is unlikely that the City Council will be able to make a meaningful contribution to the unmet employment land need in the Black Country FEMA area.

4.10 Birmingham will continue to work with the Black Country Authorities, as well as other authorities which make up the relevant FEMA, to identify and implement an approach to tackle how such shortfalls are to be accommodated. The Council will continue to promote and encourage further work to provide a strategic approach to the supply and delivery of employment land. This may require and include further studies across the wider West Midlands.

Wyre Forest District Council's position

4.11 Wyre Forest District Council are unable to confirm at this stage whether the new Local Plan will be able to contribute towards wider unmet needs. The District is likely to be in a position where its potential supply of employment land is limited and may not be sufficient to meet either its own needs or wider needs. However, the Council will continue to engage with other authorities party to this agreement as the new plan progresses.

Tamworth Borough Council's position

4.12 Tamworth Borough Council is unable to meet its own employment land need and is unable to confirm at this stage whether the new local plan will be able to do so. The Council will continue to engage with the other authorities party to this agreement as the new plan progresses.

Lichfield District Council's position

4.13 Lichfield District Council are unable to confirm at this stage whether the new Local Plan will be able to contribute towards wider unmet needs. Indeed, emerging evidence indicates that the district is likely to be in a position where its potential supply of employment land is limited and may not be sufficient to meet either its own needs or wider needs. In August 2024 Lichfield District Council confirmed in a response to the Black Country authorities that the proportion of the WMI which the 2021 West Midlands SRFI Employment Issues Response Paper suggested could be apportioned to Lichfield may be required towards Lichfield's own needs.

Bromsgrove Council's position

³ West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

4.14 Bromsgrove District Council are unable to confirm at this stage whether the new Local Plan will be able to contribute towards wider unmet needs. The Council will actively investigate its ability or otherwise to accommodate unmet needs from the Black Country FEMA through the preparation of the Local Plan.

Shropshire Council's position

4.15 On the adoption of the Shropshire Submission (Regulation 19) Local Plan, Shropshire Council proposes to contribute 1,500 dwellings and 30 hectares of employment land in Shropshire towards unmet development needs in the Black Country. Shropshire Council remains committed to the delivery of these proposed contributions which are identified in the Statement of Common Ground with the Black Country Authorities. Shropshire Council wish to confirm that their proposed contributions of 1,500dws (as distributed in the GBBCHMA SoCG section 5) and their 30ha employment land provision are dependent on the adoption of the Shropshire Submission (Regulation 19) Local Plan, otherwise these contributions towards unmet needs in the Black Country will not be provided. Shropshire Council recognise that the remaining unmet development needs in the four Black Country Authorities should primarily be addressed within the GBBCHMA and the BCSSFEMA to meet these development needs within or close to the principal housing and employment market areas. Any consideration of further contributions from Shropshire as part of future Local Plan Reviews will need to reflect updates to Shropshire's own employment land and housing needs and its ability to accommodate these needs within its administrative boundary

Summary of key issues relating to the Black Country FEMA

- There remains a shortfall of around 257.3ha of employment land to 2041 and 280.45ha of employment land to 2042 arising cumulatively from the Black Country FEMA (Wolverhampton, Walsall, Dudley and Sandwell).
- South Staffordshire, Lichfield, Tamworth, Cannock Chase, Birmingham, Solihull, Bromsgrove and Wyre Forest are identified in the 2017 and 2022 update of the Black Country EDNA as areas outside of the Black Country FEMA which nonetheless have strong or moderate economic links with this geography.
- Work undertaken as part of the Shropshire Local Plan has identified an economic relationship between Shropshire and the Black Country, confirmed in the Shropshire Economic Development Needs Assessment (2021).
- The Stafford Borough Local Plan Economic and Housing Development Needs Assessment (EHDNA) 2020 identifies some overlap with the Wolverhampton Travel to Work Area, recognised in representations submitted by the BCLAs to the emerging Stafford Borough New Local Plan Issues and Options in 2020, and by the individual Council's in 2022 through the preferred options stage.

Summary of key areas of agreement

- The Black Country FEMA's shortfall is significant and requires cross-boundary working with local authorities within and outside of the Black Country FEMA in order to be addressed.
- Duty to Co-operate discussions with all local authorities identified as having a strong or moderate economic relationship with the Black Country FEMA and other areas with which there is an evidenced functional relationship should continue to be progressed to identify further options to address the area's shortfall.
- The 2024 update to the West Midlands Strategic Employment Sites Study will inform future Duty to Co-operate discussions over the need for, scale of, location and phasing of additional strategic employment sites to meet the needs identified. The SESS examines the need for large sites (around 25ha and above) that can meet both local and wider needs. Given the stage of plan making that a number of authorities subject to this Statement are at, it is considered appropriate that those authorities at (or more advanced than) Regulation 19 stage, consider the studies findings through future Local Plan Reviews.
- The BCLAs consider South Staffordshire District Council's proposed contribution to unmet employment land needs (112.2ha minimum) to be proportionate.
- The BCLAs consider Shropshire Council's proposed contribution to unmet employment land needs (30ha) to be proportionate.
- The contributions from South Staffordshire and Shropshire reduce the Black Country employment land shortfall to 115.1ha of employment land to 2041 and 138.2ha of employment land to 2042.

6. Future work streams to address key issues and areas where an agreement is still being sought

6.1 There is considerable variety in the progress and status of local plans across the Black Country FEMA, those areas with strong or moderate economic transaction with the Black Country and other areas with a functional economic relationship with the Black Country. The position on the unmet employment land needs of the Black Country is likely to change over time as plan-making within that area progresses. Notwithstanding this complexity, the signatories to this statement will seek to engage proactively and positively on employment land shortfalls, seeking to maximise agreement on the approach to distributing any shortfalls and using shared evidence bases wherever possible.

6.2 It is anticipated that the following key steps will be required to address the outstanding issues identified in this section:

- The Black Country authorities will continue to approach authorities where contributions have not been secured to request evidence of ability to assist with unmet employment needs.
- For those areas where contributions have not been secured, and where these local plans have not yet been submitted for Examination, the respective local authorities will consider whether opportunities for contributions should be tested, having regard to up to date evidence, and subject to the requirements of the Development Plan system and Government guidance in place at that time.
- For those areas where contributions have been secured, or where Local Plans have not made a contribution but are subject to Examination following their submission, the respective local authorities will consider through future Local Plan reviews whether opportunities for further contributions should be tested, having regard to up to date evidence, and subject to the requirements of the Development Plan system and Government guidance in place at that time..
- The findings and recommendations of the West Midlands Strategic Employment Sites Study 2024 will be fully considered by all local authorities within the study area identified in that work.⁴
- The Black Country authorities will continue to understand the extent to which the consented land at West Midlands Interchange is required to meet needs arising across the market area and whether any surplus exists that could be redistributed to meet needs arising in areas with an evidenced shortfall of employment land.

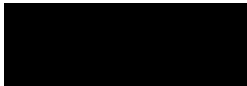
⁴ For those authorities at an advanced stage of plan making (i.e Regulation 19 stage or more advanced) it is considered appropriate that that the findings and recommendations of the study are considered through a review of their current emerging Local Plan.

Signatories

Dudley Metropolitan Borough Council

Name: Helen Martin

Position: Director of Regeneration & Enterprise

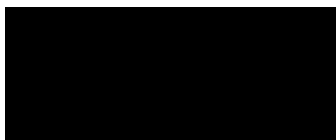
Signature: 

Date: 04/03/2025

Sandwell Metropolitan Borough Council

Name: Councillor Peter Hughes

Position: Cabinet Member for Regeneration & Infrastructure



Date: 25/02/2025

Walsall Metropolitan Borough Council

Name: Dave Brown

Position: Executive Director

Date: 5 March 2025

City of Wolverhampton Council

Name: Councillor Christopher Burden

Position: Cabinet Member for City Development, Jobs and Skills

Date: 12/03/2025

South Staffordshire District Council

Name: Kelly Harris

Position: Lead Planning Manager



Date: 20/03/2025

Stafford Borough Council

Name: 

Position: *Portfolio Holder - E.D & Planning*

Date: *5/3/24*

Cannock Chase District Council

Name: Dean Piper



Position: Head of Economic Development and Planning

Date: 02 April 2025

Lichfield District Council

Name: Councillor Alex Farrell

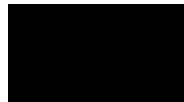


Position: Cabinet Member for Housing and Local Plan

Date: 21/02/2025

Tamworth Borough Council

Name: Richard Powell



Position: Planning Policy & Delivery Team Leader

Date: 12/5/2025

Birmingham City Council

Name: Richard Lawrence



Position: Executive Director of Place, Prosperity & Sustainability

Date: 04/03/2025

Solihull Borough Council

Name: Gary Palmer



Position: Group Manager – Policy & Engagement.

Date: 06/06/2025

Bromsgrove District Council



Name:

Position: Leader, Bromsgrove Council

Date: 24/3/25

Wyre Forest District Council

Name: Kate Bailey



Position: Head of Strategic Growth

Date: 30.4.2025

Shropshire Council

Name:

Position:

Date:

Appendix 1 – August 2020 Duty to Cooperate correspondence from the Black Country



Our Ref: HP/CW
Date: 4 August 2020
Please ask for: [REDACTED]
Direct Line: [REDACTED]

Dear Colleagues

Black Country Plan Review
Duty to Co-operate: Strategic Housing and Employment land Issues

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

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

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

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

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Cornwell Street, Walsall, WS1 1TP.
Tel: [REDACTED]
Web: www.walsall.gov.uk

Strategic Housing Issues

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able to accommodate all of our identified housing needs within the urban area of the Black Country.

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

Strategic Employment Land Issues

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

Potential contributions from Non-Green Belt Areas

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

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darvall Street, Walsall, WS1 1TP.
Tel: [REDACTED]
Web: www.walsall.gov.uk

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

Green Belt Areas

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

Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study¹ concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan². This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands.

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

Turning to employment, the call for sites stage identified few additional sites for consideration on land within the Black Country Green Belt. We are considering

¹ https://www.birmingham.gov.uk/downloads/17150/pg3_housing_delivery_on_green_belt_options_2013.pdf

² https://www.birmingham.gov.uk/downloads/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper

Or Helen Peterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darvall Street, Walsall, WS1 1TP.
Tel: [REDACTED]
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these proposals but it is not anticipated that this will provide significant additional capacity.

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

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

Duty to Cooperate progress

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

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

Dr Helen Paterson, Secretary to ABCA
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Web: www.walsall.gov.uk

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

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

Statement of Common Ground

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

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

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

Timetable for Responses

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

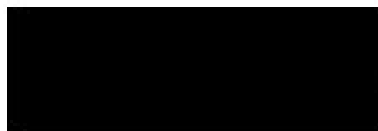
Dr Helen Pearson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darvall Street, Walsall, WS1 1TP
Tel: [REDACTED]
Web: www.walsall.gov.uk

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

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

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

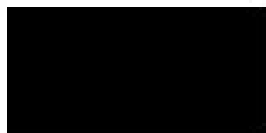
Yours sincerely



Councillor Patrick Harley
Leader
Dudley Metropolitan Borough Council



Councillor Mike Bird
Leader
Walsall Metropolitan Borough Council



Councillor Maria Crompton
Deputy Leader
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield
Leader
City of Wolverhampton Council

Dr Helen Peterson, Secretary to ABCA,
Walsall Metropolitan Borough Council,
The Civic Centre, Darvall Street, Walsall, WS1 1TP.
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Appendix 2 – April 2022 Duty to Co-operate correspondence from Black Country



Our Ref: HP/CW
Date: 26 April 2022

Dear Colleagues,

**Black Country Plan Review
Duty to Cooperate: Strategic Housing and Employment land issues**

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

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

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

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

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council
The Civic Centre, Darvall Street, Walsall, WS1 1TP
Tel: [REDACTED]
Web: www.walsall.gov.uk

Recent progress

1. The Regulation 18 BCP consultation took place between August and October 2021. We received around 20,800 responses and all of the representations can be viewed online via the link - <https://blackcountryplan.dudley.gov.uk/bcp/>. The bulk of feedback centred around the potential use of green belt land for development and we are currently reviewing all of the responses to inform the preparation of the Regulation 19 BCP programmed for consultation in the Autumn of this year.
2. We received responses from a number of neighbouring authorities – Bromsgrove, Cannock Chase, Lichfield, Redditch, Solihull, South Staffordshire, Stafford, Staffordshire and Worcestershire. These representations raised a variety of issues at a strategic level, recognising the broad scale of the shortfall and the need for ongoing and better aligned engagement going forward, in order to ensure a consistent and fair approach be taken to address longer term needs once the final shortfalls are confirmed.
3. The next sections of this letter summarise the current scale of the housing and employment land shortfalls and how we intend to address them.

Strategic Housing Issues

4. The Regulation 18 BCP identifies a housing shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 2031-39). This shortfall is based on the most up to date local housing need (including the 35% uplift for Wolverhampton), the most recent housing monitoring information and land supply on sites allocated in the draft BCP including land currently designated as green belt. The Regulation 18 BCP proposes that this shortfall is addressed via the Duty to Cooperate through 'exporting' to sustainable locations in neighbouring areas.
5. As part of the preparation of the Regulation 19 BCP, we are undertaking further evidence gathering in relation to urban land supply. This will involve an update of the existing Urban Capacity Study including a detailed assessment of the implications of the ongoing restructuring of some retail and commercial sectors which may 'free up' space in town and city centres. However, the scale of any additional capacity is likely to be limited and is not anticipated to make significant headway into the shortfall outlined above.
6. As set out above, through the Duty to Cooperate, we are pleased that some Local Plans have responded positively to our request initially raised in 2018 for assistance in addressing our future growth needs. Potential contributions through our Duty to Cooperate engagement to date are outlined in the table below.

Dr Helen Paterson, Secretary to A&CA
Walsall Metropolitan Borough Council,
The Civic Centre, Darvall Street, Walsall, WS1 1TP.
Tel: [REDACTED]
Web: www.walsall.gov.uk

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

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

Dr Helen Paterson, Secretary to AJICA
Walsall Metropolitan Borough Council,
The Civic Centre, Farnall Street, Walsall, WS1 1TP.
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7. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.
8. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.
9. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.
10. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.
11. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Chair Centre, Church Street, Walsall, WS1 1TP.
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Web: www.walsall.gov.uk

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

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

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

Strategic Employment Land Issues

13. As is the case with housing needs, the Black Country is unable to meet its identified employment land requirements in full. The Black Country Plan employment land shortfall to 2039 is 210ha as set out in the Regulation 18 Black Country Plan – this figure the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the split of employment land provided for by the Plan comprise around 30% of B8 activity and 70% for E(g)(i)(ii)B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(i)(ii)B2 a requirement of 396-410ha. We are reviewing these requirements in the light of updated economic projections which include a more up to date understanding of the CV-19 recession recovery trajectory. This work may result in a refinement of the requirements but it is highly likely that our shortfall will remain.
14. In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darvall Street, Walsall, WS1 1TP.
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7. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.
8. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.
9. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.
10. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.
11. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

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7. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.
8. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.
9. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.
10. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.
11. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

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

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

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

Strategic Employment Land Issues

13. As is the case with housing needs, the Black Country is unable to meet its identified employment land requirements in full. The Black Country Plan employment land shortfall to 2039 is 210ha as set out in the Regulation 18 Black Country Plan – this figure the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the split of employment land provided for by the Plan comprise around 30% of B8 activity and 70% for E(g)(i)(ii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(i)(ii)/B2 a requirement of 396-410ha. We are reviewing these requirements in the light of updated economic projections which include a more up to date understanding of the CV-19 recession recovery trajectory. This work may result in a refinement of the requirements but it is highly likely that our shortfall will remain.
14. In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

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15. At this stage, we would not identify a specific functional geography for addressing the E(g)(i)(ii)B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>). This suggests that a minimum of some 67ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be largely satisfied by this site should the programmed South Staffordshire EDNA update confirm a surplus of employment land against local needs. **This could reduce the Black Country employment land shortfall to 138ha. Any additional surplus of employment land arising from the South Staffordshire EDNA update would reduce the shortfall further.**
16. In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, **reducing the shortfall to some 168ha.** We are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford, but no contributions have been put forward by those authorities and the BCAs will continue to press this matter through Local Plan examinations, particularly those authorities within the areas of strong economic transactions with the Black Country as listed above. We will also be seeking the participation of authorities listed in paragraph 14, and any others able to contribute to BCA employment shortfalls, in a Statement of Common Ground (SoCG) addressing this issue to inform the Black Country's Regulation 19 plan and will use the responses to this letter to inform the draft SoCG. **As is the case with housing, additional sources of land supply must be identified if the Black Country is able to meet its growth needs in full.**

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

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

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18. The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.
19. The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.
20. There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. Through the HMA Group and liaison with those bodies who were party to the 2021 Study, a draft brief has been prepared to address the recommendations for the 2021 Study and strongly recommend that this work is progressed in partnership with the local planning authorities across the 2021 Study geography, and other areas which share a functional relationship with the Black Country, for example Shropshire.

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

Next steps

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

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

25. Turning to employment land, as with housing we will pursue a Statement of Common Ground with functionally related authorities to both secure current contributions and engage with less progressed Local Plans through the Duty to Cooperate to establish potential for further contributions. We have set out the compelling need for a follow-up study to address the recommendations of the 2021 West Midlands Strategic Employment Sites Study and have asked if your authority would be willing to participate in this work and assist with its resourcing.
26. Common to both the housing and employment land shortfalls is the final element of our strategy – for Local Plans to include an early review mechanism. This is important given the potential for there could continue to be a shortfall following the current round of Local Plan preparation. This shortfall should trigger the detailed evaluation of opportunities identified from the recommendations of the proposed work outlined above in relation to both housing and employment land through updated Local Plans. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. We consider that a failure to include an early review mechanism is a serious omission and must be addressed in order for the Plan to be sound.

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

Timetable for responses

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

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

Yours sincerely



Councillor Patrick Harley
Leader
Dudley Metropolitan Borough Council



Councillor Mike Bird
Leader
Walsall Metropolitan Borough Council



Councillor Kerrie Carmichael
Leader
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield
Leader
City of Wolverhampton Council

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Appendix 4 – Statement of Common Ground between Shropshire Council and the Association of Black Country Authorities (ABCA)

Statement of Common Ground between Shropshire Council and the Association of Black Country Authorities (ABCA)

Date: July 2021

1. Introduction

- 1.1. The National Planning Policy Framework (2019) (NPPF), specifies that Local Planning Authorities are *“under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*¹.
- 1.2. The NPPF also specifies that *“in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”*².

2. Purpose

- 2.1. This Statement of Common Ground (SoCG) has been produced to support the Shropshire Council Local Plan Review. It sets out how Shropshire Council has engaged with the Association of Black Country Authorities (ABCA) on behalf of the Black Country local authorities in order to fulfil its Duty to Cooperate requirements.
- 2.2. For the avoidance of doubt, this Duty to Cooperate is between Shropshire Council and the Association of Black Country Authorities (ABCA), and not between Shropshire Council and the individual local authorities who are members of ABCA.

3. Scope

- 3.1. The National Planning Practice Guidance (NPPG) provides details on the scope of a SoCG, which can be summarised as follows:
 - The plan-making authorities responsible for joint working detailed in the statement;
 - A description and map of the administrative areas covered by the statement, and a brief justification for these area(s);
 - The key strategic matters being addressed by the statement;
 - Governance arrangements for the cooperation process;
 - If applicable, the housing requirements (if known) within the area covered by the statement;

¹ MHCLG, (2019), NPPF – Paragraph 24

² MHCLG, (2019), NPPF – Paragraph 26

- Distribution of needs or the process for agreeing distribution of needs (including whether there is and the distribution of unmet needs);
- A record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- Any additional strategic matters to be addressed by the statement which have not already been addressed.

3.2. The NPPG also recognises that *“The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites”³.*

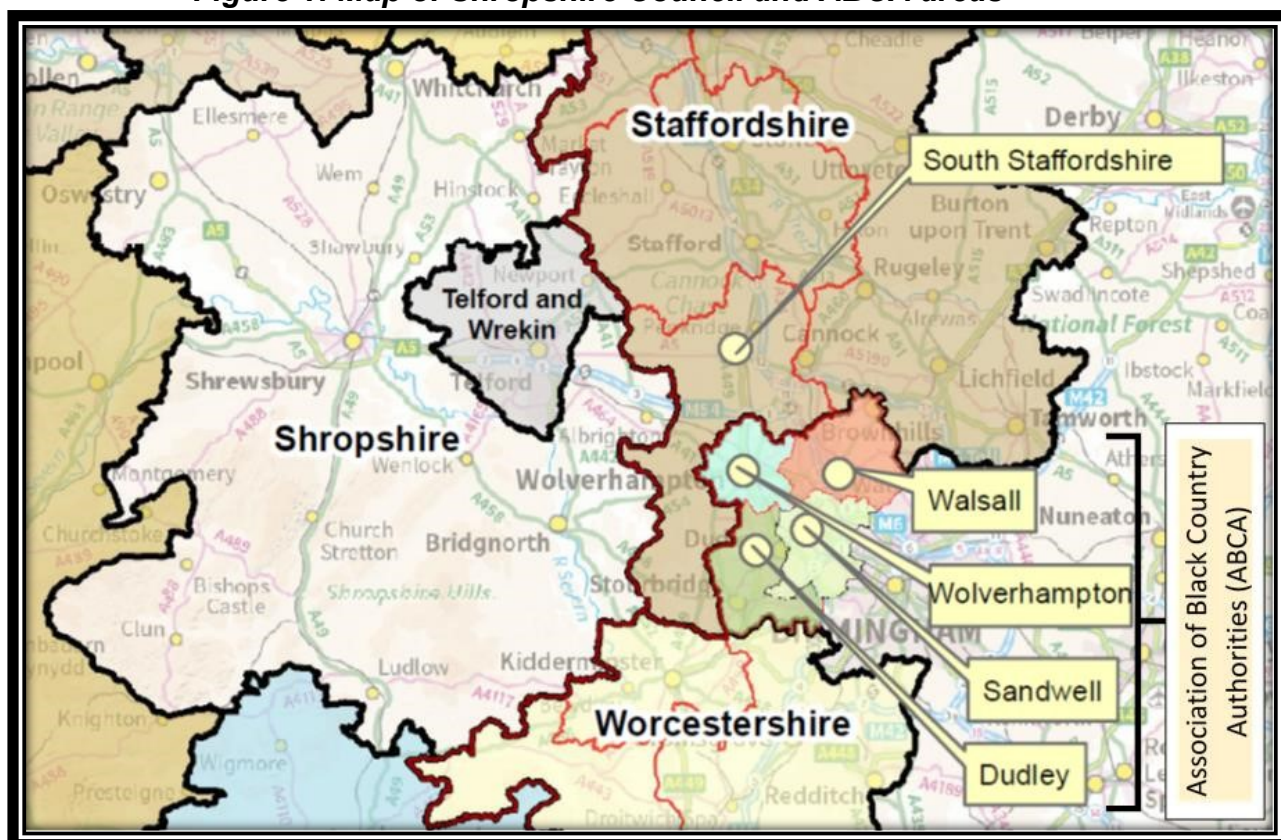
4. Relevant Local Authorities and Geography

4.1. This SoCG has been prepared jointly by Shropshire Council and ABCA representing the four Black Country Local Planning Authorities - Wolverhampton, Walsall, Sandwell and Dudley Councils. Shropshire and the ABCA local authorities are located within the West Midlands region, and whilst they do not share a physical boundary, it is acknowledged there is an interrelationship between the two from a plan making perspective. ABCA

4.2. Figure 1 illustrates the location of Shropshire Council and ABCA:

³ MHCLG, (2019), NPPG – Plan Making, Paragraph: 011 Reference ID: 61-011-20190315

Figure 1: Map of Shropshire Council and ABCA areas



- 4.3. As closely related Local Planning Authorities it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.
- 4.4. Shropshire Council is at an advanced stage in the review of its Local Plan which has been through several stages of consultation. The current timetable included in the Council's Local Development Scheme indicates the following:
- A Draft (Regulation 18) Local Plan was subject to pre-submission consultation in July-September 2020.
 - The Draft (Regulation 19) Pre-Submission version of the Local Plan consultation, running for 10 weeks from 18th December 2020 to 25th February 2021;
 - Council approved in July 2021 for the draft Local Plan to be submitted to the Secretary of State for Examination by a Government appointed Planning Inspector in August 2021.
 - The Examination into the Shropshire Local Plan is expected to take place between August 2021 and June 2022;
 - Adoption of the Shropshire Local Plan Review is forecast in July 2022 subject to a successful Examination.
 - The above timescales are subject to ongoing review in light of the Covid-19 emergency, and will depend on capacity at the Planning Inspectorate, and any

further changes to the timetable will be reflected in an updated Local Development Scheme.

4.5. The combined Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton) have agreed the following timetable (July 2021) for the development of their joint Local Plan.

- The Draft Black Country Plan (Regulation 18) will be subject to an eight week consultation in August – October 2021;
- The Pre-Submission Draft Black Country Plan (Regulation 19) will be subject to consultation in August – September 2022;
- The Examination in Public will take place between April 2023 and March 2024
- Adoption of the Black Country Local Plan is forecast in April 2024, subject to a successful Examination.

4.6. Given the respective timescales for the preparation of Local Plan Reviews, this SoCG focuses on those issues relevant to the Shropshire Council Local Plan Review. A separate SoCG will be prepared regarding the issues relevant to the Black Country Plan at an appropriate time in its preparation process. However, duty to cooperate discussions will continue as both Local Plan Reviews progress.

5. Duty to Cooperate

Shropshire Council Local Plan Review

5.1. The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with adopted formal Neighbourhood Development Plans. On completion of the review process, the Core Strategy and SAMDev Plan documents will be replaced by a single Local Plan document (with the exception of any saved policies), and supported by any adopted formal Neighbourhood Development Plans.

5.2. The new Local Plan will include all strategic and detailed policies, together with all site allocations for a Plan period 2016 to 2038.

5.3. There has been ongoing and active engagement between Shropshire Council and ABCA throughout the Shropshire Council Local Plan Review.

5.4. Shropshire Council has consulted directly with ABCA at every stage of plan making. The Local Plan Review consultation periods thus far are as follows:

- Issues and Strategic Options Consultation – 23rd January 2017 to 20th March 2017.
- Preferred Scale and Distribution of Development Consultation – 27th October 2017 to 22nd December 2017.
- Preferred Sites Consultation – 29th November 2018 to 8th February 2019.
- Strategic Sites Consultation – 1st July 2019 to 9th September 2019.

- Regulation 18 Pre-Submission Draft Plan – 3rd August 2020 to 30th September 2020
- Regulation 19 Pre-Submission Draft Plan – 18th December 2020 to 25th February 2021

5.5. Duty to Cooperate discussions have also occurred at appropriate times during the Local Plan Review process. The Shropshire Local Plan is due to be submitted to the Secretary of State in August 2021.

5.6. The Black Country Plan is at an earlier stage of plan preparation and has been subject to re-programming due to the ongoing Covid 19 emergency. However, a number of key pieces of evidence base have been prepared to inform the ongoing Plan. As at June 2021, ABCA have updated its plan preparation timetable as follows:

- Draft Local Plan (Regulation 18) – August 2021 to October 2021;
- Draft Local Plan Pre-Submission (Regulation 19) – August 2022 to September 2022;

5.7 It is anticipated the Black Country Plan will be submitted for Examination in Public in April 2023, and subject to a successful Examination, that the Plan will be adopted in April 2024.

6. Key Strategic Matters

6.1 The following key issues have been identified in the Duty to Cooperate conversations between Shropshire Council and ABCA:

- The requirement for Shropshire Council to consider accepting an element of ABCA's housing and employment need, within the context of evidence (prepared by ABCA to inform their Local Plan Review) indicating it is unlikely that the defined local housing and employment need is capable of being delivered solely within the Black Country area;
- Relevant cross boundary waste and mineral considerations;
- That Shropshire Council should consider introducing a mechanism which would allow the Council to trigger a review of the Plan in light of additional evidence on housing delivery to meet either the needs of Shropshire or the Black Country.

6.2 It is considered that the Duty to Cooperate process has been progressed in a positive and progressive manner by both bodies. Whilst this SoCG identifies outstanding areas where there remains some disagreement between the Parties, it is considered this does not represent a failure of the Duty to Cooperate process, but instead are issues which can be discussed through the Examination into the Shropshire Local Plan if considered necessary.

Housing Market Areas

6.3 The Shropshire Council area is considered to represent a self-contained housing market area (HMA).

6.4 However, it is acknowledged that the duty to cooperate is not restricted to just Local Planning Authorities within the same HMA. As such both Local Authorities continue to liaise closely in accordance with the duty to cooperate. There are strong links, particularly for commuting, between the eastern part of Shropshire and the Black Country.

Housing Need and Requirement: Shropshire Council

6.5 Using Government's standard methodology Shropshire Council calculated a Local Housing Need (LHN) which applies to both the Local Planning Authority area and the Shropshire Council housing market area of some 1,177 dwellings per annum (equating to 25,894 dwellings over the 22-year plan period from 2016-2038).

6.6 Shropshire's proposed development requirement in the Pre-Submission Local Plan is the delivery of 30,800 dwellings and 300 hectares of employment land over the plan period, equating to around 1,400 dwellings and 14ha of employment land per annum. It is considered this level of growth will meet identified needs and additionally provide for appropriate opportunities to meet some of the key challenges set out in the Council's Housing and Economic Growth Strategies. The Strategic Approach to development seeks to support a sustainable pattern of future growth across Shropshire over the Plan period. The Strategy seeks an urban focused distribution of development with the majority of development and infrastructure growth directed to Shrewsbury and the other Shropshire towns together with strategic sites and more limited development to support the sustainability of rural communities.

6.7 In summary, within the ongoing Local Plan Review, Shropshire Council is proposing to meet the entirety of its LHN.

Green Belt: Shropshire Council

6.8 In order to achieve a sustainable pattern of development, Shropshire Council is proposing to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work. Specifically, the Local Plan Review intends direct the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support it. However, it also allows for appropriate levels of development within rural areas, to support the longer-term sustainability of rural communities.

6.9 The eastern part of Shropshire is located within the West Midlands Green Belt. To inform the ongoing Local Plan Review, Shropshire Council has undertaken a Green Belt review. Whilst most additional development is proposed in locations

outside the Green Belt, the strategic economic importance of the eastern part of the County, particularly the M54 corridor, is a significant consideration. Impacts on longer term sustainability of Green Belt settlements due to constraints on their ability to meet their local development requirements have also been identified. As such a level of Green Belt release is proposed within the ongoing Local Plan Review.

7 Other Strategic Matters

The M54/A5 Strategic Corridor

7.1 Both Shropshire Council and ABCA recognise the strategic significance of the M54/A5 corridor. This corridor:

- Provides strategic links between the Shropshire Council area and Wolverhampton and to the wider West Midlands region.
- Offers strategic employment and investment opportunities, having considered constraints such as the Green Belt.

7.2 Both Shropshire Council and ABCA support the development of the strategic corridor and acknowledge the need for proportional infrastructure contributions from development sites, recognising the cumulative impact of such development.

Minerals: Shropshire Council

7.3 Increasing rates of housing and employment development have strengthened the demand for construction aggregates within Shropshire and in the adjacent areas which it supplies. Despite increased demand, sufficient crushed rock aggregate resources are already available from permitted sites.

7.4 The availability of sand and gravel resources remains well above the minimum guideline and the adopted Plan (SAMDev) included allocations which provide for additional capacity. No additional site allocations for either crushed rock or sand and gravel provision are therefore proposed as part of the ongoing Local Plan Review. However, Development Management policies will continue to provide for the consideration of 'windfall' sites or site extensions.

7.5 Shropshire has comfort of high reserves; therefore, it is unlikely to be allocating any new sites

Waste: Shropshire Council

7.6 Shropshire has a waste transfer and energy recovery facility located in Shrewsbury. The Council supports the development of a circular economy where the active recovery of material resources and energy from waste helps reduce environmental and financial costs and fosters business growth opportunities. The County performs well against national waste management targets and has sufficient existing capacity, including the land resources, to

meet its future needs. No further specific provision is therefore planned for waste management infrastructure. To accommodate any future demands, suitable land will continue to be provided for these purposes as part of the employment land supply.

Gypsies and Travellers: Shropshire

7.7 Shropshire has finalised an updated Gypsy and Traveller accommodation assessment (GTAA 2019). The updated GTAA refines the previously published GTAA (2017) by updating site information and considering public site management data to better understand and evidence site capacity and pitch turnover. Unauthorised encampment activity is also considered.

7.8 The evidence concludes that there is no current strategic requirement for allocation. However, the need to provide a permanent plot for Travelling Showpeople resident on a temporary site in Shropshire and potentially for public transit capacity to support private provision are identified. These requirements are proposed to be directly addressed by the Council, with a planning application for a travelling show persons site currently under consideration. In addition to the intended direct provision, policies within the ongoing Local Plan Review will facilitate the ongoing delivery of sites to meet arising needs. Shropshire thus intends on addressing its own needs for gypsy and traveller provision.

Unmet Need from Other Local Planning Authorities

7.9 Published evidence informing the ongoing Black Country Local Plan indicates a significant level of unmet housing and employment need, which is unlikely to be able to be accommodated within the Black Country planning authority area in a sustainable manner.

7.10 Whilst Shropshire is not an adjoining authority to the Black Country area, and is a self-contained housing market area, it is recognised that there are good road and rail links between the areas, particularly between the central and eastern areas of Shropshire and Wolverhampton and Dudley. On this basis it has been considered reasonable for the two plan making areas to enter into constructive discussions, through the duty to cooperate process, about the potential to meet cross boundary unmet need.

7.11 Following positive duty to cooperate discussions throughout the Regulation 18 stage of plan preparation, ABCA responded to Shropshire Council's Regulation 19 Draft Local Plan Consultation in February 2021. ABCA's response is summarised below.

Summary of ABCA's response to Shropshire's Regulation 19 Local Plan Consultation (February 2021)

- *Support proposals to provide for up to 1,500 homes attributed to meeting needs arising in the Black Country.*

- *Consider proposals for significant levels of development in Bridgnorth and Shifnal could credibly meet Black Country needs, given existing migration patterns, geographical proximity and physical links. However, likely a shortfall of land to meet Black Country housing needs will remain, even with this and likely contributions within other emerging neighbouring Local Plans*
- *The Black Country evidence (Urban Capacity Review (UCR) Update 2019) demonstrates a need for 71,500 homes between 2019 and 2038, of which 44,500 homes can be accommodated in the urban area leaving a shortfall of 27,000. This shortfall is likely to increase by around 5,000 homes as a result of recent changes to the calculation of local housing need. An UCR Update 2020 will shortly be published calculating an up-to-date shortfall figure, which will inform a forthcoming consultation on the draft Black Country Plan. Evidence clearly demonstrates the Black Country cannot accommodate all of its needs in the urban area.*
- *Duty to cooperate discussions with neighbouring Local Authorities have resulted in a number of local authorities (including South Staffordshire, Lichfield, Cannock and Shropshire) indicating they will seek to test ability to accommodate additional housing need over and above their own as part of Local Plan Reviews (anticipate as a best-case scenario they could accommodate up to 10,500-12,500 homes, leaving a significant shortfall of approximately 14,550-16,500 houses (plus 5,000 homes as a result of the change to the calculation of local housing need). Currently engaging with other Local Authorities with a functional relationship (including Telford & Wrekin, Solihull and Bromsgrove) and it is possible further contributions will come forward.*
- *In terms of non-urban capacity, assessments undertaken (Green Belt, Landscape Sensitivity, Historic Landscape Characterisation and Ecological surveys) severely constrain capacity to deliver large scale development across much of the Black Country. Market deliverability is also being assessed, but consider this will also limit capacity (based on experience in Birmingham, where capacity of an urban extension was reduced from 10,000 to 5,000 over the 15 year plan period and this was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands). The majority of the Green Belt is located in Walsall and to a lesser extent Dudley, so these are the two main housing market areas with potential for Green Belt housing, based on a scenario that there is sufficient unconstrained capacity in the Black Country Green Belt, a deliverability study may reasonably conclude capacity for some 10,000 homes in the Green Belt over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities. This does not reflect findings of key studies/Green Belt assessment, position will be made clearer at the forthcoming consultation on the draft Black Country Plan. However, it is clear that on the basis of the maximum capacity of the urban area, the potential contribution of neighbouring local authorities, and the indicative market capacity of the Green Belt, it is likely that the Black Country will be unable to meet its own housing land needs.*

- *Request the draft Shropshire Local Plan recognises there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This must be recognised in the Plan as a key trigger for an early review of the draft Shropshire Local Plan. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. Failure to include this is a serious omission and must be addressed in order for the Plan to be sound.*
- *Incorporation of 30ha of employment land to meet needs arising in the Black Country, within the overall employment land requirement is welcomed in principle. The evidence for this is set out in the Economic Development Needs Assessment (EDNA), which identifies strong labour market linkages with the Black Country and Wolverhampton in particular, and recommends close cooperation on employment land supply.*
- *The Black Country employment land requirement ranges from 592ha (baseline) to 870 ha (aspirational growth based on WMCA SEP). Existing urban employment land supply is around 305ha, leaving a shortfall of between 263ha and 500ha, depending on the growth scenarios applied. As per housing, considering all opportunities to bring forward additional employment land within the urban area and Green Belt, but this exercise will not make a significant impact upon addressing unmet need. Contributions through the Duty to Cooperate are currently limited to 50ha in total (including the 30ha in the draft Shropshire Local Plan), but this work is ongoing and will include a proportion of the consented West Midlands Interchange at Four Ashes in South Staffordshire.*
- *The employment land requirement identified in Shropshire's EDNA is between 164ha and 264ha (including the 30ha Black Country contribution). The current supply is some 276ha and the Plan target 300ha. This suggests there is an oversupply of land of between 138ha and 36ha, not required to meet local needs and could provide scope to increase the contribution to the Black Country further.*
- *Employment sites in Shifnal and Bridgnorth (given their location and functional relationship) could be assumed to be capable of meeting needs arising in the Black Country. Size and accessibility of proposed sites to the motorway network may limit the range of occupiers attracted to them (unlikely to be attractive to large scale and footloose inward-investment requirements). Note the EDNA recognises proximity of i54 (Junction 2 of M54) and potential for this to draw further occupiers into the County and the need to consider whether there will be enough demand to justify additional development (in addition to that already proposed as part of the i54 extension). Demand for large scale occupiers/need for additional 'strategic' employment sites will be considered in the West Midlands Strategic Sites Study and is anticipated to be completed in early 2021.*
- *As for housing, it is possible there could continue to be a quantitative and qualitative shortfall of employment land in neighbouring areas which could be accommodated within the Plan area. Request the draft Shropshire Local Plan recognises there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This must be recognised in the Plan as a key trigger for an early review of*

the draft Shropshire Local Plan. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. Failure to include this is a serious omission and must be addressed in order for the Plan to be sound.

- *Evidence indicates facilities in Shropshire provide for both minerals and waste requirements arising in the Black Country. With regard to minerals, availability of aggregates has been in excess above minimum guidelines and the Plan does not propose any additional site allocations.*
- *With regard to waste, existing consented facilities are anticipated to provide sufficient capacity to accommodate forecast throughput negating the need for additional facilities.*

7.12 Since the Regulation 19 response from ABCA, the Black Country authorities have published the Draft Black Country Plan and its supporting evidence base including the Urban Capacity Review update 2020. This has further considered the size of the shortfall in the supply of land for housing and employment in the Black Country. Taking into account proposed new sites, the final urban capacity as set out in the Draft Black Country Plan is 40,117 homes and 307 ha of employment land. The Plan period has also been extended to 2039, because of the requirement to address need for 15 years from the anticipated adoption date of 2024. Evidence supporting the forecast housing and employment shortfall is subject to further public consultation on the Black Country Local Plan at both Regulation 18 and 19 stages, and will be subject to the Examination in Public in line with the agreed Black Country Local Plan preparation timetable

8 Matters of Agreement

8.1 Shropshire Council intends to meet its identified LHN within its Local Authority area.

8.2 That at June 2021, based upon the policies and proposals of the Draft Black Country Plan referenced in paragraph 7.12 the total level of unmet need from the Black Country area to 2039 is forecast to be:

- 28,239 dwellings;
- 210 hectares of employment land

8.3 As such, the Black Country is not able to meet its full LHN within its area to 2039, and is therefore seeking appropriate contributions from all neighbouring and closely related councils through the duty to cooperate process, and for these contributions to be included in the emerging Local Plan Reviews of these areas. It is agreed that whilst the two areas are not adjoining, due to their proximity and transport links, it is appropriate for these two plan making areas to undertake a duty to cooperate.

- 8.4 The evidence base which supports these forecasts, and thus the level of unmet need, is included within the Black Country Urban Capacity Study and the Strategic Housing Land Availability Assessment (SHLAA), both of which have been published on the Black Country website <https://blackcountryplan.dudley.gov.uk/bcp/> and which have informed the upcoming Regulation 18 consultation on the Draft Black Country Local Plan, and the Site Assessment Report, which will be published as part of the consultation. . Given the stage of the plan making process, neither of these documents has been subject to Examination in Public. Should the Inspector chairing the EiP into the Shropshire Local Plan require a discussion on these evidence base material, officers representing the ABCA will provide a lead role in this process.
- 8.5 It is agreed that it is inappropriate and beyond the powers of the adjoining and closely related authorities to establish the limits of sustainable development in neighbouring and closely related authority areas.
- 8.6 Notwithstanding this, as part of its Regulation 19 stage draft Local Plan, Shropshire Council has accepted the principle of meeting a proportion of ABCA's 'unmet' need in a way which recognises the functional relationship between the areas, and which respects the character of the area. It is agreed that the following levels of unmet need are accepted in principle by Shropshire as part of its Local Plan Review:
- Housing: up to 1,500 dwellings up to 2038;
 - Employment: up to 30 hectares up to 2038
- 8.8 In establishing the principle of accepting this level of unmet need, it is recognised that Shropshire's housing need over the plan period 2016 to 2038 increases to 27,394 dwellings, and that the employment need range (as set out in the Shropshire Economic Development Needs Assessment (EDNA)) increases to between 162 and 264 hectares over the Plan period.
- 8.9 It is agreed that the draft Shropshire Local Plan seeks to plan positively to distribute this unmet need in sustainable locations in accordance with the draft Local Plan's strategic approach to development, and in line with distribution of development outlined in the draft policies SP2 and S1-S21 of the Shropshire Local Plan.
- 8.10 Having considered migration patterns, geographic proximity and physical links, it is agreed that this unmet need could credibly be accommodated within the already planned development in Shifnal and Bridgnorth over the plan period to 2038. However, it is agreed that no one specific allocation will accommodate unmet need and rather this will be met through the delivery of the overall Shropshire Local Plan housing requirement.
- 8.11 It is recognised that ABCA's response to the Shropshire's Regulation 19 Local Plan consultation supports the Shropshire Council offer of meeting a

proportion of unmet need for both housing and employment; specifically around 1,500 dwellings and around 30ha of employment land up to the end of the plan period in 2038;

- 8.12 It is recognised that current evidence produced to support the Black Country Draft Plan (July 2021) would indicate a continuing need for ABCA to further increase the level of cross boundary support to accommodate identified housing and employment needs from all of its neighbouring and adjoining council areas;
- 8.13 That as part of the Examination into the Shropshire Local Plan, expected in 2021/022, there may be a requirement to further consider the issue of cross boundary support from Shropshire should the appointed Inspector raise this as a main issue in response to the representations made by ABCA and other parties. Should a main modification be required on the issue of cross boundary unmet need, that this is a matter for Shropshire Council to consider and recommend to the Examination.
- 8.14 No strategic cross boundary issues regarding mineral or waste provision have been identified

9 Matters of Disagreement

- 9.1 ABCA consider that Shropshire should introduce a mechanism into the Local Plan Review to trigger an early review of the Local Plan should there be a need to do so to address the ongoing level of unmet need in the Black Country having regard to the quantum of development proposed in the Black Country Plan and contributions from other neighbouring Local Plans. This review could include the early release of safeguarded land and / or the identification of new sites that would provide an additional supply of housing and employment land in the eastern part of Shropshire where it would be best located to contribute to meeting this need.
- 9.2 Shropshire Council consider there is no specific requirement for such a mechanism to be introduced, as it is considered the natural five year review cycle of Plan preparation will be sufficient to further consider any potential future accommodation of Black Country unmet need within the Shropshire plan making area. This position takes into account the updated timeframe for the preparation of the Black Country Plan which was published in July 2021, indicating an adoption date for the Black Country Plan of April 2024. Shropshire Council would also note that existing/proposed safeguarded land is to meet needs beyond the current Plan period, i.e. beyond 2038. This is consistent with the National Planning Policy Framework (NPPF) which in paragraph 130 (d) and (e) states: “make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;”

“be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period”

10. Duty to Cooperate agreement

10.1 The parties agree that:

- i) Shropshire Council has fulfilled its Duty to Cooperate with the Association of Black Country Authorities.
- ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

11 Signatories

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

Shropshire Council	
Name:	Councillor Lezley Picton
Position:	Leader of Shropshire Council & Cabinet Member for Improvement
Date:	18 th August 2021
Signature :	
Association of Black Country Authorities (ABCA)	
Councillor Patrick Harley Leader of Dudley Council 11 August 2021 	Councillor Rajbir Singh Leader of Sandwell Council 11 August 2021 
Councillor Mike Bird Leader of Walsall Council 11 August 2021 	Councillor Ian Brookfield Leader for City of Wolverhampton Council 11 August 2021 

Appendix 5 - Notes and minutes of Duty to Cooperate meetings

Appendix 5a – Meetings with Telford & Wrekin Council

Appendix 5b – Meetings with Telford & Wrekin Council and Black Country Councils

Appendix 5c – Meetings between South Staffordshire, Black Country Councils and Birmingham Council

Appendix 5d – Meetings with South Staffordshire FEMA LAs

Appendix 5e – Meetings with Lichfield Council

Appendix 5f – Meetings with Shropshire Council

Appendix 5g – Meetings with Sandwell Council

Appendix 5h – Meetings with Dudley Council

Appendix 5i – Meeting with Walsall Council – checking with Nev and Dave

Appendix 5j – Meeting with Stafford Council – checking this with Alex

Appendix 5k – Black Country Local Authority Planning Leads meetings

Appendix 5l – Greater Birmingham and Black Country Housing Market Area Development Needs Group Meetings

Appendix 5m - West Midlands Aggregate Working Party (WMAWP) meetings

Appendix 5n - West Midlands Resource Technical Advisory Board (RTAB)

Appendix 5a – Meetings with Telford & Wrekin Council



Telford & Wrekin
Co-operative Council

**Protect, care and invest
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Duty to Cooperate (DtC)

City of Wolverhampton Council (CWC) and Telford & Wrekin Council (TWC)

Date of meeting: 10am on Monday 3rd April 2023

In attendance:

Telford & Wrekin Council (GA)
Telford & Wrekin Council (HP)
Telford & Wrekin Council (HB)
City of Wolverhampton (IC)

Notes:

TWC Local Plan Review Update

- GA updated CWC on the progress that has been made on the Local Plan Review. Still plan for Draft Plan (Reg. 18) to be ready to go out for consultation in Autumn of 2023 with proposed Site Allocations included. Scheduled to move forward to Reg. 19 by Sept 2024 as per Local Development Scheme.
- Currently in Purdah before elections at the beginning of May, however TWC are still making progress with evidence base and assessment work.
- TWC would like to start arranging regular meetings (monthly if possible) to continue to discuss progress with the Local Plan review.
- Despite possible changes to the NPPF, TWC recognise we are still required to consider DtC issues
- TWC would like to discuss the principle of an approach to unmet need in advance of the draft plan (Reg. 18), subject to member agreement.

CWC Plan Update

- ABCA Black Country Plan has now ceased as of September 2022 – there will be no more joint DtC meetings with TWC.
CWC are progressing their Local plan now and think that they will be going out with a draft plan (Reg. 18) in the Summer (2023) subject to the timing of the updated NPPF. The Local Plan will have a shortfall in housing which they are seeking to address with a number of authorities through DtC.

Housing

- CWC raised the acknowledgement of the Black Country shortfall within the Report of the Interim findings of the Shropshire Local Plan Examination, published in February 2023.
- TWC explained that census/ONS Data is likely to be a source of the data used for the evidence base to justify the apportionment of housing numbers based on

migration patterns. Note that future migration and unmet need will also need to be considered within the evidence base.

- There is agreement that there is evidence of a migratory pattern between TW and Wolverhampton, and TW and CWC agreed to progress further discussions on how this data could be used to inform the approach to be used to calculate the TW Local Plan housing requirements, having regard to the CWC shortfall.

Infrastructure

- There are no critical cross boundary infrastructure issues identified. Mutually beneficial issues such as the electrification of the Shrewsbury – Telford – Wolverhampton rail lines was discussed.

Other

- Discussion on Shropshire Draft Local Plan Review.

Actions:

GA – brief and update cabinet member regarding Statement of Common Ground from Birmingham and the Black Country after May.

GA – speak to Eddie West at Shropshire regarding their progress.

IC – to send CWC responses to Stafford and South Warwickshire Local Plans to TWC for information.

Next Steps:

TWC will schedule monthly meetings at the end of future meetings.

Next meeting arranged for 15th May 2023, 11am.



Telford & Wrekin
Co-operative Council

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Duty to Cooperate (DtC)

City of Wolverhampton Council (CWC) and Telford & Wrekin Council (TWC)

Date of meeting: 11am on Monday 15th May 2023

In attendance:

Telford & Wrekin Council (GA)
Telford & Wrekin Council (HP)
Telford & Wrekin Council (HB)
City of Wolverhampton (IC)

Notes:

- TWC agreed to investigate their ability to provide the BC authorities with a contribution to the Black Country unmet housing need and for this overall contribution, should it be forthcoming, would be apportioned by the Black Country Authorities.– This contribution and the apportionment could be evidenced by looking at migration patterns or travel to work data.
- TWC are still not ready to share a draft Local Plan housing target figure but we anticipate a conversation being possible before draft plan consultation to share our proposed approach
- The NPPF proposal on – netting off past delivery to inform the calculation of the Local Plan housing target – both authorities are unsure on how this may work in practice. Will await further updates from the Government on this issue.
- In calculating the Local Plan housing target, CWC would expect TWC to have regard for the range of housing growth scenarios referred to in the Issues and Options paper and demonstrate that all sustainable growth options have been explored.
- IC explained that the majority of the BC shortfall as set out in the BCP Regulation 19 draft arises in Sandwell and to a lesser extent in Wolverhampton. IC will confirm this with TWC as soon as possible

Actions:

- IC to confirm the source of BC shortfall figure by way of it being ‘split out’ between the BCAs.

Next Steps:

Next meeting scheduled – 12th June 2023 at 11am



Telford & Wrekin
Co-operative Council

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Duty to Cooperate (DtC)

City of Wolverhampton Council (CWC) and Telford & Wrekin Council (TWC)

Date of meeting: 16th September 2024

In attendance:

Telford & Wrekin Council (GA)
Telford & Wrekin Council (HB)
City of Wolverhampton (IC)
City of Wolverhampton (MR)

Notes:

TWC Update

- Plan to take the publication version of the plan to December Cabinet, Full Council January, 7 week consultation after that
- Barrister advice before progress definitely confirmed
- Submission next year (June 2025)
- Certainty around the offer to the BCA's - will be put into policy with a clear mechanism as to how the figure has been accounted for in our requirement
- Transitional arrangements – Council anticipate going under the new NPPF system

CWC Update

- Regulation 19 Plan is programmed for Cabinet mid-November with consultation to follow shortly afterwards.- will try to get out to consultation as soon as possible after that
- The Plan will be progressed under the current Regulations and NPPF subject to the transitional arrangements associated with the introduction of the new NPPF.

NPPF

- TWC not as bound by housing numbers – already planning at that level
- Renewables - could change how TWC policies will look depending on when the NPPF will come out
- Discussed what defines being into Reg 19? – considered to be legal notice as the official start of Reg 19 period

- New Towns – potential for west midlands new town to take some unmet need? No confirmation of position from Government yet
- Strategic Employment Sites Study – Final report was released last week
- SoCG - Housing paper for BCA's and then will address other cross boundary issues separately



Telford & Wrekin
Co-operative Council

**Protect, care and invest
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Duty to Cooperate (DtC)

City of Wolverhampton Council (CWC) and Telford & Wrekin Council (TWC)

Date of meeting: 1pm Tuesday 28th May 2024

In attendance:

Telford & Wrekin Council (GA)
Telford & Wrekin Council (HB)
City of Wolverhampton (IC)
City of Wolverhampton (MR)

Notes:

TWC updates:

- Regulation 18 consultation completed – concluded January 31st 2024
- 3,625 individual comments received (2,762 individuals/organisations)
- Have had sought legal advice where needed
 - DtC – aware clarity is needed to justify offer to the Black Country (BC) – awaiting information from consultants before confirming a position on this
- Comments regarding site allocations:
 - Limited comments on methodology
 - Broad issues regarding infrastructure – Infrastructure Delivery Plan to follow for Regulation 19
 - Use of agricultural land – perception of Telford as having large supply of brownfield sites despite reality of there being very little that is not permissioned
 - Looking to start provisionally identifying site potential allocations over the summer
- Local Development Scheme being reviewed - looking to adjust timetable - due to more feedback on the Draft Plan than expected
- Would look to establish a working position on DtC unmet need before cabinet process begins
- Consideration on changing the plan period to 2021-2041 - to be in line with the census data – TBC
- Target Regulation 19 cabinet is December 2024 (January 2025 full council)
 - CWCs opinion that this could be a little late to submit before deadline of current planning system (June 2025)

General discussion

- Discussion regarding upcoming General Election and how this could impact Local Plans
- South Staffordshire (SS) have significantly reduced the DtC housing contribution the HMA – had previously been c.4,500 units

- CWC advise that housing offer to be noted in the Local Plan Review document – TWC also advised this by Barrister

CWC Updates:

- Regulation 19 – expected to go to November cabinet, November- January consultation
- There were 119 responses to the R18 Issues and Preferred options consultation. The main issues were:
 - Support for the scope of the WLP and its alignment with the BCP work, particularly evidence base and policy development;
 - Acknowledgement of the limited amount of development land in Wolverhampton and support for attempts made to maximise delivery over the Plan period;
 - Objection to the exclusion of site allocations in the Wolverhampton City Centre from the scope of the WLP
 - Support for spatial strategy including the protection of the green belt and the exclusion of the green belt from the search for new sites to meet housing needs, in accordance with the December 2023 NPPF
 - Given the scale of the Wolverhampton housing shortfall and the potential negative implications of this for neighbouring authorities under the duty to cooperate, a green belt review should be carried out and sites released from the green belt for development
 - Support continued joint work with other Councils on transport modelling, school places, waste and minerals, and meeting employment and housing needs, across the Black Country and other relevant geographies

Next Steps:

- Once position clarified by consultants, TWC to share housing figure with CWC and the other BC Authorities
 - Before September 2024

Appendix 5b – Meetings with Telford & Wrekin Council and Black Country Councils



Telford & Wrekin
Co-operative Council

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Duty to Cooperate (DtC)

Meeting with Black Country Authorities (BCA) to discuss Telford and Wrekin Councils (TWC) draft Local Plan Review consultation 2023

Date of meeting: 12pm, Tuesday 7th November 2023

In attendance:

Gavin Ashford - Telford & Wrekin Council (GA)
Harriet Broster - Telford & Wrekin Council (HB)
Ian Culley – City of Wolverhampton (IC)
Michele Ross – City of Wolverhampton (MR)
Elizabeth Vesty – Dudley Metropolitan Borough Council (EV)
Vicki Popplewell – Dudley Metropolitan Borough Council (VP)
Patricia McCullah – Sandwell Metropolitan Borough Council (PM)
Phillippa Smith – Sandwell Metropolitan Borough Council (PS)
David Holloway – Walsall Council (DH)
Neville Ball – Walsall Council (NB)

Update from TWC

- Live on draft plan consultation – runs until 12 January 2024
- Confident with basis for the offer given to the BCA
- Not all sites will come forward – consulting with more than needed
- Welcome conversation around initial thoughts ahead of formal comments being submitted

Wolverhampton

- Welcome an offer from TWC
- Telford EHDNA not clear – need to see the full report before any comments can be made on whether approach behind housing offer is robust enough
- Possibly backwards thinking by looking at census data – agree that it is a helpful baseline but unsure whether this will reflect actual levels of need
- Will be keen to understand whether TWC have maxed out on the allocations and offer given to BCA
- TWC need to be able to justify the figure decided on
- Want the assurance that the overall offer figure is not going to change – experience in the past of LPA's figures winding down as the process goes on
- Will there also be a buffer?

TWC response

- Telford is no longer a 'new town'

- TWC have already consulted on more sites than are needed - pressure from residents already regarding infrastructure
- The figure has been agreed by cabinet and so this should not change now – consulting on more sites than needed will help safeguard this

Dudley Council

- Offer just for BCA or HMA?

TWC response

- Don't feel that there is a strong enough connection to the wider HMA

TWC questions

- TWC have an unmet need for G&T
 - All BCA's confirmed that this is an issue across LPA's and so no answer possible to give

Black Country progress

- Dudley
 - 6 week consultation on draft plan starts on Friday 10th November
 - Approx.1000 dwelling shortfall in housing figures
 - Urban led strategy
 - Green Belt land taken out of plan which had previously been in the CBP
- Sandwell
 - Consultation on draft plan started on Monday (6th)
 - Housing need – 29,000, 18,000 shortfall
 - No Green Belt allocations
- Walsall
 - Pause due to uncertainty in the planning process
 - Likely to start under the new system
 - Housing need over plan period (to 2042) – 17,100
 - Supply - 11,000 homes
 - 7,000 homes in the Green Belt as part of the BCP – this will be being reviewed but not ruling out GB
- Wolverhampton
 - Waiting on confirmation of NPPF changes – will depend on whether or not plan process needs to start again
 - Foreseeing a 12,000 home shortfall (up to 2042)
 - Urban led approach – depending on NPPF changes, not including Green Belt
 - City Centre plans to be updated under new planning system
 - Green Belt that was included previously – approx. 800 homes no longer to be included

- Employment land
 - Shortfall is a lot less than it was – won't be requesting help from TWC with this

Actions:

- BCA's will provide TWC with questions on the draft plan consultation ahead of submitting a formal response by way of 'informal' feedback



Telford & Wrekin
Co-operative Council

Protect, care and invest
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Duty to Cooperate (DtC)

Black Country Authorities (BCA's) and Telford & Wrekin Council (TWC)

Date of meeting: 4pm Tuesday 15th April 2025

In attendance:

██████████ Telford & Wrekin Council (GA)
- Dudley Council (VP)
- Sandwell Council (PM)
- Walsall Council (NB)
- City of Wolverhampton Council (MR)
- Telford and Wrekin Council (HB)

Apologies:

██████████ – City of Wolverhampton Council (IC)

Notes:

Telford Update

- 17th March started consultation of Reg 19 plan
- Consultation ends 5th May
- TWC going under the updated (December 2024) NPPF
- Objections likely to be focused on the Sustainable Communities sites but don't foresee anything major emerging issues at this moment in time, but will be reviewing responses in detail
- Aiming to submit late June / early July
- Delegated authority (via Cabinet) to submit the plan
- BCA's want TWC to make it clear that the allocations within the plan is the maximum capacity for the borough and therefore no additional capacity available – TWC confirmed this was the case and will clarify this as part of submission.
- TWC stated there was also circa 5% buffer to allow for potential under delivery during plan period.

Dudley Update

- Finished consultation in November 2024 and submitted 14 February 2025
- Reg 19 consultation received approx. 700 reps, 200 responses
- DMBC were advised minor mods won't be examined
- Advised to complete all of their topic papers before examination
- Finalising dates for hearings – likely to start in the Summer 2025

- Telford confirmed no other cross boundary issues with Dudley and have formalised this in a letter to Dudley MBC.

Sandwell Update

- End of consultation in September, submitted in December before the NPPF came out
- 46 Respondents and 376 representations
- Hearing sessions likely to start in the Summer 2025

Wolverhampton Update

- Only had 48 responses – submitted by end of March after close of consultation in January
- Look at response to Reg 19 consultation statement to see how they dealt with not recommending any minor mods
- Their inspectors have been appointed, just waiting to hear from them

Walsall Update

- Working on their timetable
- Reg 18 consultation likely for the Autumn
- Currently procuring work for their evidence base

SoCG

- May need to make some adjustments to the document TWC have amended

Other

- BCA's pointed out the recent changes in affordability ratios that will impact TWC housing need figure. TWC may be expected to update housing need figures prior to submission or as part of the examination.
- BCA's suggested that TWC may be expected to have a later plan start date for housing purposes, in accordance with the standard method, and may need to extend the Plan end date to ensure 15 years from adoption. This may result in a reduction in the global contribution from TWC to the BCA's.
- BCA's suggested that the next LPA to submit takes the lead on updating the GBBCHMA Statement of Common Ground.

Actions

- TWC to send an email to Sandwell/Walsall/Wolverhampton to agree whether there are any non-housing cross boundary issues that require a Statement of Common Ground.

Appendix 5c – Meetings between South Staffordshire, Black Country Councils and Birmingham Council

South Staffs Council, Black Country Local Authorities, Birmingham City Council

DTC Meeting 31.10.2022

Attendees:

Kelly Harris (KH) - South Staffordshire District Council (SSDC)

Ed Fox (EF) - SSDC

Patricia McCullagh (PM) – Sandwell Metropolitan Borough Council (SMBC)

Michelle Ross (MR) – City of Wolverhampton Council (CWC)

Vicki Poplewell (VP) – Dudley Metropolitan Borough Council (DMBC)

Maria Dunn (MD) – Birmingham City Council (BCC)

Uyen-Phan Han (UPH) - BCC

Liz Forster (LF) – Walsall Metropolitan Borough Council (WMBC)

Neville Ball (NB) – WMBC

Gypsy and Traveller unmet needs:

EF – BCC has responded but Black Country authorities haven't to date

KH – Are there plots on public sites? Site options for new public sites, including in Green Belt?

Engaged with site promoters to see if there's opportunity for new public sites? Considered publicly owned land? This is what South Staffs have done, need to understand what others have.

VP – have recently re-examined site options; can come back in writing

KH – need to understand the process others have gone through

NB – one Council public site is full, just opened a temporary transit site with 6 pitches, haven't considered options for new sites other than a existing SAD non-GB allocation; goes towards existing needs, haven't discussed public sites with GB housing sites but have with non-GB housing sites, non-GB sites indicated it would affect viability to do so.

MR – latest G&T assessment isn't published yet, likely to be published in January. 1) No, 2) No, 3) No but can do that during consultation on Issues and Options, 4) Yes but could do further work at January consultation to examine this. Will examine but can't respond with any substance before January.

PM – Will be examining these four areas through Issues and Options on Sandwell plan. 1) No, 2) No, 3) No but will examine through Issues and Options and 4) have looked at some for transit sites but not any further.

Apportionment of housing contributions:

IC – have discussed this with Bham previously but see a need to separate out housing contributions between 4 BC LPAs and BCC. May be significant for justifying Green Belt exceptional circumstances. From Shropshire examination the earlier this is sorted out the better. Most progressed offer is Shropshire (signed SoCG) and some are expressed to BC specifically (e.g. Lichfield). Others aren't attributed to any individual LPAs.

IC – Have proposed an approach in circulated note based on net migration flows between importing and exporting authorities. Based on authorities mainly to north and west of conurbation as this is where majority of local plan activity is at this point. Based on a migration based method, % figures in Table 2 of the circulated note could be used as basis for separating out offers between four BC authorities and BCC. Would like to see this reflected in the SSDC SoCGs to provide certainty.

IC – Might be argued that if LPA area doesn't have a shortfall then it shouldn't be receiving offers from neighbouring LPAs. CWC want to use this approach as soon as possible to allow local plans to progress.

MD – Want to understand how lack of BC plan impacts shortfalls and want to see how contributions would be distributed across LPAs where a contribution would be given to LPA without a shortfall (e.g. if Walsall's needs are met, where does Lichfield's contribution go). What happens to individual LPAs within the Black Country which can meet their own need, but which could have a role in assisting with Bham's shortfall?

IC – If moving to four individual local plans it pushes preparation back a year, may not be the case that some LPAs which were meeting own needs still can

NB – May not reflect people moving from Sandwell to other BC authorities, which in turn then have residents moving to shires

MD – If we can't treat as collective HMA shortfall (Bham preference) then the % are a sensible way to go about it but does appear to make life difficult for Sandwell which has a large shortfall but no direct relationships.

IC – Sandwell's strongest relationships are with Dudley, Wyre Forest, Bham. If Wyre Forest was more progressed then this approach would give Sandwell a stronger argument for asking them.

MD – Should we be looking across the whole HMA then?

KH – Probably for next iteration of HMA SoCG if we're going down that route. Also need to be mindful that Wyre Forest isn't in HMA. Need to be mindful of what we can agree now for SoCG.

IC – Would seek agreement on approach to apportionment if not number at this stage.

KH – Over the next couple of months could Bham and Black Country work together on this?

MD – Would need the next couple of months to work this out.

IC – Could SoCG commit to doing apportionment based on evidence of functional relationships between LPAs?

MD – would need to check with senior management given that approach to date has been to push for singular HMA shortfall

IC – Would like to have agreement to work together on how to apportion in areas of agreement

MD – Agree it would be better to show we have a way forward on this

KH – If BCC can get wording to us by end of this week that would enable us to put in

AGREED – BCC to provide wording by the end of this week to put into each SoCG on way forward for apportionment

Timescales for plan-making

KH – Any update from BC LPAs on this in light of individual plans being pursued?

MR – CWC LDS indicates consult in Spring 2023, Reg 19 Summer/Autumn 2023, examination 2024, adopt 2025

NB – WMBC LDS going to cabinet this week, going back to Reg 18, Issues and Options after elections next Summer, submit March 2026

VP – DMBC looking to incorporate Briery Hill AAP into plan, Reg 18 plan after elections in June/July 2023, not agreed submission/adoption timescales at this stage.

MD – Submission 2025, adoption 2026 for BCC, can't sit still and wait for new system

IC – Apportionment will be important if plans are all operating to different timescales

PM – LDS in December 2022, looking to do one Local Plan with Issues and Options February/March 2023, adoption early 2026

Signing statements of SoCG

KH – HMA SoCG; signed copy from Bham, SSDC's likely to be signed subject to scrutiny, going to be chasing today. Individual SoCGs need to be agreed at officer level this week (prior to consultation) but any idea of timescales for formal sign off?

IC – End of November for CWC

MR – should education be included at this stage?

PW – could reflect current position on school places; that each CWC and SSDC working with education authority confirm that each area can accommodate its own growth in school places

MD – Can likely do BCC's under delegated sign off

MR – Would sign off be delayed until submission next year?

KH – Need sign off as soon as possible to support Regulation 19. Will happily participate in updated SoCG with CWC and others at submission stage but that needs to be in addition to Regulation 19 stage SoCG, not instead of.

AGREED – Officer comments back by end of the week with aim to sign individual SSDC SoCG after this.

AGREED – Dudley, Sandwell and Walsall to confirm individual decision making processes in light of ABCA no longer being decision making signatory

Appendix 5d – Meetings with South Staffordshire FEMA LAs

02.11.2022 – FEMA duty to co-operate meeting minutes

Black Country South Staffordshire Cannock Stafford - Employment FEMA SoCG Duty to Cooperate meeting

2nd November 2022

Attendees:

(AY) – Stafford Borough Council
(NB) – Walsall MBC
(DH) – Dudley MBC
(IC) – City of Wolverhampton Council
(SB) – Cannock Chase District Council
(HH) – Cannock Chase District Council
(MW) – Sandwell MBC
(KH) – South Staffordshire District Council
(EF) – South Staffordshire District Council
(PW) – South Staffordshire District Council

Matters discussed:

KH – Revised FEMA SoCG with Stafford, Cannock and Black Country comments circulated

SoCG latest draft presented for comments and agreement within meeting

AY – will add in a sentence to clarify Stafford FEMA in introduction

AY – will add in an extra sentence saying WMI 8ha apportionment isn't needed

AY – will add in text in table at end that FEMA is predominately Stafford's own borough area

AY – what are the next steps in terms of the Black Country EDNA, implies that relationship to Stafford will be reviewed?

IC – EDNA likely to be published in February to support CWC/SMBC Reg 18 plans

AY – will there be conversations in advance if local authorities are affected by this?

IC – yes

KH – Black country evidence as published to date will be kept until new evidence base is available?

IC – Yes, FEMA will have light touch review in new EDNA also, likely that strong links between BC LPAs will remain

Presentation of SoCG finished; agreement to text of document and publication in draft by SSDC from all

AY – When is signing of SoCG likely to be required?

KH – Will be published in draft as part of DtC topic paper alongside South Staffordshire Publication Plan, hoping for signatures as soon as possible after that

IC – Not sure CWC can sign in advance of Reg 19 consultation response, do they need to be published in draft at Reg 19?

KH – follows from PAS advice in 2021 that raised concerns over lack of SoCG to date

PW – SoCG intended to be record views understood to be agreed to date

IC – Inclusion of SSDC employment contribution being agreed might stray into endorsement of Reg 19

NB – SoCG also helps with the tests of soundness being met at Reg 19

IC – Think housing is more firmed up in previous conversations (4,000 offer) and employment isn't

KH – understand signing process will need Reg 19 consultation response from Black Country to be agreed first to avoid perception of prejudging

DH – Para 4.5; repeats “must” – can we change to “should”?

KH – This is in section on SSDC's position – may not be view of all but is SSDC's view

IC – Could change it to “must continue”?

KH – Agreed

ACTIONS: AY to confirm text changes to SoCG by Friday 4th November

ACTIONS: Further info on signing timescales expected from all

ACTIONS: SSDC to compile/format SOCG including agreed wording change at para 4.5

Appendix 5e – Meeting with Lichfield Council

Duty to Co-operate Meeting

BCLAs/ Lichfield DC

8th November 2023

1	Lichfield/BCLAs Statement of Common Ground 2022 included a contribution of 2000 homes for the BC BCA Concerns - Not a sufficient contribution. - Push housing into less sustainable locations. - 4500 is considered to be a more appropriate number (as per PD document); - decrease has not been justified. - 13,306 capacity with 9,727 to be delivered – buffer is too big and could contribute more to unmet need. Lichfield – starting again. Will take into account the existing capacity of 13,306 plus any new capacity in new settlements.
2.	Lichfield Update Cabinet decision – 23rd September 2023: - Recommend withdrawal from EiP – Full Council will ratify. - Produce withdrawal notice. - Letters going out this week. - Documents removed from the website - 6 week legal challenge period. Unsure as to what happens next . Uncertainty around plan-making. Reasons for withdrawal: - Concern over the appropriateness of the strategy. - Location of proposed new development. - PINS raised a number of issues. Will need to do a new Reg18 consultation as the Plan has been withdrawn. Will need to do a new Reg18 consultation as the Plan has been withdrawn. SoCG – won't be ready to commit to a new SoCG. Will be planning under at the new system which has no commitment for DtC.

Appendix 5f – Meetings with Shropshire Council

Duty to Co-operate Meeting

BCLAs/ Shropshire Council

9th November 2023

1 Shropshire Local Plan Contribution to BCLAs

SoCG signed in 2021

1500 dwellings – 3 sites

30ha employment land – Shiinal Ind Estate

Operational issues – how will the council meet the requirement.

PINS asked for specific sites to be identified that will meet the needs of the BC rather than just subsume the numbers into the Plan.

One developer sent in a protocol letter stating that continuing with the EiP would be unlawful

PINS also had concerns on soundness and are seeking clarification on 11 points, including reasonable alternatives to meeting the BC need (SA).

May have another year of the EiP and may need to update the SoCG

2. BC FEMA

- Numbers and supply have been updated to 2041
- Shropshire and S.Staffs contribution taken into account;
- Left with 19ha shortfall;
- Potential for a contribution from Bromsgrove

Duty to Co-operate Meeting

BCLAs/ Shropshire Council

10th June 2024

Attendance Eddie West (EW) - Shropshire Council
Dan Corden (DC) – Shropshire Council
Ina Culley (IC) – City of Wolverhampton
Vicki Popplewell (VP) – Dudley Council

Apologies Sandwell Council

1 EW – Advised further dates were agreed for Examination Hearings in October on the Spatial Strategy followed by detailed sessions on site allocations (inc omission sites) in November.

Further hearings on other site allocations would be held post the above Hearings.

Stages as follows-

- Overall Spatial Strategy
- Detailed site allocations
- Other site allocations

Shropshire have now used 2020 as its base date to inform its Housing Need calculation, but in responding to the Inspectors concerns has included the proposed Black Country housing and employment contributions as an additional amount above the Shropshire based needs. This has led to an uplift in housing requirement (500 dwellings) and employment land requirement (10ha) overall. EW clarified that the additional housing and employment requirements is for Shropshire's need and not a contribution to the BC needs.

EW advised Shropshire's contribution to the BC needs remained the same 1,500 homes and 30ha of employment land.

Additional work on the SA has been carried out to summarise the uplift position. Table 9.1 of the SA provides detail of the uplift options.



2. **Shropshire/BC SoCG**

Agreed that existing SoCG may require an update to reflect the updated /additional evidence prior to the next stage of Hearings.



Appendix 5g – Meetings with Sandwell Council



Minutes

Meeting title:	Duty to Co-operate – City of Wolverhampton Council
Meeting date:	3 rd June 2024
Meeting time:	14.00- 15.00
Meeting venue:	Teams
Present:	Ian Culley, Michele Ross, Bart Shirm

1. Introductions

- Michele Ross – Planning Policy Manager, Wolverhampton
- Ian Culley – Lead Planning Manager, Wolverhampton
- Bart Shirm – Senior Planning Policy Officer, Sandwell

2. Sandwell Council Local Plan timetable

BS advised preparation timetable for the SLP as follows:

September/October 2024	Cabinet and Full Council approval to consult on Submission Plan (Reg19) and then submission to Secretary of State
November – December 2024	Six-week Submission Plan consultation (Reg19)
January 2025	Submit the Plan and representations to the Secretary of State
January 2025 – Summer 2025	Window for holding the Examination in Public (likely to be a 2-3 week-long hearing) followed by Inspector's report
30 th June 2025	Last date for submitting Plan under current system
Late 2025/Early 2026	Adoption at Full Council (assuming plan has been found 'sound')

3. Wolverhampton Council Local Plan Update

MR explained that Wolverhampton is preparing its Local Plan around a month behind Sandwell. The Reg.19 WLP is due to be presented to Cabinet in November, Council at the beginning of December with consultation taking place December 2024 – January 2025. The anticipated adoption date is 2026.

MR explained that the WLP sets out policies and allocations to guide the growth of the city until 2042. The WLP does not allocate sites in the City Centre. The Council intend to adopt a Supplementary Plan (under the new planning system) or an Area Action Plan to replace the existing City Centre



Area Action Plan which will provide site allocations and specific policies for the City Centre.

MR explained that the majority of development opportunities within the City Centre are already captured by the existing Area Action Plan.

4. Wolverhampton Council reps to Sandwell Local Plan / cross boundary matters

BS summarised the Wolverhampton Reg.18 representations to the Sandwell Local Plan -

- Wolverhampton recognise that Sandwell has fully explored all opportunities within the borough to maximise development capacity and that it will not be possible to meet all development need within the Borough. It is necessary for Sandwell to ask other authorities if they are able to contribute towards meeting Sandwell needs through the allocation of land in their Local Plans.
- Wolverhampton is committed to excluding any green belt land from development in the emerging Wolverhampton Local Plan.
- The Wolverhampton Local Plan is likely to generate a shortfall of around 11,500 homes and 50ha of employment land. Wolverhampton is not in a position to provide land within the emerging Wolverhampton Local Plan to meet either housing or employment development needs arising in Sandwell.
- The West Midlands Resource Technical Advisory Body has submitted responses to the Sandwell Local Plan on behalf of member authorities (including Wolverhampton) regarding strategic waste management.

IC confirmed that the overall position for Wolverhampton set out in its Reg.18 representations remain the same.

MR confirmed that Wolverhampton received Sandwell's representations to its Reg.18 (Issues and Preferred Options) consultation, however this was submitted with the caveat that it is yet to be politically endorsed by Sandwell's Members. **Action: Sandwell to confirm in writing to Wolverhampton whether its representations have been politically endorsed.**

5. DtC correspondence / matters arising / SoCG

BS discussed the need for a SoCG between the Black Country authorities for housing to include apportionment methodology and a SoCG between the FEMA (BC and S.Staffs) for employment.

IC agreed that both SoCGs are needed.

IC said that a SoCG is needed across the wider GBBCHMA explaining position on housing as well.

MR suggested that a housing SoCG look to cover Gypsy and Traveller provision as well as there is a shortfall of 19 pitches in the Reg.18 WLP which



is likely to stay the same at Reg.19.

Post meeting note: Sandwell MBC intends to draft a SoCG between Sandwell and Wolverhampton relating to housing, employment land, waste and Gypsy and Traveller provision.

IC explained that Wolverhampton is waiting for a formal response from Sandwell as to whether it intends to participate in the Strategic Growth Study Update.

Action: Sandwell to formally confirm whether it is partaking in the Strategy Growth Study Update.

BS and MR agreed that there are currently no cross-boundary infrastructure matters between the two authorities that need to be resolved outside of joint evidence base work (such as the SWECO transport model).

6. Evidence Base

It was confirmed that the four Black Country authorities are continuing to work together on certain evidence including:

- Refresh to extend end date of EDNA to 2042 – brief and costs being agreed
- Refresh to extend end date of Centres Study to 2042– Wolverhampton to confirm the scope of the update.
- Transport Modelling work
- SHMA – housing / labour link – Sandwell Stakeholder Event this Wednesday. Wolverhampton has commissioned HDH to undertake their SHMA update in parallel to Sandwell.

7. Next Steps

- BS to circulate notes for agreement.
- Sandwell to draft SoCG between Sandwell and Wolverhampton relating to housing, employment land, waste and Gypsy and Traveller provision
- Other SoCG relating to all Black Country authorities to be discussed in Planning Lead Meetings

8. AOB

BS explained that the RTPI Young Planners are organising an event at the National Brownfield Institute in Wolverhampton on 10 July and that officers are welcome to register and attend.

Appendix 5h – Meetings with Dudley Council

Notes of Meeting

18 June 2024, 10:00 – 11am

MS Teams

Attendees

VP – Dudley MBC (DMBC)
 EV – Dudley MBC (DMBC)
 IC – City of Wolverhampton Council (CWC)
 MR – City of Wolverhampton Council (CWC)

1.	Introductions
	None Required
2.	Update Dudley Local Plan (DLP) Reg 19
	VP provided an update on the timescales. Confidential timetable at present: Reg 19 – Cabinet in September and Full Council in October with consultation in November. Target for submission prior to June 2025 remains. Plan not significantly changed in terms of strategy/policies – updates to sites and housing/employment land supply. There are a few additional housing sites following landowner responses to Reg 18 reps which are likely to reduce the overall shortfall but not significantly. Following landowner responses to the Reg 18 Plan there will likely be a small reduction in employment land supply of 2ha. No change in Gypsy and Traveller provision shortfalls.
3.	Update Wolverhampton Local Plan (WLP) Reg 19
	CWC are aiming for Cabinet in mid November 2024 and Full Council in December followed by a 6-week consultation Dec and January and submission in June 2025



	100 responses were received to the Issues and Options Consultation. CWC received an employment related objection from Nurton Developments. Dudley received the same objection. WLP plan period 2024-2042
4.	Response(s) to Dudley/Wolverhampton Reg 18 Plans and DtC correspondence
	Neither authority raised objections to each other's Plan. With regards to Dudley's comments on housing capacity in Wolverhampton's City Centre (Strategic Centre), CWC advised that the further evidence base will support this position. CWC to take on board Dudley's reps in next version of the WLP. Action - KL to liaise with MR on environment policies and viability work. CWC advised that they had sought assistance from APSE on Renewable Energy. Both LAs were involved in the joint SAC HRA and air quality work and hoped this would be reporting in time to inform Reg 19 Plans.
5.	Mineral and Waste DtC /Matters
	BCLAs have met – no strategic issues arising between Dudley & Wolverhampton.
6.	Evidence Base Updates
	Black Country LAs Joint evidence work – transport, centres, EDNA, emp/housing evidence ongoing. Dudley was updating its HMA, V&D, SFRA, Water Cycle Study. It would be commissioning an update of its open space audit. Viability – contributions would be required to make schemes viable. Dudley would seek clarification required on this and agreed to share this info with CWC.
7.	Further DtC Correspondence /SoCG



	Agreed Bi-lateral SoCG but unlikely any issues would be arising therefore review the requirement for one as Plan progress. Reps to Reg 19 Plans would clarify any issues and anything outstanding will be sorted via SoCG. Drafts SoCG prior to Reg19 and then review post Reg 19 for formal agreement and sign off prior to submission. Both CWC and Dudley would work on strategic SoCG for FEMA and HMA.
8.	Next Steps
	Apportionment agreement for contributions to BC and Birmingham contributions – need to make this formal in relation to reps received.
9.	AOB
	None
10.	Next Meeting
	Early September ahead of Dudley's Local Plan going to Cabinet.

Dudley MBC and City of Wolverhampton

Duty to Co-operate Meeting

Notes of Meeting

6 September 2024, 12:00 – 1pm

MS Teams

Attendees

VP – Dudley MBC (DMBC)

KL – Dudley MBC (DMBC)

IC – City of Wolverhampton Council (CWC)

MR – City of Wolverhampton Council (CWC)

1.	Notes of last meeting 18 June 2024
	Agreed
2.	Update Dudley Local Plan (DLP) Reg 19
	The Reg 19 Plan will be submitted to Cabinet on 25 September for approval to consult. This will be followed by a six-week consultation with provisional dates 18 October – 29 th November 2024. Dudley intends to submit the Plan in 2025, subject to the publication of the NPPF and the related transitional arrangements.
3.	Update Wolverhampton Local Plan (WLP) Reg 19
	The Regulation 19 Plan will be submitted to Cabinet in November for approval to consult. This will be followed with a six-week consultation in December – January. Plan submission will be subject to the publication of the NPPF and the related transitional arrangements.
4.	Waste and Minerals DtC Matters
	This has been covered in a separate meeting with Black Country Officers leading on these matters.
5.	Evidence Base Updates
	Dudley – HMA Study has been finalised Viability & Delivery Study – has been finalised SA and HRA – finalised WCS and SFRA – finalised



	Wolverhampton Evidence commissioned as per above and was nearing completion to inform their Reg 19 Plan. Joint Evidence Previously discussed by Black Country Planning Leads • Centres Work – nearing completion • Transport Modelling – nearing completion • AQ Modelling/HRA – nearing completion and wider implications to be considered • Black Country EDNA – 2024 update in progress to ensure that the use of the economic modelling has regard to more recent census data and the most recent post covid economic data available. Subject to the completion of this work it was acknowledged that this may require a modification to Sandwell and Dudley Local Plan figures but was unlikely to be significant.
6.	DtC Correspondence /SoCG
	Agreed that a HMA wide SoCG would be drafted for circulation and agreement. This would focus on the contributions made to date from the contributing Local Authorities (LAs) and the receiving LAs. This SoCG would need to include/agree the details of the approach /methodology the to apportionment of the contributions between the relevant local authorities. The apportionment would be based upon migration data between the contributing LAs & receiving LAs. VP to draft a Draft HMA SoCG for circulation. Black Country FEMA SoCG – would be prepared and circulated for agreement. Ian Culley to co-ordinate. Agreed that the Black Country SoCG to agree the apportionment of contributions of the Black Country could be tied into the wider HMA SoCG. Bilateral SoCG would be required (where relevant) between each local authority on other cross boundary related matters. Dudley/Wolverhampton Bilateral SoCG would pick up cross boundary matters as picked up in each other's representations to the respective local plan consultations.
7.	Next Steps
	None flagged up other than in item 7 above
8.	AOB
	None



9.	Next Meeting
	4 th November 2024



Dudley MBC and City of Wolverhampton

Duty to Co-operate Meeting

Notes of Meeting

4 November 2024, 2pm – 3pm

MS Teams

Attendees

VP – Dudley MBC (DMBC)

KL – Dudley MBC (DMBC)

MR – City of Wolverhampton Council (CWC)

1.	Notes of last meeting 6 September 2024
	Agreed
2.	Update Dudley Local Plan (DLP) Reg 19
	Currently out to consultation which is due to close on 29 November 2024. Dudley will then determine next steps depending on the NPPF publication. VP to work on SoCG – to be issued for agreement. Potentially go to Full Council 2 nd December 2024 for approval to submit.
3.	Update Wolverhampton Local Plan (WLP) Reg 19
	To be considered by Cabinet w/c 11 th November. Expect consultation to commence 25 November 2024. Intend to take their Plan to Full Council 4 th December to seek approval to submit. The Regulation 19 version of the WLP confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.
4.	Waste and Minerals DtC Matters
	None arising – matters between the BC auths have been previously covered in a wider BC meeting on Waste and Minerals matters.
5.	Evidence Base Updates
	Work for both LAs has been completed. Dudley's evidence based has been published on the website.
6.	DtC Correspondence /SoCG
	Agreed that a HMA wide SoCG would be drafted for circulation and agreement. This would focus on the contributions made to date from the contribution Local Authorities (LAs) and the receiving LAs. This SoCG would need to include/agree the details of the approach /methodology the to



	apportionment of the contributions between the relevant local authorities. The apportionment would be based upon migration data between the contributing LAs & receiving LAs. VP to draft a Draft HMA SoCG for circulation. Black Country FEMA SoCG – would be prepared and circulated for agreement. Ian Culley to co-ordinate. Agreed that the Black Country SoCG to agree the apportionment of contributions of the Black Country could be tied into the wider HMA SoCG. Bilateral SoCG would be required (where relevant) between each local authority on other cross boundary related matters. Dudley/Wolverhampton Bilateral SoCG would pick up cross boundary matters as picked up in each other's representations to the respective local plan consultations.
7.	Next Steps
	None flagged up
8.	AOB
	None
9.	Next Meeting
	TBC

Appendix 5i – Meeting with Walsall Council

City of Wolverhampton and Walsall Local Plans

Duty to Co-operate Meeting

Notes of Meeting

13 February 2025, 16:30 – 17:30

MS Teams

Attendees

IC – City of Wolverhampton Council (CWC)
MR – City of Wolverhampton Council (CWC)
NB – Walsall MBC (WMBC)
DH – Walsall MBC (WMBC)

1.	Update Wolverhampton Local Plan (WLP) Reg 22
	The Regulation 22 Plan will be submitted to the Secretary of State by 7th March 2025, in line with the transitional arrangements set out in the December 2023 NPPF. Walsall submitted representations to the R19 consultation subject to Cabinet Member approval. WMBC will seek to submit the final version of the representations to CWC before the 7 March 2025. WMBC will also confirm whether the representations raised any soundness issues as this was not explicitly stated in the officer version. The officer reps highlighted issues around the shortfall between housing land need and supply, the absence of a green belt review to address this and a number of more detailed issues around specific policies. WMBC accepted that the approach of not identifying sites in the green belt is compliant with the December 2023 NPPF. CWC explained that they are unlikely to propose any modifications to the R19 Plan but there may be a number of areas where some changes could be provide for in order to assist with interpretation. These are not soundness issues and could be explored during the examination. It was agreed that there will be no SoCG between WMBC and CWC.
2.	Update Walsall Borough Local Plan (WBLP)
	The Walsall Borough Local Plan will progress under the December 2024 NPPF and the existing Development Plan Regulations, requiring it to be submitted by December 2026. Given the increased housing requirement in the new NPPF, it will not be possible for Walsall to meet this need on the basis of the sources of supply set out in the draft Black Country Plan (including sites currently in the Green Belt). A R18 Plan will be published for consultation in Autumn 2025, and R19 Spring 2026.

	The strategic approach will inform the need for additional evidence including HMA. WMBC will confirm their approach to taking part in the completion of the Rapleys instruction on the alignment of jobs and homes.
6.	Approach to key cross boundary issues
	The key cross-boundary issues are addressing the housing and employment land shortfalls. These will be addressed in line with the approach set out in the GBBCHMA and BCFEMA Statements of Common Ground. It was agreed that there was no need for a separate SoCG between Walsall and CWC No other key issues.
7.	Next Steps
	None flagged up
8.	AOB
	None

Appendix 5j – Meeting with Stafford Council

	New Local Plan 2020 - 2040 Preferred Options Duty to Cooperate meeting: 17 November 2022 City of Wolverhampton Council (CWC) & Stafford Borough Council (SBC)
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Minutes of meeting

1. Attendees

- IC - Lead Planning Manager (CWC)
- MR - Lead Planning Policy Manager (CWC)
- AY - Strategic Planning and Placemaking Manager (SBC)
- HM - Planning Policy Officer (SBC)

2. Stafford Borough Council Local Plan process update

SBC are currently consulting on the Preferred Options version of the new Local Plan 2020-2040. Consultation closes at 12 noon on Monday 12th December 2022 and representations are encouraged. A short video was shown introducing the Preferred Options document. A presentation was then shown providing a brief overview of the Preferred Options proposed allocations and draft policies, including the Stafford Borough key diagram, as well as Stafford and Stone.

3. City of Wolverhampton Council Local Plan process update

CWC are currently preparing the new Local Plan, with the latest timetable sets out Preferred Options consultation taking place in February 2023 including site allocations, based on work of the Black Country Plan which has now been discontinued.

4. Key issues at this stage

- 4.1. It was confirmed by CWC that an email was received from SBC, which included the draft Duty to Cooperate pro forma associated with the New Local Plan 2020 - 2040 Preferred Options consultation.
- 4.2. CWC are currently reviewing SBC's Preferred Options and intend to provide a response in due course.
- 4.3. CWC asked for information with regards to SBC's climate change and zero carbon policies, as SBC are going beyond current building requirements. Further information on SBC's policies can be found in the climate change

policy section of the Preferred Options draft plan, and in the topic paper that is available online. A whole plan viability assessment has also been produced.

- 4.4. SBC have made provision for at least 2,000 houses above the current Local Housing Need requirement, which would be delivered as part of the Meecebrook proposals. The surplus would be available to the wider region and SBC currently have not taken any decisions about authorities that may be assisted regarding unmet housing needs. A decision will be made following receipt of Preferred Options representations and will be available at the next stage of the plan process.
- 4.5. SBC have an employment allocation target of 80 hectares (ha) as a minimum, and a 150 ha supply, which includes 15 ha at Meecebrook. CWC raised the query as to whether some of this oversupply would be provided to neighbouring authorities with a shortfall to help meet their employment needs.
- 4.6. CWC and SBC acknowledged the continued joint working on the Cannock Chase Special Area of Conservation and meeting the Habitat Regulations Assessment requirements, including nutrient neutrality.

Appendix 5k – Black Country Local Authority Planning Leads meetings

Black Country Planning Leads - Duty to Co-operate Meeting - 19th January 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country DfC meeting notes – N/A	
2.	Black Country Local Plans Dudley – Preferred Options Summer 023. R19 Summer 2024. UDP approach Sandwell - 6th Feb I&O. Unitary Plan approach Walsall – I&O Summer 2023 after local elections. Submit June 2026. UDP approach Wolverhampton - current programme anticipates I&O going to Cabinet Feb 2023	
3.	Evidence and Cross Boundary Issues Transport – Transport modelling study - completed agree to publish on Individual websites Car parking study – completed agree to publish on Individual websites EDNA update – completed – agree to publish on Individual websites. IC to ask WECD for extended projections beyond 2040. Waste – completed but not published. Runs to 2039 and will need updating Minerals - completed but runs to 2028 and will need updating Housing – N/A G&T study - completed agree to publish on Individual websites. PM to confirm what approach should be used to define definition of needs BC playing pitch strategy – completed – published by CWC November Centres Study – not yet completed and won't be until after 6th February	
5.	HMA and DfC SoCGs	

	Wider HMA SoCG - HMA Statement of Common Ground and Work Programme – Sandwell happy to sign. South Warwickshire Local Plan – out for consultation	
6.	AOB Regional Air Quality work – some delay in being able to commission the work due to capacity of the consultants and updated information on housing proposals in emerging Local Plans. Traffic modelling – AM to advise on the opportunity to prepare updated traffic modelling work to inform future local plan preparation – Ideally in place by mid-2024.	

Black Country Planning Leads - Duty to Co-operate Meeting - 9th March 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country DfC meeting notes – 19/01/23 All actions completed apart from Air Quality work which is in progress	
2.	Black Country Local Plans Dudley – R18 consultation summer with Cabinet late June/July. This subject to the final NPPF being published Sandwell - R18 consultation to 20th March. R18 Draft Plan Autumn 2023 Walsall – R18 I&O consultation June with draft Plan Summer 2024. The latter stages will need to be prepared under the new system Wolverhampton - R18 I&PO July consultation subject to NPPF. R19 Feb 2024 to submit mid-2024 and adopt 2025. Similar timetable to Dudley and Sandwell	
3.	Evidence and Cross Boundary Issues Transport – BCT are working up the scope of a commission to update the existing modelling work prepared for the R18 BCP. Discussion reflected the challenges of joint evidence across the BC associated with differing plan programmes and certainty over confirmation of sites. A joint baseline assessment was suggested with the Individual LAs commissioning their own work going forward to support Individual Local Plans. This proposal to be worked up by BCT officers and circulated to PL. Car Parking Study – completed and published on Sandwell Local Plan consultation. EDNA update and Strategic Sites Study – Completions data required. Scope is to extend the forecasts to 2041 and provide information on associated employment growth by sector. Waste and Minerals – proposed way forward to commission joint baseline report and individual reports to support the 4x local plans. Housing – N/A G&T study - need to agree to using a common definition (middle definition) but review in the light of emerging case law and Inspectors Reports	ALL

	Centres Study – not yet completed and won't be until after 6th February SFRA – need for an update is being scoped by the Environment Group Water Cycle Study – Environment Group to review in the light of Local Plan consultation responses.	
5.	HMA and DfC SoCGs HMA Statement of Common Ground and Work Programme - CWC and SMBC have signed. DMBC and WMBC to review. South Staffordshire SoCGs – CWC, DMBC and SMBC have signed. WMBC to review Approach to DfC going forward – each BCLA will need to write to neighbours including each other to understand their ability to meet shortfalls and highlight the need to apportion the current BC offers. Sandwell to issue DfC letter pre-May on this basis. Neighbouring Local Plan consultations South Warwickshire - All responded in a positive manner. Shropshire Local Plan Interim Report – Agreed BCAs to meet Shropshire to discuss potential contributions Lichfield – NB to contact Lichfield to understand current position on Examination	ALL IC NB
6.	AOB N/A	

5.	HMA and DfC SoCGs HMA Statement of Common Ground and Work Programme - agreed that there is a need to keep the momentum going and be consistent with the previous ABCA position as we are still under the current system. Walsall and Dudley still haven't signed as they are waiting for the revised NPPF. South Staffordshire SoCGs – no further progress Approach to DfC going forward – Sandwell to write to everyone re housing and employment shortfall and requesting certainty over the DfC offers left on the table through the MoU. Shropshire – BC only Solihull – BC and B'ham (potentially all to B'ham) Lichfield – 2000 to BC S.Staffs – HMA Neighbouring Local Plan consultations Shropshire Local Plan Interim Report – no action at present. Maybe a need for another session at EIP. Lichfield – Draft MoU is available but no progress as yet. BCAs need to meet with Lichfield to confirm the status of the 2000 figure.	Sandwell NB
6.	AOB N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 5th June 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country DtC meeting notes – 26/04/23	
2.	Black Country Local Plans Dudley – Reg 18 consultation in October after Cabinet in September Sandwell - R18 Draft Plan Autumn 2023 Walsall – will try and progress under the new system depending on whether green belt sites are included Wolverhampton - R18 I&PO reprogrammed to October	
3.	Evidence and Cross Boundary Issues Transport – work to cost £15 - 20K and is about to be commissioned. EDNA update and Strategic Sites Study – info provided to Warwick Economics - overall requirement will not change - still waiting on report Strategic Sites Study - next stage is to discuss where the sites will be located. Waste – no update. Housing – N/A G&T study – no update Centres Study – no update SFRA – no update Water Cycle Study – no update.	
5.	HMA and DtC SoCGs HMA Statement of Common Ground and Work Programme – no update South Staffordshire SoCGs – no further progress	

	Sandwell DtC letter – CWC do not want to move away from migration and cited Gt Manchester as an example. BCAs need evidence that Telford have a housing/employment shortfall before they accept the offer of contributions. Neighbouring Local Plan consultations Shropshire – no update Lichfield – no update	
6.	AOB N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 13th July 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country Dtc meeting notes – 26/04/23 All actions completed.	
2.	Black Country Local Plans Dudley – R18 Draft Plan - October Cabinet subject to NPPF Sandwell - R18 Draft Plan - October Cabinet Walsall – Local Plan Board meeting 14/7. I&O Feb/Mar under current system, but potential for being unable to adopt under current system and likely to get caught but the introduction of the new system. Wolverhampton - need to re-programme the LDS in the light of NPPF	
3.	Evidence and Cross Boundary Issues Transport – work not been commissioned but will go through the TfWM framework. EDNA update and Strategic Sites Study – report circulated for comment Waste – report circulated for comment. Housing – N/A G&T study - info supplied to consultants. Steering Group meets regularly to update on progress. Centres Study – nothing to report SFRA – each LA to commission its own SFRA work	
5.	HMA and Dtc SoCGs HMA Statement of Common Ground and Work Programme - Dudley likely to want to hold off until NPPF is published. Walsall position is unclear. HMA SoCG not been signed by Walsall or Dudley. Sandwell keen to progress. CWC position not yet confirmed. South Staffordshire SoCGs – no further progress	

	Approach to DiC going forward – Response to Sandwell letter - Dudley and Walsall drafts being prepared for the end of July. CWC completed in draft. Neighbouring Local Plan consultations Lichfield – Walsall to chase.	NB
6.	AOB N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 24th August 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country Dtc meeting notes – 05/06/23	
2.	Black Country Local Plans Dudley – Reg18 consultation - autumn Sandwell - R18 Draft Plan - October Cabinet – consultation autumn Walsall – paused awaiting NPPF Wolverhampton - LDS consultation in autumn. LP - Cabinet Jan/Feb. Aiming to consult before the elections. If NPPF released in January will have to go under new system	
3.	Evidence and Cross Boundary Issues Transport – review of modelling work commissioned and target date for completion end of September. £9k in total. This could result in the commissioning of additional work for individual LAs.. EDNA update and Strategic Sites Study – potential issue over the Walsall Plan will extend the Plan period to 2042 with implications for the EDNA. Agree to complete the current EDNA and then take a view on the need for an update in 2024 with greater certainty on Plan programmes. Strategic Sites Study - Study is progressing and IC to circulate updated slide pack. Waste – report circulated for comment. Housing – N/A G&T study – no update Centres Study – remove references to BCP and just refer to Local Plan SFRA – no update NRN - WMCA are leading on the Local Nature Recovery Strategy (NRS) work but working arrangements to be confirmed. BC already has a NRS which will be plugged into the WMCA work. The BC NRS	

	will be considered by BC Cabinets in the Autumn for the purposes of BNG work.	
5.	HMA and DfC SoCGs HMA Statement of Common Ground and Work Programme - The next meeting of the Group is September. South Staffordshire SoCGs – no further progress Approach to DfC going forward – Response to Sandwell letter - Walsall response to be endorsed by Planning Committee in Sept/Oct – CWC in Sept. Dudley to send an officer response followed by formal response in October following cabinet. Neighbouring Local Plan consultations Lichfield – An update report on the local plan will be taken to Lichfield Cabinet in September. LDC has indicated they will not respond until after that meeting. BCAs to arrange a meeting to discuss the way forward with LDC, i.e. to discuss the status of the offer in the submission plan and apportionment. Shropshire – to be invited to a meeting with the BCAs to discuss the strategic issues of housing and employment land. Coventry Local Plan – work has commenced.	NB
6.	AOB N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 10th October 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country DiC meeting notes – 24/10/23	
2.	Black Country Local Plans Dudley – Reg18 consultation - autumn Sandwell - R18 Draft Plan - October Cabinet – consultation autumn Walsall – paused awaiting NPPF and Planning Reform Wolverhampton - LDS will need to be updated when the NPPF is published. Likely to progress R18 consultation early 2024. If NPPF into 2024 is delayed, then may need to progress under the new system. Tight timetable to achieve Plan under the new system dependant on NPPF being issues prior to end of Year.	
3.	Evidence and Cross Boundary Issues Transport – no update. Sandwell to chase EDNA update and Strategic Sites Study – Final report was expected on 9th October. CWC to chase. IC will be updating the Employment Land supply Paper – equivalent of a SHLAA and sets out employment land supply. IC to circulate by the end of the week. Waste – no update Housing SHMA will need to updated separately for each LA GTAA - CWC plan period will need an update to 2042. May need to update the evidence base for 5 year supply. LAs to determine whether GTAA to be updated. CWC to speak to RRR Consultancy. Centres Study – remove references to BCP and just refer to Local Plan SFRA – no update NRN - WMCA are leading on the Local Nature Recovery Strategy (NRS) work but working arrangements to be confirmed. BC already has a NRS which will be plugged into the WMCA work. The BC NRS	Sandwell CWC CWC CWC

	will be considered by BC Cabinets in the Autumn for the purposes of BNG work.	
5.	HMA and DfC SoCGs HMA Statement of Common Ground and Work Programme - number of LAs confirmed that they wish to hold off progressing with any work prior to awaiting NPPF outcome. South Staffordshire SoCGs – no further progress Approach to DfC going forward – Response to Sandwell letter – no change Neighbouring Local Plan consultations Lichfield – Lichfield have Cabinet approval to withdraw Plan and this will go to Full Council for ratification. Dates to be circulated for DfC meeting Shropshire – to be invited to a meeting with the BCAs to discuss the strategic issues of housing and employment land. Coventry Local Plan – Issues and Options closed in October – Dudley confirmed that they had no comments to raise	WMBC SMBC
6.	A&B N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 16th November 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton		Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell		Neville Ball, Dave Holloway - Walsall
Apologies:		
		Actions
1.	Black Country Dtc meeting notes – 13/07/23 All actions completed.	
2.	Black Country Local Plans Dudley – will be issuing Dtc letters as part of the current consultation. Sandwell - The green belt has been identified as a hard constraint in the Sandwell Local Plan. The explanation for this approach needs to be addressed in the context of the requirements of the current NPPF. Walsall – no change. Wolverhampton – no change.	
3.	Evidence and Cross Boundary Issues Transport – Further work is required for Dudley, Walsall and Wolverhampton Local Plans, to be completed in Spring 2024. Not likely to be required for Sandwell. The AECOM Parking Study is published on the Sandwell and Dudley websites. EDNA update and Strategic Sites Study – EDNA completed. WMSESS Report is delayed to the end of November. Waste – Dudley and Sandwell updates completed. Awaiting Wolverhampton. Additional information is required for Walsall to enable the work to be completed. Housing – N/A G&T study - Info supplied to consultants. Steering Group meets regularly to update on progress. Centres Study – Final draft submitted to the LAs. Deadline for final comments – 16/11/23 Environment – LNRS work LNRS approved by all LAs except Sandwell (to go in December 2023). WMCA LNRS – Agree to attend individually at this stage.	
5.	HMA and Dtc SoCGs	

	HMA Statement of Common Ground and Work Programme - agree to pause until the NPPF is published. South Staffordshire SoCGs – no further progress Neighbouring Local Plan consultations Lichfield - meeting in January to understand current position Telford & Wrekin – Plan and evidence currently being reviewed to inform individual LA responses. Agreed that the overall approach from the LAs is to request that T&W fully justify the basis for the housing 'offer'. South Staffs letter – agreement that the letter is premature until at least the final NPPF is published, and that any major change in strategy may require another R18 consultation. CWC will be responding following January 2024 Cabinet meeting, as will Dudley, Walsall and Sandwell to consider timing of the response.	
6.	AOB N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 23rd December 2023**Present:**

Ian Culley (Chair), Michele Ross – Wolverhampton	Vicki Popplewell - Dudley
Patricia McCullagh, Philippa Smith, Andy Miller – Sandwell	Neville Ball, Dave Holloway - Walsall

Apologies:

		Actions
1.	Black Country Dtc meeting notes – 16/11/23 N/A.	
2.	Black Country Local Plans Dudley – R18 closing date 22 December. Sandwell - R18 closing date 18 December. Walsall – awaiting clarification of the new system. Call for Sites to commence in January. Wolverhampton – R18 programmed for February Cabinet subject to NPPF. 6 week consultation March - April. May need to produce a supplementary Plan for the City Centre under the new system.	
3.	Evidence and Cross Boundary Issues Transport – Consultants have produced a report with recommendations on the need for and scope of further modelling. Recommendation to use Prism 6 as it is more up to date but likely to be more expensive. Need timescales and costs for each option, with inception meeting in January. Stage 2 Parking Study approved but not published. CWC to publish in February alongside R18 consultation. EDNA update and Strategic Sites Study – EDNA completed. Publication of the WMSESS Report is imminent. Waste – Walsall and Wolverhampton reports are not yet completed. Officers to chase. Housing – N/A. G&T study – nothing to update Centres Study – Addendum finished and published Environment – LNRS work All BCLAs have approved the LNRS and is being used for BNG work.	WMBC/CWC
5.	HMA and Dtc SoCGs	

	HMA Statement of Common Ground and Work Programme - to be discussed at the next PL subject to the Issuing of the NPPF. South Staffordshire SoCGs – no further progress Neighbouring Local Plan consultations Lichfield - meeting in January to understand current position Telford & Wrekin – Walsall, Dudley, Sandwell and CWC submitting a response welcoming the principle of a contribution but clarity needed on the basis for it. South Staffs letter – CWC and Walsall to respond in January. Sandwell have responded to say the request is premature and any significant changes to the R19 Plan may be challenging procedurally and reminding SS of the BC shortfall. Dudley to respond on similar basis.	
6.	AOB N/A	

Black Country Planning Leads - Duty to Co-operate Meeting - 22nd February 2024**Present:**

IC – Wolverhampton (Chair)		VP - Dudley
PM, AM, PS - Sandwell		LF, NB - Walsall
Apologies:		
MR - Wolverhampton		
DH - Walsall		
		Actions
1.	Formalising Black Country Planning Leads Meetings Agreed that BCPL meetings be formalised as DtC meetings, with relevant DtC issues minuted as a formal record.	PS to take notes of meeting and produce minute
2.	Black Country Local Plans Dudley – Reg18 complete, working towards Reg19 later this year Sandwell - Reg18 complete, working towards Reg19 later this year Walsall – Call for Sites until later in 2024 Wolverhampton – Reg18 Issues and Preferred Options out for consultation until April 2024	
3.	Evidence and Cross Boundary Issues SFRA – JBA request for info – will be similar for all BCLAs Infrastructure – need to address issues around sites adjacent to council boundaries in BC. Ident work on review of Local Housing Need for Dudley, Sandwell and Wolverhampton Local Plans – MR drafted a brief prior to demise of the BCP. Need to check relevance and confirm costings. Transport – will receive a 'do minimum' scenario in May with the rest of the data received during June/July. BCLAs will need to review their Uncertainty Logs ASAP so as not to impact the programme.	Dudley to check info sent for BCSFRA. Discuss at next BCPL meeting MR to action and report back All to review Log ASAP
4.	BNG Discussion around the potential for BC BNG process if we're off-setting sites outside of borough boundaries. NE is currently the only responsible body for BNG, BCLAs could be each other's responsible body.	Briefing note to next BCPL meeting
5.	HMA and DtC Strategic Growth Study – potential for 10 LAs to participate in the work. Will need to rely on data from those who don't want to participate. Remit – review of existing study, advise on need, high level look at areas over and above the existing growth locations. Agreed to request advice from PAS.	IC

	Cannock Local Plan Closing date for reps – 18th March Includes 500 dwellings for BC – will be asking for more clarity over the wording and justification for this contribution. South Staffs Currently reviewing the Local Plan in the light of the current NPPF.	Walsall to respond to Cannock Local Plan consultation.
6.	AOB National Trust – have plans for a regional park, mainly in Bromsgrove https://www.nationaltrust.org.uk/visit/worcestershire-herefordshire/cient-hills/8-hills	VP to monitor/respond

Black Country Planning Leads - Duty to Co-operate Meeting - 9th April 2024**Present:**

IC (Chair), MR – Wolverhampton		LV - Dudley
PM, AM, PS - Sandwell		LF, NB, DH - Walsall
Apologies:		
VP - Dudley		
		Actions
1.	Black Country DtC meeting notes – 22/02/24 Agreed that BCPL will be the forum for signing off DtC minutes. There is an understanding that the minutes may be published. All four councils agreed to Ian Culley chairing the meetings.	Dudley to confirm acceptance of notes All to provide track changes by end of week
2.	Black Country Local Plans Dudley – Reg18 complete, working towards Reg19 later this year Sandwell - Reg18 complete, working towards Reg19 later this year Walsall – Call for Sites until later in 2024, awaiting new Regs before producing a new timetable. Wolverhampton – Reg18 Issues and Preferred Options out for consultation until April 2024	
3.	Evidence and Cross Boundary Issues Infrastructure – need to address issues around sites adjacent to council boundaries in BC. Iceni work – MR drafted a brief prior to demise of the BCP. Need to check relevance and confirm costings. Waste and Minerals – Walsall and CWC still awaiting their final reports. DtC – concerned with local and strategic cross boundary waste movements. Dudley has requested meetings with relevant LAs. Separate meeting to be arranged to discuss how the BCAs are individually approaching minerals and waste issues and to agree a consistent approach. Employment – SSES has identified sites in adjacent boroughs that could contribute to BC needs.	MR to action and report back. WSP have been contacted Waste and Minerals Leads to discuss Employment Leads to discuss
4.	BNG Agreed that BNG Governance should be a regular item on the agenda. Walsall are leading on this for the BC.	Discussion at next meeting

	Further discussion at next BC meeting.	
5.	HMA and DiC HMA Growth Study – LAs in the HMA now need to confirm whether they are prepared to contribute to the Study. Letters need to go out. South Staffs Reg19 Plan approved. The GB sites have been deleted which reduces the housing contribution to the BC and increases the employment land contribution. BC responses are likely to express disappointment at the changes but recognise that they are in accordance with the revised NPPF. S.Staffs has also sent round SoCGs for housing and employment. None of the BCAs will be signing them in the current form.	IC and Sandwell
6.	AOB Raby Estates, Beslow, Shropshire – developers are looking for support from BCLAs. Dudley and Sandwell have responded.	

Black Country Planning Leads - Duty to Co-operate Meeting - 6th June 2024**Present:**

IC (Chair), MR – Wolverhampton		VP - Dudley
PM, PS - Sandwell		LF - Walsall
Apologies:		
AM - Sandwell		
NB, DH - Walsall		
		Actions
1.	Black Country DfC meeting notes – 09/04/24 Employment – SSES has identified potential broad locations in adjacent boroughs for more detailed assessment though Local Plan preparation that could contribute to BC needs. BNG Governance – see item 4. HMA Growth Study – IC has emailed all HMA LAs to confirm participation and contributions	
2.	Black Country Local Plans Dudley – Reg19 – September Cabinet and October Council Sandwell - Reg19 – September Cabinet and October Council Walsall – Call for Sites until later in 2024, awaiting new Regs before producing a new timetable. Wolverhampton – Reg18 closed in April, Reg19 – November Cabinet and December Council	
3.	Evidence and Cross Boundary Issues Transport – Transport Study – consultants are awaiting info from various sources. Employment – WMSESS – Draft Final Report has been received. Looking to publish in September. EDNA update – commissioned by CWC. Centres – CWC working on brief and quote. Waste and Minerals – Walsall and CWC have not yet received their reports. Sandwell to chase. Housing – Homes and Jobs Alignment Study – the proposal for the work has been received from consultant. HRA – Awaiting the results of the Regional Air Quality Modelling work. HMA Growth Study – HMA LAs have been asked to participate and contribute – awaiting responses.	
4.	BNG Agreed that BNG Governance should be a regular item on the agenda. Walsall are leading on this for the BC.	Discussion at next meeting

	Further discussion at next BC meeting. Strategic Significance Guidance for BNG – EcoRecord has requested the info be held on their website. CWC and Sandwell need to agree.	MR and PMc
5.	HMA and DfC HMA Growth Study – email sent to all HMA authorities asking for confirmation that they will take part in the Study – asking for response by 14th June. South Staffs Local Plan South Staffs consultation – all BC responses submitted. SoCGs Discussed an approach to DfC for the BC. The main aim is to have a housing SoCG covering the wider HMA area. This was agreed as a way forward for DfC in BC and will seek approval for the approach across the wider HMA area. DfC Letter – discussed the draft letter to be sent out from Sandwell as part of the DfC process. BCLAs have agreed in principle but have time to send specific comments to Sandwell. BC Apportionment – agreed to use the most up-to-date migration figures for BC apportionment. Andy Donnelly is reviewing the previous paper prepared by IC using the most up to date data.	IC
6.	AOB Strategic Significance Guidance for BNG – EcoRecord has requested the info be held on their website	

Black Country Planning Leads - Duty to Co-operate Meeting - 9th July 2024**Present:**

IC (Chair), MR – Wolverhampton		VP - Dudley
PM, PS – Sandwell		NB, DH - Walsall
Apologies:		
AM - Sandwell		
LF - Walsall		
		Actions
1.	Black Country Dtc meeting notes – 06/06/24 Agreed that BNG Governance should be a regular item on the agenda. Walsall are leading on this for the BC. Further discussion at next BC meeting.	Discussion still needs to take place
2.	Black Country Local Plans Dudley – Reg19 – September Cabinet and October Council Sandwell - Reg19 – September Cabinet and October Council Walsall – Call for Sites until later in 2024, awaiting new Regs before producing a new timetable. Wolverhampton – Reg18 closed in April, Reg19 – November Cabinet and December Council	No change
3.	Evidence and Cross Boundary Issues Transport – Transport Study – timetable will be delayed due to waiting for information. There will be a three-week delay on the original SWECC work. Employment – WMSESS – Final Report will be discussed at Next HMA meeting. Discussion ongoing to confirm publication date and arrangements but provisionally September 2024. EDNA update – Findings will be fed into the Jobs and Alignment Study. Centres – currently awaiting approvals from Sandwell to commence the work. Waste and Minerals – Walsall and CWC have not yet received their reports. Sandwell to chase. Housing – Homes and Jobs Alignment Study – awaiting approvals from Sandwell to commence the work. HRA – Cannock Extension Canal is potentially the only area likely to be impacted by air quality issues. However, there are some concerns over the methodology, particularly the housing numbers, which may have been under-estimated.	
5.	HMA and Dtc HMA Growth Study – sufficient local authorities have been engaged to enable the work to begin. The next stage is to confirm the	IC

	arrangements for commissioning the work, considering any changes to the NPPF. Work to be commissioned by WMCA. Birmingham Plan – agreed to prepare a BC response to the Reg18 consultation. Solihull – a BC response is required. Propose to revisit the previous draft response and recirculate. SoCGs South Staffs – agreed to undertake individual bi-lateral SoCGs with SStaffs.: FEMA – Neville to produce comments on the draft South Staffs FEMA SoCG for employment land and circulate. This to form the basis of the Black Country FEMA SoCG which IC will draft and circulate. WM Interchange – Email has been sent to all relevant LAs. The information from this SoCG will inform the Black Country FEMA SoCG. Sandwell Dtc Letter – BC Responses CWC – briefing Cabinet Member on 2nd August and then will send a formal response. Walsall – response sent. Dudley – to brief Leader and Cabinet. BC Apportionment VP to update the HMA SoCG once information on migration figures is received from Andy D.	VP ALL NB / IC IC IC VP VP
6.	AOB	

Black Country Planning Leads - Duty to Co-operate Meeting -**5th September 2024****Present:**

IC (Chair) – Wolverhampton		VP - Dudley	
AM, PS – Sandwell		NB, DH - Walsall	
Apologies:			
PM - Sandwell			
MR - Wolverhampton			
			Actions
1.	Black Country DfC meeting notes – 09/07/24 None		None
2.	Black Country Local Plans Dudley – Reg19 – 25 September Cabinet and consult in October – November Sandwell - Reg19 – 11 September Cabinet and consult in Sept – October Walsall – tbd – may decide to progress a Plan under current guidance given the extension to submit until December 2025. Wolverhampton — November Cabinet and consult in December-January		
3.	Evidence and Cross Boundary Issues Transport – Transport Study – timetable has been delayed but SWECCO will complete prior to Sandwell consultation commencing. AM advised that there were no showstoppers flagged up by the modelling particularly when proposed mitigation/transport improvements and proposals were factored in. Employment – WMSESS – Final Report to be published on 9th September by Nuneaton & Bedworth as part of the EIP submission. Report will be presented to WMCA Board in November. EDNA update – Work currently being reviewed to address concerns over the robustness of the forecasting data. Centres – work commenced and nearing completion. The updated report is not expected to have any major changes from previous Centre's work. Waste and Minerals – CWC has now received their reports. Walsall to follow up with WSP. Housing – Homes and Jobs Alignment Study – awaiting clarification on the economic modelling and agreed employment land data approach. HRA – Ongoing		
5.	HMA and DfC		

	HMA Growth Study – sufficient local authorities have been engaged to enable the work to begin. The next stage is to confirm the arrangements for commissioning the work, considering any changes to the NPPF. Work to be commissioned by WMCA. Birmingham Plan – agreed to prepare a BC response to the Reg18 consultation. Solihull – a BC response is required. Propose to revisit the previous draft response and recirculate. SoCGs Shropshire Updated SoCG - to be signed off by each LA to reflect the identification of sites in the Shropshire Plan to meet the BC housing needs. Agreed HMA wider SoCG to agree apportionment on the contributions and those LAs receiving the contributions. This will need to be based on migration data which Andy Donnelly is currently pulling together. South Staffs – agreed to undertake individual bi-lateral SoCGs with SStaffs. FEMA – BC FEMA SoCG to be produced for agreement. WM Interchange – Email has been sent to all relevant LAs. The information from this SoCG will inform the Black Country FEMA SoCG. Bilateral SoCG between individual LAs were required on cross boundary matters. Sandwell Dtc Letter – Responses Still awaiting three responses. BC Apportionment VP to update the HMA SoCG once information on migration figures is received from Andy D.	IC VP ALL VP IC IC ALL VP
6.	AOB	

Black Country Planning Leads - Duty to Co-operate Meeting - 16th October 2024**Present:**

IC (Chair), MR – Wolverhampton		VP - Dudley
PM, PS – Sandwell		NB, DH - Walsall
Apologies:		
AM - Sandwell		
		Actions
1.	Black Country DfC meeting notes – 05/09/24 None	None
2.	Black Country Local Plans Dudley – Reg19 – Reg19 consultation begins on 18th October. Sandwell - Reg19 – Reg19 consultation began on 23rd September until 11th November (extended by one week). Walsall – tbd Wolverhampton — November Cabinet and consult in December-January	
3.	Evidence and Cross Boundary Issues Transport – Transport Study – completed. Dudley has some concerns with how the Active Travel Measures have been written into the Plan, i.e. their impacts on the movement of traffic. There are also some issues around Burnt Tree that needed to be addressed. Employment – WMSESS – Final Report has been published. Only queries so far have related to Nuneaton and Bedworth. EDNA update – the final demand figures have been agreed. We are now only waiting for the demand vs supply paper. This will enable the Jobs and Homes Study to be completed. There are also issues around offices to be addressed which will have some cross over with the Centres Study. Centres – work commenced and nearing completion. Waste and Minerals – Walsall still to follow up with WSP Housing – Homes and Jobs Alignment Study – can progress once the demand vs supply paper has been received (EDNA). AQ HRA – Work on two of the sites is ongoing. All parties have agreed to produce a SoCG containing a mitigation plan. NE need to be happy with the mitigation measures to enable them to sign the SoCG.	
5.	HMA and DfC	IC IC

	HMA Growth Study – Brief is currently being prepared in line with the current NPPF. The next stage is to confirm the arrangements for commissioning the work with the WMCA. SoCGs Shropshire Updated SoCG - signed and completed Wider HMA SoCG - agree apportionment of any contributions and those LAs receiving the contributions, including th apportionment between the BCAs. This will include the contribution from Telford to the BC. VP to provide draft early in November. South Staffs – CWC and Sandwell have signed, DMBC & WMBC will sign after Cabinet approval. BC FEMA SoCG – 4 BCAs, SStaffs, Birmingham, Bromsgrove, Wyre Forest, Shropshire This can now be produced using the EDNA figures WMI apportionment table will be included. Bilateral SoCG between individual LAs were required on cross boundary matters.	VP ALL IC ALL
6.	AOB BNG – BNG meetings to be held every 6 weeks. Invitation to a discussion session with Warwickshire Council – LAs to identify attendees.	

Black Country Planning Leads - Duty to Co-operate Meeting - 12th November 2024**Present:**

IC (Chair), MR – Wolverhampton		VP - Dudley
PM, PS, AM – Sandwell		NB, DH - Walsall
Apologies:		
		Actions
1.	Black Country DfC meeting notes – 12/11/24 BNG - No action as yet. IC to discuss with AD	None
2.	Black Country Local Plans Dudley – Reg19 consultation ends on 29th November. Sandwell - Reg19 consultation ended on 11th November Walsall – tbd Wolverhampton — November Cabinet with Reg19 consultation in December- January. Hope to submit by end of January 2025.	
3.	Evidence and Cross Boundary Issues Transport – Transport Study – completed. SWECO have produced a response to technical queries raised by National Highways on the modelling. This response can be used by all BCAs and will be published. Employment – WMSESS – Final Report has been published. EDNA update – final document has been received and circulated to employment leads Centres – work completed Waste and Minerals – Walsall still to follow up with WSP. CWC – checking queries. Housing – Homes and Jobs Alignment Study – still to be completed. AQ HRA – Meeting this week to discuss further findings. Hoping to agree a way forward for local plans this week.	
5.	HMA and DfC HMA Growth Study – Brief is currently being prepared in line with the current NPPF. The next stage is to confirm the arrangements for commissioning the work with the WMCA. SoCGs	IC

	Shropshire Updated SoCG - still uncertainty about Shropshire contribution to BC housing shortfall due to pause in EIP. Still awaiting a letter from the Inspectors as to the issues to be addressed. Wider HMA SoCG - VP has circulated a first draft for comment. It contains the approach to apportionment and confirmation of the shortfalls. There are also lots of gaps. Need comments before it can progress any further. To be discussed at the next HMA meeting. BC FEMA SoCG – 4 BCAs, SStaffs, Birmingham, Bromsgrove, Wyre Forest, Shropshire Still to do. Bilateral SoCG between individual LAs were required on cross boundary matters.	VP ALL IC ALL
6.	AOB None	

Black Country Planning Leads - Duty to Co-operate Meeting - 12th December 2024**Present:**

IC (Chair), R – Wolverhampton		VP - Dudley
PM, PS, AM – Sandwell		NB, DH - Walsall
Apologies:		
		Actions
1.	Black Country DfC meeting notes – 12/11/24 No Issues	
2.	Black Country Local Plans Dudley – Reg19 consultation closed on 29th November. Looking to submit during the transition period. Sandwell - Reg19 consultation closed on 11th November. Submitted 11/12/24. Walsall – timetable approved at Cabinet – Reg18 in Autumn 2025, Submission in December 2026. Wolverhampton — Reg19 closes on 9th January. Hope to submit by end of January 2025.	
3.	Evidence and Cross Boundary Issues Transport – Transport Study – completed. SWECO have produced a response to technical queries raised by National Highways on the modelling. This response can be used by all BCAs and will be published. EDNA update – completed Waste and Minerals – Walsall still to follow up with WSP. Housing – Homes and Jobs Alignment Study – work will not be progressing unless it is required at an EIP. AQ HRA – Draft SoCG has been prepared	
5.	HMA and DfC HMA Growth Study – Brief is currently being prepared in line with the current NPPF. The next stage is to confirm the arrangements for commissioning the work with the WMCA. SoCGs Shropshire Updated SoCG - no update on EIP. However, the BCAs have commented on the draft SoCG. Wider HMA SoCG - almost completed – awaiting response from North Warwickshire and Telford. To be discussed at future HMA meetings. BC FEMA SoCG – still in progress	IC VP

	Bilateral SoCG between individual LAs could be required on cross boundary matters. Lichfield Local Plan – Dudley and Walsall responded Call for evidence from WM Mayor – no responses	ALL ALL
6.	AOB None	

	Call for evidence from WM Mayor – no responses	ALL
6.	AOB None	

Appendix 5I – Greater Birmingham and Black Country Housing Market Area Development Needs Group Meetings

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL
MONITORING WORKING GROUP**

Tuesday 18 January 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. National Land Data Programme
4. TfWM update
 - Representation on Central and Local Government Information Partnership (CLIP) Planning Statistics Sub-Group
 - Land use data monitoring
 - Migration / ONS data
5. Tasks arising from SSDC meeting 15th December 2021
 - Governance
 - Need for an updated Growth Study
 - Next steps
6. Strategic Employment Sites Study Phase 3 brief
7. GBBCHMA Position Statement 2020 update
- 
9. Local Plan updates
10. Any other business
11. Future meeting dates

GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL MONITORING WORKING GROUP 18 January 2022, 14.00 – 16.00, via MS Teams Notes of meeting		
Item		Action
1	Apologies and Introductions	
	In attendance Ian Culley (Chair), Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Mike Dittman, Dorothy Barrett (North Warwickshire), Heidi Hollins (Cannock Chase), Stephen Stray, Patrick Jervis (Lichfield), Dan Corden (Shropshire), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Darren Beriro, Mehul Doshi (Geospatial Commission), Louise Jones (Redditch); Butler, David Butler (Coventry), Uyen-Phan Han, Martin Dando (Birmingham), Hannah Post (Telford and Wrekin), Kelly Harris (South Staffordshire), Liam Edge (TfWM), Ruari McKee (Rugby), John Careford (Stratford on Avon / Warwick), Mike Dunphy (Bromsgrove), Richard Powell, (Tamworth), Vicki Popplewell (Dudley),	
2	Notes from last meeting / matters arising	
2.2	Meeting invitations sent out for six months, send for next six months.	AD
3	Local Plan updates	
	Birmingham	
3.1	Progressing review of the Birmingham Development Plan. Sustainability appraisal scoping report out to consultation and work ongoing on the HEDNA and the urban capacity study. Still expecting to start consultation on issues and options in early June in accordance with the LDS.	
	Black Country	
3.2	Regulation 18 Preferred Option consultation ended in summer - some 20,000 representations made. Regulation 19 consultation scheduled for mid-summer 2022. Continued engagement via Duty to Cooperate.	

	South Staffordshire	
3.3	Consultation on Regulation 18 Preferred Option closed 13 December. Approximately 2,500 representations mainly on specific sites. Regulation 19 Submission consultation around October 2022.	
	Lichfield	
3.4	Members deferred Regulation 19 plan being received by Cabinet. Working with members on next steps.	
	Cannock Chase	
3.5	No change from last meeting's update.	
	Bromsgrove	
3.6	Preferred Options scheduled for Summer 2022.	
	Tamworth	
3.7	No change from last meeting, Issues and Options due for consultation Summer 2022	
	Redditch	
3.8	LDS now approved by Full Council	
	Shropshire	
3.9	Plan submitted in September 2021. Working through initial sets of questions set by Inspector with a view to responding by end of the month. Hearings may commence May / June, but dependent on Inspector.	
	Rugby	
3.10	Local plan review to commence summer 2022.	
	Telford	
3.11	Plan still paused as await further guidance from Government., no formal review timetable yet.	
	Stratford on Avon / Warwick	
3.12	Updated informal timetable on website, Issues and Options Summer 2022, possible adoption 2025. Currently analysing call for sites and scoping consultation responses.	
	Solihull	

3.13	Examination ongoing, last session of hearings next week.	
	[REDACTED]	
	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	
	[REDACTED] [REDACTED]	
	[REDACTED] [REDACTED]	
	[REDACTED] [REDACTED] [REDACTED]	
	[REDACTED] [REDACTED]	
	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
5	TfWM update	
5.1	Requests sent to update the 2020 smartsheets, please contact if not received. Dudley suggested may not have been received. Also issue regarding employment data needs resolving, currently collected in square metres when hectares needed too.	LE/ALL
5.2	Regarding the migration data, [REDACTED] responsible for this and will be leaving at the end of January. Data to be supplied within next two weeks.	
6	Tasks arising from SDDC meeting 15th December 2021	
6.1	Attendees thanked and positive feedback from PAS – final notes now circulated. SDDC set out its approach and rationale for using Strategic Growth Study and sought views as to how others were addressing shortfall and whether there were alternatives.	

6.2	Next steps critical and include refresh of Strategic Growth Study and suggestions included in circulated Black Country Leaders letter. With regard to Governance, Cannock Chase SAC suggested as a model (MoU circulated), currently only operate at officer level. Other issues discussed included the name of the group and the role of local authorities beyond the GBBCHMA. In summary, three main issues: • What would governance look like? • What would SoCG contain • Future workstreams Agreed a draft SoCG for discussion be brought to next meeting	AD / IC / SSOC
7	Strategic Employment Sites Study	
7.1	Brief circulated with papers, but minor amendment omitted, need to re-circulate. Previously agreed that once brief agreed would seek funding, possibly Midlands Engine? Budget figure of £30,000 mooted.	IC / AD
7.2	Other issues raised: • Cross boundary issues e.g. Hinckley and Bosworth • Aligning with WMCA Growth Plans • Informally liaising with private sector regarding brief suitability / cost Coventry Airport Gigafactory would fit strategic sites criteria – now with planning permission but referred to SoS as a departure.	
8	Any other business	
	Gypsy and Travellers	
9.1	Inquiry made (South Warwickshire) whether there was any merit /interest in looking at a study which looks at Gypsy and Traveller movements as GTAA's largely confine themselves to individual LPA areas. Agreed that this had merits, but no firm conclusions drawn.	
10	Dates of future Meetings	

	15 February @14:00	
	15 March @14:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL
MONITORING WORKING GROUP**

Tuesday 15 March 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. PlaceMaker presentation (by Urban Intelligence)
4. TfWM update
5. Local Plan updates
- 
7. First Draft GBBCHMA SoCG / MoU
8. West Midlands Strategic Employment Sites Brief and next steps
9. Position Statement 2021 refresh
10. Any other business
11. Future meeting dates

GBBCHMA / WMCA Officer meeting – 19 April 2022		
Note of main points and actions		
	In attendance: Ian Culley (Chair), Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Sushil Bindi (Cannock Chase), Stephen Stray, Patrick Jervis (Lichfield), Eddie West (Shropshire), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Mark Andrews, (Solihull), Louise Jones (Redditch), Clare Eggington (Coventry), Maria Dunn (Birmingham), Ed Fox, Kelly Harris (South Staffordshire), John Careford (Stratford on Avon / Warwick), Mike Dunphy (Bromsgrove), Richard Powell, (Tamworth), Jennie Plant (Dudley), Neville Ball (Walsall), Philip Hatton (TFWM), Martin Hutchings, Shelley Rouse (PAS).	
	Matters arising	
1	[REDACTED]	[REDACTED]
	SoCG general	
2	Contact Wyre Forest with a view to being signatories	IC
	As many changes as possible made – LPAs to check. This excludes governance, as many of the issues raised require further discussion.	ALL
3	General point that SoCG is a live document and timing of publication needs consideration. For example, timing of South Staffordshire and Black Country Regulation 19 plans and Birmingham Issues and Options – the latter would firm up the shortfall.	
	Main changes made	
4	Reference to Black Country and emerging Birmingham shortfalls yet to be tested	
5	Issue around extent of GBBCHMA. Agreement (in meeting) that not seeking to change HMA boundaries. Birmingham CC HEDNA report now complete and includes evidence supporting current HMA geography (and linkages), to be published after local elections. Suggested quoting directly from published document.	
6	Noted that the Strategic Growth Study recommendations were tested locally and complemented by local evidence.	
7	Issue around 35% urban uplift and whether this absorbed in situ and ignored if cannot be met here or dispersed via Duty to Cooperate. General view that	

	cannot be ignored as sums to 300,000 national target and numbers prior to urban uplift cannot be met in-situ. Noted that DLUHC had been unable to advise.	
8	Agreed that minerals and waste be included in SoCG.	
9	Noted that legacy strategic employment sites referenced rather than just need for additional ones.	
	Outstanding issues	
10	Whether contributions apportioned to Black Country or Birmingham shortfalls	
11	Whether to include further market absorption workstream. South Essex Stantec evidence noted, this concluded that HMA could not absorb the LHN requirements. Would this conflict with local plan evidence if done at GBBCHMA level?	
12	Aligning housing with economic growth. Issue is that GBBCHMA unlike other areas where there is a common employment forecast.	
13	Whether WMCA is a signatory, this is enabled by the NPPG.	
14	The Strategic Employment Sites workstream includes LPAs outside of GBBCHMA.	
	Governance	
15	Agreed (in meeting) that the approach differed from previously as governance addressed. Fundamental issue as to whether principles agreed with members before setting out the issues (currently the document attempts both) and hence whether the two elements need splitting. PAS template includes governance in overarching SoCG, but not set in stone.	
16	Following the discussion, four options were identified: 1. Details of officer and member groups as in current draft 2. Details of officer working arrangements and principles for members 3. Principles of both groups but details of neither 4. No details or principles for either group	
17	The second group was agreed in principle as a way forward, but LPAs would need to take soundings from members.	ALL
18	Changes agreed today and Bromsgrove, Redditch, and Shropshire to be incorporated into revised document and circulated week ending 29 th April.	AD

	Strategic Employment Sites Study	
19	Presentation given to Coventry and Warwickshire Officers and around 12 LPAs had committed to a £5,000 contribution. Commissioning body yet to be identified.	
	Any other business	
20	Local Plan latest positions schedule was tabled – changes made and circulated after meeting (attached here too)	
21	New LHN numbers published, those published by Turley and Lichfield's match GBBCHMA spreadsheet. Attention drawn to OBR report, which suggests that affordability ratios may be artificially inflated as incomes fell but transactions increased during pandemic. Link to be circulated	AD
22	Attention drawn to Turley submission (previously circulated) to BC Regulation 18 consultation critiquing the GBBCHMA Position Statement.	
	Date of next meeting	
23	Tuesday 17 May 2022 @ 14:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL
MONITORING WORKING GROUP**

Tuesday 17 May 2022, 14:00 – 16:00, via MS Teams,

AGENDA

4. Apologies / introductions
5. Actions from last meeting
6. TfWM Update
7. Local Plan updates
5. Statement of Common Ground
 - Main outstanding issues (see below)
 - Detailed Governance Arrangements
 - Next Steps / timetable for completion
6. Strategic Employment Sites Update
7. Local Aggregate Assessment
7. AOB
8. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 17 May 2022, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley (Chair), Andrew Donnelly (West Midlands Met Authorities), Sushil Bindi (Cannock Chase), Patrick Jarvis (Lichfield), Eddie West (Shropshire), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn (Birmingham), Alex Evans (South Staffordshire), John Careford (Stratford on Avon / Warwick), Mike Dunphy (Bromsgrove), Richard Powell, (Tamworth), Vicki Popplewell (Dudley), Lian Edge, Sue Balu (TfWM), Martin Hutchings, Andrew Seaman (PAS), Heather Stone (Wyre Forest), Gavin Ashford (Telford), Eddie West (Shropshire), Mike Dittman, Dorothy Barratt (North Warwickshire).	
1	Matters arising	
1.1	[REDACTED]	[REDACTED]
2	TfWM update	
2.1	[REDACTED] has produced spreadsheets for migration flows (in / out, age) – currently being checked	
3	Local Plan updates – see separate schedule	
[REDACTED]	Observations on Levelling up and Regeneration Bill • Need for transitional arrangements • Mixed messages regarding status of 300,000 dpa target and local flexibility • Duty to Cooperate legislation to be replaced with revised policy test • 2024 before legislation enacted so continue under current arrangements • Much more detail to follow • Top down approach with new powers at very local level • Situation unlikely to change for urban areas, make maximum use of previously developed land	
4	GBBCHMA Position statement	
4.1	All to advise when 2021 update required bearing in mind time needed to collect and verify data	ALL
[REDACTED]	[REDACTED]	
5	Statement of Common Ground	

5.1	Good progress made with sharper focus on areas of agreement, disagreement, and course of action	
5.2	General view that comments have been addressed but all LPAs to check detail, particular focus on Approach taken in local plans to date and governance sections.	ALL
5.3	Agreed to edit 'clean' version from now on as tracked changes version illegible	ALL
	Outstanding Matters	
5.4	Agreed that no reference to 35% uplift being met in area specifically identified not to be referred to as it is physically not possible for this to be achieved	
5.5	Agreed that not seeking to extend HMA but identify linkages with LPAs beyond it.	
5.6	Difficult to estimate with precision the extent of pre and post 2031 contributions from current data as plan reviews overlap. Note that at Solihull ELP a pro-rata approach was suggested. Matter will be further clarified once Birmingham Issues and Options published	
5.7	Details for Officer Group mentioned in document and principles for Members. Existing ToR for officer group need amending	AD
5.8	Apportioning contributions to Birmingham or Black Country – Lichfield has apportioned Solihull has not. May be a case for contributions from beyond HMA e.g. Shropshire. Birmingham and Black Country to share work on this with wider group	BCC / BC
5.9	Strategic Employment Sites – Include text to acknowledge that this group does not have ownership if this as it draws on a wider geography. At present, the only commitment is to commission a study, a further SoCG may be needed when dealing with recommendations.	AD
5.10	WMCA as a signatory – Starting point to consider legislation, especially S33A and Regulation 4. Noted that WMCA geography does not cover all LPAs directly and that WMCA authorities are already party to SoCG.	AD/PW
5.11	Common employment forecast – Common forecast impractical due to progress on local plans to date. Future workstreams to consider housing / workforce alignment with strategic employment sites which may draw labour from beyond immediate area e.g. UKC and WML.	AD
5.12	Market Absorption – Agreed this should be a future workstream, South Essex cited as an example	AD

5.13	Extent to which HMA to consider all options before seeking assistance from elsewhere to be included as a workstream	AD
5.14	PAS confirmed funding secured to support the SoCG work but specific details as to what this entails to be established. Support, in principle, to give a third-party overview of next draft of document.	PAS /IC
6	Strategic Employment Sites Study	
6.1	• Details of commissioning to be determined – possible commission late June, target time for completion 6 – 9 months. • Steering Group arrangements to be established – maybe on a sub-regional basis e.g. Coventry and Warwickshire. • Advise of potential consultants to be invited to tender	ALL
7	Local Aggregate Assessment	
7.2	Metropolitan Authorities to provide contacts to set up a LAA sub-group to progress	Met LAs to AD
8	Any on the business	
8.1	None	
9	Date of Next Meeting	
9.1	Tuesday 21 st June @14:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL
MONITORING WORKING GROUP**

Tuesday 21st June 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM Update
4. Local Plan updates
5. Statement of Common Ground
6. 2021 update of Position Statement [REDACTED]
[REDACTED]
7. Strategic Employment Sites Update
8. Local Housing Need and 2021 Affordability Ratios
9. Local Aggregate Assessment
10. AOB
11. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 21 June 2022, 14:00 – 16:00	
Note of main points and actions	
	In attendance: Ian Culley – chair, Wolverhampton, Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Sushil Birdi (Cannock Chase), Lauren Lymer, Helena Tuck (Lichfield), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn (Birmingham), Kelly Harris (South Staffordshire), John Careford (Stratford on Avon / Warwick), Richard Powell, (Tamworth), Vicki Popplewell (Dudley), Liam Edge, (TFWM), Martin Hutchings (PAS), Andrew Seaman (IPe), Gavin Ashford (Telford), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Patricia McCullagh (Sandwell)
	Apologies: Heather Stone (Wyre Forest), Eddie West (Shropshire), Stephen Stray (Lichfield)
1	[REDACTED]
	[REDACTED]
2	TFWM update
2.1	Looking to have all 2021 data by end of July, contact LE or Sue Balu if there are any problems. Next step is data quality check. Noted that first Census results due end of June.
3	Local Plan updates – see separate schedule
4	Draft Statement of Common Ground (SoCG)
4.1	[REDACTED] (IPe, commissioned by PAS) presented his initial findings of review of draft GBBCHMA SoCG. Main points as follows: • Useful summary of plan making activity and extant plan provision. Effective and ongoing engagement thus far. • Currently focuses too much on what has happened rather than being forward looking – should focus on next 15 years and engage with LHN needs. • Focus of review on legal compliance, soundness and compliance with national policy and discharging DdC. • Focus should be on strategic matter of housing – other SoCGs for different topics. • Needs to clearly express areas of agreement and disagreement • GBBCHMA commenced early, many SoCGs put together at last minute • Commonality of principles needs expressing more clearly along with objectives of officer group and cross over to member group. • Details of member group need to be strengthened. • Consider whether Gypsy and Traveller issues need to be included.

	Consider core principles around methodologies for compiling evidence
	Any further comments to AS by close of play Thursday 23 June. Final report to be available within next couple of weeks.
5	GBBCHMA Position statement / WMCA Housing Deal Monitoring
5.1	Data for year end 2021 has now been requested. [REDACTED]
6	Strategic Employment Sites Study
6.1	One of Black Country authorities to procure, possibly July. Nominees for membership of Steering Group required.
7	Local Housing Need and Affordability Ratios
7.1	Paper shared which shows that affordability ratio in Birmingham may be artificially inflated in 2021 due to pandemic and associated Government response i.e. Stamp Duty holiday. Comparison made with OBR forecasts at national level. Defer to next meeting for consideration.
8	Local Aggregate Assessment
8.1	Reminder to provide contact details of contact for Metropolitan LAA preparation to AD. Have Birmingham and Coventry.
9	Any on the business
9.1	None
10	Date of Next Meeting
10.1	Tuesday 19 July @14:00

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 19 July 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM Update
4. Local Plan updates
 - By LPA
 - [Evidence Base for the new Birmingham Plan | Birmingham City Council](#) (Birmingham HEDNA)
 - WMCA Black Country Brownfield Land Capacity Report
 - <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4m/>
5. 2021 update of Position Statement and WMCA Housing Deal Monitoring schedule – progress to date
6. AS / IPe Report in Respect of Draft WMCA SoCG
 - Recommendations
 - Next Steps
7. Strategic Employment Sites Study 3 Update
8. 2021 Census first results
9. Local Housing Need and 2021 Affordability Ratios
10. Local Aggregate Assessment
11. AOB
12. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 19 July 2022, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley – chair, Wolverhampton, Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Sushil Birdi (Cannock Chase), Lauren Lymer, Helena Tuck (Lichfield), Amanda Holland, Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn (Birmingham), Kelly Harris (South Staffordshire), John Careford (Stratford on Avon / Warwick), Richard Powell, (Tamworth), Vicki Popplewell (Dudley), Liam Edge, (TfWM), Martin Hutchings (PAS), Andrew Seaman (IPE), Gavin Ashford (Telford), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Patricia McCullagh (Sandwell)	
	Apologies: Heather Stone (Wyre Forest), Eddie West (Shropshire), Stephen Stray (Lichfield)	
1	Matters arising	
1.1	[REDACTED]	[REDACTED]
2	TfWM update	
2.1	Looking to have all 2021 data by end of July, contact LE or [REDACTED] if there are any problems. Next step is data quality check. Noted that first Census results due end of June.	
3	Local Plan updates – see separate schedule	
4	Draft Statement of Common Ground (SoCG)	
4.1	• Review of changes to report made in response to IPE/PAS report into SoCG. • Pragmatic approach take in terms of what can be addressed now and what needs to be considered in the future. • As different geographies, deliberate focus on housing with employment signposted. • Make clear what are objectives for SoCG and DNG • Make it clear the SoCG is complementary to other DfC exercises between local authorities. • Make it clear that by being a signatory it is considered that cooperation has been effective and ongoing. • Issue regarding maturity of Strategic Growth Study and it is only one source of evidence. • Make it clear that at present shortfalls are Birmingham and Black Country, which make up wider HMA shortfall.	

	- Issue of apportioning between Birmingham / Black Country a future workstream - Shared evidence documents to be considered where appropriate, not universally	ALL
	Next Steps	ALL
	- Further draft to be issued taking on board views expressed today further comments by Friday 29th July. - All encouraged to socialise Members with the document, may take some authorities longer to get there than others. - South Staffordshire deadline for document being in public domain end of September, not necessarily signed off by all authorities. Once officer draft completed South Staffordshire to formally send to all LPAs. - Member body should be a 'board' not 'forum' and timetable for establishing this required. - Details need completing e.g. LHN, housing requirements, footnotes, links etc.	
5	Notes of last meeting and matters arising	
5.1	Outstanding matter of WMCA employment forecasts, Pat Willoughby to liaise with [REDACTED]	PW
6	TFWM update	
6.1	Resource constraints mean some LPAs will not be able to provide data this year. Schedule of returns to date shared and to be circulated with notes.	AD/SB
7	Local Housing Need and Affordability Ratios	
7.1	Paper shared which shows that affordability ratio in Birmingham may be artificially inflated in 2021 due to pandemic and associated Government response i.e. Stamp Duty holiday. Comparison made with OBR forecasts at national level. Defer to next meeting for consideration.	
8	Local Aggregate Assessment	
8.1	Reminder to provide contact details of contact for Metropolitan LAA preparation to AD. Have Birmingham and Coventry.	ALL
9	Any on the business	
9.1	None	
10	Date of Next Meeting	
10.1	Tuesday 16 August @14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 16 August 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. Local Plan updates
4. 2021 update of Position Statement and [REDACTED]
[REDACTED]
5. Final draft Statement of Common Ground (SoCG)
6. AOB
7. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 16th August 2022, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley – chair, Wolverhampton, Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Sushil Birdi (Cannock Chase), Gurdip Nagra (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn, Sarah Scannell (Birmingham), Kelly Harris (South Staffordshire), Richard Powell, (Tamworth), Jennie Plant (Dudley), Liam Edge, (TFWM), Mike Dittman, (North Warwickshire), Patricia McCullagh (Sandwell), Mike Dunphy Bromsgrove, Eddie West (Shropshire).	
	Apologies: Uyen Phan Han (Birmingham), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley), Clare Eggington (Coventry).	
1	Actions from last meeting	
1.1	Agreed as an accurate record	
2	Local Plan updates	
2.1	See attached schedule. Noted Nuneaton and Bedworth missing from schedule.	
3	2021 update of Position Statement and WMCA monitoring	
3.1	Responses thus far from Birmingham, Coventry, Bromsgrove, Redditch, and Cannock Chase. Outstanding response to be provided ASAP. [REDACTED]	ALL
4	Final draft of Statement of Common Ground (SoCG)	
4.1	Amendments have been made to the SoCG following receipt of the Intelligent Plans and Examinations (IPE) report. Additional officer comments have been taken on board and clean / tracked changes copies of the SoCG were circulated in advance of this meeting. Agreed that document largely complete subject to inclusion of last-minute changes and final proofread.	KH
4.2	SSDC to send document to those local authorities (officers / members) present at 15 th December 2021 meeting inviting responses as to their intentions regarding endorsement and accompanying timetables.	KH

	Covering letter on behalf of SSDC cabinet member will make it clear that this is not an SSDC led /owned exercise but rather a collective effort on behalf of HMA and other related local authorities. The driver is that SSDC need something to accompany their Regulation 19 plan due to be published in Autumn 2022. Responses to this request will determine whether a further member meeting is required.	
4.3	Noted that the document will continue to evolve as local plans progress e.g. Birmingham Issues and Options later this year.	
4.4	SSDC having difficulty producing a boundary map showing relationships within / beyond / and overlapping HMAs. TfWM may be able to assist with this.	LE/GN/ KH
5	Any other business	
5.1	None.	
6	Date of next meeting	
6.1	Tuesday 20 th September @14:00 – 16:00	

SEPTEMBER MEETING CANCELLED

NO OCTOBER MEETING

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 1st November 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM data update
4. Local Plan Updates*
5. Housing Statement of Common Ground (SoCG)
6. Response to South Staffordshire District Council request
 - Implications of latest local plan updates
 - Next steps
7. 2021 update of Position Statement and [REDACTED]
[REDACTED]
8. Strategic Employment Sites phase 3 Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting
13. Quite a lot of activity since August meeting Birmingham, Black Country, Shropshire, Bromsgrove, Solihull, Tamworth, Cannock Chase, Nuneaton and Bedworth.

GBBCHMA / WMCA Officer meeting – Tuesday 1st November 2022, 14:00 – 16:00**Note of main points and actions**

	In attendance: Ian Culley – chair, Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Clare Eggington (Coventry), Maria Dunn, Uyen Phan Han (Birmingham), Kelly Harris, Ed Fox (South Staffordshire), Richard Powell, (Tamworth), Liam Edge, (TfWM), Mike Dittman, (North Warwickshire), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Eddie West, Dan Corden (Shropshire), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest), Neville Ball (Walsall), Rebecca Brown (Redditch), Joanne Bozdoganli (Stratford on Avon)	
	Apologies: Sarah Scannell (Birmingham), Amanda Holland (WMCA), Dorothy Barratt (North Warwickshire)	
1	Actions from last meeting	
1.1	Addressed as tidying up SoCG, which has now been issued.	
2	TfWM Update	
2.1	2019/20 is baseline year for PRISM. Awaiting Black Country 20/21 data, Walsall confirmed it had been sent, others to check	MR, PM, VP
3	Work has been done pulling together Investment Zones expressions of interest but policy initiative short lived. Information may be useful for future initiatives / Commissions e.g., SESS work	
3.1	Information to be packaged and made available.	LE
4	Local Plan updates	
4.1	See separate schedule	
5	GBBCHMA plus SoCG	
5.1	South Staffordshire has sent the HMA plus SoCG document to relevant local authorities and most responses thus far have been to the effect that document is under consideration, not necessarily with definitive dates. Those local authorities who haven't made any response yet encouraged to do so. It is not currently published on the website but is available on request, a FOI request has already been made.	

5.2	Whilst the HMA plus SoCG is the final version, those between SSDC and individual authorities are in draft form. All documents will be on the website individual authorities to accompany SSDC's Regulation 19 plan, these are to be published on the website Friday 11 th November, so if any amendments required, contact SSDC. PAS has advised this approach.	ALL
5.3	Bromsgrove, Redditch, and Stratford on Avon all advised that officer comments were likely to be available within this timeframe, but that member endorsement was to come afterwards.	
5.4	NWBC confirmed that it was intending to take a Committee Report on 21 st November addressing the matter.	
5.5	Noted that circumstances had changed since the SoCG was issued in August, notably the abandonment of a joint Black Country Plan. Agreed that an addendum to the HMA plus SoCG be added advising that circumstances had changed since it was published, and the document will be updated at some point. The workstreams identified in the document remain valid and still need to progress.	
5.6	Noted that no local authority is compelled to sign the document, but that SSDC will need to report to the Inspector what response there has been.	
7	Strategic Employment Sites Study	
7.1	Dudley has utilised the Homes England multi-disciplinary framework seeking expressions of interest by 5 th December.	
8	Local Aggregate Assessment	
8.1	Noted as this needs progressing, there are other examples out there to use as a template	
9	Any other business	

9.1	Reminder that session arranged for 15 th November with WMCA regarding Oxford Economics job forecasts	
10	Date of next meeting	
10.1	Tuesday 13 th December @ 14:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 13th December 2022, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM data update
4. Levelling Up and Regeneration Bill
5. 2021 update of Position Statement [REDACTED]
6. Local Plan Updates
7. Strategic Employment Sites phase 3 Study
8. Housing Statement of Common Ground (SoCG)*
9. Review / Update of Strategic Growth Study
10. Apportioning need contributions
11. Establishing member board
12. Local Aggregate Assessment
13. Any other business
14. Date of next meeting

* Will be influenced by Item 4.

GBBCHMA / WMCA Officer meeting – Tuesday 13th December 2022, 14:00 – 16:00**Note of main points and actions**

	In attendance: Ian Culley – chair, Michele Ross (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Gurdip Nagra, Patricia Willoughby (WMCA), Gary Palmer, (Solihull), Maria Dunn, (Birmingham), Kelly Harris, Ed Fox (South Staffordshire), Richard Powell, (Tamworth), Mike Dittman, Dorothy (North Warwickshire), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Dan Corden, Liam Cowden (Shropshire), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest), Neville Ball (Walsall), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth)	
	Apologies: Sarah Scannell (Birmingham), Liam Edge (TfWM), Clare Eggington (Coventry)	
1	Actions from last meeting	
1.1	AD to ask LE for summary of Investment Zone data for circulation.	AD / LE
2	TfWM Update	
2.1	No update from previous meeting	
3	Levelling Up and Regeneration Bill	
3.1	Secretary of State's letter and Parliamentary Statement noted, main points: • Changes to joint working • Urban uplifts to be met in situ • No need to review Green Belt to meet housing needs NPPF prospectus due to be published before Christmas.	
3.2	Initial thoughts as follows:	
3.3	Cannock Chase At Regulation 19 Stage and may proceed with Green Belt releases as they are necessary to support infrastructure delivery.	
3.4	Shropshire	

	Currently at examination stage. Green Belt and other land releases as much about permitting existing settlements to grow sustainably.	
3.5	Birmingham Issues and options consultation has just ended, some late responses referring to SoS letter accepted. Need to consider implications of NPPF Prospectus before forming a view how to proceed.	
3.6	South Staffordshire Currently at regulation 19 stage and need to consider the implications.	
3.7	Wolverhampton Intended to publish Issues and Options in in New Year but will now await NPPF Prospectus.	
3.8	Dudley Letter welcomed by elected members but need to consider details in Prospectus.	
5	Local Plan updates	
5.1	See separate schedule. AD to prepare briefing on South Warwickshire Issues and Options.	AD

6	Strategic Employment Sites Study	
		
6.2	Attention drawn to local elections and the need for any release of the study to be managed accordingly.	
7	Statement of Common Ground	
7.1	Two main issues: • Progress on signing bi-lateral and joint SoCGs. • Progressing identified workstreams In general, it was noted that the latest SoS letter is causing uncertainty regarding future joint working arrangements.	
7.2	To date Birmingham, Cannock Chase and South Staffordshire have signed joint SoCG	
7.3	North Warwickshire reported that members had concerns about appendix 2. Having adopted a growth led plan there were concerns that the necessary infrastructure was not coming forward as envisaged. It was suggested that NWBC may wish to reflect this in responding.	
7.4	Solihull reported that the attention was for both to be signed but noted that it was 'of it's time' and much had changed since the August 2022 agreement date. These matters need to be picked up in future iterations, but we must not lose momentum now. Important to make the distinction between agreeing to further commissions and agreement as to what may come out of them. Member (governance) inputs need to be factored in also.	
7.5	Request that member signatures are sent to SSDC as a photo for easy insertion into final document.	ALL
7.6	Bromsgrove reported that reports to be considered in January but members may want to take account SoS and future announcements given that document dated August 2022.	

7.7	Dudley also noted that members may wish to consider the proposed changes to national policy.	
7.8	Also noted that apportionments will need to be re-considered in light of the BCP no longer proceeding.	
7.9	Agreed that AD / SSDC progress with a first draft of a brief / programme for further consideration.	AD/SSDC
8	Local Aggregate Assessment	
8.1	AD advised of initial meeting 14 th December with Walsall and Solihull.	
9	Any other business	
9.1	None	
10	Date of next meeting	
10.1	Tuesday 24 th January 2023 @14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 24 January 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. *Apologies / introductions*
2. *Actions from last meeting*
3. *TfWM data update*
4. *Local Plan Updates*
5. *NPPF Prospectus*
6. *GBBCHMA plus SoCG – progress towards agreeing and future work streams*
7. *2021 update of Position Statement*
8. *Local Aggregate Assessment*
9. *Any other business*
10. *Date of next meeting*

GBBCHMA / WMCA Officer meeting – Tuesday 24 January 2022, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley – chair, Andrew Donnelly (West Midlands Met Authorities), Sushil Bindi, Heidi Hollins (Cannock Chase), Gurdip Nagra, Patricia Willoughby, Amanda Holland (WMCA), Gary Palmer, (Solihull), Maria Dunn, Uyen Phan Han (Birmingham), Ed Fox (South Staffordshire), Richard Powell, (Tamworth), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Eddie West (Shropshire), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Rob Haigh (Coventry), Liam Edge (TFWM), Gavin Ashford (Telford and Wrekin)	
	Apologies: Sarah Scannell (Birmingham), Clare Eggington (Coventry), Mike Dittman, Dorothy Barratt (North Warwickshire), Neville Ball (Walsall), Dan Corden (Shropshire)	
1	Actions from last meeting	
1.1	Agreed as an accurate record and relevant matters on agenda. [REDACTED] to remind [REDACTED] for Investment Zones data.	
1.2	Update on Strategic Employment Sites Study given as not on the agenda. Dudley commissioned and Mace / Iceni successful bidder, inception meeting with steering group to be convened.	
2	TFWM Update	
2.1	TFWM processing most recent returns and updating uncertainty log for PRISM. Clarification being sought where necessary	
3	Local Plan Updates	
3.1	See separate schedule	
4	NPPF Review	
4.1	Two main strategic issues of relevance: • Approach to housing numbers, more flexibility • Proposed change to Green Belt policy, housing need not necessarily an exceptional circumstance	
4.2	Initial thoughts: • Potentially easier to progress plans without Green Belt releases • Duty to Co-operate arrangements in place until 2025, but tools to address it blunted. Implications for 300,000 dpa national target. Duty to Cooperate requires legislative not just policy change. • Unclear / confusing transitional arrangements • More focus on non – Green Belt locations, funding to deliver • Greater emphasis on urban centres meeting their uplift.	
4.3	Agreed to share emerging responses to consultation.	ALL
5	GBBCHMA plus statement of Common Ground	
5.1	Most local authorities have responded explaining if / how taking it through internal processes, around five formal signatories to date. SSDC to send a reminder email.	
5.2	Suggested that this reminder refers to fact that this was drafted at a point in time, August 2022, and acknowledge that circumstances within	

	the GBBCHMA have changed; also note that NPPF proposed changes do not do away with the need to work together.	
5.3	Comments from local authorities: Bromsgrove / Redditch Not in a position to take to members yet until further clarity regarding national policy. It is in the forward plan and this does not mean it will not be signed in the future	
5.4	Solihull Noted August 2022 date and that future iterations may differ. Very sensitive politically.	
5.5	In terms of the brief for further work Main issues • What is shortfall • What is capacity • What are realistic options	
5.6	Agreed all to comment on brief. Uncertainty acknowledged but ideally need to be in position to commence work once the changes to national policy are formalised.	
6	GBBCHMA Position statement and WMCA Housing Deal Monitoring	
6.1	Latest figures (2021) show that shortfall fallen to just above 2000 due to additional capacity being identified in Birmingham. [REDACTED]	
6.2	Note that this is for 2021, additional capacity in emerging plans may not have been picked up but would be in 2022, although some may be removed again e.g. Black Country.	
6.3	Telford data taken from AMR, assumptions made for Shropshire as data not in same format as GBBCHMA / WMCA template, Solihull data taken from eip trajectory.	
6.4	Noted that baseline need in Position Statement is based on 2014 HHPs plus a vacancy rate allowance. It does not take account of affordability / urban uplifts, which will need to be considered as part of future need. Opportunity to look at future need scenarios for GBBCHMA.	AD
6.5	GWHMA has published a HEDNA, which deviates from using 2014 HHPs and is based on more accurate Census data. Noted that 2014 HHPs significantly overestimate Birmingham's growth.	
6.6	No disagreement in principle to publishing a 2021 addendum to the GBBCHMA Position Statement.	AD
6.7	All to check that data has been transcribed accurately	All
7	Local Aggregate Assessment	
7.1	Sales data now available, noted future need estimates problematic as Regional Guidelines not available beyond 2020. [REDACTED]	AD
8	Any other business	
8.1	None	

9	Date of next meeting	
9.1	Tuesday 21 st February 2023 @14:00 – 16:00	ALL

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 21 February 2023, 14:00 – 16:00, via MS Teams,

AGENDA

11. Apologies / introductions
12. Actions from last meeting
13. TfWM update
14. Local Plan Updates
15. GBBCHMA plus SoCG
 - Progress on signing
 - Further work brief



- Plan for Growth

<https://www.wmca.org.uk/what-we-do/economy-and-innovation/plan-for-growth/>

17. GBCHMA matters
 - Position Statement refresh
 - Future housing need scenarios
18. Strategic Employment Sites Study
19. Local Aggregate Assessment
20. Any other business
21. Date of next meeting

GBBCHMA / WMCA Officer meeting – Tuesday 21 February 2022, 14:00 – 16:00 Note of main points and actions		
	In attendance: Ed Fox (South Staffordshire) – chair, Andrew Donnelly (West. Midlands Met Authorities), Sushil Birdi, Heidi Hollins (Cannock Chase), Patricia Willoughby, (WMCA), Gary Palmer, (Solihull), Maria Dunn, Sarah Scannell (Birmingham), Sam Holder (Sandwell), Mike Dunphy (Bromsgrove), Dan Corden (Shropshire), Jennie Plant (Dudley), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Clare Eggington (Coventry), Jackie Padbury (Nuneaton and Bedworth), Mike Dittman, Dorothy Barratt (North Warwickshire), Neville Ball (Walsall), Michele Ross (Wolverhampton), Chris Styles (Coventry)	
	Apologies: Ian Culley (Wolverhampton) Uyen Phan Han (Birmingham), Kelly Harris (South Staffordshire), Maria Bailey (Nuneaton and Bedworth), Gavin Ashford (Telford and Wrekin), Liam Edge (TFWM), Richard Powell (Tamworth), Vicki Popplewell (Dudley), Heather Stone (Wyre Forest).	
1	Actions from last meeting	
1.1	Wrong date on last Meeting's notes, correct and re-circulate	AD
1.2	AD to remind LE for Investment Zones data.	AD / LE
1.3	Reminder that there is still time to share NPPF responses	All
2	TFWM Update	
2.1	Collection of data ongoing	
3	Local Plan Updates	
3.1	See separate schedule	
4	GBBCHMA SoCG	
	Signing SoCG	
4.1	Schedule showing how had responded to GBBCHMA SoCG previously circulated and SSDC has sent a reminder.	
4.2	Solihull: Necessary approvals secured Shropshire: Agreed in principle, going through relevant approval processes North Warwickshire: Members uncomfortable with Appendix Two of HMA SoCG, but fine with bi-lateral one	
4.3	Thus far only Stratford on Avon had commented on draft further work brief, main points as follows: • Study date to 2042, South Warwickshire Local Plan (SWLP) extends to 2050 • Must not duplicate 2018 study • Must not infringe on areas of local plan responsibility • Coventry and Warwickshire HEDNA uses standard method inputs derived from 2021 Census, not 2014 HHPs. • Links with employment, not just housing • Prefer commencement sooner rather than later to feed into SWLP	

4.4	Agreed that Stratford's comments be circulated	AD
4.5	Solihull comments: • Uncertainty around need given 2021 census results • NPPF Green Belt and density proposals need to be factored in • 35% uplift down to areas' accessibility so should not be exported	
4.6	Birmingham comments: • Cannot meet own need even without 35% uplift so export inevitable • Reiterate concerns over housing need uncertainty • Suggested factoring in each authority's position on Green Belt release	
4.7	North Warwickshire comments: • Transport infrastructure to support local plan implementation the missing link as A5 funding stalled and necessary to bring forward major local plan allocations. • Members want to see infrastructure to support growth	
4.8	South Staffs comments: • Reiterated uncertainty over numbers • Factor in rail corridors served settlements • Need something for those looking to submit during transitional arrangements (until 2025) and noted that DtC in current form applies until then.	
4.9	Conclusion that need to await finalisation of NPPF review but to continue commenting on the draft brief.	ALL
5	WMCA Matters	
		
	WMCA Plan for Growth	
5.2	• Not a formal strategy, but a plan for post pandemic recovery given that West Midlands's relative economic performance dipped • Identifies eight clusters, with a focus on interventions to grow industries • May be of relevance to Strategic Employment Sites Study • Agreed to bring a more detailed presentation to future meeting	
6	GBBCHMA Matters	
6.1	Paper circulated earlier which estimates shortfall to 2031 and post 2031	

	• Shortfall largely cleared by 2031 for Position Statement Addendum refresh • As the shortfall has been driven by that in the Birmingham Development Plan (BDP). In 2022 the BDP was five years old so LHN rather than OAN is the default need; this is much higher. • Taking published Birmingham and Black Country shortfalls and potential contributions, a best-case scenario estimate of the gap is 92,000 and worst case 106,000.	
6.2	Further paper circulated looking at 2021 Census outputs and previous HHPs: • This looked at what implications may be for GBBCHMA if used Census outputs like CWHMA HEDNA. Much of CWHMA difference driven by international students counted in but not out • 2014 HHPs overestimate Birmingham's growth significantly compared to the 2021 HHPs so using 2014 HHPs likely to significantly over-estimate growth across HMA. There would, however, be 'winners and losers with 2014 HHPs lower for some authorities • Noted that BLUCH only committed to considering 2021 Census outputs and request use of 2014 HHPs. • Draft NPPF gives more scope to challenge Standard Method, but option there for development industry also. • LPAs may wish to comment on this in responding to NPPF review proposals.	AD
7	Strategic Employment Sites Study	
7.1	• Steering Group met with consultants for inception meeting earlier this month • Data requests circulated for 25 ha plus sites and completions / commitments for units over 9,000 sqm	
7	Local Aggregate Assessment	
7.1	No update since last meeting	
8	Any other business	
8.1	None	
9	Date of next meeting	
9.1	Tuesday 21 st March 2023 @14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 21 March 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. [REDACTED]
4. TfWM update
5. Local Plan Updates
6. GBBCHMA plus SoCG
 - Progress on signing
 - Further work brief responses
7. 2021 GBBCHAM Position Statement Update
8. Strategic Employment Sites Study
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

[illegible]

[illegible]

5.2	Bromsgrove and Redditch both not in a position to sign at present but may be in the future once NPPF clarity.	
5.3	SSDC to update brief considering comments when capacity permits.	PW
6	GBBCHMA Position statement refresh	
6.1	2021 data shows shortfall has fallen since 2020 data published December 2021. Attention drawn to fact that need is now far greater than that assumed in the Strategic Growth Study (2014 HHPs plus vacancy allowance).	
6.2	All to check data / document with a view to signing off at next meeting. Requests have been made from the private sector regarding publication.	ALL
6.3	AD to send JB copy of proforma to familiarise.	AD
7	Strategic Employment Sites Study	
7.1	Data requests made by consultancy team. Interim statement due late April / May and to be brought to this group.	
7	Local Aggregate Assessment	
7.1	No update since last meeting.	
8	Any other business	
8.1	None	
9	Date of next meeting	
9.1	Tuesday 18 April 2023 @14:00 – 16:00. AD to send meeting dates for after June.	AD

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 18 April 2023, 14:00 – 16:00, via MS Teams,

AGENDA

22. Apologies / introductions
23. Actions from last meeting
24. TfWM update
25. Local Plan Updates
26. Local Housing Need – 2022 Affordability Ratios

[Improving affordability ratios should not mask near-record highs in much of England | Turley](#)

27. WMCA update
28. GBBCHMA plus SoCG
 - Progress on signing
 - Further work brief responses
29. 2021 GBBCHAM Position Statement Update
30. Strategic Employment Sites Study
31. Local Aggregate Assessment
32. Any other business
33. Date of next meeting

GBBCHMA Development Needs Group – 18 April 2022, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West Midlands Met Authorities), Heidi Hollins (Cannock Chase), Patricia Willoughby, Amanda Holland (WMCA), Gary Palmer, (Solihull), Maria Dunn, (Birmingham), Patricia McCullagh (Sandwell), Mike Dunphy (Bromsgrove), Dan Corden (Shropshire), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Mike Dittman, (North Warwickshire), Neville Bell (Walsall), Michele Ross (Wolverhampton), Alex Evans, Patrick Walker, Kelly Harris, Alex Evans (South Staffs.), Patrick Jervis (Lichfield), Liam Edge, Owen O'Neill (TFWM), Sushil Birdi (Cannock Chase), Pooja Agrawal (Public Practice)	
	Apologies: Sarah Scannell, Uyen Phan Han (Birmingham) Dorothy Barrett (North Warwickshire) Clare Eggington, Rob Haigh (Coventry), Vicki Poplewell (Dudley), Richard Powell (Tamworth)	
2	TFWM Update	
2.1	Owen O'Neill in post and to take over more of the land use planning liaison. LE to contact Solihull regarding a query on development returns	LE
2.2	Confirmed that there is a script to handle the internal migration matrices, AD to contact LE regarding latest data availability	AD / LE
3	WMCA Update	
3.1	Plan for Growth covering report to be circulated. Request made for overview of employment land position across WMCA area, representatives from this group invited to join a working group to progress this.	PW
4	Local Plan Updates	
4.1	See separate schedule	
5	2022 Affordability ratios and new Local Housing Need figures	
5.1	Table presented and noted that figures consistent with those published by Turley. Little difference across GBBCHMA from last year but some differences for individual local authorities.	
5.2	On wider planning reforms, some suggestion that revised NPPF will not be published until late summer. Also, there will be a separate consultation on the alignment test to replace the Duty to Cooperate (DtC), but formal removal of the DTC would require new legislation. Concern expressed that late publication of NPPF would not lead to an extension of transition arrangements / timeframe to progress a plan review under current arrangements.	

	[REDACTED]	
	[REDACTED]	
	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
	[REDACTED]	
7	Statement of Common Ground	
7.1	To date 8 local authorities have formally signed the SoCG with Walsall, Lichfield, Shropshire and Telford and Wrekin indicating that they will shortly.	
7.2	In terms of the brief for further work early comments have been addressed: • Extending time horizons to coincide with local plan reviews • Issue of 2014 household projections being out of date, noted that South Warwickshire plan seeking comments on need estimates derived from 2021 Census, which corrects previous Coventry errors but increases need in Warwick and Stratford on Avon • Steer on impact of urban uplift and whether it can be exported • Consider implications of Strategic Employment Sites Study • Consider growth around rail links and wider transport infrastructure implications.	
	[REDACTED]	
7.4	Noted that the NPPF review will have a bearing and agreed probably taken as far as we can now but further comments to be provided at the end of the month to South Staffordshire.	

7.5	Issue of member Governance arrangements and fact that new members would need to get up to speed after the local elections. Initial ToR for member group to be worked up for discussion	ALL/PW
8	GBBCHMA Position statement refresh	
8.1	Updated document circulated, attention drawn to new paragraphs 6,7 and 8 which set out the post 2031 context and the need to address Local Housing need rather than the Strategic Growth Study Baseline.	
8.2	Comments to AD by 30 th April and indicate when 2022 data will be available. Intention to sign of document for publication at next meeting	ALL
9	Strategic Employment Sites Study	
9.1	Consultants are reviewing information received, reaching out to stakeholders, and undertaking technical desktop work. Initial findings due to Steering Group early May and will be shared with this group.	
9.2	Schedule of outstanding local authority information circulated but may be out of date as more updates likely to have been received. Noted that Dr Colin Clinton, WMCA Business and Partnership lead not included on stakeholder contact list. IC to advise consultants	IC
10	Local Aggregate Assessment	
10.1	No progress since last meeting but noted that Regional Aggregate Working Party meeting at end of month and an update will be required.	AD
11	Any other business	
11.1	None	
12	Date of next meeting	
12.1	Tuesday 16 May 2023 @14:00 – 16:00.	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 16 May 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. Local Plan Updates
6. West Midlands Strategic Sites Study
7. GBBCHMA plus SoCG
 - Progress on signing
 - Further work brief responses
8. 2021 GBBCHAM Position Statement Update
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – 16 May 2023, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West. Midlands Met Authorities), Heidi Hollins, Jemma March (Cannock Chase), John English, Amanda Holland (WMCA), Mark Andrews, Charlene Jones (Solihull), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Eddie West (Shropshire), Joanne Bozdoganli (Stratford on Avon), Maria Bailey (Nuneaton and Bedworth), Mike Dittman, (North Warwickshire), Neville Ball (Walsall), Ed Fox, Kelly Harris, (South Staffs.), Patrick Jarvis (Lichfield), Clare Eggington (Coventry), Richard Powell (Tamworth); Vicki Popplewell (Dudley).	
1	Actions from last meeting	
1.1	Addressed via agenda items	
2	TfWM Update	
2.1	Not available	
3	WMCA Update	
3.1	Reported that the inaugural meeting of Employment Land Working Group had met, with a future meeting to be convened. Issue around local authorities with no affiliation to WMCA, yet have a functional relationship, e.g., SSDC. Agreed that WMCA formally set out remit of group and extend invitation to SSDC. Copy of presentation to working group to be circulated.	AH / AD
4	Local Plan Updates	
4.1	See separate schedule, only change from April is that the Shropshire Minerals and Waste hearings have now taken place.	
4.2	Of those local authorities present, most are hoping to progress plans under the current arrangements, rather than those proposed in the draft NPPF revisions.	
4.3	Tamworth remains uncertain, due to no overall control post local elections, but is continuing in line with current arrangements. Other local authorities with no overall control are as follows: Cannock Chase, Lichfield, North Warwickshire, and Bromsgrove.	
5	Strategic Employment Sites Study	
5.1	Presentation previously given to Steering Group had been circulated previously.	
5.2	Summary of Comments made as follows: North Warwickshire: - Issue raised by members, are individual authorities / sub-regions all chasing / attracting same demand e.g., M54/M6 and M42? - Also, it would be a political concern if Warwickshire expected to accommodate similar levels of growth as in the past, especially with infrastructure constraints.	
5.3	South Staffordshire: How do MDS based forecasts relate to the likes of Oxford / Experian forecasts?	

	Manufacturing and warehousing may have different locational requirements, e.g., former closer proximity to workforce, latter to motorway junctions.	
5.4	Any further comments to AD / IC for forwarding to consultants by 26/05/23.	ALL
6	Statement of Common Ground	
6.1	Bi-lateral statements continue to be agreed. Regarding the HMA (plus) SoCG, Bromsgrove, Redditch and North Warwickshire are unable to agree in its current form / at this time. Of the other outstanding local authorities, Shropshire confirmed that the matter was in hand and Lichfield has not yet appointed a portfolio holder. Walsall and Telford to be contacted outside of the meeting.	
	Phase 2 brief for follow up commission	
6.2	Only issue not included was for brief to suggest locations etc. based on commuting flows. Agreed that whilst this may be an option, it was for the consultants to propose a methodology, taking account of all relevant factors.	IC
6.3	Note that any request to consider the standard method inputs needs to be consistent with the approach undertaken in Coventry / Warwickshire.	
6.4	NPPF delays and implications for submitting plans under current arrangements remain a matter of concern. Agreed a backstop of September meeting for determining if / how to proceed with commission.	
6.5	[REDACTED]	[REDACTED]
6.6	Agreed that a final version of the brief (v3 without track changes) is circulated for noting.	AD/PW
	Draft Member Group Terms of Reference	
6.7	Latest document presented by SSDC; this is based on the successful Cannock Chase SAC Partnership Board ToR. Any further comments to AD / PW by 26/5/23	ALL
7	GBBCHMA Position statement refresh	
7.1	Updated document circulated, attention drawn to new paragraphs 6,7 and 8 which set out the post 2031 context and the need to address Local Housing Need rather than the Strategic Growth Study Baseline going forward. Comments to AD by 26/05/23: Main document: Michele Ross's track changes have been accepted, please check that you are content with the wording especially new paragraphs 6,7 and 8 Appendix 1: Last check on figures, these should be fine as we have been through them before Appendix 2: Please check that you are happy with the wording around your plan review status and dates etc. Again, MR changes accepted and corrections from Birmingham, Cannock, and Stratford.	

8	Local Aggregate Assessment	
8.1	Some progress being made but query regarding the status of some Walsall reserves, which have been identified in the Regional Monitoring Report	
9	Any other business	
9.1	None	
10	Date of next meeting	
10.1	Changed to Tuesday 28 th June – subsequently cancelled so next meeting 18 th July @14:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 18 July 2023, 14:00 – 16:00, via MS Teams,

AGENDA

12. Apologies / introductions

13. Actions from last meeting

14. TfWM update

- Monitoring returns
- Freight and the Planning System – Call for Evidence.

[Freight and logistics and the planning system: call for evidence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/freight-and-logistics-and-the-planning-system-call-for-evidence)

15. WMCA Update

- [REDACTED]
- Employment Land Working Group

16. Local Plan Updates

17. West Midlands Strategic Sites Study

18. GBBCHMA plus SoCG

- Progress on signing
- Members' ToR
- Further work brief

19. 2021 GBBCHMA Position Statement Update

20. Local Aggregate Assessment

21. Any other business

22. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 18 July 2023, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton) – chair, Andrew Donnelly (West Midlands Met Authorities), Jemma March (Cannock Chase), Pat Willoughby, Amanda Holland (WMCA), Mark Andrews, (Solihull), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Dan Corden (Shropshire), Joanne Bozdoganli (Stratford on Avon), Dorothy Barratt, (North Warwickshire), Neville Ball (Walsall), Kelly Harris, (South Staffs.), Patrick Jervis (Lichfield), Clare Eggington, Chris Berry (Coventry), Richard Powell (Tamworth); Vicki Popplewell (Dudley), Owen O'Neill, Matt Malin, Helen Davies (TfWM), Patricia McCullagh (Sandwell)	
	Apologies	
	Sarah Scannell (Birmingham), Mike Dittman (North Warwickshire), Gavin Ashford (Telford and Wrekin)	
1	Actions from last meeting	
1.1	Addressed via agenda items	
2	TfWM Update	
2.1	Freight and the planning system – call for evidence	
2.2	TfWM is preparing a response as a key cluster in plan for growth and a large employment sector. No policy changes proposed at this juncture, rather evidence sought to inform future policy. Any comments / views to [REDACTED] TfWM by 31 st August. HD to return to September meeting with update. Consultation response deadline 6 th October. Response likely to be endorsed by TfWM Board of Directors.	HD/all
2.3	Birmingham noted that lorry parking is an issue. North Warwickshire likely to submit own evidence given the amount of logistics related development in the area.	
2.4	AD to provide HD with link to 2021 Strategic Employment Sites study	AD
	Data collection	
2.5	Progress on cleaning up 2020 and 2021 data and making the collection process less onerous. Data to be available on Arcinfo GIS and DNG member s will have access; data can be provided in other formats too. Be helpful to compare totals with those presented in GBBCHMA Position Statement.	
1	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	Employment Land	
3.2	Progress being made on 5 workstreams identified at first meeting. Work being led by [REDACTED] and further meeting to be scheduled at the end of July.	
4	Local Plan Updates	
4.1	See separate schedule.	
5	Strategic Employment Sites Study	

5.1	Work has progressed identifying where large units have been delivered on small sites and small units on large sites, the former more likely in urban areas. Level of need being refined with the upper end of the range likely to fall. Ongoing liaison with Highways England and other highways authorities.	
5.2	Agreed that presentation to be given to Coventry and Warwickshire authorities following Mike Dittman's request.	
5.3	Issue raised as to whether stage papers were to be available or just presentations. IC to pursue.	IC
5.4	Also, is there any evidence of B8 premises having more than one storey as this may impact on land take. To be raised with consultancy team	AD
6	Statement of Common Ground	
6.1	No change since last meeting: • Lichfield to contact South Staffordshire directly. • Dudley reiterated that members awaiting NPPF details. • Shropshire's position unlikely to change but have a new portfolio holder	
6.2	Noted that this was drafted in August 2022 and circumstances were very different now.	
6.3	All to take soundings and give indication at August 15th meeting whether prepared to commission further work and whether agree to members terms of reference.	ALL
7	GBBCHMA Position Statement refresh	
7.1	Completed with 2021 data and ready for internal sign off / publication. Local authorities to advise when publishing it on websites	ALL
7.2	Attention drawn to fact that document no makes reference to the post 2031 shortfall.	
8	Local Aggregate Assessment	
8.1	No progress since previous meeting	
9	Any other business	
9.1	None	
10	Date of next meeting	
10.1	Tuesday 15 th August @ 14:00. Subsequently changed to Tuesday 26 th September @14:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 26th September 2023, 14:00 – 16:00, via MS Teams,

AGENDA

23. Apologies / introductions

24. Actions from last meeting

25. TfWM update

- Freight call for evidence
- Monitoring returns

26. WMCA Update



- Employment Land

27. Local Plan Updates

28. West Midlands Strategic Employment Sites Study

29. GBBCHMA plus SoCG

30. DLHC Local Plan reforms consultation

31. Local Aggregate Assessment

32. Any other business

33. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 26 September 2023, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton), Andrew Donnelly (West Midlands Met Authorities), Jemma March, Grace Lockley (Cannock Chase), John Godfrey, Amanda Holland (WMCA), Maria Dunn, (Birmingham - chair), Mike Dunphy (Bromsgrove), Dan Corden, Eddie West (Shropshire), Joanne Bozdoganli (Stratford on Avon), Mike Dittman Barratt, (North Warwickshire), Neville Ball (Walsall), Ed Fox, (South Staffs.), Patrick Jervis (Lichfield), Clare Eggington, (Coventry), Richard Powell (Tamworth); Vicki Popplewell (Dudley), Helen Davies (TFWM), Patricia McCullagh (Sandwell), Jacqueline Padbury, Maria Bailey (Nuneaton and Bedworth), Andrew Cornfoot (Warwick), Sally Horne (Wyre Forest)	
	Apologies	
	Sarah Scannell (Birmingham), Dorothy Barratt (North Warwickshire), Gavin Ashford (Telford and Wrekin), Neville Ball (Walsall), Gary Palmer (Solihull)	
1	Actions from last meeting	
1.1	Addressed via agenda item other than Position Statement Refresh, the action was for local authorities to approval through internal processes and publish.	
2	TFWM Update	
	Freight and the planning system – call for evidence	
2.1	TFWM draft responses circulated for comment and response framed following discussions / events with Midlands Connect, Urban Transport group and CIHT..	HD/all
2.2	Main issues include: • Sector a major employer, some 100,000 jobs in the West Midlands • Lack of reliable data, a Freight Observatory has been established in the West Midlands hosted at Aston University • Need for decarbonisation – shift to rail and waterways • Difficulty of workers accessing jobs as often in peripheral locations • Limited guidance in NPPF as written for local plans when many issues regional and national • HS2 provides extra capacity / opportunities • Better integrated of planning and transport policies needed • Difficulties in forecasting requirements • Last mile deliveries important and innovative solutions required e.g. e-cargo bikes	
2.2	Comments to [REDACTED] by 4 th October for 6 th October submission.	ALL
2.3	Link to CIHT seminar to be provided	AD
	Data collection	
2.5	No update available	

[illegible]

6.5	Wolverhampton has a new leader and Portfolio Holder and is not in a position to commit until details of NPPF known	
6.6	Common view that NPPF details critical, especially regarding Green Belt exceptional circumstances test and use of more up to date household projections, which in some instances could change the numbers significantly.	ALL
6.7	Noted that those anticipating adopting a plan under the current arrangements need to comply with the Duty to Cooperate, whilst those proceeding with new arrangements will need to comply with the as yet unspecified Alignment Test. It is understood that the Alignment test will be a lower bar and not apply to housing.	
6.8	Role of local authorities outside of HMA and whether they will be invited to contribute financially needs clarification.	
6.9	Clarification required whether for regional housing legacy funds are available to support study refresh	IC
6.10	Agreed that updated table to be circulated for completion	AD/ALL
7.1	Local Plan Reforms consultation	
7.2	Summary of proposals and first thoughts circulated. Noted that the reforms were mostly about process and there may still be delays with policy issues, e.g. site allocations, unmet housing need. Also issues around capacity of PINS to support new arrangements as some plans been in examination for over two years.	
8	Local Aggregate Assessment	
8.1	Helpful meeting with DLUHC and Aggregate Working Party Secretariat about how to produce a Local Aggregate Assessment.	
9	Any other business	
9.1	None	
10	Date of next meeting	
10.1	Tuesday 17th October @ 14:00 cancelled. Next meeting Tuesday 21 st November 14:00 to 16:00.	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT
NEEDS GROUP**

Tuesday 21st November 2023, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
- 
- Employment Land
5. Local Plan Updates
6. West Midlands Strategic Employment Sites Study
7. GBBCHMA plus SoCG
8. Local Aggregate Assessment
9. Any other business
10. Date of next meeting

[illegible]

4.6	Request to populate and return outstanding employment land supply proformas to WMCA.	
4.7	In general, attention drawn to fact that several work / funding streams ongoing in CA around investment Zones, Levelling Up Zones, affordable housing with Homes England. Local Authorities advised to make contact if have not already.	
5	Local Plan Updates	
5.1	See separate schedule	
6	Strategic Employment Sites Study	
6.1	Some ongoing work regarding rail-based logistics need being completed and continued engagement with Warwickshire CC Highways. Draft report awaited for circulation to this Group (via Steering Group).	
6.2	Final report will pick up outstanding queries, e.g., demand side methodology	
7	GBBCHMA plus Statement of Common Ground / Strategic Growth Study Refresh	
7.1	Schedule circulated showing local authority positions regarding study refresh and support for governance arrangements. Strategic Growth Study refresh cannot commence until clarity via revised NPPF but understood that Duty to Cooperate will be in place under planning making system with alignment test coming thereafter.	
7.2	The 'original' SoCG will also need to be refreshed as circumstances are much different to now, for example plan delays / withdrawals.	
7.4	Noted that Birmingham's financial position means any spending requests have to be submitted to spend and control process	
7.5	Attention drawn to potential political realities should the NPPF confirm that no need to review Green Belt boundaries to meet own need then buy in to look at wider need may be difficult regardless of technical merits of further study.	
7.6	Noted that revisiting housing need figures will not be helpful for those authorities currently consulting on draft plans.	
7.7	Agreed that position to be reviewed at subsequent meeting once NPPF published.	
8	Local Aggregate Assessment	
8.1	Meeting of Regional Aggregate Working Party las week. Noted Staffordshire's succinct LAA could be used as a template.	
9		
10.1	Tuesday 19th December @ 14:00 cancelled. Next meeting Tuesday 16th January 10:30 – 12:30.	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 16th January 2024, 10:30 – 12:30, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
 - Demonstration of Data Insight Portal (provisional)
 - Land use monitoring
4. WMCA Update
 - 
 - Employment Land
5. Local Plan Updates
6. Revised NPPF
 - Main changes
 - Implications for future workstreams / governance / SoCG
7. West Midlands Strategic Employment Sites Study
8. 2022 Housing Delivery Test Results
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 16th January 2024, 10:30 – 12:30		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton – chair, Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland (WMCA), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), Eddie West, Dan Corden, (Shropshire), Jo Bozdoganli (Stratford on Avon), Mike Dittman, Dorothy Barrat(North Warwickshire), Neville Ball (Walsall), Ed Fox, Kelly Harris, Alex Evans(South Staffs.), Patrick Jervis (Lichfield), , Vicki Popplewell, Jennie Hadley (Dudley), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Michele Ross (Wolverhampton), Owen O'Neill, Liam Edge(TfWM), Richard Powell (Tamworth), Neil Glover (Nuneaton and Bedworth)	
1	Apologies	
1.1	Andrew Donnelly (West. Midlands Met Authorities), Clare Eggington, Chris Styles (Coventry) Jacqueline Padbury, (Nuneaton and Bedworth)	
2	Actions from last meeting	
2.1	Items covered on agenda.	
3	TfWM Update	
3.1	Demonstration of Data Insight Portal, main points: • Catalogue tab has user guide. • Public and facing with private parts of site requiring login, contact TfWM for access. • Strategic planning hub contains information on the likes of green space, housing, employment forecasts, demographics. • Data primarily for Metropolitan Area but tagged where it is available over a wider geography. • Non constituent authorities not obliged to provide housing / employment monitoring data, but it would be welcomed. • FAQs section being developed as questions asked. • Monitoring forms for 2022/23 to be issued shortly. • Check up on TfWM visit to NWBC to explain format data required in • Check mailing list to ensure data request gone to non-constituent partners in particular. • Contact OO if want data putting on strategic planning page	OO OO OO
4	WMCA update	
■		■
■		
■		
■		

4.4	Request that employment land information schedules be returned to [REDACTED] and copied to LP. Have from all constituent authorities except Sandwell and Solihull. From non-constituent authorities Shropshire and Nuneaton have responded	ALL
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
5	Local Plan Updates	
5.1	See separate schedule	
6	Revised NPPF December 2023	
6.2	Discussion in two strands: What are the main changes / issues? Implications for future workstreams	
6.3	• Duty to Cooperate • Calculating Housing Need • Green Belt	
6.4	Duty to Cooperate remains and understood that the legal duty will remain until the next iteration of the NPPF / new arrangements for preparation when a replacement Alignment Test will be introduced. Local plans progressing through current arrangements, therefore, need to comply with the Duty to Cooperate as before.	
6.5	Confirmed that standard method a starting point for calculating local housing need and that scope to deviate restricted	
6.6	Confirmed that urban uplifts to be met in-situ unless conflicts with other parts of Framework or voluntary agreements to accommodate.	
6.7	Confirms that Green Belt boundaries do not have to be reviewed unless LPAs choose to do so. This applies to release for all uses, not just housing as was the case in the 2022 draft. Discussion about whether it was a binary choice to review or not or whether reviews could be partial. Noted that Written Ministerial Statement is a material consideration.	
6.8	Tension identified between para 154 (Green Belt) and para 35, positively prepared and meeting need.	
6.9	Will be implications for LPA's with hinterlands beyond the Green Belt.	
7	GBBCHMA plus Statement of Common Ground / Strategic Growth Study Refresh	
7.1	Some support previously expressed for updating the Strategic Growth Study, particularly those proceeding under current arrangements as it	

	would assist in demonstrating compliance with Duty to Cooperate. Views expressed summarised below:	
7.2	North Warwickshire - Has an up-to-date plan and is struggling to get the promised infrastructure investment in place to deliver major allocations, which include a major contribution towards HMA shortfall, therefore no political appetite at present. This may change if infrastructure was delivered and requested that study considers emphasising the importance of the NWBC contribution (and necessary infrastructure) to the wider HMA.	
7.3	South Staffordshire - Observed that the previous study is now out of date so support an update. The brief will need amending in light of new NPPF para. 145.	
7.4	Solihull – No formal position yet but question purpose of a study which considers Green Belt options when even LPAs generating shortfalls are not considering Green Belt review as the NPPF now gives that option. Also, existing study has been interpreted differently by LPAs.	
7.5	Birmingham - Supportive as acknowledge the importance of an update to assist in meeting Duty to Cooperate requirements.	
7.6	Sandwell – As Birmingham above.	
7.7	Dudley – Officer acknowledgement that work needed for Duty to Cooperate compliance but not yet taken political soundings. Of the view that it is LPA view whether to review Green Belt or not. Brief needs to be worded very carefully to reflect this.	
7.8	Lichfield – Officer view only but supportive and would like to be involved. Needs to be policy off and reflect NPPF that it is a matter of choice by LPA whether to review Green Belt. Study needs to be future proofed in the event of change in Government.	
7.9	Shropshire – Non-constituent and not in HMA, on outside looking in and have been part of the Duty to Cooperate process. Local plan quite advanced and have passed the Duty to Cooperate test so would impact on next plan. Would need to carefully consider political risk of involvement.	
7.10	WMCA – supportive of need for infrastructure asks alongside new development, GLA commissions such studies to assist in building Green Book cases and secures much more funding than the West Midlands.	
7.11	Also suggested broadening brief to look at appropriate densities in different locations and if LPAs were looking at Green Belt release, what design codes would apply.	
8	Strategic Employment Sites Study	
8.1	Comments on draft report to consultancy team by 19 th January. Agreed that most suitable way is to reference comments in a word document.	
8.2	Issue raised regarding proximity of locations to areas of high unemployment but considered that report too far advanced to introduce new issues.	
9	Housing Delivery Test	
9.1	Consider at next meeting	

10	Local Aggregate Assessment	
10.1	Consider at next meeting	
11	Date of next meeting	
11.1	Tuesday 20 th February 2024, 14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 20th February 2024, 14:00 – 16:00, via MS Teams,

AGENDA

12. Apologies / introductions

13. Actions from last meeting

[REDACTED]

15. TfWM update

16. WMCA Update

[REDACTED]

- Employment Land

17. Local Plan Updates

18. Future workstreams – revised Strategic Growth Study Refresh brief

19. West Midlands Strategic Employment Sites Study

20. Strengthening planning policy for brownfield development consultation

[Strengthening planning policy for brownfield development - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development)

21. Housing Delivery Test results

22. Local Aggregate Assessment

23. Any other business

24. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 20 th February 2024, 10:30 – 12:30		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton – chair, Jemma March (Cannock Chase), Leo Pollak, Amanda Holland, Leo Pollak (WMCA), Uyen Phan Han, (Birmingham), Mike Dunphy (Bromsgrove), Dan Corden, (Shropshire), Jo Bozdoganli (Stratford on Avon), Mike Dittman, (North Warwickshire), Neville Bell (Walsall), Ed Fox, Alex Evans (South Staffs.), Patrick Jervis (Lichfield), Vicki Popplewell, (Dudley), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill, Gundip Nagra (TFWM), Hether Stone (Wyre Forest), Andy Donnelly (WM Metropolitan Authorities, Andrew Ward (DLUHC).	
1	Apologies	
1.1	Sarah Scannell (Birmingham), Maria Dunn (Birmingham), Maria Bailey (Nuneaton and Bedworth), Richard Powell (Tamworth)	
2	Actions from last meeting	
2.1	Items covered on agenda – note next meeting should have said 20 February not 19 March	
4	TFWM update	
4.1	No update from last meeting. Agreed to look at possibility of putting the internal migration datasets on data insight.	AD/OO
5	WMCA update.	

5.3	WMCA is preparing a Housing Monitor, currently this pulling together datasets publicly available e.g. affordability, completions and will be presented at tomorrow's Housing and Land Delivery Steering Group. Agreed to bring an update to future meeting of this group.	LP
5.4	Solihull, South Staffordshire, Cannock, and Telford employment land supply returns outstanding. Return to AH as soon as possible. Suggested that employment land shortfalls in emerging local plans are monitored.	
6	Local Plan Updates	
6.1	See separate schedule	
7	Strategic Growth Study Refresh	
7.1	Brief updated to address comments made at last meeting and to reflect changes in the revised NPPF. Local authority views summarised below.	
7.2	Solihull – Reiterated its view as recorded at last meeting.	
7.3	South Warwickshire – Supportive as need to tackle issue head on and collaboratively	
7.4	South Staffordshire – Supportive as progressing under current system and need to demonstrate compliance with the Duty to Cooperate	
7.5	Dudley – Supportive in principle and suggest taking soundings from Planning Advisory Service.	
7.6	Sandwell – Position unchanged, supportive.	
7.7	Birmingham – Continue to be supportive in principle	
7.8	Lichfield – Had steer from portfolio holder and supportive	
7.9	Cannock Chase – Supportive in principle subject to overall level of support and remit.	
7.10	WMCA – Supportive and agreed to make contribution	
7.11	Bromsgrove – Not yet an official position but unlikely to be supportive.	
7.12	Redditch – Yet to be established, but likely to be as Bromsgrove.	
7.13	Walsall – Awaiting lead from portfolio holder, probably supportive.	
7.14	Agreed Actions: • Amend brief to take account of revised NPPF density policy. • Consult informally with PAS. • Soft test brief with consultants on a without prejudice basis	AD IC IC
8	Strategic Employment Sites Study	
8.1	All thanked for comments to consultants on draft study. Direction note from consultants should be issued next week.	

8.2	Query as to whether work would be completed for invoicing this budget year.	
9	Strengthening planning policy for brownfield development consultation	
9.1	Noted that Reading BC had offered to coordinate a response on behalf of the nineteen largest urban areas (excluding London), view emerging that separate tier of national policy for urban areas.	
9.2	WMCA is drafting a response and welcomes views of planning authorities	ALL
9.3	Walsall briefing note to be shared and all to consider sharing draft responses	NB/ALL
10	Housing Delivery Test	
10.1	Noted that results, in the main, are impressive but measurement is over past three years and includes capped local plan figures and does not yet include the urban uplifts.	
11	Local Aggregate Assessment	
11.1	No update from last meeting	
12	Any other business	
12.1	Noted that the Greater Manchester Spatial Framework Inspectors' Report has been published	
13	Date of next meeting	
13.1	Tuesday 19 th March 2024, 14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 19th March 2024, 14:00 – 16:00, via MS Teams,

AGENDA

25. Apologies / introductions
26. Actions from last meeting
27. Department for Education engagement with local planning authorities' – John Pilgrim
and Andrew Carter (Department for Education)
28. TfWM update
29. WMCA Update
 - [REDACTED] / Housing Monitor
[Housing Monitor Report.pdf \(wmca.org.uk\)](#)
 - Employment Land
30. Local Plan Updates
31. Future workstreams – Strategic Growth Study Refresh
32. West Midlands Strategic Employment Sites Study
33. Local Aggregate Assessment
34. Any other business
35. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 19th March 2024, 14:00 – 16:00 Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton – chair), Jemma March, Grace Lockley (Cannock Chase), Leo Pollak (WMCA), Maria Dunn, (Birmingham), Mike Dunphy (Bromsgrove), , John Careford (Stratford on Avon), Dorothy Barratt (North Warwickshire), Neville Ball (Walsall), Alex Evans(South Staffs.), Patrick Jervis (Lichfield), Jennie Hadley, (Dudley), Richard Powell (Tamworth), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill, Gurdip Nagra (TfWM), Michele Ross (Wolverhampton), Andy Donnelly (WM Metropolitan Authorities, Clare Eggington (Coventry), Neil Glover (Nuneaton and Bedworth) Andrew Carter, John Pilgrim (Department for Education - DfE)	
1.1	Apologies Sarah Scannell (Birmingham), Amanda Holland (WMCA), Dan Corden, Eddie West (Shropshire) Jo Bozdoganli (Stratford on Avon), Gavin Ashford (Telford and Wrekin), Vicki Popplewell (Dudley).	
2	Actions from last meeting	
2.1	WMCA response to Strengthening planning policy for brownfield development consultation to be circulated	GN
2.2	Noted that response being prepared by Reading BC on behalf of 19 largest LPAs outside of London being progressed	
2.3	AD to liaise with OO regarding internal migration data, note that this also been raised with ONS via regular Birmingham liaison meetings.	AD/OO
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
4	GBBCHMA Strategic Growth Study Refresh	
4.1	Brief circulated following soft market testing. Main changes:	
	[REDACTED]	

	- Greater clarity as to how the 2018 study had been considered i.e. where recommendations had / had not been taken forward, and whether there are any further potential locations. - Removed need to provide alternative housing need scenarios but refer to alternatives that LPAs may be considering through local plan reviews.	
4.2	WMCA offered to commission if local authorities in agreement and subject to internal resources.	
4.3	IC to contact Regional Housing Group to establish whether any funding available, also to contact PAS for informal views.	IC
4.5	Anticipation that those authorities not contributing would still be required to provide relevant information to support study, otherwise published information would be drawn on.	
4.6	At present agreement to actively participate / financially contribute recorded in notes of this group. Need to consider whether a more formal approach needs to be made.	
4.7	Any further comments on this iteration of brief to AD.	ALL
5	TfWM update	
5.1	Currently occupied with procurement of new strategic model and clearing up various reports so that they can be automated.	
6	WMCA update.	
	Housing Monitor	
6.3	Inaugural report circulated; data sourced from secondary published sources. Any suggestions of additional data that could feature in future iterations requested. This report has previously been presented to WMCA's Housing and Land Delivery Steering Group and Housing and Land Board.	
7	Local Plan Updates	
7.1	See separate schedule	
8	Strategic Employment Sites Study	
8.1	Comments on advanced draft received by consultancy team. IC to meet with consultants and Rugby BC next week to address the issues raised by Rugby	IC/NH
9	Local Aggregate Assessment	

9.1	Some preliminary drafting commenced drawing on Regional Monitoring Report and other county LAAs.	
10	Any other business	
10.1	Group asked to consider if any appetite for face to face or hybrid meetings. Noted that Birmingham CC meeting room availability was now very limited, although WMCA offices could be a possibility. Noted that a previous in person WMCA Housing and Land Delivery Group meeting in Shropshire included a site visit, which may be an approach to consider going forward on an occasional basis.	ALL
11	Date of Next Meeting	
11.1	Tuesday 16 th April @ 14:00 via MS Teams	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 21st May 2024, 14:00 – 16:00, via MS Teams,

AGENDA

36. Apologies / introductions

37. Actions from last meeting

38. TfWM update

39. WMCA Update

- Mayor's manifesto commitments
- [REDACTED] Housing Monitor
- Employment Land

40. Local Plan Updates

41. Strategic Growth Study Refresh

42. West Midlands Strategic Employment Sites Study

43. Local Aggregate Assessment

44. Future agenda items

45. Any other business

46. Date of next meeting

[illegible]

5	Local Plan updates	
5.1	See separate schedule	
6	Strategic Growth Study Refresh	
6.1	No further changes requested to brief. Tracked changes to be removed and brief circulated with covering email seeking willingness to participate / contribute financially, suggested date for response 14 th June. Still need to establish whether any regional legacy funds available to support budget.	IC
6.2	Need to be clear that this is primarily to assist existing plans in complying with Duty to Cooperate. Whilst it may support any future more formal strategic planning work, it is not a precursor to it.	
7	Strategic Employment Sites Study	
7.1	Direction note recently circulated addressing issues raised, final draft of report anticipated this week. Main outstanding matter is reconciliation with recommendations and the strategic B8 component of the Coventry and Warwickshire HEDNA.	
7.2	Need to consider when / how publish final study, when individual local authorities publish it, colleagues elsewhere need to be aware so that they can deal with any queries. Potential for report to be reported through WMCA Housing and Land Board.	
8	Local Aggregate Assessment	
8.1	Some initial drafting done and circulated to Metropolitan LPA contacts / leads and information shortfalls identified. Metropolitan Area inevitably reliant on imports, especially from Staffordshire.	
8.2	General concerns about outdated regional production guidelines and lack of information on recycled and secondary aggregates	
8.3	Agreed to bring more worked up draft to future meeting of this group.	AD
9	Future agenda items	
9.1	RTPI research on strategic planning, some have had contact with Catriona Riddell / University of West England who is working on this, consider inviting to a future meeting when study completed.	

9.2	WMCA has been doing work on energy infrastructure / capacity with local authorities, which may be of interest to this group as grid capacity for new development has been an issue in some areas e.g. Ealing.	
9.3	██████ Chairs Coventry and Warwickshire Critical Infrastructure Group and requested that LP copy him into anything. National Grid has a useful substation mapping tool which identifies capacity but difficulty sourcing information about wider grid capacity. Currently have photovoltaic and battery storage proposals which may have difficulty connecting to the grid in the short term.	LP
9.4	Shropshire's ecologists have noted that some developers are looking immediately to offsite BNG provision, which is likely to be more expensive than on-site provision. Asked whether other LPAs were experiencing the same. Agreed as an item for a future agenda.	
10	Any other business	
10.1	None	
11	Date of next meeting	
11.1	Tuesday 18 th June, 14:00 – 16:00	
11.2	Meeting invitations July – December to be circulated	AD

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 18 June 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update

[REDACTED]

5. Local Plan Updates
6. Strategic Growth Study Refresh
7. West Midlands Strategic Employment Sites Study
8. Local Aggregate Assessment

[REDACTED]

10. Energy Infrastructure and capacity in the West Midlands – Kate Ashworth and Gordon Telling (WMCA)
11. Any other business
12. Date of next meeting

[illegible]

[illegible]

10	Any other business	
10.1	None	
11	Date of next meeting	
11.1	Tuesday 16 th July, 14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 16 July 2024, 14:00 – 16:00, via MS Teams,

AGENDA

47. Apologies / introductions

48. Actions from last meeting

49. TfWM update

50. WMCA Update





51. Wider planning reforms

[Chancellor Rachel Reeves is taking immediate action to fix the foundations of our economy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/chancellor-rachel-reeves-is-taking-immediate-action-to-fix-the-foundations-of-our-economy)

52. Local Plan updates

53. Strategic Growth Study refresh

54. West Midlands Strategic Employment Sites Study

55. Local Aggregate Assessment

56. Accessible Housing in The West Midlands – representative (s) from Habinteg

57. Any other business

58. Date of next meeting

GBBCHMA Development Needs Group – Tuesday 16 th July 2024, 14:00 – 16:00		
Note of main points and actions		
	In attendance: Ian Culley (Wolverhampton – chair), Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland, (WMCA), Maria Dunn, (Birmingham), Mike Dunphy, (Bromsgrove), Jo Bozdoganli (Stratford on Avon), Dorothy Barratt, Mike Dittman (North Warwickshire), Neville Bell (Walsall), Alex Evans, Kelly Harris, (South Staffs.), Patricia McCullagh (Sandwell), Gary Palmer (Solihull), Owen O'Neill, Gurdip Nagra (TFWM), Andy Donnelly (WM Metropolitan Authorities), Clare Eggington, (Coventry), Neil Glover, Chris Kingham (Nuneaton and Bedworth), Eddie West, Dan Corden (Shropshire), Vicki Popplewell (Dudley), Patrick Jervis (Lichfield), Michele Ross (Wolverhampton), Dr Mark Fosbrook, Simon Hall (WMCA), Fara Muneer (CAE), Christina McGill (Habinteg)	
1	Apologies Sarah Scannell (Birmingham)	
2	Actions from last meeting	
2.1	Solihull MBC's report detailing how they are dealing with applications on proposed local plan allocations circulated for information.	
2.2	Coventry and Warwickshire authorities to follow up with WMCA energy capacity contacts regarding future capabilities of the modelling.	
2.3	Meeting with Shropshire ecologists / planners and AD / IC / WMCA to be arranged	AD
3	TFWM update	
3.1	The 2023 housing / employment site schedules have been circulated to local authorities for completion.	
5	Local Plan Updates	

[illegible]

The diagram shows a 10x10 grid. A thick black cross is centered, consisting of a vertical bar from row 3 to row 8 and a horizontal bar from column 3 to column 8. Yellow squares are located at the intersections of the cross with the grid lines, specifically at (row, column) coordinates: (3,3), (4,3), (5,3), (6,3), (7,3), (8,3), (3,4), (3,5), (3,6), (3,7), (3,8), (4,4), (4,5), (4,6), (4,7), (4,8), (5,4), (5,5), (5,6), (5,7), (5,8), (6,4), (6,5), (6,6), (6,7), (6,8), (7,4), (7,5), (7,6), (7,7), (7,8), and (8,4), (8,5), (8,6), (8,7), (8,8). The grid is divided into four 5x5 quadrants by a central vertical line and a central horizontal line.

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 17 September 2024, 14:00 – 16:00, via MS Teams,

AGENDA

- 59. Apologies / introductions
- 60. Actions from last meeting
- 61. TfWM update
- 62. WMCA Update
- 63. NPPF review
 - Responses
 - Next Steps
- 64. Local Plan update and significant appeal updates
- 65. Strategic Growth Study refresh
- 66. West Midlands Strategic Employment Sites Study
- 67. Local Aggregate Assessment
- 68. Any other business
- 69. Date of next meeting

	West Midlands Development Needs Group, 17 September 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), Grace Lockley (Cannock Chase), Leo Pollak, Amanda Holland, (WMCA), Rebecca Brown, (Birmingham), Mike Dunphy, Alison Grimmett (Bromsgrove), Jo Bozdoganli (Stratford on Avon), Neville Bell (Walsall), Ed Fox, Kelly Harris, (South Staffs.), Charlene Jones (Solihull), Owen O'Neill, Gurdip Nagra (TFWM), Andy Donnelly (WM Metropolitan Authorities), Jacqueline Padbury Nuneaton and Bedworth), Vicki Popplewell (Dudley), Patrick Jervis (Lichfield), Michele Ross (Wolverhampton), Andrew Cornfoot (Warwick), Richard Powell (Tamworth)	
1	Apologies	
1.1	Dorothy Barratt, Mike Dittman (North Warwickshire), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Maria Dunn, Sarah Scannell (Birmingham), Clare Eddington, (Coventry),	
2	Notes of last meeting	
2.1	Biodiversity Net Gain - Meeting took place between Wolverhampton planners and Shropshire planners / ecologists. Main concern was tendency of developers to immediately seek to go off-site and the lack of local habitat banks to accommodate this. Understood that Coventry / Warwickshire may have developed a mechanism to deliver BNG on sites they own, and this may be something others could learn from. Matter to be considered at a future meeting	
2.2	Brief note of meeting to be circulated along with Iceni article on off-site BNG	AD
3	TFWM update	
3.1	Note that ONS had agreed to provide an informal demonstration on how to extract the migration data. Guidance notes and dataset to be circulated in case anyone has the opportunity to look at it.	AD
3.2	Request for latest housing and employment returns has been circulated for attention, thanks to those who have responded. Agreed that employment returns need to include a hectares field as well as square metres. Square metres unlikely to be known until a planning application received whereas plan allocations will be in hectares. Also query whether wheelchair accessible dwellings in the pipeline could be collected as part of the housing returns as information is currently limited.	OO
4	WMCA Update	
4.1	Received final draft of Accessible Housing Report, one of key recommendations is to build in need for accessible housing into local plan need assessment work. NBBC requested any supportive data on need as currently a live issue at eip.	LP
4.2	Note that governance arrangements are being reviewed following abolition of Housing and Land Delivery Board – new groupings proposed focussing on jobs, skills, homes, and journeys; officer groups to follow	
5	National Planning Policy Framework review	
5.1	Main points in emerging WMCA response as follows: Support a standard method in principle but scope for it to be more nuanced to reflect demographic change / factors.	

	• Grey Belt definition unclear and scope for disputes. If Green Belt reviews are necessary, then better guidance on how to undertake them would be welcome. • Need assurances that development can fund the necessary infrastructure given scale of growth requirements. • Increased allocations do not necessarily lead to higher build out rates – absorption rates and skill/materials availability, greater scope for build-out conditions. • Transport guidance too vague. • Support increased fees to fully fund planning services. • Supportive of focus on key economic sectors but should include advanced manufacturing. • Weak on the likes of embedded carbon and circular economy	
5.2	Local Authority comments • Dudley - Response broadly aligned on approach to housing need and vague definition of Grey Belt. Also concern about tight transitional arrangements. • Solihull – Share concerns regarding change to standard method and also concerned that Green Belt will become a reservoir for development and its function eroded. • Walsall - Again, concern over standard method changes as stock-based approach does not reflect where growth pressures, and hence need is. • Stratford on Avon - : Note that much higher housing need figure, but less likely to be asked to meet urban shortfalls. Not adverse to reviewing Green Belt but concern that approach could lead to fragmentation. Assurances regarding necessary infrastructure required. • Warwick: Members very keen on full fee recovery to support planning services. • Wolverhampton: Grey Belt definition unhelpful as it is Green Belt that makes least contribution, which would be the first to be released anyway. More guidance on how to conduct Green Belt reviews would be more useful.	
5.3	Any LPA comments (on WMCA approach) please advise WMCA asap as closing date 24/8/24, slides to be circulated after the meeting. Draft response to be made available but needs quick turnround due to tight timescales.	ALL
5.4	Note that a report would be going to West Midlands Metropolitan Area Chief Executives next month setting out implications and potential options for strategic planning. Will recommend an exploratory questionnaire sent to LPAs within constituent area and beyond.	
6	Local Plan Updates / Major Appeals	
6.1	See separate schedule	
6.2	Halesowen Battery Farm decision to be circulated	VP/AD
7	Strategic Growth Study Refresh	
7.1	Main points of discussion: • Need something to provide narrative for Duty to Cooperate compliance for plans seeking submission via transitional arrangements.	

	• NPPF review, however, means more uncertainty as plans will be submitted under different versions, need to re-brief members. • Anything done before revised NPPF will need to be revisited as part of whatever strategic planning arrangements emerge. • The challenge remains the same in that we have unmet need across a common geography. • Attention drawn to overlap with New Towns Taskforce, due to report summer 2025. • For those LPAs who will be without a local plan when the new NPPF is in place, commissioning a study may help deal with speculative applications. • Suggestion that brief nuanced to take account of gentle density increases, design typologies etc. • Despite uncertainty, suggestion that some things could be done e.g. extent that previous options considered, major infrastructure requirements.	
8	Strategic Employment Sites Study	
8.1	Note that this is now in public domain via the Nuneaton and Bedworth eip website	
9	Local Aggregate Assessment	
9.1	Convene meeting of relevant officers to progress and identify difficulties obtaining relevant data.	
10	Any other business	
10.1	None	
11	Date of Next Meeting	
11.1	Tuesday 15 th October, 14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 15th October 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TfWM update
4. WMCA Update
5. NPPF review – next steps
6. Local Plan and significant appeal updates
7. Strategic Growth Study refresh
8. West Midlands Strategic Employment Sites Study – feedback from stakeholders
9. Local Aggregate Assessment
10. Any other business
11. Date of next meeting

	West Midlands Development Needs Group, 16 October 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), Jemma March (Cannock Chase), Leo Pollak, Amanda Holland, (WMCA), Maria Dunn, (Birmingham), , Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Ed Fox, Alex Evans, (South Staffs.), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Sarah Matile (Nuneaton and Bedworth), , Patrick Jervis (Lichfield), Richard Powell (Tamworth) Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Mike Dittman (North Warwickshire).	
1	Apologies	
1.1	Sarah Scannell (Birmingham), Clare Eggington, (Coventry), Mike Dunphy, Alison Grimmett (Bromsgrove), Vicki Popplewell (Dudley)	
2	Notes of last meeting	
2.1	Confirmed that Coventry / Warwickshire has identified sites to meet need in vicinity of where BNG contributions arise so potential for others to replicate the approach; this is being coordinated by the Warwickshire OC ecologist. To be discussed outside of this meeting with a view to brining to a future meeting of this group / separate session.	IC/AD/MDi
2.2	Awaiting details from ONS Local for demonstration about how to extract internal migration data. Would need to be run informally for a couple of people as a larger event would need to be facilitated as a formal webinar, this would take longer to set up.	AD
3	TfWM update	
3.1	Ongoing collection and input of housing / employment monitoring returns.	
3.2	Advised that Local Transport Plan is on hold as will need to reflect the new Mayor's priorities.	
4	WMCA Update	
4.1	Been in discussion with MHCLG about the English Devolution and Planning and Infrastructure Bills and awaiting further clarity / certainty.	
4.2	Ongoing liaison with Government regarding the Integrated Settlement. Seeking better alignment with the planning process regarding affordable housing programme, e.g. where there are local viability issues.	
4.3	Work commissioned looking at the likes of migration, travel to work and spending data at different geographies. Anticipate sharing more widely once completed.	
5	National Planning Policy Framework Review	
5.1	Report taken to West Midlands (Metropolitan) Chief Executives on 11 October. This set out the main strategic / cross boundary implications and, current working arrangements; authorisation was given to issue the questionnaire to identify strategic issues and resources /	

	capacity to address the agenda. Request to report back in January.	
5.2	Agreed that the questionnaire would be circulated to this group and that approximately a month would be given for responses. To be sent to both Housing Market Areas and LPAs with functional linkages, with political sign off.	
5.3	Concern expressed regarding the sequencing of reforms and transitional arrangements. Some local plans seeking to proceed under the new NPPF, whereas others would be using the revised version.	
5.4	Also, how strategic matters would be dealt with when there is effectively a round of plan making before Spatial Development Strategies (SDS) are introduced. For example, if a local plan reviews Green Belt boundaries, would this be expected again as part of SDS preparation? The findings of the New Towns Task Force add another layer of uncertainty.	
5.5	Noted that whilst the focus is on housing, North Warwickshire is addressing strategic employment land matters, including an Employment DPD (including Green Belt review) and anticipates that this work will roll forward to inform any future SDS.	
6	Strategic Growth Study Refresh	
6.1	Discussions have taken place with WMCA regarding procurement arrangements	
6.2	Noted that the NPPF review has created further uncertainty as brief currently reflects NPPF published in December 2023.	
6.3	Within the conurbation overall need remains broadly the same but with a different distribution, whilst in the shire districts it increases significantly, doubling in some cases.	
6.4	Noted that the brief is phased and that the initial stages can be progressed, e.g. evaluation of the 2018 study recommendations, but later part needs to be flexible to respond to new NPPF once published. Brief to be amended and re-circulated.	AD/IC
6.5	Contributions circa £7,000 per local authority, some will have difficulty increasing contributions due to tight budgetary constraints. May be left over funds from Strategic Employment Sites Study. Need to check with Dudley	IC
6.6	In terms of management, suggested all contributing LPAs are on steering group with a smaller group convened to appraise tenders.	
7	Local Plan Updates and Major Appeals	
7.1	See separate schedule for local plan updates	
	Major Appeals	
7.2	Strategic Employment Site M42 J10, North Warwickshire – Inspector accepted the strategic need for a site in this general vicinity but refused the appeal on grounds that it conflicted with the adopted local plan strategic gap policy. NBBC will address the issue via its Employment Land DPD.	
7.4	Green Belt housing proposal, Sandwell – 150 homes on site unallocated in emerging local plan, 40% affordable housing	

	and a countryside park, site a SINC and contains ancient hedgerows. Appeal dismissed on grounds of significant harm to Green Belt purposes, also noted that it would make little contribution to addressing the shortfall. Decision notice to be circulated.	PM / AD
8	Strategic Employment Sites Study	
8.1	The study was addressed during the Nuneaton and Bedworth hearings and a further report has been commissioned, which reconciles it with the Coventry and Warwickshire HEDNA.	
8.2	Acknowledged that the timing of report's release meant it could not be fully reflected in the local plan but some interesting observations whether the 25-ha strategic site definition could be disaggregated.	
8.3	NWBC advised that the report would advise preparation of and responses to its Employment Land DPD.	
9	Local Aggregate Assessment	
9.1	Meeting of officers arranged for 17/10/24	
10	Any other business	
10.1	None	
11	Date of Next Meeting	
11.1	Tuesday 19 th November, 14:00 – 16:00	

1. Apologies / introductions
2. Actions from last meeting
3. Climate Change Adaptation- Bethany Haskins (WMCA)
4. TfWM update
5. [REDACTED]
6. Strategic Growth Study refresh – [REDACTED]
7. Local Plan and significant appeal updates
8. New Towns Task Force – Expressions of interest
9. West Midlands Strategic Employment Sites Study – feedback from stakeholders
10. Local Aggregate Assessment
11. Any other business
12. Date of next meeting

[illegible]

[illegible]

6.2	Suggested that although the brief is flexible, it is more upfront and that phase three may need tweaking to reflect new NPPF when it is published.	IC
7	Local Plan Update	
7.1	Dudley MBC will circulate a SoCG apportioning contributions from relevant local authorities for comment and endorsement. Noted that if Shropshire's plan is withdrawn, then its contribution is no longer available. If we are able to process the migration data in time, then more up to date figures can be used, but it is not considered that this will drastically change the distribution as migration flows are well established.	VP
7.2	See separate schedule also	
8	New Towns Task Force (NTTF)	
8.1	NTTF has invited expressions of interest from local authorities and invited Mayor to a roundtable.	
8.2	In terms of local authority submissions, Stratford members are considering the pros and cons, especially in terms of additional infrastructure, but unclear whether it counts towards local plan need. Matt Pennycook has stated that New Towns are additional to the standard method derived need. Also noted that some proposals may come forward via call for sites exercises.	
8.4	Agreed to circulate details of any local authority or other stakeholder proposals, closing date for submissions 13 December.	ALL
9	Strategic Employment Sites Study	
9.1	A couple of technical queries have been received, which may need referral to Iceni / Mace. There is a small amount of money unspent, which could be used if required. Noted that Coventry / Warwickshire had received a report from Iceni which aligned the SESS with its HEDNA.	
10	Local Aggregate Assessment	
10.1	Aim to have a more worked up draft by end of November.	
11	Any other business	
11.1	None	
12	Date of Next Meeting	
12.1	Tuesday 17 th December, 14:00 – 16:00	

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA DEVELOPMENT NEEDS
GROUP**

Tuesday 17th December 2024, 14:00 – 16:00, via MS Teams,

AGENDA

1. Apologies / introductions
2. Actions from last meeting
3. TFWM update
4. WMCA Update
5. Strategic Growth Study refresh – commissioning arrangements
6. GBBCHMA SoCG

[REDACTED]

[REDACTED] 2024 NPPF [REDACTED]

9. Local Plan and significant appeal updates
10. New Towns Task Force – Expressions of interest
11. Local Aggregate Assessment
12. Any other business
13. Date of next meeting

	West Midlands Development Needs Group, 17th December 2024, 14:00 – 16:00	
	Notes and Summary of Main Actions	
	In attendance: In attendance: Ian Culley (Wolverhampton – chair), , Leo Pollak (WMCA), Maria Dunn, (Birmingham), Jo Bozdoganli (Stratford on Avon), Neville Ball (Walsall), Ed Fox, Alex Evans, Kelly Harris(South Staffs.), Owen O'Neill, Gurdip Nagra (TfWM), Andy Donnelly (WM Metropolitan Authorities), Jacqueline Padbury (Nuneaton and Bedworth), Chris Brewerton(Lichfield), Richard Powell (Tamworth), Gary Palmer (Solihull), Mike Dittman (North Warwickshire), Eddie West, Dan Gorden (Shropshire), Clare Eggington, Chris Styles (Coventry), Mike Dunphy, Alison Grimmer (Bromsgrove), Vicki Popplewell (Dudley), Heather Stone, Robert Wall (Wyre Forest), Michelle Ross (Wolverhampton), Jemma March, Grace Lockley (Cannock Chase), Vicki Popplewell (Dudley), Andrew Cornfoot, Philip Clarke (Warwick)	
1	Apologies	
1.1	Sarah Scannell (Birmingham), Patricia McCullagh (Sandwell), Patrick Jervis (Lichfield)	
2	Notes of last meeting	
2.1	AD / IC still to discuss BNG on local authority sites with MD (NWBC)	IC/AD/MD
3	TfWM update	
3.1	Finalising analysis of employment and housing site returns, to be available after Christmas.	OO
4	WMCA Update	
4.1	Matters to be addressed via other agenda items throughout meeting.	
6	Statement of Common Ground	
6.1	Officer agreed document previously circulated with position in November 2024; outstanding minor amendment requested by Sandwell to be included.	VP
6.2	Noted that this is position as of November 2024, and new NPPF published since. Suggested amending paragraph 3.11 to reflect this	VP
6.3	New NPPF changes Birmingham's need changed significantly, which will have implications for any shortfall, although precise details yet to be established.	

6.4	Assumed that the North Warwickshire contribution was towards the shortfall in the adopted Birmingham Development Plan. NWBC to check that satisfied with reference to this.	MDi/VP
8	National Planning Policy Framework and Devolution White paper	
8.1	New Government's NPPF published 12 th December, extension of transitional arrangements from one to three months welcomed.	
8.2	Local Authorities intending to submit during transitional period:	
8.3	Dudley – but acknowledge due to transitional arrangements will need to commence immediate review.	
8.4	Coventry – Regulation 19 plan approved for consultation 10 th December, helpfully new NPPF LHN is similar to HEDNA derived figure.	
8.5	South Staffordshire – Plan submitted 11/12/24, but as less than 80% of new NPPF housing need, need to twin -track review.	
8.6	Nuneaton and Bedworth – Examination hearings completed and awaiting Inspectors response regarding modifications. Anticipate adopting by April 2025 but need to commence immediate review as do not meet new LHN.	
8.7	Wolverhampton – Regulation 19 consultation ends 9 th January, so submit for examination under transitional arrangements.	
8.8	Shropshire – Still awaiting further response from Inspectors following their decision to cancel final hearings.	
8.9	Birmingham – given scale of change in new NPPF from draft, will probably need to do an additional Regulation 18 plan. Unfortunately, as not at Regulation 19 stage, not in a position to bid for the extra funding, despite evidence base needing major overhaul.	
8.10	General view that resources had not been considered for immediate local plan reviews and that internal budgets may not have been sought.	
8.11	Concern around progressing immediate plan reviews, as instructed in new NPPF, and whether the evidence base etc. would be compatible with the 30-month preparation arrangements proposed by the previous administration.	
8.12	Noted that funding is available to support local authorities undertaking Green Belt Assessments and Local Plan Reviews. Eligibility criteria differ. Expressions of interest are sought by 17 th January, with final funds awarded in February.	
8.13	Awards of up to £70k are available for Green Belt Assessments and joint bids are encouraged. General consensus that a joint approach has merit in terms of consistency and in attracting consultants as they will be in high demand. This could be in terms of commission or shared, agreed methodology.	
8.14	Logistically, however, it will be difficult to coordinate a joint bid in within the tight timeframe and also if it needs Section 151 officer approval / oversight. Would one Section 151 officer need to take responsibility for all authorities?	

[illegible]

13.1	21 st January 2025 @14-16:00	
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Appendix 5m - West Midlands Aggregate Working Party (WMAWP) meetings



Wednesday, 29 January 2025

**Minutes of West Midlands Aggregates Working Party
(WMAWP) meeting.**

Meeting date: 3 December 2024
Virtual Meeting via Microsoft Teams

Chair: Herefordshire Council

Secretariat: Capita

Attendees:

Initials	Full Name	Organisation
		Birmingham City Council
		Solihull MBC
		Shropshire Council
		Worcestershire County Council
		Worcestershire County Council
		Herefordshire Council
		Wolverhampton Council
		Staffordshire Council
		Warwickshire Council
		Stoke Council
		Sandwell Council
		Staffordshire County Council
SJ	Sarah Jones	Dudley Council
		Coventry Council
		Warwickshire Council
		Birmingham Council



29/01/2025

	Walsall Council
	Department for Levelling Up Housing and Communities (DLUHC)
	Mineral Products Association (MPA)
	Breedon
	Cemex
	Tarmac
	Heidelberg
	British Aggregates Association (BAA)
	Capita

Apologies:

Initials	Full Name	Organisation
		Dudley Council
		Telford Council
		Aggregates Industries
		Breedon Group
		Warwickshire Council
		Cemex
		Shropshire Council
		Stoke City Council
		Tarmac
		Birmingham Council
		Birmingham Council
		Mineral Products Association (MPA)
		Environment Agency (EA)



29/01/2025

	Department for Levelling Up Housing and Communities (DLUHC)
	Coventry City Council

Agenda:

Item	Description
1.	Introductions and apologies
2.	Minutes of last meeting (20 May 2024) and actions arising
2a.	<i>Update on issue of 2042 permissions (NM)</i>
3.	Local Aggregate Assessments
3a.	<i>Meeting the LAA timetable</i>
3b.	<i>Datasets from BGS</i>
3c.	<i>Authority Updates</i>
4.	WM AWP Annual Report (2023 data)
4a.	<i>Any missing data from authorities</i>
4b.	<i>Confidential data</i>
4c.	<i>Timeline for circulation of draft report</i>
4d.	<i>Next year's survey (2024 data)</i>
5.	MPA's Update on Local Plans
6.	Industry Update
7.	DLUHC Update
7a.	<i>AMS four-yearly survey</i>
8.	NACG Meeting update (VE/ MP)
9.	AOB
9a.	<i>Passing on of AWP Chair</i>
10.	Date of next meeting

1. Introductions and apologies



Minutes of West Midlands Aggregates Working Party
20 May 2024
Virtual Meeting via Microsoft Teams

Chair: Herefordshire Council

Secretariat: Capita

Attendees:

	Capita
	Birmingham City Council
	Solihull MBC
	Shropshire Council
	Worcestershire County Council
	Environment Agency
	Coventry City Council
	Herefordshire Council
	Wolverhampton Council
	Staffordshire Council
	Birmingham Council
	Warwickshire Council
	Telford Council
	Stoke Council
	MPA
	Breedon
	Staffordshire County Council
	Cemex



	Tarmac
	Sandwell Council
	Heidelberg
Sarah Jones	Dudley Council
	Department for Levelling Up Housing and Communities

Apologies:

	Coventry Council
	Dudley Council
	Telford Council
	British Aggregates Association
	Aggregates Industries
	Breedon Group
	Breedon Group
	Cemex
	Hanson
	Stoke City Council
	Tarmac

Item	Description
1.	Introductions and apologies
2.	Minutes and actions of last meeting (13 November 2023)
3.	Local Aggregate Assessments
4.	MPA's Update - Progress on Development Plans
5.	Industry Update
6.	DLUHC Update - Any updates on the national survey
7.	AOB
8.	Date of next meeting
9.	<i>Appendix 1 – LAA Timetable</i>



Minutes of West Midlands Aggregates Working Party
13 November 2023
Virtual Meeting via Microsoft Teams

Chair: Worcestershire County Council

Secretariat: Capita

Attendees:

	Capita
	Birmingham City Council
	Shropshire Council
	Aggregates Industries
	Worcestershire County Council
	Environment Agency
	Breedon Group
	Coventry City Council
	Herefordshire Council
	Wolverhampton Council
	Staffordshire Council
	Warwickshire Council
	Breedon Group
	Dudley Council
	Telford Council
	MPA
	Breedon
	British Aggregates Association

	Staffordshire County Council
	Cemex
	Tarmac
	Sandwell Council
	Hanson
Sarah Jones	Dudley Council
	Department for Levelling Up Housing and Communities

Apologies:

	Coventry Council
	Birmingham City Council
	Cemex
	Telford Council
	Hanson
	Stoke City Council
	Solihull MBC
	Tarmac
	Walsall Council
	Department for Levelling Up Housing and Communities

Item	Description
1.	Introductions and apologies
2.	Minutes and actions of last meeting (27 April 2022)
3.	Local Aggregate Assessments
4.	MPA's Update - Progress on Development Plans
5.	Industry Update

Item	Description
6.	DLUHC Update
7.	Annual Monitoring Report with 2021 Data
8.	AOB
9.	Date of next meeting

1. Introductions and apologies

2. Mersey Forest Project

3. Minutes and actions of previous meeting (27 April 2022)



Minutes of West Midlands Aggregates Working Party
27 April 2023
Virtual Meeting via Microsoft Teams

Chair: Worcestershire County Council

Secretariat: Capita

Attendees:

	Capita
	Birmingham City Council
	Shropshire Council
	Aggregates Industries
	Worcestershire County Council
	Environment Agency
	Breedon Group
	Coventry City Council
	Herefordshire Council
	Wolverhampton Council
	Staffordshire Council
	Warwickshire Council
	Breedon Group
	Dudley Council
	Telford Council
	MPA
	Breedon
	British Aggregates Association

	Staffordshire County Council
	Cemex
	Tarmac
	Sandwell Council
	Hanson
Sarah Jones	Dudley Council
	Department for Levelling Up Housing and Communities

Apologies:

	Coventry Council
	Birmingham City Council
	Cemex
	Telford Council
	Hanson
	Stoke City Council
	Solihull MBC
	Tarmac
	Walsall Council
	Department for Levelling Up Housing and Communities

Item	Description
1.	Introductions and apologies
2.	Minutes and actions of last meeting (27 November 2022)
3.	Local Aggregate Assessments
4.	MPA's Update - Progress on Development Plans
5.	Industry Update

Item	Description
6.	DLUHC Update
7.	Annual Monitoring Report with 2021 Data
8.	AOB
9.	Date of next meeting

1. Introductions and apologies

2. Minutes and actions of previous meeting (27 November 2022)



Minutes of West Midlands Aggregates Working Party

24 November 2022

Virtual Meeting via Microsoft Teams

Chair: Warwickshire County Council

Secretariat: | Capita

Attendees:

	Capita
	Birmingham City Council
	Shropshire Council
	Solihull MBC
	Worcestershire County Council
	Environment Agency
	Breedon
	Coventry City Council
	Herefordshire Council
	Wolverhampton Council
	Staffordshire Council
	Warwickshire Council
	Walsall Council
Vicki Popplewell	Dudley Council
	Telford Council
	MPA
	Breedon
	British Aggregates Association

	Staffordshire County Council
	Cemex
	Tarmac
	Sandwell Council
	Hanson
	Department for Levelling Up Housing mmunities
	Department for Levelling Up Housing and Communities

Apologies:

	Birmingham City Council
	Coventry Council
	Birmingham City Council
	Cemex
	Telford Council
	Hanson
	Stoke City Council
	Tarmac

Item	Description
1.	Introductions and apologies
2.	Minutes and actions of last meeting (23 June 2022)
3.	Local Aggerate Assessments
4.	MPA's Update - Progress on Development Plans
5.	Industry Update
6.	DLUHC Update
7.	2021 Survey Returns
8.	AOB

Item	Description
9.	Date of next meeting

1. Introductions and apologies

2. Minutes and actions of previous meeting (23 June 2022)

ACTION: Revisit approach to collation of comments at next WM AWP meeting.

Appendix 5n - West Midlands Resource Technical Advisory Board (RTAB)

Draft Notes of WMRTAB Meeting: Wednesday 4th December 2024

Attendees:

- Stoke-on-Trent City Council
 - Worcestershire County Council
 - Warwickshire County Council
 - Staffordshire County Council
 - Shropshire Council
 - Cool Planet Resources and Chair
 - Biffa/Environmental Services Association
 - Walsall Council
 - Sandwell Metropolitan Borough Council
 - Environment Agency
 - Warwickshire County Council
 - Telford and Wrekin
 - Worcestershire County Council
 - Coventry City Council
- Sarah Jones – Dudley Council
- Dudley Council
 - City of Wolverhampton Council
 - Birmingham City Council

1. Introductions made. Apologies received from:

2. Notes from December 2024 meeting agreed and most of matters arising actioned.

3. Member Updates:

4. Environment Agency update
5. Update to West Midlands Landfill Study/Study on Residual Waste in West Midlands:
 - circulated a draft copy of the study prior to the meeting.

6. Feedback from National Waste TAB Chairs Group:

7. Other Central/local announcements/consultations

8. Next meeting: 5th June 2025 10.00-13.00.

9. AOB:

WMRTAB

West Midlands Resource Technical Advisory Body

Notes of WMRTAB Meeting: Wednesday 12th June 2024

Attendees:

- Stoke-on-Trent City Council
- Worcestershire County Council
- Warwickshire County Council
- Staffordshire County Council
- Shropshire Council
- Cool Planet Resources and Chair
 - Biffa/Environmental Services Association
 - Staffordshire County Council
- Walsall Council
 - Sandwell Metropolitan Borough Council
 - Environment Agency
 - Coventry City Council
 - Warwickshire County Council
 - Telford and Wrekin
 - Worcestershire County Council
 - Coventry City Council
- Sarah Jones – Dudley Council
- City of Wolverhampton Council

1. Introductions made. Apologies received from:

2. Notes from December 2023 meeting agreed and most of matters arising actioned.

3. Member Updates: most authorities had provided updates for the table -

Potential additional Local Plan consultations including waste matters before or around next RTAB meeting December are Dudley, Sandwell, Coventry, Wolverhampton (all Reg 19 stage).

Action: Responses to these Local Plan consultations will be prepared by WMRTAB in due course

4. Environment Agency update – Martin Everett
5. Update to West Midlands Landfill Study/Study on Residual Waste in West Midlands:
 - had circulated briefing note with meeting invite to inform the discussion.

- Next steps: brief to be prepared to be circulated to members for comments.

6. Applicability of Exemptions to Waste Needs Assessments:

7. Approaches to net self-sufficiency by WPAs in West Midlands:

- SJ - focused DfC on facilities that may not be available within the borough e.g., landfill - aiming for overall net self-sufficiency at total arisings/capacity level and recognising specific gaps to be addressed via DfC.

8. Feedback from National Waste TAB Chairs Group:

9. Biodiversity Net Gain and Waste Management:

10. Other consultations:

11. Next meeting: 4th December 2024 10.00-13.00.

Items for discussion will include:

- Residual Waste Study
- Consultation responses to various local plans

12. AOB:

Notes of WMRTAB Meeting: Wednesday 6th December 2023

Attendees:

- Cool Planet Resources and Chair
 - Worcestershire County Council
- Worcestershire County Council
 - Herefordshire Council
- Stoke-on-Trent City Council
- Coventry City Council
 - Coventry City Council
- Walsall Council
 - Solihull MBC
 - Staffordshire County Council
 - Staffordshire County Council
- Warwickshire County Council
 - Sandwell Metropolitan Borough Council
 - Shropshire Council
- Dudley Council
 - Birmingham City Council
 - Environment Agency
 - DLUHC (part)
 - Environment Agency (part)
 - Birmingham City Council (part)

Sarah Jones – Dudley Council

1. Introductions made.
2. Notes from June 2023 meeting agreed
3. Member Updates: most authorities had provided updates for the table - other updates:

4. Herefordshire Minerals and Waste Local Plan Inspectors Report –

5. DLUHC update:

WMRTAB

West Midlands Resource Technical Advisory Body

6. Environment Agency update –
7. Presentation on the Second National Infrastructure
Assessment.
8. Presentation on Incidental Waste Use
Mapping to Promote the Circular Economy in Birmingham.
9. Responses to Local Plans: Draft WMRTAB Responses to **Dudley,**
Local Plans circulated.

Discussion on Duty to
Cooperate approaches.
10. Waste TAB Chairs National Guide on Waste Management Capacity:

11. Feedback from National Waste TAB Chairs Group:

12. Other consultations:

13. Next meeting:

Notes of WMRTAB Meeting: Wednesday 21st June 2023

Apologies:

Member Updates:

WMRTAB Approach to Duty to Cooperate:

organise session to discuss approach to the Duty to Cooperate

Matters Arising from West Midlands Landfill Location Study:

AOB:

**MINUTES OF WMRTAB Meeting –
6.12.2022 at 11.00am
via Teams**

Present:

- Cool Planet Resources and
Chair (IB)
- Worcestershire
County Council (RS)
- Stoke-on-Trent City Council
(SM)
Elizabeth Vesty – Dudley Metropolitan
Borough Council (EV)
- Derbyshire County
Council (BW)
- Coventry City Council (RH)
- Walsall Council (JH)
- Staffordshire
County Council (JCD)
- Warwickshire County
Council (TL)
- Sandwell Metropolitan
Borough Council (MW)
-
Staffordshire County Council (LC)
- City of Wolverhampton
Council (VK)
- Shropshire Council
(TS)
- Telford & Wrekin Council
(JB)
- Worcestershire
County Council (MP)
- Stoke-on-Trent City
Council (TL)

Apologies:

- Solihull MBC (MB)
- Herefordshire (VE)
- FoE
- Veolia
- Biffa
- Environment Agency,
- Birmingham City Council

1.0 Discussion of Minute Taking for Meetings

1.1

2.0 Introductions and Apologies

3.0 Minutes of Last Meeting

ACTION

4.0 Knowledge Hub and Wiki Waste

5.0 Response on the consultation of draft energy, national policy statements

6.0 Potential Changes to National Planning Policy for Waste

7.0 Landfill study

8.0 Recycled aggregates methodology

9.0 Guidance on the use of the waste data interrogator

10.0 Anaerobic Digestion

11.0 Discussion of Venue for Future WMRTAB Meetings

12.0 WMRTAB Member Updates

12.1 thanked those members that had provided updates and asked for any others.

13.0 WMRTAB Statement of Common Ground

13.1 A Statement of Common Ground for WMRTAB had been prepared

14.0 West Midlands Landfill Constraints Study

15.0 National Methodology for Assessing Waste Management Capacity

16.0 Feedback from National Waste TAB Chairs Group

17.0 Central/Local Announcements/Consultations

18.0 Summary of Climate Change Impacts in West Midlands Combined Area (WMCA)

19.0 DEFRA Residual Waste Study

20.0 Government Response to Environmental Audit Committee, Building to net zero: costing carbon in construction

21.0 England's Material Footprint (updated September 2022)

22.0 Net Zero Review

23.0 Resources and waste strategy: monitoring progress (3rd edition, Nov 2022)

24.0 Environment Service Association (ESA) webinar Exploring biodiversity best-practice for the recycling and waste sector

25.0 Other Government Activity

26.0 Future of WMRTAB

27.0 Next WMRTAB meetings

28.0 Items for future meetings

29.0 Any other business

30.0 Conclusion of Meeting

Appendix 6 – Wolverhampton Local Plan Regulation 19 Duty to Cooperate letter

Sent to the following Councils:

Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford-on-Avon, Tamworth, Walsall, Shropshire, Telford and Wrekin, Wyre Forest, Stafford

25th November 2024

Issued via email.

Regulation 19 Wolverhampton Local Plan – Duty to Cooperate

In February this year the City Council consulted you on the Regulation 18 Issues and Preferred Options Local Plan. Since then, we have been reviewing the responses to the consultation, updating the evidence base, engaging with key Duty to Cooperate bodies and updating the Plan as appropriate.

Today, the Local Plan has reached another key milestone through the commencement of consultation on the Publication (Regulation 19) Plan. The consultation will run until 9 January 2025 with the submission stage programmed for later that month.

The principal strategic matters, as set out in the Regulation 18 Plan and the supporting Duty to Cooperate Statement, included meeting unmet housing need, gypsy and traveller needs and meeting unmet employment need. It is the view of the City Council that these strategic matters continue to be the principal cross boundary issues affecting the preparation of the Wolverhampton Local Plan (SLP).

The purpose of this note is to outline the Council's preferred approach to the Duty to Cooperate (DtC) in respect of strategic housing and employment issues, to seek your views on this approach and to request that your Council fully engages with this work.

Background

Housing Provision

Using the Government's current standard method, Wolverhampton needs to identify land for 19,728 homes 2024-42. However, the supply of suitable residential land based on the most recent evidence stands at 9,330 homes meaning there is an unmet need of 10,398 homes over this period. The WLP therefore provides for just under 50% of the Council's housing need on the land that is available in the City. As of November 2024, Wolverhampton's unmet need contributes to a larger shortfall across the Black Country of approximately 30,000 homes, made up of the following components:

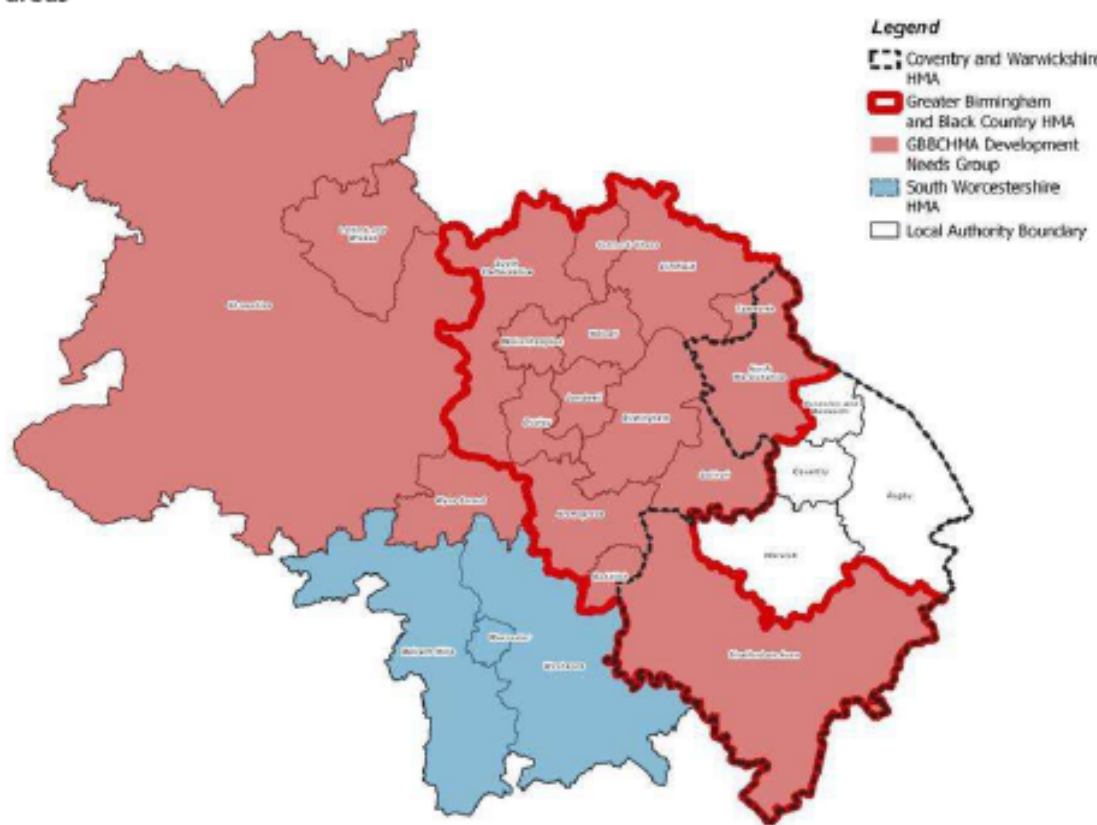
- Dudley – shortfall of 699 homes 2022-41 as set out in the 2024 Regulation 19 Local Plan consultation.
- Sandwell – shortfall of 15,916 homes to 2041 as set out in the 2024 Regulation 19 Local Plan consultation.
- Walsall – shortfall of 3,414 homes to 2020-39 as set out in the Regulation 18 stage of the Black Country Plan.

In addition, the emerging Birmingham Local Plan identifies a significant housing shortfall in the order of 46,000 homes 2022-42 as set out in the 2024 Preferred Options consultation. Together, these emerging Local Plans indicate a housing shortfall of some 76,000 across the Black Country and Birmingham Housing Market Area.

Previous discussions across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) (as shown on the Map below) and some neighbouring Local Plan areas, indicated that contributions to addressing this shortfall have been made from a number of adopted and emerging Local Plans. Work on a Statement of Common Ground to apportion these contributions to the shortfall areas is progressing. However, it is anticipated that contributions secured or 'offered' to

date will not make significant headway into addressing the shortfall, indicating a very substantial under-delivery of homes compared with identified needs.

Map1 : Birmingham and Black Country Housing Market Area (B&BCHMA) plus neighbouring Local Plan areas



Gypsy and Traveller Provision

The WLP (Reg 19) approach will deliver 56 permanent pitches up to 2032, as shown in Table 6 of the WLP. This is not sufficient to provide a five-year deliverable supply of pitches from adoption of the WLP in 2027 (as required by the PPTS), with a remaining unmet need for 19 pitches up to 2032.

The Council explored all potential sites for their suitability for plots and pitches including council land and the potential to expand or new public site provision, no new sites were identified.

Employment land

Turning to employment land, the Black Country authorities commissioned an update of the Economic Development Needs Assessment (EDNA) reflecting the approach to joint working across the Functional Economic Area (FEMA) which comprises the four local authority areas. The updated EDNA is published as part of the Regulation 19 consultation. For the period to 2042, this work provides an updated demand requirement of 661.9ha for the Black Country as a whole taking into account the need to make good employment land losses. This is an increase from the level of demand identified in the previous EDNA.

Through work on the constituent local plans, the Black Country Council's have been able to identify some limited additional supply within the Black Country, but there is a significant shortfall of 280.45ha against this need. Contributions secured through the Duty to Cooperate to date from the

emerging South Staffordshire and Shropshire Local Plans are able to provide 142.2ha, but there remains a significant shortfall of 138.3ha to 2042.

Addressing the shortfalls

Housing and gypsy and traveller provision

As Wolverhampton and other Local Plan areas are reliant on contributions from the HMA and wider to meet identified housing needs, we need to determine whether your Council is able to make any contribution to the wider shortfall, either through current or future local plan reviews. This request is consistent with the December 2023 National Planning Policy Framework (NPPF) which confirms the need for Local Plans to consider how they can accommodate need from neighbouring areas where it is practical to do so whilst achieving sustainable development through the Duty to Cooperate.

Therefore, as part of the DtC, please could you provide the following information:

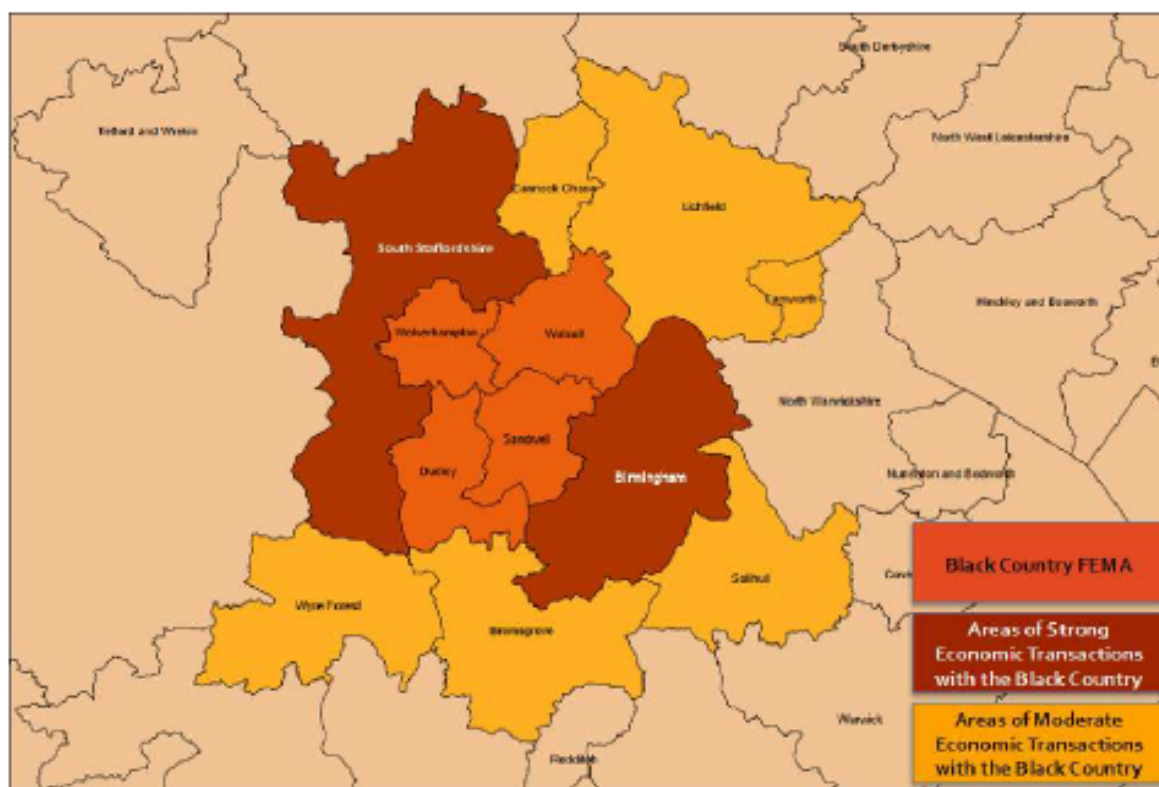
- confirm the timetable for reviewing your Council's Local Plan, and the term of this Local Plan.
- confirmation of whether your adopted and emerging Local Plan is able to meet local housing needs in full within the administrative area.
- confirm how your adopted / emerging Local Plan is responding to the requirements of the NPPF outlined above and whether your council will be able to contribute to the overall unmet need in the wider HMA area.
- confirm whether this contribution will be for the Black Country, Birmingham, or for the wider HMA.
- confirmation of whether your adopted and emerging Local Plan is able to meet Gypsy and Traveller needs in full within the administrative area.

We anticipate that the responses to these questions will confirm that emerging Local Plan work will fail to address the identified shortfall and that further collaborative work will be needed to identify additional sources of land across the whole of the HMA and almost certainly beyond it. The most recent HMA-wide evidence designed to consider this issue is the 2018 Growth Study which a number of emerging Local Plans consider to be out of date. Wolverhampton Council is committed to an inclusive and comprehensive review and update of this work as the most effective vehicle to respond to the shortfall and we encourage your Council to actively participate in order to shape its findings and recommendations. We note that the commissioning of this work is progressing through the HMA Development Needs Group.

Employment land

The updated EDNA recommends that the Black Country Council's continue to progress engagement with neighbouring Local Plan areas identified as having a strong or moderate economic relationship with the Black Country FEMA (as shown on the map below) and other areas with which there is an evidenced functional relationship. The Council will continue to progress this recommendation through engagement in Local Plan preparation across this geography and with other Local Plan areas which have an evidenced functional relationship with the Black Country FEMA.

Map2 : Black Country FEMA and areas with strong or moderate economic relationship



The Council was also a participant in the West Midlands Strategic Employment Sites Study which reported in 2024. This work identifies a series of opportunity areas for potential additional strategic employment sites and a number of these are well-located to meet needs arising in the Black Country. It is anticipated that the sites that emerge from this work could assist towards addressing the Black Country shortfall.

Therefore, as part of the DtC, please could you provide the following information:

- confirmation of whether your adopted and emerging Local Plan is able to meet local employment land needs in full within the administrative area.
- confirm how your adopted / emerging Local Plan is responding to the requirements of the NPPF outlined above and whether your council will be able to contribute to the overall unmet need in the Black Country FEMA area.

Next steps

Moving forward, there is a body of joint working progressing across the area to address some of the issues identified above, and proposed reforms to the planning system at the national level will also directly influence the way in which local Plans respond to cross-boundary strategic issues.

However, there remain significant unresolved issues primarily around meeting housing and employment land which must be clarified in order to enable the progression of the Wolverhampton Local Plan to the programmed timetable.

The Council would therefore be grateful if you could respond to the issues raised in this letter by the end of the Regulation 19 consultation at the very latest. This will enable the Council to ensure that the submitted Plan reflects the very latest information and duty to cooperate activity.

Appendix 7 – Letter to Staffordshire County Council on Waste matters

25th November 2024

CITY OF
WOLVERHAMPTON
COUNCIL

Staffordshire County Council

[REDACTED]

[REDACTED]

Dear Sir/Madam

Re: Wolverhampton Local Plan Regulation 19 - Strategic Waste Movements

City of Wolverhampton Council (CWC) is undertaking the Wolverhampton Local Plan Publication Consultation (Regulation 19) between 25 November 2024 to 9 January 2025, to seek the views of interested parties.

The Duty to Cooperate requires planning authorities to seek agreement with other planning authorities where their plans may have an impact on their area. We are writing to you as part of the duty to co-operate, about strategic waste exports from Wolverhampton to your area.

You are receiving this letter because the Council has identified strategic movements of waste that it considers may require further engagement under the Duty to Cooperate at this time. This is based upon the Environment Agency Waste Data Interrogator (WDI) information from 2019-2023 and the thresholds below.

In relation to identifying strategic waste movements, the Council has utilised the West Midlands Resources Technical Advisory Board waste movement thresholds (2019 protocol, as referenced in the national Duty to Cooperate guidance). These are as follows:

- For each waste category, more than 20% of a waste arising in one WPA is managed in the specific WPA for at least 3 of the last 5 years: This threshold allows for the normal workings of the market, reflecting the tendency for contracts to change rapidly and for ability of the market and existing facilities to react to changes in smaller-scale movements.
- For each waste category, more than 40% of waste arising in one WPA is managed in the specific WPA during the last year: This higher threshold enables a more active response to significant changes that might result from the closure of some facilities or opening of new facilities.

I have asked five questions below to initiate duty to co-operate engagement on waste.

City of Wolverhampton Council
Planning, 2nd Floor, Civic Centre,
St Peter's Square, WV1 1RP

🌐 [wolverhampton.gov.uk](https://www.wolverhampton.gov.uk)
📧 @WolvesCouncil
📺 WolverhamptonToday

Q1: Do you agree with the following waste exports figures?

Strategic waste exported from Wolverhampton to Staffordshire 2019-2023

Year	Waste Type	Sum of Tonnage	%age of total waste
2023	Household/Ind/Comm	76,015	23%
	Inert/C and D	244,231	92%
	Hazardous	1,454	2.8%
Grand total		321,700	
2022	Household/Ind/Comm	72,664	20.6%
	Inert/C and D	224,322	83%
	Hazardous	1,311	1.96%
Grand total		298,297	
2021	Household/Ind/Comm	45,188	19.5%
	Inert/C and D	358,906	83.4%
	Hazardous	337	0.58%
Grand total		404,431	
2020	Household/Ind/Comm	55,890	20.6%
	Inert/C and D	229,433	82.1%
	Hazardous	521	1.3%
Grand total		285,844	
2019	Household/Ind/Comm	44,190	17.3%
	Inert/C and D	191,898	80%
	Hazardous	305	0.79%
Grand total		236,393	

All figures in tonnes and rounded. Note: percentages highlighted show where waste movements exceeded strategic waste movement thresholds.

Q2: Do you consider recent movements of waste from Wolverhampton to your area to be of 'strategic' importance?

Q3: Are you aware of any planning reasons why similar movements of waste cannot continue in the future (for example any planned closure of facilities)?

Q4: The NPPF requires planning authorities to prepare statements of common ground to document and address strategic cross-boundary matters. Do you consider a statement of common ground is necessary with Wolverhampton on cross-boundary movements of waste?

Q5: Are there any other matters you wish to raise at this stage?

I would be grateful for a response to the above questions by 9 January 2025 as part of the Regulation 19 consultation. If you have any problems responding, please let me know.

Thank you in advance for your assistance.

Yours faithfully

Vijay Kaul
Section Leader (Planning)
Planning

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Appendix 8 – Letter to Walsall Council on waste matters



25th November 2024

Walsall Council

[Redacted]
[Redacted]

Dear Sir/Madam

Re: Wolverhampton Local Plan Regulation 19 - Strategic Waste Movements

City of Wolverhampton Council (CWC) is undertaking the Wolverhampton Local Plan Publication Consultation (Regulation 19) between 25 November 2024 to 9 January 2025, to seek the views of interested parties.

The Duty to Cooperate requires planning authorities to seek agreement with other planning authorities where their plans may have an impact on their area. We are writing to you as part of the duty to co-operate, about strategic waste exports from Wolverhampton to your area.

You are receiving this letter because the Council has identified strategic movements of waste that it considers may require further engagement under the Duty to Cooperate at this time. This is based upon the Environment Agency Waste Data Interrogator (WDI) information from 2019-2023 and the thresholds below.

In relation to identifying strategic waste movements, the Council has utilised the West Midlands Resources Technical Advisory Board waste movement thresholds. These are as follows:

- For each waste category, more than 20% of a waste arising in one WPA is managed in the specific WPA for at least 3 of the last 5 years: This threshold allows for the normal workings of the market, reflecting the tendency for contracts to change rapidly and for ability of the market and existing facilities to react to changes in smaller-scale movements.
- For each waste category, more than 40% of waste arising in one WPA is managed in the specific WPA during the last year: This higher threshold enables a more active response to significant changes that might result from the closure of some facilities or opening of new facilities.

I have asked five questions below to initiate duty to co-operate engagement on waste.

City of Wolverhampton Council
Planning, 2nd Floor, Civic Centre,
St Peter's Square, WV1 1RP

- 🌐 [wolverhampton.gov.uk](https://www.wolverhampton.gov.uk)
- 📱 @WolvesCouncil
- 📺 WolverhamptonToday

Q1: Do you agree with the following waste exports figures?

Strategic waste exported from Wolverhampton to Walsall 2019-2023

Year	Waste Type	Sum of Tonnage	%age of total waste
2023	Household/Ind/Comm	11,240	3.3%
	Inert/C and D	117	0.04%
	Hazardous	12,087	23.4%
Grand total		23,444	
2022	Household/Ind/Comm	7061	2%
	Inert/C and D	4915	1.8%
	Hazardous	10,499	15.72%
Grand total		22,475	
2021	Household/Ind/Comm	6265	2.7%
	Inert/C and D	5438	1.3%
	Hazardous	14,674	25.5%
Grand total		26,377	
2020	Household/Ind/Comm	6616	2.4%
	Inert/C and D	3850	1.4%
	Hazardous	14,420	35.9%
Grand total		24,886	
2019	Household/Ind/Comm	3585	1.4%
	Inert/C and D	1792	0.75%
	Hazardous	19,841	51.1%
Grand total		25,218	

All figures in tonnes and rounded. Note: percentages highlighted show where waste movements exceeded strategic waste movement thresholds.

Q2: Do you consider recent movements of waste from Wolverhampton to your area to be of 'strategic' importance?

Q3: Are you aware of any planning reasons why similar movements of waste cannot continue in the future (for example any planned closure of facilities)?

Q4: The NPPF requires planning authorities to prepare statements of common ground to document and address strategic cross-boundary matters. Do you consider a statement of common ground is necessary with Wolverhampton on cross-boundary movements of waste?

Q5: Are there any other matters you wish to raise at this stage?

I would be grateful for a response to the above questions by 9 January 2025 as part of the Regulation 19 consultation. If you have any problems responding, please let me know.

Thank you in advance for your assistance.

Yours faithfully

Vijay Kaul
Section Leader (Planning)
Planning

[Redacted signature]