

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

South Staffordshire Local Plan 2023-
2041

Position at 19/07/2024

Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Wyre Forest District Council (WFDC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Wyre Forest District Council (WFDC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2023-2041.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023-2041 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
 - Housing;
 - Employment land;
 - Transport and infrastructure matters;
 - Gypsy and traveller accommodation; and
 - Natural environment.

Geography covered by Statement of Common Ground

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

Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

Housing

6. SSDC and WFDC are within separate housing market areas (HMAs). Although WFDC are not within the GBBCHMA¹ they are members of the Technical Officers Group as a related planning authority. Both authorities are party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the appropriate vehicle by which to consider the issue holistically.
7. No other housing related cross-boundary issues have been identified.

Employment

8. SSDC and WFDC are within separate functional economic market area but continue to work together collaboratively as part of GBBCHMA Technical Officers Group to progress the necessary follow on work identified as necessary in the West Midlands Strategic Employment Sites Study 2021.
9. The South Staffordshire Local Plan 2023-2041 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls.
10. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.
11. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. . In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale

¹ The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.

12. Additionally, the SSDC will allocated the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work commissioned to examine the apportionment of WMI suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country authorities making up the Black Country FEMA. The remaining land supply from WMI aside from the South Staffordshire, Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

13. SSDC and WFDC are committed to continuing to work in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC's are proposing two strategic housing site allocations, however none are within close proximity to the Wrye Forest administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

14. SSDC and WFDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
15. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

16. SSDC has an identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period². SSDC considers that latest evidence from Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public

² South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.

17. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDC's GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.
18. WFDC's most recent response to the August 2022 correspondence confirmed that their planned new allocated sites and the expansions of existing sites will only provide enough new pitches to meet the needs of Wyre Forest. WFDC also confirmed that the allocation of gypsy pitches on the proposed housing allocations was discussed through the Local Plan Inquiry and was not considered feasible. SSDC's view it is currently unclear as to what extent WFDC may or may not be able to assist in meeting unmet pitch need arising from SSDC due to public land within WFDC's administrative area needing to be assessed to see if there are any additional suitable sites for pitches to help meet SSDC's need.
19. WFDC disagree that it needs to conduct a further Gypsy and Traveller site assessment) at the current time. The WFDC Gypsy and Traveller Accommodation Assessment was completed in late 2020, as part of the now adopted Local Plan (adopted April 2022). The conclusion of the GTAA was that adequate provision was made for the duration of the plan period. There are no other public sites in WFDC ownership that can be allocated. Therefore, based on these factors, WFDC does not consider it necessary to revisit the site assessment as part of the SSDC SoCG process.

Natural Environment

20. SSDC and WFDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
21. No cross-boundary issues have been identified.

Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District

Council and Wyre Forest District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name: Kelly Harris

Position: Lead Planning Manager

Signature:



Date: 22/07/2024

Wyre Forest District Council

Name: Kate Bailey

Position: Head of Strategic Growth

Signature:



Date: 19/07/2024