

Statement of Common Ground between  
Stratford-on-Avon District Council and  
South Staffordshire District Council  
South Staffordshire Local Plan 2023-2041  
December 2024

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

## Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stratford-on-Avon District Council (SoADC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2023-2041.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the South Staffordshire Local Plan 2023-2041 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.
3. In respect of plan-making in Stratford-on-Avon District, the Council is working with Warwick District Council to prepare a South Warwickshire Local Plan (SWLP) for the period to 2050. A scoping consultation was undertaken in 2021 and Regulation 18 Issues and Options held between January and March 2023. Regulation 19 Preferred Options consultation is planned to take place from January to March 2025 with adoption of the Part 1 SWLP expected in 2027. More information is available at [www.southwarwickshire.org.uk/swlp/](http://www.southwarwickshire.org.uk/swlp/). The plan is seeking to address strategic cross boundary issues.

## Geography covered by Statement of Common Ground

4. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Stratford-on-Avon District Council.
5. Although not neighbouring authorities, both Councils are within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

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

## Key Strategic Matters

6. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. 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.
7. 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

8. SSDC and SoADC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. An update to the Strategic Growth Study is proposed to commence in 2025, with both authorities as participants.
9. The Black Country authorities<sup>2</sup> declared an unmet need from their urban area as early as their Issues and Options consultation in 2017. With the exception of Walsall Council, all the Black Country authorities consulted on Regulation 19 Local Plans in autumn 2024 and there is a collective shortfall across the Black Country area of approximately 30,000 dwellings. Birmingham City Council are also preparing a new Birmingham Local Plan with their most recent Preferred Options consultation (July 2024) identifying a shortfall of approximately 46,000 dwellings. It is acknowledged that at this point in time, there is a significant unmet need of housing and employment land which will need to be addressed.
10. SoADC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground , which seeks to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. The 2022 Statement of Common Ground is expected to be updated via a 2024/25 version, which both Councils will be signatories of. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group's planned refresh of the Strategic Growth Study and associated Statement of Common Ground are considered to be the appropriate vehicles by which to consider the issue holistically.

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<sup>2</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

## Employment

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

## Cross boundary transport impacts

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

## Infrastructure

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

## Gypsy & Traveller Provision

15. SSDC has identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period<sup>3</sup>. SSDC considers that latest evidence from the Council's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide **new** public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
16. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still

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<sup>3</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023, work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.

17. In SSDC's view, the established Greater Birmingham and Black Country Housing Market (GBBCHMA) is clear evidence of a functional link between both authorities and therefore requires that both authorities work together to address cross boundary housing matters (including Gypsy and Traveller provision). SoADC's most recent response to the August 2022 correspondence stated that in view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SoADC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding this, SoADC is keen to work with authorities across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) in respect of evidence gathering to better understand these functional relationships. SSDC acknowledges that it has less of a functional relationship with SoADC than it does with some other authorities within the GBBCHMA, but believes it cannot be assumed that traveller families would be unwilling to relocate to a public site in SoADC's administrative area if this secured them a permanent pitch.
18. SoADC are planning for Gypsies and Travellers through the preparation of the South Warwickshire Local Plan and have recently completed a [2024 GTAA](#) to help inform that process. This identifies a need across Stratford and Warwick districts for 89 traveller pitches, 18 Travelling Showperson plots and 35 permanent residential moorings over the proposed 25 year South Warwickshire Local Plan period to 2050. There is also an additional recommendation that two transit sites are developed. The Preferred Options SWLP (December 2024) includes a Draft Policy Direction which proposes that this need will largely be met by requiring the provision of traveller pitches and travelling showperson plots on large scale development sites which deliver over 500 homes. However, as this is a Draft Policy Direction and the Preferred Options SWLP does not contain site allocations, it is uncertain how many development sites providing 500+ homes will be included within the plan, and therefore how much of the identified Gypsy and Traveller need will be met through this method. SoADC therefore advise that it is unlikely that they will be able to assist with meeting any of SSDC's need given its own recently identified high level of need. PO has minimal weight at the moment. SSDC will review SoADCs approach when considering and responding to the SWLP Preferred Options consultation.

## Natural Environment

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

## Signatures

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

### South Staffordshire District Council

**Name:** Kelly Harris

**Position:** Lead Planning Manager

**Signature:**

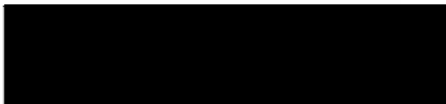


**Date:** 4<sup>th</sup> December 2024

### Stratford-on-Avon District Council

**Name:** Jo Bozdoganli

**Position:** Policy Manager



**Signature:**

**Date:** 4<sup>th</sup> December 2024