

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;
 - 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

¹ MHCLG, (2019), NPPF – Paragraph 24

² MHCLG, (2019), NPPF – Paragraph 26

- 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.

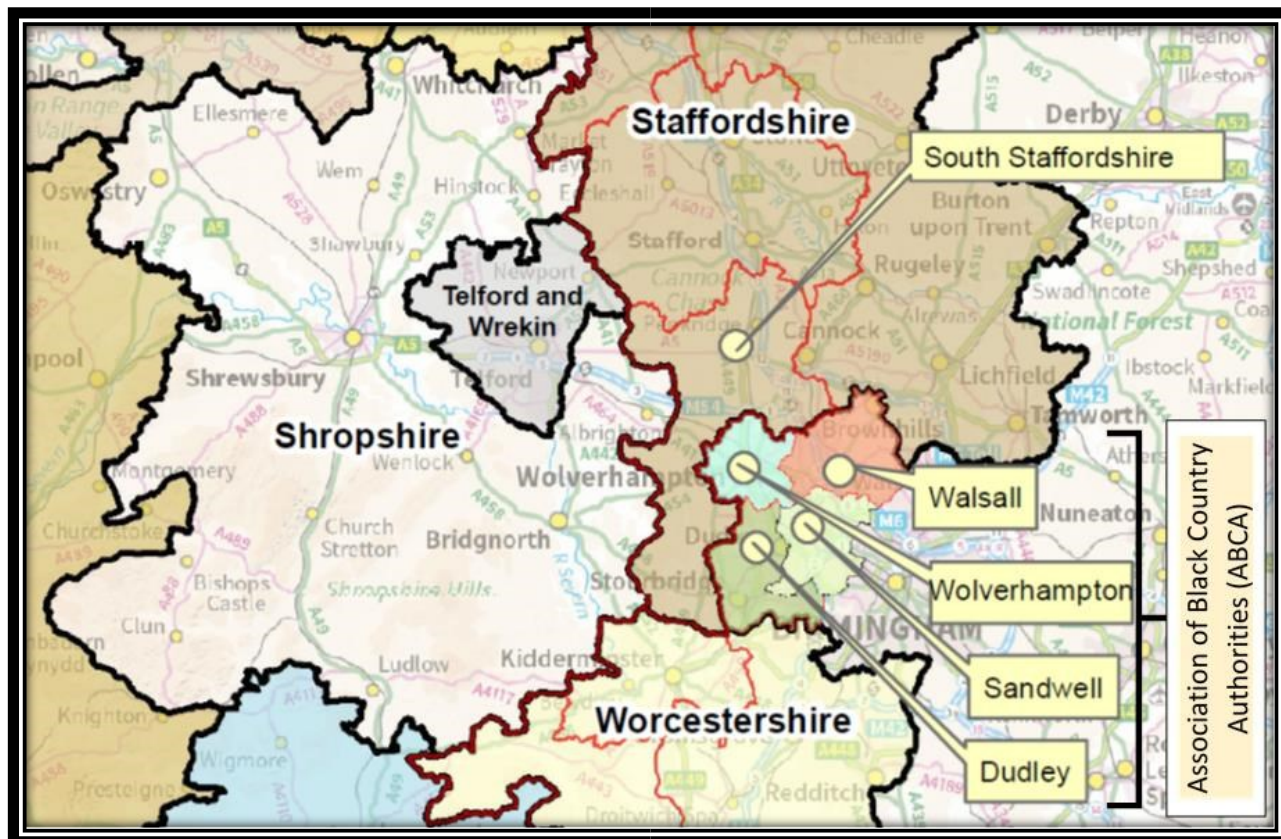
4. Relevant Local Authorities and Geography

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:

Figure 1: Map of Shropshire Council and ABCA areas

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



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 have 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 