

Statement of Common Ground between Shropshire Council and South Staffordshire District Council

Date: 26 May 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 both the Shropshire Council Local Plan Review (2016-2038) and South Staffordshire Local Plan Review (2018-2038). It sets out how Shropshire Council and South Staffordshire District Council have positively engaged in order to fulfil its Duty to Cooperate requirements.

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
 - 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*

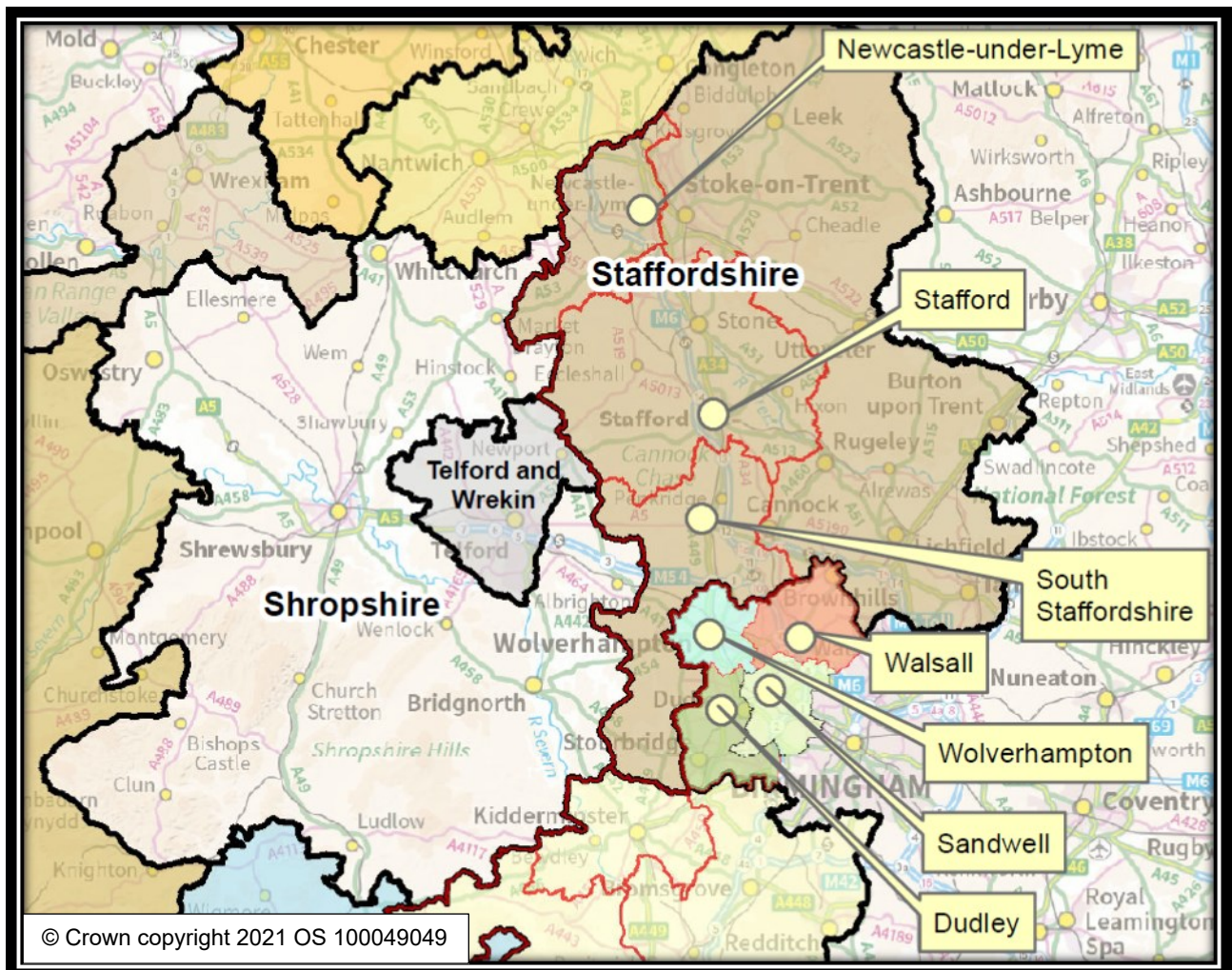
¹ MHCLG, (2019), NPPF – Paragraph 24

² MHCLG, (2019), NPPF – Paragraph 26

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 South Staffordshire District Council. As neighbouring Local Planning Authorities, it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.
- 4.2. The below map illustrates the location of Shropshire Council and South Staffordshire District Council:



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 Plans. On completion of the review process, the Core Strategy and SAMDev Plan documents will be replaced by the 'Shropshire Local

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

Plan' (2016-2038) document (with the exception of any saved policies), supported by any adopted formal Neighbourhood Plans.

- 5.2. The Shropshire Local Plan will include strategic and detailed policies, together with site allocations for a Plan period 2016 to 2038.
- 5.3. There has been ongoing and active engagement between Shropshire Council and South Staffordshire District Council throughout the Shropshire Council Local Plan Review. Specifically:
 - Duty to Cooperate discussions have occurred at appropriate times during the Local Plan Review process.
 - South Staffordshire District Council have been consulted during the various 'Regulation 18' Consultations undertaken to inform the Shropshire Local Plan Review. 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 of the Shropshire Local Plan – 3rd August 2020 – 30th September 2020.
 - South Staffordshire District Council were also consulted as part of the 'Regulation 19' Consultation undertaken to inform the Shropshire Local Plan Review.
 - Duty to Cooperate discussions will continue at appropriate times as the Local Plan Review progresses.

South Staffordshire District Council Local Plan Review

- 5.4. The South Staffordshire Local Plan currently comprises the adopted Core Strategy (2012) and Site Allocations Document (2018). On completion of the review process, the Core Strategy and Site Allocations Documents will be replaced by single 'Local Plan' (2018 – 2038) (with the exception of any saved policies), supported by any adopted formal Neighbourhood Plans.
- 5.5. The South Staffordshire Local Plan will include strategic and detailed policies, together with site allocations for a Plan period 2018 to 2038.
- 5.6. There has been ongoing and active engagement between South Staffordshire District Council and Shropshire Council throughout the South Staffordshire Local Plan Review. Specifically:
 - Duty to Cooperate discussions have occurred at appropriate times during the Local Plan Review process.
 - Shropshire Council have been consulted during the various 'Regulation 18' Consultations undertaken to inform the South Staffordshire Local Plan Review. The Local Plan Review consultation periods thus far are as follows:
 - Issues and Options Consultation – 8th October 2018 to 30th November 2018.
 - Spatial Housing Strategy & Infrastructure Delivery – 17th October 2019 to 12th December 2019.
 - Duty to Cooperate discussions will continue at appropriate times as the Local Plan Review progresses. South Staffordshire Council's Local Development Scheme (LDS)

sets out the timetable for plan preparation with a Regulation 18 Preferred Options earmarked for summer 2021 and a Regulation 19 Publication earmarked for summer 2022.

6. Key Strategic Matters

Housing Market Areas

- 6.1. The Shropshire Council area is considered to represent a self-contained housing market area (HMA).
- 6.2. The South Staffordshire District Council area is considered to form part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 6.3. 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.

Housing Need and Requirement: Shropshire Council

- 6.4. Using Government's standard methodology, in 2020, 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). The assessment of need will be kept under review. Shropshire Council is proposing to meet the entirety of its LHN.
- 6.5. Shropshire Council currently understands that evidence prepared to inform the Local Plan Review being undertaken for the Association of Black Country Authorities (ABCA) indicates a significant unmet housing and employment land need within the Black Country, which forms part of the GBBCHMA, although the exact extent of these unmet has not yet been fully quantified through the Black Country's plan review. However, the NPPF is clear that strategic cross-boundary matters should be "dealt with rather than deferred", so as a result of Duty to Cooperate discussions with ABCA, Shropshire Council is proposing to contribute towards meeting unmet housing and employment land needs understood to be arising in the Black Country. Specifically, Shropshire Council is proposing to contribute around 1,500 dwellings and around 30ha of employment land towards unmet needs arising in the Black Country. Rather than identifying specific sites to achieve these contributions, they will form part of the wider housing and employment land requirements for Shropshire.

Housing Need and Requirement: South Staffordshire District Council

- 6.6. Using Government's standard methodology, in 2020, South Staffordshire District Council calculated a Local Housing Need (LHN) for South Staffordshire District of some 254 dwelling per annum for 2020 onwards. Taking into account completions in 2018/19 and 2019/20 this results in a LHN of some 5,068 dwellings between 2018 and 2038.
- 6.7. Policy SAD1 of the adopted Site Allocations Document (2018) requires South Staffordshire District Council to review housing supply options to meet both the District's own housing needs and potentially unmet cross-boundary needs from GBBCHMA, including from the Black Country. Having considered best available evidence, including evidence of unmet needs in the GBBCHMA up to 2038 and the GBBCHMA-wide evidence base provided by the GBBCHMA Strategic Growth Study 2018, and responses to consultations thus far undertaken to inform the Local Plan Review, South Staffordshire District Council is proposing a proportionate contribution of some 4,000 dwellings towards

unmet housing needs arising in the GBBCHMA up to 2038. The approach and location for meeting this contribution will be identified through the emerging Local Plan Review.

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 to 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/A5 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. There is also a need to facilitate the long-term sustainability of the occupiers of the RAF Cosford site, including the Midlands Air Ambulance Charity. As such a level of Green Belt release is proposed within the ongoing Local Plan Review.
- 6.10. As required by the NPPF, Shropshire Council has explored with South Staffordshire District Council their ability to accommodate Green Belt development requirements, particularly those relating to the sustainable growth requirements of specific settlements. This has been formalised in a written communication sent on the 27th February 2020 which asked whether with South Staffordshire District Council could assist in meeting the identified development needs for: Bridgnorth; Albrighton; Shifnal; Alveley; and RAF Cosford.
- 6.11. South Staffordshire District Council have not indicated that they are able to meet these identified Green Belt development requirements.

Green Belt: South Staffordshire District Council

- 6.12. If South Staffordshire delivered all current housing allocations, permissions and safeguarded sites for housing land, the District's most recent Spatial Housing Strategy and Infrastructure Delivery consultation (2019) suggests that only around 3,800 dwellings would be delivered in the District between 2018 – 2037. This is evidently well short of the level of growth the District is seeking to achieve in the Local Plan Review.
- 6.13. The Council will continue to review its housing land supply to inform its 2021 Preferred Options consultation. However, due to the District's rural nature and the lack of any towns or cities in South Staffordshire, it is unlikely that achievable density uplifts to existing suitable land supply will significantly alter the capacity on existing sites.
- 6.14. Whilst there are some areas of land beyond the Green Belt in the District, the Council's 2019 SHSID consultation and the GBBCHMA Strategic Growth Study both suggest that it is unlikely to be sustainable or deliverable to focus all new housing allocations in the District on the limited area of Open Countryside in South Staffordshire.
- 6.15. The District therefore considers that evidence to date suggests it is highly likely that South Staffordshire will need to release further Green Belt land through the Local Plan Review in

order to meet its own needs and to make a proportionate contribution to the GBBCHMA's unmet housing needs.

- 6.16. As required by the NPPF, South Staffordshire District Council has explored with Shropshire Council their ability to accommodate unmet need arising within the wider GBBCHMA and reduce the need to release further Green Belt land through the Local Plan Review in order to meet its own needs and to make a proportionate contribution to the GBBCHMA's unmet housing needs. This has been formalised in a written communication sent on the 8th January 2021.
- 6.17. Shropshire Council have advised that whilst they are proposing to contribute towards meeting unmet housing and employment land needs arising in the Black Country, given their current understanding of the level of this unmet need, they do not consider they are able to provide sufficient additional housing supply or employment land supply to address the entirety of this unmet need or enable South Staffordshire District Council to reduce its own proposed contribution towards meeting these unmet needs, and as a direct consequence enable South Staffordshire District Council to reduce its proposed Local Plan Review housing target.

7. Other Strategic Matters

The M54/A5 Strategic Corridor

- 7.1. Both Shropshire Council and South Staffordshire District Council recognise the strategic significance and support the principle of attracting investment into the existing and proposed Strategic Employment Sites at i54, Hilton Cross, ROF Featherstone, Four Ashes, Shrewsbury (including the new proposed strategic employment site at Shrewsbury - SHR166), and the proposed strategic employment site at Shifnal - SHF018b and SHF018d, on the M54/A5 strategic corridor. RAF Cosford is also recognised as a strategic site on this strategic corridor, although this site is specifically for military and non-profit making uses, it complements and facilitates wider investment on this strategic corridor. These locations:
 - Provide strategic links between the Shropshire Council and South Staffordshire District Council.
 - Provide strategic links from both Shropshire and South Staffordshire into the conurbation; the M6; and the national motorway network.
 - Offers investment opportunities.

Gypsies and Travellers: Shropshire Council

- 7.2. Shropshire Council 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.
- 7.3. 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.

Gypsies and Travellers: South Staffordshire District Council

- 7.4. Based on current evidence there is no strategic cross-boundary matter in relation to gypsy and traveller needs arising in the South Staffordshire District Council area. Updated evidence on Gypsy and Traveller needs is currently in progress and the need for Gypsy and Traveller accommodation will then be considered within a forthcoming Preferred Options Document which will be subject to consultation in 2021. Depending what the emerging evidence concludes, it may be necessary to explore if neighbouring authorities have available site capacity to meet the unmet Gypsy and Traveller needs of South Staffordshire. In the case of Shropshire Council, given the advanced stage of the current Local Plan Review, this would form part of duty to cooperate discussions for a future Local Plan Review.

Minerals and Waste

- 7.5. Shropshire Council is engaging separately with Staffordshire County Council as the Mineral and Waste Authority for Staffordshire.

Neighbourhood Planning

- 7.6. No significant cross boundary issues identified.

8. Matters of Agreement

- 8.1. Shropshire Council and South Staffordshire District Council intend to meet their identified LHN within their Local Authority area.
- 8.2. Shropshire Council currently understands that evidence prepared to inform the Local Plan Review being undertaken for the ABCA indicates a significant unmet housing and employment land need within the Black Country, which forms part of the GBBCHMA, although the exact extent of these unmet has not yet been fully quantified through the Black Country's plan review. However, the NPPF is clear that strategic cross-boundary matters should be "dealt with rather than deferred", so as a result of Duty to Cooperate discussions with ABCA, Shropshire Council is proposing to contribute towards meeting unmet housing and employment land needs understood to be arising in the Black Country. Specifically, Shropshire Council is proposing to contribute around 1,500 dwellings and around 30ha of employment land towards unmet needs arising in the Black Country. Rather than identifying specific sites to achieve these contributions, they will form part of the wider housing and employment land requirements for Shropshire.
- 8.3. Having considered best available evidence, including evidence of unmet needs in the GBBCHMA up to 2038 and the GBBCHMA-wide evidence base provided by the GBBCHMA Strategic Growth Study 2018, South Staffordshire District Council is testing a proportionate contribution of some 4,000 dwellings towards unmet housing needs arising in the GBBCHMA up to 2038, subject to confirmation of the extent of the unmet needs arising from the Black Country and the wider GBBCHMA. The approach and location for meeting this contribution will be identified through the Local Plan Review.
- 8.4. Shropshire Council has explored with South Staffordshire District Council their ability to sustainably accommodate the development requirements associated with specific settlements/sites within the Green Belt in Shropshire. Following these discussions which were formalised in a written communication sent 27th February 2020, South Staffordshire District Council have not indicated that they are able to meet these identified Green Belt development requirements.

8.5. South Staffordshire District Council has explored with Shropshire Council their ability to sustainably accommodate sufficient additional housing supply to enable South Staffordshire District Council to reduce its contribution to unmet housing needs arising within the wider HMA and as a direct consequence reduce its proposed Local Plan Review housing target. Shropshire Council have advised that whilst they are proposing to contribute towards meeting unmet housing and employment land needs arising in the Black Country, given their current understanding of the level of this unmet need, they do not consider they are able to provide sufficient additional housing supply or employment land supply to reduce its contribution to unmet housing needs arising within the wider HMA, and as a direct consequence reduce its proposed Local Plan Review housing target.

8.6. All other strategic matters are agreed.

9. Matters of Disagreement

9.1. There are no matters that Shropshire Council and South Staffordshire District Council disagree on.

10. Governance Arrangements

10.1. Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

10.2. Updating of this SoCG will be linked to key milestones within the Local Plan process for the Local Planning Authorities involved.

11. Conclusions

11.1. The parties agree that:

- i) Shropshire Council has fulfilled its Duty to Cooperate with South Staffordshire District Council.
- ii) South Staffordshire District Council has fulfilled its Duty to Cooperate with Shropshire Council.
- iii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

12. Signatories

12.1. This SoCG has been agreed and signed by the following:

Shropshire Council	South Staffordshire District Council
Name: Edward West	Name: Councillor Roger Lees
Position: Planning Policy and Strategy Manager	Position: Deputy Leader and Cabinet Member for Planning
Date agreed: 26/05/21	Date agreed:26/05/21
Signature:	Signature: