

Statement of Common Ground
between Redditch Borough Council
and South Staffordshire District
Council

South Staffordshire Local Plan 2018-
2039

[Insert Date]

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Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Redditch Borough Council (RBC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Redditch Borough Council (RBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2018-2039.
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 2018-2039 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.

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Redditch Borough Council.
4. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)¹. 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.

Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing housing needs and Gypsy and Traveller provision. These discussions have informed the development of adopted plans and other related documents. 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.
6. 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.

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

Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

Housing

7. SSDC and RBC 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 address any resulting unmet needs. The Black Country authorities² similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
8. RBC 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 emerging 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. 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 address the issue holistically.

Employment

9. SSDC and RBC 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. No further cross-boundary issues have been identified.
10. The South Staffordshire Local Plan 2018-2039 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.
11. South Staffordshire's EDNA 2020-2040 suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 36.6ha to the unmet needs of other local authorities. In addition, SSDC will release 232ha of Green Belt to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The EDNA 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 planning authorities. The remaining land supply from WMI aside from the South Staffordshire and Black Country 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

² City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

apportionment of land from WMI which could be apportioned towards the Black Country unmet needs, dependent on the stance of other authorities related to the site.

Cross boundary transport impacts

12. SSDC and RBC 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 four strategic housing site allocations, however none are within close proximity to the Redditch administrative area. No other cross-boundary transport issues have been identified.

Infrastructure

13. SSDC and RBC 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 121 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5 year period³. 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 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 remained and that SSDC required assistance in addressing its unmet pitch needs through

³ South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report August 2021

new or expanded publicly run sites.

17. RBC's most recent response was to the January 2022 correspondence where they considered that there is insufficient evidence to conclude that there was a strong connection between movement patterns of travellers between the authority areas. Therefore, additional provision within the Redditch area would not provide a sustainable solution to meeting the specific needs of the Gypsy and Traveller population within the South Staffordshire area. 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). SSDC acknowledges that it has less of a functional relationship with RBC 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 RBC's administrative area if this secured them a permanent pitch. In SSDC's view it is therefore currently unclear as to what extent RBC may or may not be able to assist in meeting unmet pitch need arising from SSDC. RBC maintain that the evidence does not provide clear evidence of a functional link with regard to Gypsy and Traveller Accommodation Needs, which can be closely related to extended family and their existing locations. The GBBCHMA strategic study does not consider the needs of Gypsy and Travellers and It is not clear whether any work has been previously done to evidence this functional link in relation to these specific gypsy and traveller needs. Therefore, RBC feel that the emphasis remains as stated here - that it is very much unclear as to what extent RBC may/may not be able to assist in meeting SSDC's pitch needs.

Natural Environment

18. SSDC and RBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
19. 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 Redditch Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

South Staffordshire District Council

Name:

Position:

Signature:

Date:

Redditch Borough Council

Name:

Position:

Signature:

Date:

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