

**FW: Black Country Core Strategy Review- Duty To Cooperate meeting 'dutytooperate@orr.gsi.gov.uk' - Meeting**

---

**Meeting** | Scheduling Assistant | Insert | Draw | Format Text | Review | Help | Tell me what you want to do

Delete Copy to My Calendar → Forward ↓ | ResourceFinder | Meeting Notes | Accept Tentative ↓ | Decline ↓ | Propose New Time ↓ | Respond ↓ | Show As: Busy | Private | Categorize | High Importance | Low Importance | Dictate

Actions | Resource Central | Meeting Notes | Respond | Options | Tags | Voice

Accepted on 26/01/2018 09:01.

### FW: Black Country Core Strategy Review- Duty To Cooperate meeting 'dutytooperate@orr.gsi.gov.uk'

---

Organizer: Reena Mehta Sent Wed 17/01/2018 14:50

Time: 14 February 2018 14:00-16:00

Location: Committee Room 2, Dudley Council House, Dudley

Response: Accepted Change Response

14022018 DTC Agenda.pdf  
281 KB

---

When: 14 February 2018 14:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.  
Where: Committee Room 2, Dudley Council House, Dudley  
Note: The GMT offset above does not reflect daylight saving time adjustments.  
\*\*\*\*\*

Good afternoon,  
I have not yet received your response as to whether you are able to attend or send a substitute to this meeting, please can you confirm whether you are able to attend  
Kind regards  
Reena Mehta  
-----Original Appointment-----  
**From:** Reena Mehta  
**Sent:** 17 January 2018 14:48

---

In Shared Folder | Calendar

Last modified by Adrian Cooper on 15/02/2020

# Black Country | **Core Strategy**

Planning for the future of the Black Country

## **The Black Country Core Strategy Review 2016 – 36**

### **Duty to Co-operate Meeting**

**Venue:** Committee Room 2, Dudley Council House,  
Priory Road, Dudley, DY1 1HF

**Date:** Wednesday 14th February 2018 – 2-4pm

**Chair:** Ian Culley, Lead Planning Manager (Regional Strategy),  
City of Wolverhampton Council

### **Agenda**

1. **Welcome and Introductions**
2. **Black Country Core Strategy review – key issues and options**
3. **Feedback from Summer 2017 Issues and Options consultation**
4. **Next Stages and timescales**
5. **Ongoing engagement with Duty to Co-operate partners**
6. **AOB**

**From:** [Adrian Cooper](#)  
**To:** [Gemma Davies](#); [Edward West](#); [Liam Cowden](#); [Dan Corden](#)  
**Subject:** FW: WMCA Housing Deal [PROTECT]  
**Date:** 28 February 2018 15:14:02

---

FYI – I had already invited Kelly Harris from South Staffs separately, but in light of this response, I have now offered her the opportunity to join this meeting as an alternative.

Kind Regards

Adrian Cooper MA (Hons) MSc MSc MRTPI

Planning Policy & Strategy Manager, Shropshire Council

Chair, West Midlands Resource Technical Advisory Body <http://www.westmidlandsiep.gov.uk/rtab>

Chair, West Midlands Aggregates Working Party

1

---

**From:** Ian Culley  
**Sent:** 28 February 2018 15:01  
**To:** Adrian Cooper; Mike Smith (Strategic Planning); Andrew Donnelly  
**Subject:** RE: WMCA Housing Deal [PROTECT]

**PROTECT**

Hi Adrian,

Thanks for the email and it would be good to meet.

I will coordinate attendance from our side and also think it would be helpful for SStaffs to join us given the cross boundary issues if this is OK with you.

In terms of dates I can do the 8<sup>th</sup> (am), 13<sup>th</sup> (pm) and 15<sup>th</sup> (am).

Regards

Ian

Ian Culley

Lead Planning Manager (Regional Strategy)

City of Wolverhampton Council

---

**From:** Adrian Cooper  
**Sent:** 28 February 2018 11:33  
**To:** Ian Culley ; Mike Smith (Strategic Planning)  
; Andrew Donnelly  
**Cc:** Gemma Davies ; Liam Cowden  
; Edward West ; Dan Corden

**Subject:** WMCA Housing Deal

Hi All,

Further to my quick chat with you after the recent BC Core Strategy meeting in Dudley, I'd be grateful for an opportunity to meet with you to discuss the potential for any new settlement which has been proposed in Shropshire to contribute to any identified strategic housing or employment land shortfall. Please could you advise your availability for such a meeting in Shrewsbury over the next 2-3 weeks.

Kind Regards

Adrian Cooper MA (Hons) MSc MSc MRTPI

Planning Policy & Strategy Manager, Shropshire Council

Chair, West Midlands Resource Technical Advisory Body <http://www.westmidlandsiep.gov.uk/rtab>

Chair, West Midlands Aggregates Working Party

\*\*\*\*\*

If you are not the intended recipient of this email please do not send it on to others, open any attachments or file the email locally. Please inform the sender of the error and then delete the original email.

\*\*\*\*\*



Thank you for your letter of 12<sup>th</sup> July concerning the above. Shropshire Council's Planning Policy and Strategy Manager, [REDACTED], attended your most recent Duty to Co Operate meeting in February 2018.

### **Strategic Planning in Shropshire**

In the context of your request for an update regarding our local plan review status, I am pleased to confirm that Shropshire Council's Core Strategy was adopted in 2012 and its site allocations plan (known as SAMDev) was adopted in 2015. These documents cover the period 2006 – 2026 and established growth guidelines of 27,500 dwellings and 290 Ha of employment land for this period. Further information is available here: <https://www.shropshire.gov.uk/planning-policy/local-planning/> The Council adopted a new Economic Growth Strategy <https://shropshire.gov.uk/business-support/economic-growth-strategy-2017-2021/> in September 2017.

In order to help deliver its objectives and keep our Local Plan up to date, the Council initiated a Local Plan Review in 2016 and published preferred options for the scale and distribution of growth for the period 2016 – 2036 late last year. This established growth guidelines of 28,750 dwellings and 300Ha of employment land. The Council currently has identified housing need of 25,400 dwellings and a housing land supply of 6.04 years. Further information is available here: <https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base/> The Council plans to publish preferred site options for its main market towns, together with growth guidelines for smaller rural service settlements (known as 'Community Hubs') in October 2018. These settlements will provide sufficient growth capacity to meet the preferred level of housing growth. However, in addition to these sites, a number of strategic site opportunities have been promoted which could provide additional housing and employment land growth potential in excess of the identified growth guidelines. Shropshire Council will consult on preferred options for these sites in spring 2019. Our Local Development Scheme was updated in May 2018 and currently assumes that the Local Plan Review will be submitted for examination at the end of 2019. Further information is available here: <https://www.shropshire.gov.uk/planning-policy/local-planning/local-development-scheme-lds/>

### **Cross Boundary Development Needs**

Whilst Shropshire is located in a different Housing Market Area to the Black Country, we acknowledge that there exists a functional economic relationship between Shropshire and the Black Country. In this context, Shropshire Council has recently commissioned consultants GVA to carry out a strategic options study of the M54 corridor to examine the strategic economic context and potential opportunities for economic growth. Given the geographical proximity of parts of eastern Shropshire to the Black Country, we recognise that there is merit in further discussion about the potential for Shropshire to help meet cross boundary needs from the Black Country. As explained above, our preferred sites consultation in October will address both our currently identified housing needs and provide for the delivery of a housing requirement greater than this need. Therefore any other strategic proposals which have been promoted through the current Local Plan Review process would help us to provide a non-delivery allowance for Shropshire and might also provide headroom to cater for cross boundary needs. However, such proposals will need to be consistent with the objectives of our EGS and will need to be accompanied by extensive infrastructure investment, and for sites in the Green Belt we must ensure the ability to demonstrate exceptional circumstances in order to meet the requirements of the current and emerging NPPF.

We would welcome further discussions in relation to this potential as our work progresses, particularly in relation to the M54 corridor.

Best wishes

[REDACTED]

[REDACTED]

WMCA Housing Deal - Meeting

FileMeetingScheduling AssistantTrackingInsertDrawFormat TextReviewHelpTell me what you want to do

Cancel MeetingCopy to My Calendar

Skype MeetingTeams MeetingResource FinderMeeting NotesContact AttendeesAddress BookCheck NamesResponse Options

Show As: BusyReminder: NoneRecurrenceCategorizeDictate

ActionsSkype Meeti...Teams Meeti...Resource CentralMeeting Not...AttendeesOptionsTagsVoice

Liam Cowden: Automatic reply: " I am on leave from Monday, 8th August 2022 for an extended period to Friday, 3rd September 2022. If you require a response on any matters during my absence please contact planningpolicy@...

Attendee responses: 4 accepted, 0 tentatively accepted, 1 declined.

Send Update

TitleWMCA Housing Deal

Required

Jan CulleyMike Smith (Strategic Planning)Andrew Donnelly

Harris, KellyGemma DaviesLiam Cowden

Optional

Fox, Edward

Start time

Tue 13/03/201814:30

All dayTime zones

End time

Tue 13/03/201816:00

Make Recurring

Location

Nimbus Room, 5th Floor Shirehall, ShrewsburyRoom Finder

This meeting is designed to provide an opportunity to meet with you all to discuss the potential for any new settlement in Shropshire (proposed by a landowner) to contribute to any identified strategic housing or employment land shortfall for the WMCA.

In Shared FolderCalendar

Last modified by Adrian Cooper on 13/03/2020

Type here to search

14:3524/08/2022

21

Page 7



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW  
Date: 12 July 2018  
Please ask for: Christine Williams  
Direct Line: 01922 652089

Dear Colleagues

**Black Country Core Strategy Review**  
**Duty to Co-operate: Strategic Housing Issues**

As you will be aware the Black Country Authorities have commenced a review of our joint Core Strategy. As a key part of this review we completed our Issues and Options consultation in September 2017. This included a call for sites. We are currently in the process of reviewing the responses to consultation and are progressing various other work in connection with the review. This includes a number of key pieces of evidence including the second stage of our EDNA, and finalising an Urban Capacity Report.

We are keen to continue to work with neighbouring Authorities, including yours, on strategic matters – you may recall our most recent Duty to Co Operate meeting in February 2018 when we took the opportunity to update neighbouring LAs and to ask how you would like to continue to work with us on key strategic planning matters.

The purpose of this letter is to raise the issue of housing need across the Black Country – and how these can be met. You may be aware that we have allocated a significant number of sites for both housing and employment development through current local plan documents. We intend to update this work as part of the current review where this may be necessary.

Our most recent housing evidence sets out our housing need (up to 2036) – and whilst we acknowledge this might change as a result of updated government policy (which is anticipated to slightly increase our current OAN) we know that we cannot accommodate all our identified needs within the urban area of the Black Country. This view is supported by our current work reviewing the urban capacity of the Black Country (see latest urban capacity report - May 2018 <http://blackcountrycorestrategy.dudley.gov.uk/t2/>) and the recently published Birmingham and Black Country HMA study. Even by increasing densities and looking to other sources of urban land supply, we still cannot accommodate all our housing and employment needs within the urban area.

Current estimates are that we may have a shortfall in the region of **22,000** dwellings and **300 ha** of employment land. However our review is focussing on continuing a brownfield first approach, building on the success of the current strategy, and we will continue to make every endeavour to accommodate as much of our need as

possible in our urban areas before considering other locations in the Black Country or beyond.

At this stage we would be grateful if you were able to provide an update regarding your strategic plan making, specifically your local plan review status. In addition, considering the situation faced by the Black Country, as set out above, and building upon the recently published Strategic Growth Study for the Greater Birmingham and Black Country HMA, we are asking for your Authority to consider whether it would be able and willing to accommodate any identified housing and employment development needs arising from the Black Country? This request covers all types of housing need as identified in evidence.

Such a scenario may arise where your existing or emerging plan is seeking to deliver levels of housing or employment land in excess of local needs. We are also keen to understand, in the context of plan reviews, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting some of the needs of the Black Country - with an initial focus on non-green belt locations in accordance with the existing and proposed national planning policy framework.

We ask that you consider this request and **respond in writing to [blackcountrycorestrategy@dudley.gov.uk](mailto:blackcountrycorestrategy@dudley.gov.uk) within 2 weeks of the date of this letter please.** We appreciate that this letter may raise difficult issues that need your consideration, however we would be grateful for an early response.

We look forward to working with you on strategic matters during the course of our review work.

Yours sincerely

Sarah Norman  
Chief Executive  
Dudley Metropolitan Borough Council

Helen Paterson  
Chief Executive  
Walsall Metropolitan Borough Council

Jan Britton  
Chief Executive  
Sandwell Metropolitan Borough Council

Mark Taylor  
Strategic Director  
Wolverhampton City Council

**From:** [Adrian Cooper](#)  
**To:** [Michele Ross](#)  
**Cc:** [Andrew Donnelly](#); [Ian Culley](#); [Dan Corden](#); [Edward West](#)  
**Subject:** RE: GBBCHMA Housing Position Statement  
**Date:** 07 September 2018 14:48:37  
**Attachments:** [Draft Land supply HMA position statement v4 28 aug BC comms 4 Sept AC tracked](#)

---

Hi Michele,

Thank you for your message. I think that we will need more than 3 days to consider this, since it has implications for our housing need figure and any risks that might arise from further changes to the sub-national housing projections and the national standard methodology moving forward. Whilst we recognise that some housing growth in Shropshire may arise from inward migration from adjacent areas including the Black Country, our current housing guideline is greater than need because we already have a very significant level of completions and commitments (amounting to 64% of the preferred requirement for the revised Local Plan period to 2036). The difference is also to allow for local issues such as the growth of a new university centre in Shrewsbury and the impact of meeting the changing housing needs of a rapidly growing older population.

We will be consulting on preferred sites to meet local housing and employment need in and around our market towns and larger villages in November 2018. However, through our Local Plan Review process, Shropshire Council has also been asked to consider several strategic sites which have the potential to deliver additional housing and employment growth in strategic locations and we will be consulting on any of these sites which the Council may choose to support in Spring 2019.

Any agreement on Shropshire's part to take responsibility for any part of the current shortfall relating to your HMA would need to be the subject of a formal Statement of Common Ground which also recognised the implications of such growth, beyond that required to deliver our own needs, for employment, facilities, services and infrastructure, including transport systems, in Shropshire.

For this reason, we do not support the current text and I have attached a version which includes tracked changes to paragraphs 28 and 29 which suggest an alternative form of words.

My colleagues and I would be happy to discuss this further with you if this would be helpful.

Kind Regards

Adrian Cooper MA (Hons) MSc MSc MRTPI  
Planning Policy & Strategy Manager, Shropshire Council  
Chair, West Midlands Resource Technical Advisory Body <http://www.westmidlandsiep.gov.uk/rtab>  
Chair, West Midlands Aggregates Working Party

---

**From:** Michele Ross  
**Sent:** 04 September 2018 16:16  
**To:** Adrian Cooper  
**Cc:** Andrew Donnelly; Ian Culley  
**Subject:** GBBCHMA Housing Position Statement  
**Importance:** High

**Sensitivity: RESTRICTED**

Hi Adrian,

We have been asked by the Greater Birmingham and Black Country HMA Steering Group to consult you on a form of wording relating to Shropshire to include in our Housing Position Statement. The Statement is intended to provide a factual update of the housing need and supply position within the HMA, but also to summarise the potential for any unmet needs to be accommodated in neighbouring areas, as far as it is possible to quantify this currently. The Statement needs to be published in the next week or so, so that it can be referred to in the North Warwickshire EIP. The most recent draft of the Statement, including the text below, is attached.

**“Potential Contributions from beyond the GBBCHMA**

In line with the Strategic Growth Study, the principal focus of this statement is the GBBCHMA. It is evident, however, that HMAs are not hermetically sealed and that there are existing and potential population flows between

them. The new NPPF (2018) recognises this by removing reference to HMAs and instead stating that: “any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (para 60)

The local planning authorities of Telford and Wrekin, and Shropshire, which adjoin the BGGCHMA, have defined separate, single authority HMAs. Both authorities are planning for housing growth above local housing need, which requires additional net in migration beyond that identified in trend-based projections. No specific authorities have as yet been identified as potential sources for this net in migration. Both local authorities are also Non-Constituent members of the West Midlands Combined Authority and as such will be covered by its emerging Spatial Investment and Delivery Plan. Given historic migration patterns it is reasonable to assume that the West Midlands conurbation will be the principal source of any net in migration. It is currently estimated that, beyond identified local need up to 2031, there is a potential contribution of 7,548 homes from Telford and Wrekin through their adopted Local Plan (2011-31) and of 3,350 homes from Shropshire through the Preferred “High Growth” housing requirement in their emerging Local Plan partial review (2016-36).”

We would be very grateful if you could check this text and provide any suggested changes by the end of the week. Please copy your email to Andy, Ian and myself.

Thanks v much,

Michele Ross  
Lead Planning Manager (Sub - Regional Strategy)

City of Wolverhampton Council

	
-------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICTED information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.



## **Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (September 2018)**

### **1 Introduction**

- 1.1 This second position statement draws upon the Strategic Growth Study (SGS, GL Hearn/ Wood, 2018), which was commissioned by the 14 Local Planning Authorities to establish the extent to which the Greater Birmingham and Black Country Housing Market Area<sup>1</sup> (GBBCHMA) can meet its own housing needs up until 2031 and 2036. The SGS was published on all participating local authorities' websites along with an initial position statement<sup>2</sup>.
- 1.2 The statement extracts the most relevant information regarding housing need and supply from the SGS and updates as appropriate where additional information is available. It also sets out the timetables for plan reviews for GBBCHMA authorities. It is anticipated that this statement will provide a starting point from which future Statements of Common Ground, as required by the revised 2018 National Planning Policy Framework (NPPF), can develop.
- 1.3 The Birmingham Development Plan (BDP, adopted January 2017) identifies a shortfall of 37,900 dwellings for the period 2011 – 31. Policy TP48 states that:
- The Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city. This will focus on:*
- *The progress of neighbouring Councils in undertaking Local Plan reviews to deliver housing growth to meet Birmingham's needs.*
  - *The progress of neighbouring Councils in delivering the housing targets set out in their plans.*
  - *The extent to which a 5 year housing land supply is maintained in neighbouring areas.*
- 1.4 Policy TP48 goes on to state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham's capacity by means of a full or partial BDP review.
- 1.5 The revised North Warwickshire Local Plan (2011-33) has been submitted for examination and this will be tested against the 2012 NPPF.
- 1.6 This statement provides a context for both the North Warwickshire Local Plan review examination and for monitoring of the BDP in accordance with Policy TP48. Therefore, for the purposes of this statement, the Objective Assessment of Need (OAN) method from the 2012 NPPF will be used rather than the Local Housing Need (LHN) standard method introduced through the revised 2018 NPPF. The LHN will

---

<sup>1</sup> Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Borough Council, Lichfield District Council, Redditch Borough Council, Solihull Metropolitan Borough Council, Tamworth Borough Council, North Warwickshire District Council, Stratford-on-Avon District Council, Sandwell Borough Council, South Staffordshire District Council, Walsall Borough Council, Wolverhampton City Council

<sup>2</sup> [https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)



provide the context for subsequent statements, plan reviews and examinations (see Appendix 1).

- 1.7 The statement covers the period 2011 to 2031 as this is the timeframe within which the BDP shortfall should be met and the North Warwickshire local plan review is making a contribution towards this. Future statements will need to be extended to 2036 to reflect new local plan end dates and provide for fifteen year time periods as required by the revised NPPF.

## 2 **Housing Need**

### **Objective Assessments of Need for Individual Authorities**

- 2.1 The starting point for determining an OAN is the official household projections. If necessary these are adjusted upwards to reflect market signals, affordable housing, past policy constraints and whether there is likely to be a sufficient labour supply to meet future job growth. Within the GBBCHMA eight local plans have been adopted post NPPF. Only South Staffordshire and the Black Country are yet to have a plan including an OAN tested at examination. Solihull has a post NPPF adopted local plan, but it does not include an OAN following legal challenge in 2014.

**Table 1: GBBCHMA Authority Plans and Objective Assessments of Need (OAN)**

Local Authority	Plan Period	OAN	OAN dpa	Study
Birmingham	2011-31	89,000	4450	PBA Stage 2 Study
Bromsgrove	2011-30	6,648	350	Amion/ Edge Housing Needs Assessment Report, Aug-14
Cannock Chase	2006-28	5,800	264	NLP Implications of CLG 2011 Household Projections, 2013
Lichfield	2008-29	8,600	430	NLP Implications of CLG 2011 Household Projections, 2013
Redditch	2011-30	6,400	337	Amion/ Edge Housing Needs Assessment Report, Aug-14
Solihull	2014-33	14,277 <sup>3</sup>	751	PBA 2016
Tamworth	2006-31	6,250	250	NLP Implications of CLG 2011 Household Projections, 2013
North Warwickshire	2011-29	3,150	175	2013 Cov/War SHMA Update
Stratford-on-Avon	2011-31	14,600	730	ERM 2016
Black Country <sup>4</sup>	2014-36	78,190	3554	PBA 2016
South Staffordshire	2014-36	5,933	270	PBA 2016
HMA Total	-	-	11,513	

- 2.2 Comparing OANs on a like for like basis is very difficult as the methods by which they were prepared and assumptions made vary significantly. Furthermore, as they were prepared at different times the demographic and employment data used may not be

<sup>3</sup> Solihull's OAN figure includes an upward adjustment to take account of under-provision between 2011 and 2014.

<sup>4</sup> Joint Core Strategy for Dudley, Sandwell, Walsall and Wolverhampton

comparable. Plans also have different start and end dates making direct comparison difficult. Table 1 shows the OAN identified through existing local authority studies for each plan area and includes an annual rate for direct comparison. In reality, however, planned delivery is often staggered over time and the housing requirement is expressed as a trajectory.

- 2.3 Having established an OAN, local plans must then consider whether this can be met in full in their area and, if not, whether it can be accommodated by neighbouring local authorities. This final plan housing requirement may be higher or lower than the OAN dependent upon circumstances.
- 2.4 As is shown in Table 2, there are three adopted plans in the GBBCHMA that have not been able to accommodate their OAN; this generates an overall unmet need of 40,325. These are:
- Birmingham 38,000
  - Tamworth 1,825
  - Cannock Chase 500

**Table 2: Plan Housing Requirements and Unmet Need in the GBBCHMA Authorities**

Local Authority	Current / Emerging Plan	Plan Period	Plan Requirement	Annual Requirement dwellings per annum (dpa)	Unmet Need	Provision for GBBCHMA Unmet Need
<b>Birmingham</b>	Adopted Jan 2017	2011-31	51,000	2,550	-38,000	
<b>Bromsgrove</b>	Adopted Jan 2017	2011-30	7,000	368	0	
<b>Cannock Chase</b>	Adopted 2014	2006-28	5,300	241	-500	
<b>Lichfield</b>	Adopted Feb 2015	2008-29	10,030	478	0	1,000
<b>Redditch</b>	Adopted Jan 2017	2011-30	6,400	337	0	
<b>Solihull</b>	Draft Plan Nov 16	2014-33	15,029	791	0	2,000
<b>Tamworth</b>	Adopted Feb 2016	2006-31	4,425	177	-1,825	
<b>North Warwickshire</b>	Draft Plan 2017	2011-31	9,070	454		4,410
<b>Stratford-on-Avon</b>	Adopted July 2016	2011-31	14,600	730	0	2,720
<b>Black Country</b>	Adopted Feb 2011	2009-26	63,000	3,150	0	
<b>South Staffordshire</b>	Adopted Dec 2012	2006-28	3850	175	0	
<b>HMA Total</b>				9,451	-40,325	10,130

- 2.5 As set out in Table 2, there are four plans either adopted or emerging which make a formal commitment to meeting part of this unmet need.
- 2.6 Solihull's draft local plan is making provision for a 2000 dwelling contribution towards Birmingham's unmet needs to 2033.

- 2.7 Lichfield's adopted plan has made provision for a 500 dwelling unmet need from Cannock Chase and a 500 dwelling unmet need from Tamworth. This is part of the overall unmet need in the GBBCHMA.
- 2.8 Both North Warwickshire and Stratford-on-Avon sit within two HMAs - the GBBCHMA and the Coventry and Warwickshire HMA (CWHMA). The CWHMA authorities have an agreed MoU regarding the distribution of housing provision which states that 2880 dwellings in Stratford-on-Avon and North Warwickshire's local plans are to meet unmet needs within the CWHMA, arising from Coventry.
- 2.9 Stratford-on-Avon makes provision for 5,400 homes up to 2031 beyond its own demographic needs, which is split equally between the two HMAs. It thus contributes 2,720 to meeting unmet needs within the GBBCHMA. North Warwickshire is making provision through its submitted Local Plan to meet 4,410<sup>5</sup> of the GBBCHMA shortfall, which specifically includes 500 homes towards Tamworth's unmet needs.
- 2.10 Whilst not specifically referenced in Table 2, the adopted Bromsgrove Local Plan 2011 - 30 (January 2017) meets a 3,600 homes shortfall, which could not be accommodated by the neighbouring Redditch Local Plan 2011 - 30 (January 2017). The two plans were prepared, examined and adopted simultaneously, so the shortfall was met as soon as its existence was known.
- 2.11 In addition, whilst there is not a specific unmet need arising from the Black Country authorities at this point, the Black Country Core Strategy review is underway and rolls forward to 2036. The 2017 Issues and Options report identifies a shortfall of 21,670 homes when comparing supply within the urban area to identified needs. The document states that the shortfall arises predominantly in the period 2031 – 36. The document also states that the review will test the accommodation of 3,000 homes of unmet housing need from the wider GBBCHMA.

### **Housing Need figure to be used for the GBBCHMA**

- 2.12 As there is no consistent OAN for the GBBCHMA as a whole, the SGS considered three baselines based on past demographic trends:
- **The 2014 based Household projections** as published by MHCLG
  - **Rebased 2014 based Household Projections**, which takes account of growth between 2014 and 2015 as shown in the ONS Mid-Year Population estimates. This simply uses published data for the initial projection year and then applies assumptions on the year on year changes in the official projections thereafter
  - **10 Year Migration Trends** – this considers the difference between the trends in migration over the input period to the SNPP (the 5 years to 2014 for domestic and 6 years for international migration) and those over a ten year period (2005 to 15), and then adjusts future trends in migration based on these.
- 2.13 There is a degree of commonality between the official projection and the variants and the SGS concludes that the rebased 2014 based projection of 205,099 (which includes a vacancy allowance) is a reasonable estimate of housing need for the

---

<sup>5</sup> Within this 620 is counted as an economic uplift together with a further 3,790 to meet the needs of the HMA. See SGS page 51 for more detail.

GBBCHMA over the period 2011 – 31. The SGS only provides overall parameters of need at HMA level and does not disaggregate this to district level.

### 3 **Housing Land Supply**

#### **Update of Existing Supply**

- 3.1 The SGS drew together and analysed information on housing land supply within the GBBCHMA using the following categories:
- i. Completions – net completions over the period from 1 April 2011 to the base date for the latest monitoring information (either 1st April 2016 or 1st April 2017)
  - ii. Sites with Planning Permissions – capacity of all sites with planning permission (full or outline) at the base date.
  - iii. Extant Allocations without Planning Permission – supply from sites allocation in adopted plans (including Neighbourhood Plans) which did not have planning permission (full or outline) at the base date.
  - iv. Allocations in Emerging Plans – capacity of sites proposed to be allocated in emerging Site Allocations Documents (under the current system) and Local Plans (Under the new system)
  - v. Additional Urban Supply – sites within existing urban areas which do not have planning consent, and are not allocated in the adopted or emerging Local Plan (including Neighbourhood Plans), but which have been identified as suitable for residential development and could be delivered by 2031 or 2036.
  - vi. Windfalls – GL Hearn assumed that most SHLAAs will include a site size and/or capacity threshold. The proforma requested that this was set out in addition to the assumptions made regarding windfall development.
- 3.2 Consistent monitoring information is now available for the period 2011 to 2017 and is compared with that published in the SGS in table 3. It is apparent that additional capacity has been identified, mainly within Birmingham. Summaries of the SGS baseline and the 2017 update by local authority are attached as appendices 2 and 3.

**Table 3: Housing Land Supply for the GBBCHMA 2011 – 31: SGS baseline and 2017 Update**

	<b>SGS Baseline (2011-31)</b>	<b>2017 Update (2011-31)</b>
Total Supply	191,654	197,283
of which:		
Completions	35,016	40,092
Sites with planning permission	55,759	61,211
Allocations in adopted plans	49,485	41,740
Proposed allocations in emerging plans	19,443	19,101
Additional urban supply	17,114	18,811
Windfalls	14,837	16,318

#### **Non – Implementation Discounts on Supply**

- 3.3 To provide a realistic assessment of the developable land supply across the HMA, with a view to quantifying what additional land supply needs to be identified, the SGS applies the following discounts:
- A discount of 5% to the supply from sites with planning consent. This recognises that the presence of planning permission provides some basis for

considering that a site will be delivered and that some sites in this category are likely to be under construction; but that in some instances planning permission will have been sought for other purposes (such as to raise land values) and some permissions do lapse;

- A discount of 15% to the supply from specific sites without planning consent in the Black Country authorities. A higher discount is considered appropriate in these authorities to take account of the significant proportion of the land supply which comprises employment sites where there are challenges associated with delivery related to assembling land, relocating existing occupiers, and development viability.
- A discount of 10% to the supply from specific sites without planning consent in the other authorities within the HMA.

3.4 The SGS, however, specifically states that:

*These discounts are judgement based and applied for the purposes of this report only and should not be considered to prejudge what allowance should be made for non-implementation in individual local plans or authorities' land supply assessments, which can take account of locally specific circumstances and evidence.*

3.5 It is, therefore, a matter of judgement for each local authority to determine the extent to which non-implementation discounts should apply and reflect this as they update their SHLAAs. For example, the Black Country has recently published an Urban Capacity Review (May 2018)<sup>6</sup>, which proposes retaining the 10% discount on sites with planning consent used in the adopted Core Strategy.

### **Potential Supply from Increasing Residential Densities**

3.6 The SGS sets out the benefits of higher density housing and notes that equally there are factors such as viability and deliverability in areas which do not commonly deliver higher density development. It does not set specific policies; instead it seeks to consider the extent to which an increase in densities could contribute towards addressing the housing shortfall. It estimates that up to 13,000 additional dwellings could be accommodated by applying average densities of 40 dwellings per hectare (dph) in Birmingham and the Black Country and 35 dph elsewhere. It suggests that local authorities should consider increasing densities through changing local plan policies and checking density estimates used when they refresh their SHLAAs; any increases would then filter through into increased capacity.

3.7 Consequently, this statement does not make any allowance for capacity gains that may arise from increased residential densities, particularly as some of the sites identified by the SGS may now have been granted planning permission. Instead, it is for local authorities to estimate likely residential densities when updating their SHLAAs and to set density standards through policy when reviewing local plans. The revised NPPF places greater emphasis on making effective use of land and requires local authorities to consider minimum density policies.

---

<sup>6</sup> <http://blackcountrycorestrategy.dudley.gov.uk/t2/>

## **Contribution towards the Coventry and Warwickshire Housing Market Area**

- 3.8 As explained in para's 2.8-2.9, Stratford-on-Avon and North Warwickshire straddle the GBBCHMA and the CWHMA. Consequently their entire supply of housing land cannot be assumed to meet GBBCHMA needs. Like Birmingham, Coventry was not in a position to meet all of its OAN within its administrative boundary and has signed a MoU with the Warwickshire Districts in order to distribute this unmet need. The agreed MoU states that 2,880 dwellings in Stratford-on-Avon and North Warwickshire's local plans are to meet unmet needs within the CWHMA. Therefore this contribution must be deducted from the GBBCHMA housing land supply.

## **Potential Contributions from beyond the GBBCHMA**

- 3.9 In line with the SGS, the principal focus of this statement is the GBBCHMA. It is evident, however, that HMAs are not hermetically sealed and that there are population flows between them. The local planning authorities of Telford and Wrekin, and Shropshire, which adjoin the GBBCHMA, have defined separate, single authority HMAs. Both authorities are planning for housing growth above demographically driven local housing need. No specific authorities have as yet been identified as potential sources for any net in migration. Both local authorities are also Non-Constituent members of the West Midlands Combined Authority and as such will be covered by its emerging Spatial Investment and Delivery Plan.

## **4 Comparing Housing Need and Housing Land Supply**

- 4.1 Table 4 compares the SGS baseline housing need figure and unadjusted land supply position with an updated supply position as of April 1<sup>st</sup> 2017. This suggests that the shortfall has fallen by 5,629 homes. It should be noted that the land supply figures are unadjusted whereas the headline figures provided in the SGS have non-implementation rates applied. Local authority's approaches to undertaking SHLAAs differ and many do not include non-implementation rates whereas the Black Country, for example, has recently published its Urban Capacity Review, which applies higher rates than the SGS.
- 4.2 This statement does not include estimates of gains that could be made from increased densities, whereas the SGS estimates that approximately 13,000 additional dwellings could be delivered if minimum densities of 35 – 40 dph were applied to sites without permission across the HMA. Local authorities will need to consider this matter further as they update their SHLAAs and review their Plans, particularly in the light of the revised 2018 NPPF.

**Table 4: Housing Shortfall for the GBBCHMA 2011 – 31: SGS Baseline and 2017 Update**

	<b>SGS Baseline (2011 – 31)</b>	<b>2017 Update (2011 – 31)</b>
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099
Contribution to CWHMA	-2880	-2880
Minimum housing requirement	207,979	207,979
Supply baseline (unadjusted)	191,654	197,283
<b>Total shortfall</b>	<b>-16,325</b>	<b>-10,696</b>

## **5 Options for Addressing Unmet Need**

- 5.1 Having established supply and need parameters, the SGS proceeded to examine options for meeting the shortfall both beyond and within the Green Belt. The methodology is summarised below.

### **Beyond Green Belt**

- 5.2 For areas beyond the Green Belt, the study mapped nationally significant constraints such as flood plains, AONB, SSSI's and National Parks and Gardens, and identified relatively unconstrained locations. The strategic transport network was overlaid to refine areas of search and these were then subjected to landscape appraisal and high level viability assessment.

### **Within Green Belt**

- 5.3 In the case of land within the Green Belt, a further appraisal stage was added. Physical features such as motorways, A roads and railway lines were used to define 120 parcels. These parcels were assessed against four of the five purposes of Green Belt as defined in national policy:
- preventing sprawl,
  - preventing towns merging into each other,
  - safeguarding the countryside from encroachment and
  - preserving the setting and character of historic towns.
- 5.4 Assisting in urban regeneration was excluded as it was assumed all Green Belt land fulfils this purpose.
- 5.5 These parcels were categorised as providing either a Principal or Supporting Contribution to Green Belt purposes. Although making a Principal Contribution provided a starting point for selecting areas of search, clear exceptions were applied for highly sustainable locations, such as areas close to a railway station.

### **Spatial Development typologies**

- 5.6 Once areas of search had been identified, a series of spatial development typologies (as defined through previous Peter Brett Associates work) to support development of 1500+ homes were identified, as follows:

- Urban Extensions (1,500 - 7,500 dwellings)
- Employment-led Strategic Development
- New Settlements (10,000+ dwellings)

5.7 In addition, a number of areas were identified within the Green Belt where “proportionate dispersal” might be appropriate, in terms of smaller scale developments (500 to 2,500 dwellings in the aggregate); this should be taken forward through the local plan process.

### **Sustainability Assessment**

5.8 The spatial development typologies and areas of search were subject to sustainability and high level infrastructure assessments. The infrastructure assessment identified possible large scale highways and public transport infrastructure requirements alongside likely utilities investment.

### **Recommended Areas of Search**

5.9 Drawing the analysis together, the study recommended 24 locations for further examination and shortlisted 11, which are summarised in Table 5.

**Table 5: SGS Long List and Short List Locations**

<b>Short List</b>	<b>Long List</b>
<b>New Settlements</b> <ul style="list-style-type: none"> <li>• South of Birmingham</li> <li>• Between Birmingham and Bromsgrove / Redditch</li> <li>• Around Shenstone</li> <li>• Around Balsall Common</li> </ul>	<b>New Settlements</b> <ul style="list-style-type: none"> <li>• Between Wolverhampton and Penkridge</li> <li>• Around Dunston</li> <li>• Around New Arley</li> <li>• Around Fradley and Alrewas</li> <li>• South West of Stratford-on-Avon District</li> <li>• Around Wellsbourne</li> </ul>
<b>Urban Extensions</b> <ul style="list-style-type: none"> <li>• South of Dudley</li> <li>• North of Tamworth</li> <li>• East of Lichfield</li> <li>• North of Penkridge</li> </ul>	<b>Urban Extensions</b> <ul style="list-style-type: none"> <li>• South of Penkridge</li> <li>• South of Stafford</li> <li>• North west of Tamworth</li> <li>• East of Polesworth</li> <li>• South of Stratford-on-Avon town</li> <li>• South East of Redditch</li> <li>• North of Walsall around Brownhills</li> </ul>
<b>Employment Led</b> <ul style="list-style-type: none"> <li>• North of Wolverhampton (I54)</li> <li>• East of Birmingham</li> <li>• South of Birmingham Airport/ NEC</li> </ul>	



## 6 Plan Review Timetables

- 6.1 Most existing adopted plans were prepared prior to the BDP shortfall being formally established. In order that plan adoption was not delayed, commitments were included in plans to review once the scale of the shortfall was established. The exceptions to this are the Black Country and South Staffordshire, which have not yet prepared post NPPF plans.
- 6.2 The SGS was prepared as a means of identifying options for meeting surplus housing requirements, with the intention that these are tested through the local authority plan-making process. Table 6 sets out the current position regarding plan reviews for GBBCHMA authorities and includes reference to the SGS where appropriate.

**Table 6: GBBCHMA Plan Review Timetables**

Birmingham	LDS approved December 2017 does not include timetable to review Birmingham Development Plan <a href="https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2">https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2</a>
Bromsgrove	Local development scheme published April 2018. <a href="http://www.bromsgrove.gov.uk/media/3460514/Local-Development-Scheme-2018.pdf">http://www.bromsgrove.gov.uk/media/3460514/Local-Development-Scheme-2018.pdf</a> This LDS will shortly be reviewed The Bromsgrove Plan Review issues and option consultation is now scheduled to begin on the 24th September.
Solihull	Local Development Scheme published January 2018, key milestones <a href="http://www.solihull.gov.uk/Portals/0/Planning/LDF/Local-Development-Scheme-2018.pdf">http://www.solihull.gov.uk/Portals/0/Planning/LDF/Local-Development-Scheme-2018.pdf</a> Publication of Submission Draft (for consultation) summer/autumn 2018 Submission to Secretary of State – winter 2018/19 Examination of plan – spring 2019 Adoption of the Local Plan Review – summer 2019
Lichfield	Local Development Scheme published 2017. <a href="https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Downloads/Local-Development-Scheme/Local-Development-Scheme-2017.pdf">https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Downloads/Local-Development-Scheme/Local-Development-Scheme-2017.pdf</a> Scoping April 2018 Preferred Option: January 2019 Publication document: September 2019 Submission document: January 2020 Adoption: End of 2020  Consultation on the Local Plan Scope Issues and Options document concluded in June 2018. The document made reference to all six areas of search identified in the SGS and integrated these into specific options for future growth in Lichfield. Question 12 also specifically asked: <i>How should Lichfield District Council assist in meeting unmet needs arising from within the GBHMA?</i>  <a href="https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Downloads/Local-plan-review/Local-Plan-Review-Scope-Issues-Options.pdf">https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Downloads/Local-plan-review/Local-Plan-Review-Scope-Issues-Options.pdf</a>

North Warwickshire	<p>Local Plan review submitted to Secretary of State for examination, hearings to commence September 2018.</p> <p>The North Warwickshire Local Plan Review commits to meeting 4,410 of the GBBCHMA shortfall and is set out in a MoU, which has been submitted to the examination hearings (Appendix D to NWBC4, the Duty to Cooperate Paper).</p> <p>In terms of the SGS, the Local Plan Review proposes major development East of Polesworth, a long-listed site in the study.</p>
Cannock Chase	<p>LDS published April 2018. Local Plan review commenced, key milestones:</p> <p>Regulation 18 Issues and scope currently published for consultation</p> <p>Issues and options consultation February 2019</p> <p>Preferred Option October 2019</p> <p>Pre submission (regulation 19) consultation July 2020</p> <p>Submission to Secretary of State for examination: December 2020</p> <p>Examination March 2021</p> <p>Adoption: September 2021</p> <p>Consultation Local Plan Review (Issues and Scope document) concluded in August 2018.</p> <p><a href="https://www.cannockchasedc.gov.uk/sites/default/files/local_plan_review_full_doc_final.pdf">https://www.cannockchasedc.gov.uk/sites/default/files/local_plan_review_full_doc_final.pdf</a></p> <p><i>Paragraph 5.46 states that: An initial 24 areas of search for large scale strategic growth (new settlements and large urban extensions) were narrowed down by the study to a short list of 11 areas, none of which are located in this District, although it should be noted in terms of cross-boundary implications that the area north of Walsall (Brownhills) was identified on the original 'long list'. For this District, the areas of search which we will need to investigate relate to smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area to the south-east of the District. However, we will need to consider these 'in the round' with other options for accommodating housing in the District.</i></p>
Tamworth	<p>LDS published March 2017. <a href="http://www.tamworth.gov.uk/sites/default/files/planning_docs/LDS_2017.pdf">http://www.tamworth.gov.uk/sites/default/files/planning_docs/LDS_2017.pdf</a></p> <p>The current LDS references the potential early review but the LDS is being revised to reflect the new work programmes and whether an early review is carried out.</p>
Redditch	<p>Published Local Development Scheme (2016) does not include timetable to review Local Plan</p> <p><a href="http://www.redditchbc.gov.uk/media/2180170/RBC-LDS-2016-2019.pdf">http://www.redditchbc.gov.uk/media/2180170/RBC-LDS-2016-2019.pdf</a></p>
Stratford-on-Avon	<p>Local Development Scheme published October 2017. Does not include a commitment to review Local Plan</p> <p><a href="https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173513&amp;name=SDC%20Local%20Development%20Scheme%20%2D%20Dec%202016.pdf">https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173513&amp;name=SDC%20Local%20Development%20Scheme%20%2D%20Dec%202016.pdf</a></p> <p>Revised LDS expected December 2018.</p> <p>Council currently preparing a Site Allocations Plan to identify reserve sites capable of accommodating 20% of the housing requirement. Adoption expected 2019. Core Strategy Policies CS.16 and CS.17 commit the Council to bringing forward a review of the Core Strategy if the required scale of housing is beyond that which can be addressed through the Site</p>

	Allocations Plan.
Black Country	Issues and options consultation completed September 2017 <a href="http://blackcountrycorestrategy.dudley.gov.uk/t1/">http://blackcountrycorestrategy.dudley.gov.uk/t1/</a> Draft plan autumn 2019 Adoption 2021
South Staffordshire	Review to commence October 2018 with issues and options document. <a href="https://www.sstaffs.gov.uk/doc/179540/name/SAD%20Full%20Document%20June%202018.pdf/">https://www.sstaffs.gov.uk/doc/179540/name/SAD%20Full%20Document%20June%202018.pdf/</a> Policy SAD1 in Site Allocations Document commits Council to submitting revised plan for examination to Secretary of State by the end of 2021.

**Revised National Planning Policy Framework and Standard Method for calculating Local Housing Need**

- (i) The revised NPPF 2018 sets out a standard method for establishing Local Housing need (LHN) to replace the OAN approach. This takes the demographic household projection as a starting point and then uplifts dependent on local affordability based on the ratio of median workplace earnings and average house prices. The LHN figure is then capped at 40% above the average annual housing requirement figure set out in any Plan adopted less than five years ago.
- (ii) The LHN method was first trailed through the MHCLG Planning for the right homes in the right places consultation in 2017, which provided worked examples for each local authority using the 2014 sub national household projections. For the GBBCHMA this resulted in a collective annual LHN of 10,294, very similar to the annualised SGS requirement of 10,255 (205,099 / 20). It is of note that the annual LHN figure provided for Birmingham is 3577, capped at 40% above its adopted local plan requirement of 2,555; this is significantly lower than the tested OAN of 4450.
- (iii) A MHCLG statement which accompanied the NPPF acknowledged that the 2016-based population projections indicated lower growth than previously and that this would have a corresponding impact on the 2016-based household projections which are to follow in September 2018. In light of this, Government will consider reviewing the standard method so that it aligns with house-building targets set out in the Housing White Paper once the household projections are published.

## Appendix 2: GBBCHMA - Land supply summary table 2011 - 31 SGS baseline

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
Sites with planning permission	16,668	1,073	2,660	3,320	5,426	1,135	1,295	4,142	2,262	937	8,254	3,133	2,623	2,831	55,759
Allocations - Adopted Plans	9,435	1,871	81	8,752	1,200		4,694	10,417	2,470		5,605	455	106	4,399	49,485
Proposed Allocations - (current SADs / new Local Plans)	335		861		2,552	6,158			6,842	891			1,804		19,443
Additional Urban Supply	10,489	165	134	1,200		38	359	685	286	70			1,646	2,042	17,114
Windfall	4,525	440	154	1,650	605	660	121	1,320	1,650	330	407	407	891	1,677	14,837
Completions	10,006	1,550	725	2,996	1,190	1,069	1,019	3,366	2,207	1,265	2,447	500	3,809	2,867	35,016
Total	51,458	5,099	4,615	17,918	10,973	9,060	7,488	19,930	15,717	3,493	16,713	4,495	10,879	13,816	191,654
Supply baseline to 2030/31	41,452	3,549	3,890	14,922	9,783	7,991	6,469	16,564	13,510	2,228	14,266	3,995	7,070	10,949	156,638

## Appendix 3: GBBCHMA - Land supply summary table 2011 - 31 (as at 1<sup>st</sup> April 2017)

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
Sites with planning permission	17,298	1,073	2,545	3,489	5,426	1,135	1,295	3,345	3,437	937	10,447	3,133	2,623	5,038	61,221
Allocations - Adopted Plans	8,587	1,871	81	7,080	1,200		4,694	10,606	1,146		2,190	455	106	3,724	41,740
Proposed Allocations - (current SADs / new Local Plans)	159		695		2,552	6,158			6,842	891			1,804		19,101
Additional Urban Supply	13,757	165	362	612		38	359	725	221	70			1,646	856	18,811
Windfall	5,910	440	140	1,991	605	660	121	1,309	1,500	330	370	407	891	1,644	16,318
Completions	10,887	1,550	1,097	3,784	1,190	1,069	1,019	4,267	2,649	1,265	3,562	500	3,809	3,444	40,092
Total	56,598	5,099	4,920	16,956	10,973	9,060	7,488	20,252	15,795	3,493	16,569	4,495	10,879	14,706	197,283
2016/17 - 2030/31 supply	45,711	3,549	3,823	13,172	9,783	7,991	6,469	15,985	13,146	2,228	13,007	3,995	7,070	11,262	157,191

**From:** [Adrian Cooper](#) on behalf of [Ian Culley](#)  
**To:** [Edward West](#); [Dan Corden](#); [Adrian Cooper](#); [Liam Cowden](#)  
**Cc:** [NimbusCirrus](#)  
**Subject:** FW: Shropshire catchup

---

Ian and I were intending to discuss issues of housing and employment land need and supply for the Black Country and any cross boundary implications arising from potential growth options in the M54 corridor. I'd be happy for you to join this meeting if you are available.

-----Original Appointment-----

From: Ian Culley  
Sent: 02 October 2018 09:32  
To: Ian Culley; Adrian Cooper  
Cc: NimbusCirrus  
Subject: Shropshire catchup  
When: 09 October 2018 15:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.  
Where: Nimbus Room, Shire Hall

<<https://awards.themj.co.uk/winners-archive>> <<http://www.investwolverhampton.com/>>

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICTED information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) <<mailto:postmaster@wolverhampton.gov.uk>> and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

**From:** Adrian Cooper  
**Sent:** 11 October 2018 16:25  
**To:** Ian Culley; Mike Smith (Strategic Planning); Andrew Donnelly  
**Cc:** Liam Cowden; Hayley Owen; Gemma Davies  
**Subject:** RE: M54 Corridor [PROTECT]

Thank you all for a valuable and constructive meeting on Tuesday. I promised to send you some links:

- Shropshire FOAHN: <https://www.shropshire.gov.uk/media/7270/shropshire-council-foahn-background-paper-2017.pdf>
- Shropshire Economic Growth Strategy: <https://shropshire.gov.uk/media/6087/economic-growth-strategy-for-shropshire-2017-2021.pdf>
- Cabinet papers for 7<sup>th</sup> November will be published here: <http://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=130&MIId=3681&Ver=4>
- Evidence base documents for the Local Plan Review including our LVSS and Green Belt Review will supplement the studies already available here: <https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base/>

Other action points for me were to:

1. Obtain and share a clear view from MOD regarding their future plans at Cosford;
2. Share Shropshire's Council's position statement regarding development in the M54 corridor when available;
3. Share the final GVA M54 corridor study once it is available;

Finally, my colleague Dan Corden advises me that the outcome of the latest household projections for Shropshire results in little substantive change.

I'm now away on leave for 2 weeks, returning Monday 29<sup>th</sup> October, but please contact Liam in my absence.

Kind Regards

Adrian Cooper MA (Hons) MSc MSc MRTPI  
Planning Policy & Strategy Manager, Shropshire Council  
Chair, West Midlands Resource Technical Advisory Body <http://www.westmidlandsiep.gov.uk/rtab>  
Chair, West Midlands Aggregates Working Party

FileAppointmentScheduling AssistantInsertDrawFormat TextReviewHelpTell me what you want to do

DeleteCopy to My CalendarForward

Calendar

Actions

Skype Meeting

Skype Meeting

Skype Meeting

Teams Meeting

Teams Meeting

Teams Meeting

ResourceFinder

Resource Central

Resource Central

Meeting Notes

Meeting Notes

Meeting Notes

Invite Attendees

Attendees

Attendees

Show As: Busy

Reminder: None

Recurrence

Options

Categorize

Private

High Importance

Low Importance

Tags

Dictate

Voice

Save & Close

TitleGBBHMA

Start timeThu 06/12/201810:00

☐ All day☐ Time zones

End timeThu 06/12/201812:00

[Make Recurring](#)

LocationBirmingham

|

In Shared FolderCalendar

Last modified by Adrian Cooper on 05/12/2020

Windows Search

Taskbar Icons

System Tray

Page 28



**GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP**

**Thursday 6<sup>th</sup> December 10:00, Room 201, One Lancaster Circus, Birmingham**

**AGENDA**

- 1. Apologies and introductions**
- 2. Notes of last meeting**
- 3. Local Plan updates**
  - **Shropshire Local Plan (Adrian Cooper Shropshire CC)**
  - **GBBCHMA**
  - **OTHER ex GBBCHMA**
- 4. Latest SHLAA positions**
- 5. Alignment of Green Belt reviews**
- 6. Statement of Common Ground**
- 7. Housing in Greater Birmingham: the dangers of over-egging the pudding (CPRE report)**
- 8. Technical consultation on updates to national planning policy and guidance**
- 9. WMCA matters**
- 10. Any other business**
- 11. Date of next meeting**

<p><b>Greater Birmingham and Black Country Housing Market Area Working Group</b></p> <p><b>Notes of meeting Thursday 6<sup>th</sup> December 2018 @10:00</b></p> <p><b>Room 201, One Lancaster Circus, Birmingham City Council</b></p>		
<p><b>In attendance:</b> Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), Patricia McCullagh (Sandwell), Andy Johnson (South Staffordshire), Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Gary Palmer (Solihull), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Jacob Bonehill (WMCA), Kelly Harris (South Staffs), Vicki Popplewell (West Midlands Housing Officers Group), Dorothy Barratt (North Warwickshire), Clare Eggington (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Adrian Cooper (Shropshire), Michele Ross (Wolverhampton), Mike Smith (Walsall)</p>		
1	<b>Apologies</b> , Sandra Ford (Homes England),	
2	<b>Notes of last meeting</b>	
2.1	Agreed	
3	<b>WMCA update</b>	
3.1	[REDACTED]	
3.2	[REDACTED]	JB
3.3	[REDACTED]	
3.4	[REDACTED]	JB
4	<b>Local Plan reviews</b>	
4.1	<b>Shropshire</b> - Presentation by AC on Shropshire Local Plan review. Shropshire is planning for more than minimum housing need due to additional demands from armed forces and students and to support higher levels of economic	

	growth.	
4.2	M54 corridor study due to report in New Year. Yet to be determined whether strategic employment proposal to be pursued at J3 with a strong focus on RAF Cosford. This would possibly be accompanied by some additional housing provision, which could address shortfall in GBBCHMA albeit to back end of plan period.	
4.3	Presentation and details of latest iteration of local plan consultation to be circulated to group.	AD / AC
4.4	<b>Lichfield:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
4.5	<b>Cannock Chase:</b> [REDACTED] [REDACTED]	
4.6	<b>South Staffordshire:</b> [REDACTED] [REDACTED] [REDACTED]	
4.7	<b>Solihull:</b> [REDACTED] [REDACTED] [REDACTED]	
4.8	<b>Tamworth</b> [REDACTED] [REDACTED]	
4.9	<b>Bromsgrove:</b> [REDACTED] [REDACTED]	
4.10	<b>Black Country:</b> As previous update, Green Belt assessment ongoing and evidence base being put in place.	
4.11	<b>Birmingham:</b> [REDACTED] [REDACTED]	
4.12	<b>North Warwickshire:</b> [REDACTED] [REDACTED]	
4.13	<b>Stratford on Avon:</b> [REDACTED] [REDACTED]	
5	<b>latest SHLAA positions</b>	
5.1	[REDACTED] [REDACTED]	
6	<b>Alignment of Green Belt reviews</b>	
6.1	[REDACTED] [REDACTED]	

7	<b>Statement of Common Ground</b>	
7.1	[REDACTED]	
8	<b>Housing in Greater Birmingham: the dangers of over-egging the pudding (CPRE report)</b>	
8.1	[REDACTED]	
9	<b>Consultation on updates to national planning policy and guidance</b>	
9.1	[REDACTED]	
10	<b>Any other business</b>	
10.1	None	
11	<b>Date of next meeting</b>	
11.1	To be determined	



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW  
Date: 8 February 2019  
Please ask for: Christine Williams  
Direct Line: 01922 652089

Shropshire Council  
Planning Policy & Strategy Team  
Shirehall  
Abbey Foregate  
Shrewsbury  
SY2 6ND

By email - [planningpolicy@shropshire.gov.uk](mailto:planningpolicy@shropshire.gov.uk)

Dear Sir/Madam

**Shropshire Local Plan Review:  
Preferred Sites Consultation: November 2018**

Thank you for consulting the Black Country authorities on the Local Plan Review.

This letter contains the response of the Association of Black Country Authorities (ABCA) to the Preferred Sites Consultation.

You will recall that we wrote to you in July last year regarding the issue of housing and employment need across the Black Country and how it could be met. In summary, our most recent evidence tells us that we cannot accommodate all of our identified needs within the urban area of the Black Country. This view is supported by our current work reviewing the urban capacity of the Black Country (<http://blackcountrycorestrategy.dudley.gov.uk/t2/>) and the Birmingham and Black Country HMA study. Even by increasing densities and looking to other sources of urban land supply we estimate that we have a shortfall in the region of 22,000 dwellings and 300ha of employment land.

The letter asked for information on your Plan-making programme and to understand the opportunity for housing and employment development proposals identified in your Plan to meet needs arising from the Black Country. Your response to this letter recognised a functional economic relationship between Shropshire and the Black Country and that there may be an opportunity for a proportion of the Local Plan housing allocations to be attributed to meeting needs arising in the Black Country whilst at the same time achieving Shropshire's strategic growth aspirations.

Within this context our comments on the Preferred Sites consultation document are set out below:

1. We support the references in the Preferred Development Strategy to 'supporting the growth aspirations of neighbouring areas' and within this context the spatial focus on

Dr Helen Paterson, Secretary to ABCA  
Walsall Metropolitan Borough Council,  
The Civic Centre, Darwall Street, Walsall, WS1 1TP.  
Tel: 01922 650000  
Web: [www.walsall.gov.uk](http://www.walsall.gov.uk)

the north and east of the County. For the reasons set out above, this approach builds on existing physical and functional relationships between the Black Country and Shropshire, and recognises the opportunity for the Plan to accommodate mutually supportive cross-boundary growth needs in a sustainable manner.

2. We understand that the Council has commissioned a Study into the economic potential of the M54 Corridor and that this work will inform the next stage of the Local Plan review. We await the findings of this Study with interest. The Corridor has been long-recognised as a strategic growth opportunity and it may be appropriate to refer to it directly within the Preferred Development Strategy. This would be particularly the case if the Corridor contains strategic housing and employment sites which we understand will be the subject of a subsequent consultation.
3. Para 4.35 refers to opportunities in the Cosford area for major mixed-use strategic development and we are aware of aspirations for large scale development being promoted in this location. We recognise the important role of RAF Cosford and the opportunity for further investment in this location to strengthen the economic role of the M54 Corridor and support the nationally significant clusters of aerospace and high technology manufacturing activity in the Black Country around M54 Junction 2. The area benefits from strong physical connections to the Black Country in the form of the M54 and rail line and could be well placed to directly meet a proportion of the unmet employment land and housing needs arising from the Black Country and wider HMA.

We trust you find these comments helpful and look forward to further discussions with you as the work progresses, especially around opportunities in the M54 Corridor. In the meantime, if you would like to discuss any of our responses please contact Ian Culley, Lead Planning Manager at Wolverhampton Council on 01902 555636 or via email [ian.culley@wolverhampton.gov.uk](mailto:ian.culley@wolverhampton.gov.uk).

Yours faithfully

Councillor Qadar Zada  
Leader  
Dudley Metropolitan Borough Council

Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council

Councillor Steve Eling  
Leader  
Sandwell Metropolitan Borough Council

Councillor Roger Lawrence  
Leader  
Wolverhampton City Council

Shropshire Council  
Legal and Democratic Services  
Shirehall  
Abbey Foregate  
Shrewsbury  
SY2 6ND

Date: Tuesday, 12 March 2019

**Committee:**  
**Cabinet**

**Date: Wednesday, 20 March 2019**

**Time: 11.00 am**

**Venue: Shrewsbury Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND**

You are requested to attend the above meeting.  
The Agenda is attached

Claire Porter  
Head of Legal and Democratic Services (Monitoring Officer)

**Members of Cabinet**

Peter Nutting (Leader)  
Steve Charmley (Deputy Leader)  
Nicholas Bardsley  
Gwilym Butler  
Lee Chapman  
Steve Davenport  
Robert Macey  
David Minnery  
Lezley Picton

**Deputy Members of Cabinet**

Dean Carroll  
Rob Gittins  
Simon Harris  
Roger Hughes  
Elliott Lynch  
Alex Phillips  
Ed Potter

Your Committee Officer is:

**Amanda Holyoak** Senior Democratic Services Officer

Tel: 01743 257714

Email: [amanda.holyoak@shropshire.gov.uk](mailto:amanda.holyoak@shropshire.gov.uk)

# AGENDA

## **1 Apologies for Absence**

## **2 Disclosable Pecuniary Interests**

Members are reminded that they must not participate in the discussion or voting on any matter in which they have a Disclosable Pecuniary Interest and should leave the room prior to the commencement of the debate.

## **3 Minutes (Pages 1 - 6)**

To approve as a correct record and sign the Minutes of the Cabinet meetings held on 27 February 2019 and 6 March 2019, attached.

## **4 Public Question Time**

To receive any questions or petitions from members of the public, notice of which has been given in accordance with Procedure Rule 14. Deadline for notification for this meeting is no later than 24 hours prior to the start of the meeting.

## **5 Member Question Time**

To receive any questions of which members of the Council have given due notice, the deadline for notification for this meeting is 5.00 pm on Friday 15 March 2019.

## **6 Scrutiny Items**

To consider any scrutiny issues from Council or any of the Scrutiny Committees

## **7 North Midlands Adoption & Permanency Partnership (Pages 7 - 36)**

Lead Member – Nick Bardsley – Portfolio Holder for Children and Young People

Report of Director of Children's Services attached

Contact: Karen Bradshaw, 01743 254201

## **8 Proposed Hackney Carriage and Private Hire Licensing (Pages 37 - 286)**

Lead Member – Councillor Lee Chapman, Portfolio Holder for Adult Services, Health and Social Housing

Report of Director of Public Health

Contact: Rod Thomson, 01743 253934

## **9 Proposed Closure of Shropshire Council Bring Bank Sites (Pages 287 - 322)**

Lead Member – Gwilym Butler – Portfolio Holder for Community and Place Planning

Report of Director of Place attached

Contact: Mark Barrow, tel 01743 258916



**10 Market Drayton Neighbourhood Development Plan (Pages 323 - 404)**

Lead Member – Robert Macey – Portfolio Holder for Planning and Housing Development

Report of Director of Place attached

Contact: Mark Barrow, tel 01743 258916

**11 Woore Neighbourhood Development Plan (Pages 405 - 428)**

Lead Member – Robert Macey – Portfolio Holder for Planning and Housing Development

Report of Director of Place attached

Contact: Mark Barrow, tel 01743 258916

**12 Shropshire Local Plan Review - Strategic Development Sites (Pages 429 - 434)**

Lead Member – Robert Macey – Portfolio Holder for Planning and Housing Development

Report of Director of Place attached

Contact: Mark Barrow, tel 01743 258916

**13 Exclusion of the Press and Public**

To resolve that, in accordance with the provisions of Schedule 12A of the Local Government Act 1972 and Paragraph 10.4 (3) of the Council's Access to Information Rules, the public and press be excluded from the meeting during consideration of the following item/s.

**14 Housing Revenue Account - Purchase of Development Land Weston Rhyn**

Lead Member – Lee Chapman – Portfolio Holder for Adult Services, Health and Social Housing

Report of Director of Place, TO FOLLOW

Contact: Mark Barrow, tel 01743 258916

0



Committee and Date

Cabinet  
20<sup>th</sup> March 2019

Item

Public

## SHROPSHIRE LOCAL PLAN REVIEW STRATEGIC DEVELOPMENT SITES

**Responsible Officer** Mark Barrow, Executive Director Place  
e-mail: mark.barrow@shropshire.gov.uk Tel: 01743 258919

### 1. Summary

- 1.1 The purpose of this report is to seek approval for the Council to continue work with site proposers and other stakeholders to develop positive proposals for development on strategic sites in Shropshire. These proposals provide strategic opportunities to deliver the objectives of Shropshire's Economic Growth Strategy to increase the productivity and output of the local economy. These proposals are across 3 identified strategic locations of the county that will generate new investment in employment, thereby increasing the number but also the quality of jobs locally together with additional housing, improved infrastructure and local services. The 3 strategic sites are: the former Ironbridge Power Station, Buildwas; Clive Barracks at Tern Hill; and land near Junction 3 of the M54.

### 2. Recommendations

- A. That Cabinet approves the principle of further engagement with the proposers, neighbouring authorities, local communities and other relevant stakeholders to develop positive redevelopment proposals of strategic sites at the former Ironbridge Power Station at Buildwas and Clive Barracks at Tern Hill. These will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019;
- B. That Cabinet approves in principle the potential to explore the benefits to Shropshire of accepting a proportion of unmet development needs from the Black Country Authorities, and to engage further with the proposers of land near Junction 3 of the M54; neighbouring authorities; local communities; and other relevant stakeholders to develop positive proposals to meet these development needs and provide local employment opportunities. This will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019.

## REPORT

### 3. Risk Assessment and Opportunities Appraisal

- 3.1 Shropshire's Economic Growth Strategy (SEGS) identifies the need for a 'step change' in Shropshire's economy to: reduce levels of out commuting; retain employment and skills locally; increase productivity; and address housing

affordability issues. The SEGS also identifies a number of strategic corridors and growth zones including the M54/A5 through Shropshire.

- 3.2 The current Local Plan Review is designed to help ensure that the Local Plan will remain the starting point and platform for planning decisions during the period to 2036. The Council's preferred sites to deliver Shropshire's housing requirements were published for public consultation in October 2018. However, whilst these requirements can mainly be met from sites within existing settlements, a small number of larger mixed-use strategic sites are also being promoted in the County. These potential new settlements present a positive opportunity to generate greater resilience in housing delivery in the County and also have the potential to help address cross boundary growth needs. Strategic sites also offer the ability to increase choice and competition in the housing market, in order to complement proposals within existing settlements and increase confidence of achieving housing need. In the case of the previously developed sites, redevelopment would also demonstrate a proactive approach to bringing forward brownfield land to meet development needs.
- 3.3 Shropshire has the potential to benefit significantly from these opportunities by securing large scale investment in strategic and local infrastructure to help mitigate the impact of growth on existing towns. However, the strategic scale of these proposals and concerns about impacts on existing infrastructure and environmental assets will raise important challenges for their allocation through the Local Plan process, and this highlights the overarching need for local communities to have a positive opportunity to have their say on the proposals.
- 3.4 The need to release Green Belt land, which will require the Council to present an 'exceptional circumstances' argument at the Local Plan Review examination, and the need to secure cross boundary agreement also represent specific risks in the context of development in the M54 corridor. The Council have published a Green Belt Review as part of the recent consultation on Preferred Sites for the Local Plan Review. The emerging Local Plan will assess this evidence alongside wider considerations, such as any positive impact on economic growth, to inform the release of Green-Belt land either for allocation within the emerging Plan period or safeguarding for development beyond 2036.

#### **4. Financial Implications**

- 4.1 Planned growth provides the best possible opportunity for Shropshire Council to harness growth potential by providing a stable platform for investors and developers. Growth also provides an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure. New growth simultaneously imposes an additional burden on local services and provides opportunities to secure investment to improve local facilities which are the responsibility of Shropshire Council and other public service providers.
- 4.2 The Local Plan Review is being managed by a small professional officer team and additional professional resources will be required to address the significant additional workload implications of the inclusion of strategic sites and any Green Belt land release which makes provision beyond the Plan Period as part of the Local Plan Review. This is being managed through the Place Directorate and options are currently being costed and explored.

## 5 Background

### *Former Ironbridge Power Station*

- 5.1 The former Ironbridge power station occupies a 350 acre site south of the River Severn near Buildwas. The power station ceased operation in 2015. Harworth Group purchased the site from Uniper Plc in June 2018. Harworth is a regeneration company specialising in large sites with complex issues and have an excellent track record regenerating sites for new development like the former Power Station. Harworth will undertake the demolition of the former Power Station buildings including the cooling towers starting later this year. Harworth has been working closely with local councils, the local community and other stakeholders to understand the site and the surrounding area. This engagement will help Harworth to prepare a draft masterplan for a mixed-use scheme which would provide employment land and around 1000 homes, together with local services and facilities. Further information about development proposals and a timetable are available here: <https://ironbridgeregeneration.co.uk/the-emerging-proposal/>.
- 5.2 The redevelopment of the site presents an opportunity to support the local economy, create jobs, provide housing and to remediate the site sensitively. The opportunity to capitalise on this significant strategic opportunity has been identified within the Council's draft Economic Growth Strategy (2017-2021) and within the emerging partial review of the Local Plan. The delivery of this site is therefore an emerging strategic priority for Shropshire Council and Council officers are working closely with Harworth and colleagues from Telford & Wrekin Council to help identify and address key issues relevant to the site and the wider area.

### *Clive Barracks, Tern Hill*

- 5.3 Clive Barracks is a 50 hectare military site on the A41 near Market Drayton which is currently home to the Royal Irish Regiment. MOD announced the intention to redevelop the site in March 2016, and have recently confirmed that they now plan to complete the vacation and disposal of the site by 2025. The MOD and its consultants have been working closely with local councils, the local community and other stakeholders as part of a 'Task Force' led by Owen Patterson MP since 2016.
- 5.4 This engagement will help MOD and its consultants to prepare a draft masterplan for a mixed-use scheme which would provide employment land and around 700 homes as part of a new settlement, together with local services and facilities as part of a masterplanned design. The site is located on the A41 strategic growth corridor and close to the Junction 15 of M6. The site therefore has potential to benefit from improved connectivity from the new HS2 Rail link and Crewe Hub Station.

### *M54 Corridor Junction 3*

- 5.5 A proposal for a new town of up to 10,000 homes was put to Shropshire Council on behalf of the Bradford Estate in March 2017 as a response to consultation on Issues & Strategic Options for the Local Plan Review. The Estate has extensive land holdings north of Junction 3 on the M54 on both sides of the A41. It has since been suggested that these proposals could be amended to provide for the construction of a planned settlement west of the

A41, to provide a strategic employment site of around 50 hectares, accompanied by around 3,000 homes, and a local centre to provide services, facilities and infrastructure.

- 5.6 Recent work commissioned by Shropshire Council and which is being drafted by GVA consultants suggests that the M54/A5 corridor is a significant opportunity area and suggests there is considerable latent demand for serviced employment land to meet the needs of both occupiers for inward investment and local occupiers in the target sectors identified in the SEGS. As part of this work, GVA has engaged with neighbouring local authorities and regional organisations including the West Midlands Combined Authority (WMCA). It is envisaged that any strategic employment offer in the M54 corridor would be strongly related to the intensification of engineering training at RAF Cosford and would be complementary, rather than competing with, that of neighbouring areas. The key objective for such a site would be to deliver supply chain opportunities and growth for companies in key sectors (including but not limited to engineering, advanced manufacturing, innovative healthcare and environmental technologies) as identified in the SEGS.
- 5.7 As a strategic location, the M54 corridor benefits from its proximity to existing international businesses dominant in growth sectors such as advanced manufacturing and engineering. The corridor also benefits from good access to transport infrastructure and will benefit from planned investments in road and rail in neighbouring areas. The corridor is close to higher education and training institutions including key assets such as RAF Cosford which accommodates the RAF No.1 School of Technical Training. The recent national defence review has confirmed Cosford as a key Ministry of Defence asset. However, MOD consider that its potential to meet future operational defence requirements is restricted by its Green Belt location. To reflect this, MOD have asked Shropshire Council to release land in their ownership at Cosford from the Green Belt to provide for an intensification of their use of the site. It is very likely that such intensification will generate additional demand for employment land to support the relocation and growth of commercial companies in related sectors.
- 5.8 National planning guidance requires Shropshire Council to plan positively for growth by providing a strategy which, as a minimum, seeks to meet local development needs and to consider any unmet need from neighbouring areas and whether it is practical to meet some or all of this need, where this is considered appropriate and consistent with the principles of achieving sustainable development. The latest evidence indicates that the Black Country cannot accommodate all of its identified development needs within its urban area. The Black Country authorities estimate that there will be a shortfall of around 300ha of employment land, with a particular need for additional high quality, accessible sites capable of accommodating national investment requirements. Similarly, even by increasing densities and looking to other sources of urban land supply, the latest evidence also suggests that there will be a significant housing shortfall. An opportunity therefore may exist for Shropshire to agree to provide for some of this shortfall through the construction of a strategic employment site and housing as part of a new planned settlement at Junction 3 of the M54.
- 5.9 To deliver a balanced approach to development in Shropshire, the delivery of a strategic employment site in the M54 corridor would need to be accompanied

by some additional housing to ensure its deliverability and to limit the transport impact of additional journeys to work. The original proposal for 10,000 houses is not supported, but around 3,000 houses are still likely to be required. Careful attention would be needed to control the potential for adverse impacts on the existing communities particularly at the historic village of Tong, for example by restricting new development to the West of the A41 to help protect the setting of Tong village and nearby Weston Park. Further, detailed work will be required to identify the infrastructure investment which will be required to manage the impact of the proposed development on local transport and other infrastructure, mitigate environmental impacts, and to justify the release of land from the Green Belt.

- 5.10 In response to a direction from the Inspector for the SAMDev Plan (2015), the Local Plan Review also includes a Green Belt Review. The Review is expected to provide for development needs well beyond the current Plan period to 2036. This will help to ensure that future housing and employment land requirements and policies will meet Shropshire's future needs and capture the particular opportunities in the east of the County over an extended period. The characteristics of the M54 corridor highlighted above and its general proximity/accessibility to the Black Country, mean that the opportunity to address a shortfall in cross boundary development needs are more favourable than those in alternative locations. In these circumstances, Shropshire Council considers that there is a 'once in a generation' opportunity to generate investment which will deliver significant benefits to the Shropshire economy.
- 5.11 Whilst a new town of 10,000 homes is not supported, it is considered that the potential development of a strategic employment site and more modest levels of associated housing as part of a new planned settlement in the Green Belt near Cosford as described above represents a significant positive growth opportunity for Shropshire which could:
- i. Deliver significant additional employment growth for the local population and attract new residents and employees in an identified growth corridor. This would complement the future development of RAF Cosford and existing employment in adjacent authorities in target sectors identified in the SEGS and as a direct contribution to addressing cross boundary employment needs;
  - ii. Deliver a high quality new planned community including appropriate services, facilities and infrastructure in a location which is attractive to housing developers, which would help to maintain housing delivery rates in Shropshire and could help to address unmet housing needs from adjacent areas.

## **6 Next steps**

- 6.1 Subject to Cabinet's approval, Council officers will work with neighbouring authorities; local communities; and other relevant stakeholders to develop positive proposals for Cabinet to consider later this year as part of the Local Plan Review's Preferred Strategic Sites consultation.

**List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)**

None

**Cabinet Member (Portfolio Holder)**

Robert Macey, Portfolio Holder for Planning and Housing Development

**Local Members**

Edward Bird, Kevin Turley, Claire Wild, Karen Calder, Rob Gittins, Paul Wynn

**Appendices**

None



**Committee and Date**

Cabinet

1 May 2019

**CABINET**

**Minutes of the meeting held on 20 March 2019**

**In the Shrewsbury Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND**

**11.00 am - 12.20 pm**

**Responsible Officer:** Amanda Holyoak

Email: amanda.holyoak@shropshire.gov.uk Tel: 01743 257714

**Present**

Councillor Peter Nutting (Chairman)

Councillors Steve Charmley (Deputy Leader), Nicholas Bardsley, Gwilym Butler, Steve Davenport, Robert Macey and Lezley Picton

**8 Apologies for Absence**

Apologies were received from Councillors Lee Chapman and David Minnery.

**9 Disclosable Pecuniary Interests**

None were declared.

**10 Minutes**

**RESOLVED:**

That the minutes of the meetings held on 27 February 2019 and 6 March 2019 be approved as a correct record and signed by the Leader.

**11 Public Question Time**

A question was submitted on behalf of the CPRE by Charles Green relating to the agenda item Shropshire Local Plan – Strategic Development Sites. A copy of the question and the response provided by the Portfolio Holder for Planning and Housing Development at the meeting is attached to the signed minutes.

**12 Member Question Time**

The Portfolio Holder for Transport and Highways responded to a question from Councillor David Vasmer in relation to the reopening of a path between Abbey Foregate and Platform 3 of Shrewsbury Train Station.

The Deputy Leader responded to a question from Councillor Roger Evans asking if the Council had any business arrangements with Interserve.



The Deputy Leader responded to a question from Councillor Kevin Turley asking about build figures on possible works for transitional units for Looked After Children and about tender lists.

A copy of the full questions and the responses provided to them is attached to the signed minutes and available on the Cabinet pages of the Council's website.

### **13 Scrutiny Items**

There were no Scrutiny items.

### **14 North Midlands Adoption & Permanency Partnership**

The Deputy Portfolio Holder for Education introduced the report of the Director of Children's Services seeking approval to proceed with the establishment of a Regional Adoption Agency. The approach taken meant that Shropshire would retain local independence whilst the resources, capacity and flexibility gained from partnership working would lead to improvements in service delivery, effective practice and long-term outcomes for children. A further report to Cabinet would follow in due course.

#### **RESOLVED:**

- A That Cabinet acknowledge the statutory requirement to be part of a Regional Adoption Agency (RAA) by the 1<sup>st</sup> April 2020, as set out in the Education and Adoption Act 2016.
- B That Cabinet approve the formation of a Regional Adoption Agency (RAA) between Staffordshire County Council, Stoke-on-Trent City Council, Shropshire Council and Telford & Wrekin Council.
- C That Cabinet approves the Outline Business Case (OBC) which sets out the ambition of Staffordshire County Council, Stoke-on-Trent City Council, Shropshire Council and Telford & Wrekin Council to go beyond adoption and develop a regional model of wider permanence which includes Fostering, Connected Persons and Special Guardianship Orders (SGO).

### **15 Proposed Hackney Carriage and Private Hire Licensing**

The Portfolio Holder for Community and Place Planning introduced the report of the Director of Public Health setting out the proposed updated Hackney Carriage and Private Hire Licensing Policy 2019 – 2023. He thanked the Strategic Licensing Committee for overseeing the work leading to this point. The Policy set out a high standard for taxis and drivers licensed in Shropshire and he urged residents of Shropshire to support them.

#### **RESOLVED:**

that Cabinet approves the proposed Hackney Carriage and Private Hire Licensing Policy 2019 - 2023, as set out in Appendix 1, and agrees that it is adopted by the Council and implemented with effect from the 1 April 2019.

## **16 Proposed Closure of Shropshire Council Bring Bank Sites**

The Portfolio Holder for Culture and Leisure introduced the report of the Director of Place on the proposed closure of Shropshire Council Bring Bank Sites to generate a saving of £237,000 per annum. The proposal supported the aim of making the savings required within the overall waste and recycling service to help establish a balanced budget for 2019/20, whilst minimising the impact on the overall service.

Responding to comments made by a number of Members addressing the meeting, the Portfolio Holder said that 89% of materials picked up from Bring Banks could have been collected more efficiently from the kerbside and the same service was effectively being provided twice. She also reported on the high contamination rate of materials left at Bring Banks, the use of Bring Banks for trade and commercial waste, and the fly tipping occurring at almost all sites. Alternative options for textiles were available through charity and commercial bring bank services.

The Deputy Leader reported that kerbside recycling in Shropshire was now 53.7% which was an all time high and 10% above the national average. A Member asked about the number of prosecutions for fly tipping and the Leader said this information would be provided, and that incidences of fly tipping were monitored carefully.

### **RESOLVED:**

That Cabinet approves the closure and removal of the Shropshire Council owned Bring Bank sites, and the budget for this service is removed.

## **17 Market Drayton Neighbourhood Development Plan**

The Portfolio Holder for Planning and Housing Development presented the report of the Director of Place explaining the conclusion of the Examiner's report that the Plan should not proceed to a referendum as it did not meet the nationally prescribed set of conditions. This was not binding on the Council but there would be a significant risk of challenge to the Authority should it decide to go against the Examiner's clear conclusions on the matter.

### **RESOLVED:**

- A That Cabinet agrees the conclusions of the Examiner's report into the Market Drayton Neighbourhood Development (Appendix 1) and that the plan in its current form should NOT proceed to referendum, and that this resolution be communicated through a decision notice published by Shropshire Council.
- B That Cabinet agrees that Shropshire Council, Market Drayton Town Council and other relevant Parish Councils continue to work constructively together to determine the most appropriate means of delivering the objectives of the draft Neighbourhood Development Plan.

## 18 **Woore Neighbourhood Development Plan**

The Portfolio Holder for Planning and Housing Development presented the report of the Executive Director – Places, seeking approval for the Woore Neighbourhood Development Plan to proceed to a referendum to determine if the Plan should be used for the purposes of determining planning applications in the neighbourhood area. He reported that the Examiners Report into the Plan concluded that it should be modified to meet the basic conditions and that it should be this modified version of the Plan which should proceed to referendum, which would take place between 9 May 2019 and 13 June 2019.

### **RESOLVED:**

- A That the Woore Neighbourhood Development meets the 'basic conditions' and all other legal requirements as summarised in the Independent Examiner's Report, subject to the modifications proposed in the Schedule of Modifications (Appendix 2)
- B That the required modifications be agreed to the Woore Neighbourhood Development Plan and that the Woore Neighbourhood Development Plan Referendum Version (March 2019) proceed to referendum.
- C That the referendum area be that as defined as the designated area to which the Neighbourhood Development Plan relates, i.e. the Woore parish boundary.
- D That the Executive Director for Place be authorised to exercise all the relevant powers and duties and undertake necessary arrangements for the Woore Neighbourhood Development Plan Referendum Version (March 2019) to now proceed to Referendum and for the Referendum to take place asking the question 'whether the voter wants Shropshire Council to use this neighbourhood plan for the Woore Neighbourhood Plan area to help it decide planning applications in this neighbourhood area'.

## 19 **Shropshire Local Plan Review - Strategic Development Sites**

The Portfolio Holder for Planning and Housing Development presented the report of the Director of Place seeking approval for the Council to continue work with site proposers and other stakeholders to develop positive proposals for development. The proposals provided strategic opportunities to deliver the objectives of Shropshire's Economic Growth Strategy across three strategic sites, former Ironbridge Power Station, Buildwas; Clive Barracks at Tern Hill and land near junction 3 of the M54.

A number of members addressed Cabinet making comments about meeting a proportion of unmet development needs from the Black Country Authorities; the need for developments to yield high paid jobs for Shropshire residents; meeting the demand for a Five Year Housing Supply; impact of development on green belt land; and ensuring communication with communities was effective so that Town and Parish Councils felt that they were being listened to.

The Portfolio Holder for Community and Place Planning emphasised the importance of having structured Community Governance arrangements in place ahead of sites coming forward for housing and development, to ensure sustainability and control.

It was confirmed that the Planning Policy Team were talking to officers from the Ministry of Defence but that the Tern Hill development would not happen as quickly as envisaged as it was now known that the land would not be available until 2025.

In response to comments made, the Portfolio Holder for Planning and Housing Development confirmed that these sites did not currently contribute to the Five Year Land supply targets as there would be challenges around delivering all of them. He confirmed that Shropshire residents would have access to the jobs and that the Ironbridge and Tern Hill sites were both Brownfield. Referring to the infrastructure pressure on Shifnal which had partly been due to Five Year Land Supply pressures, there would be an opportunity to plan ahead so a Master Plan approach could be taken. He understood the importance of the need to communicate and the purpose of this report was to keep people informed at an early stage.

It was confirmed that an update report would come back to Cabinet later in the year prior to any consultation activity.

**RESOLVED:**

That Cabinet approves the principle of further engagement with the proposers, neighbouring authorities, local communities and other relevant stakeholders to develop positive redevelopment proposals of strategic sites at the former Ironbridge Power Station at Buildwas and Clive Barracks at Tern Hill. These will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019;

That Cabinet approves in principle the potential to explore the benefits to Shropshire of accepting a proportion of unmet development needs from the Black Country Authorities, and to engage further with the proposers of land near Junction 3 of the M54; neighbouring authorities; local communities; and other relevant stakeholders to develop positive proposals to meet these development needs and provide local employment opportunities. This will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019.

**20 Exclusion of the Press and Public**

**RESOLVED:**

That, in accordance with the provisions of Schedule 12A of the Local Government Act 1972 and Paragraph 10.4 (3) of the Council's Access to Information Rules, the public and press be excluded from the meeting for the following item.

**21 Housing Revenue Account - Purchase of Development Land Weston Rhyn**

The Deputy Leader and Portfolio Holder for Corporate and Commercial Support presented an exempt report of the Director of Place relating to a land purchase in Weston Rhyn through the Council's Housing Revenue Account (HRA).

**RESOLVED:**

that the recommendations in the exempt report of the Director of Place be approved.

Signed ..... (Chairman)

Date: .....



**Summary of decisions taken by  
the Cabinet  
on Wednesday, 20 March 2019**

<b>Agenda Item No</b>	<b>Topic</b>	<b>Decision</b>
<b>3</b>	Minutes	<p><b>RESOLVED:</b></p> <p>That the minutes of the meetings held on 27 February 2019 and 6 March 2019 be approved as a correct record and signed by the Leader.</p>
<b>7</b>	North Midlands Adoption & Permanency Partnership	<p><b>RESOLVED:</b></p> <p>that Cabinet acknowledge the statutory requirement to be part of a Regional Adoption Agency (RAA) by the 1<sup>st</sup> April 2020, as set out in the Education and Adoption Act 2016.</p> <p>that Cabinet approve the formation of a Regional Adoption Agency (RAA) between Staffordshire County Council, Stoke-on-Trent City Council, Shropshire Council and Telford &amp; Wrekin Council.</p> <p>that Cabinet approves the Outline Business Case (OBC) which sets out the ambition of Staffordshire County Council, Stoke-on-Trent City Council, Shropshire Council and Telford &amp; Wrekin Council to go beyond adoption and develop a regional model of wider permanence which includes Fostering, Connected Persons and Special Guardianship Orders (SGO).</p>
<b>8</b>	Proposed Hackney Carriage and Private Hire Licensing	<p><b>RESOLVED:</b></p> <p>that Cabinet approves the proposed Hackney Carriage and Private Hire Licensing Policy 2019 - 2023, as set out in Appendix 1, and agrees that it is adopted by the Council and implemented with effect from the 1 April 2019.</p>
<b>9</b>	Proposed Closure of Shropshire Council Bring Bank Sites	<p><b>RESOLVED:</b></p> <p>that Cabinet approves the closure and removal of the Shropshire Council owned Bring Bank sites, and the budget for this service is removed.</p>

Agenda Item No	Topic	Decision
10	Market Drayton Neighbourhood Development Plan	<p><b>RESOLVED:</b></p> <p>that Cabinet agrees the conclusions of the Examiner's report into the Market Drayton Neighbourhood Development (Appendix 1) and that the plan in its current form should NOT proceed to referendum, and that this resolution be communicated through a decision notice published by Shropshire Council.</p> <p>that Cabinet agrees that Shropshire Council, Market Drayton Town Council and other relevant Parish Councils continue to work constructively together to determine the most appropriate means of delivering the objectives of the draft Neighbourhood Development Plan.</p>
11	Woore Neighbourhood Development Plan	<p><b>RESOLVED:</b></p> <p>That the Woore Neighbourhood Development meets the 'basic conditions' and all other legal requirements as summarised in the Independent Examiner's Report, subject to the modifications proposed in the Schedule of Modifications (Appendix 2)</p> <p>That the required modifications be agreed to the Woore Neighbourhood Development Plan and that the Woore Neighbourhood Development Plan Referendum Version (March 2019) proceed to referendum.</p> <p>That the referendum area be that as defined as the designated area to which the Neighbourhood Development Plan relates, i.e. the Woore parish boundary.</p> <p>That the Executive Director for Place be authorised to exercise all the relevant powers and duties and undertake necessary arrangements for the Woore Neighbourhood Development Plan Referendum Version (March 2019) to now proceed to Referendum and for the Referendum to take place asking the question 'whether the voter wants Shropshire Council to use this neighbourhood plan for the Woore Neighbourhood Plan area to help it decide planning applications in this neighbourhood area'.</p>

<b>Agenda Item No</b>	<b>Topic</b>	<b>Decision</b>
<b>12</b>	Shropshire Local Plan Review - Strategic Development Sites	<p><b>RESOLVED:</b></p> <p>That Cabinet approves the principle of further engagement with the proposers, neighbouring authorities, local communities and other relevant stakeholders to develop positive redevelopment proposals of strategic sites at the former Ironbridge Power Station at Buildwas and Clive Barracks at Tern Hill. These will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019;</p> <p>That Cabinet approves in principle the potential to explore the benefits to Shropshire of accepting a proportion of unmet development needs from the Black Country Authorities, and to engage further with the proposers of land near Junction 3 of the M54; neighbouring authorities; local communities; and other relevant stakeholders to develop positive proposals to meet these development needs and provide local employment opportunities. This will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019.</p>
<b>14</b>	Housing Revenue Account - Purchase of Development Land Weston Rhyn	<p><b>RESOLVED:</b></p> <p>that the recommendations in the exempt report of the Director of Place be approved.</p>



**GREATER BIRMINGHAM AND BLACK COUNTRY HMA WORKING GROUP**

**Thursday 11 April 14:00, Rooms 201, One Lancaster Circus, Birmingham**

**AGENDA**

- 1. Apologies and introductions**
- 2. Notes of last meeting**
- 3. Purpose of meeting**
- 4. TfWM land use monitoring and demographic services presentation**
- 5. Local Plan updates**
- 6. GBBCHMA shortfall progress**
- 7. GWMCA Housing Deal progress**
- 8. Next steps – Statement (s) of Common Ground**
- 9. Date of next meeting**

<p align="center"><b>Greater Birmingham and Black Country Housing Market Area Working Group</b></p> <p align="center"><b>Notes of meeting Thursday 11<sup>th</sup> April 2019 @14:00</b></p> <p align="center"><b>Rooms 201, One Lancaster Circus, Birmingham</b></p>		
<p><b>In attendance:</b> Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), Kelly Harris (South Staffordshire), Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sarah Jones (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Sushil Birdi (Tamworth), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Dan Corden (Shropshire), Pat Willoughby (WMCA), Rob Haigh (Coventry), Alex Smith (TfWM)</p>		
1	<b>Apologies:</b>	
1.1	Dorothy Barratt (North Warwickshire), Vicki Popplewell (Dudley)	
2	<b>Notes of last meeting</b>	
2.1	Page 1: MDu would be representing Bromsgrove and Redditch, but Redditch only for WMCA matter.	
3	<b>Purpose of meeting</b>	
3.1	[REDACTED]	
3.2	[REDACTED]	
4	<b>TfWM Monitoring</b>	
4.1	<p>[REDACTED]</p> <ul style="list-style-type: none"> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> </ul>	

4.2	<div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>	AS/MS
4	<b>GBBCHMA shortfall progress</b>	AD
4.1	<div> <div></div> <div></div> <div></div> <div></div> </div>	
4.2	<div> <div></div> <div></div> <div></div> </div>	
4.3	<div> <div></div> <div></div> <div></div> </div>	
4.4	<div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>	ALL
4.5	<div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>	ALL
4.6	<div> <div></div> <div></div> </div>	AD
5	<b>WMCA housing Deal progress</b>	
5.1	<div> <div></div> <div></div> <div></div> </div>	
5.2	<div> <div></div> <div></div> <div></div> </div>	

5.3	[REDACTED]	DC/RH/AD
5.4	[REDACTED] [REDACTED] [REDACTED] [REDACTED]  [REDACTED] [REDACTED]	
5.5	[REDACTED] [REDACTED] [REDACTED]	AD
6	<b>Local Plan reviews</b>	
6.1	<b>Black Country</b>  Leaders' summit scheduled for June and emerging Green Belt assessment findings will be considered along with subsequent review timetable.	
6.2	<b>Birmingham</b>  [REDACTED]	[REDACTED]
6.3	<b>Cannock Chase</b>  [REDACTED] [REDACTED]	
6.4	<b>Solihull</b>  [REDACTED]	
6.5	<b>Stratford on Avon</b>  [REDACTED]	
6.6	<b>Lichfield</b>  [REDACTED]	
6.7	<b>South Staffordshire</b>  [REDACTED]	
6.8	<b>Bromsgrove and Redditch</b>  [REDACTED]	

6.9	<b>Tamworth</b> 	
6.10	<b>Coventry</b> 	
6.11	<b>Shropshire</b> Local Plan Review Preferred Strategic Sites consultation later in 2019.	
6.12	<b>North Warwickshire</b> 	
7	<b>Statement of Common Ground</b>	
7.1		ALL
8	<b>Any other business</b>	
8.1		
8.2		
9	<b>Date of next meeting</b>	
9.1	To be determined	

Ian Culley  
Lead Planning Manager (Regional Strategy)  
City of Wolverhampton Council  
Civic Centre  
St Peter's Square  
Wolverhampton  
WV1 1RP

Shropshire Council  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire SY2 6ND

Date: 26 April 2019

My Ref:

Your Ref

Dear Ian

I write further to the letter received from ABCA of 8<sup>th</sup> February 2019 which confirmed that, even by increasing densities and looking to other sources of urban land supply there will remain a shortfall in the region of 22,000 dwellings and 300ha of employment land.

The letter also recognised the opportunity for further investment near RAF Cosford in Shropshire to strengthen the economic role of the M54 Corridor and support the nationally significant clusters of aerospace and high technology manufacturing activity in the Black Country around M54 Junction 2. ABCA noted that the area benefits from strong physical connections to the Black Country in the form of the M54 and rail line and could be well placed to directly meet a proportion of the unmet employment land and housing needs arising from the Black Country and wider HMA.

On 20<sup>th</sup> March 2019, Shropshire Council's Cabinet approved in principle to explore the benefits to Shropshire of accepting a proportion of unmet development needs from the Black Country Authorities, and to engage further with neighbouring authorities to develop positive proposals to meet these development needs and provide local employment opportunities. We anticipate that this will then be brought forward for Cabinet to consider as part of the Local Plan Review Preferred Strategic Sites consultation later in 2019.

Our earlier response recognised that there may be an opportunity for a proportion of the Local Plan housing allocations to be attributed to meeting needs arising in the Black Country whilst at the same time achieving Shropshire's strategic growth aspirations. However, in order to be able to make a positive recommendation to our members to allocate land at Junction 3, we are likely to require some publishable evidence if we are to be able to justify the release of such a large quantity of Green Belt land, including:

1. A review of the strategic Green Belt review including Landscape Sensitivity Assessment recently commissioned from LUC for the Black Country and South Staffordshire;
2. An outline of potential alternative opportunities (including those in the West Midlands Green Belt) which are available to meet unmet Black Country development needs;
3. A commitment to entering into a NPPF compliant statement of common ground with neighbouring authorities;
4. Support for engagement with key funding bodies including WMCA and relevant LEs, infrastructure providers and Homes England;
5. Headline outcomes from the West Midlands Strategic Employment Study, 2019 which is currently being carried out by Arcadis and Avison Young.

Ideally a response on as many of these items as possible would be available to accompany our report to Cabinet on 12<sup>th</sup> June regarding the potential allocation of preferred strategic sites, although we accept that your current Local Plan timetable and local elections may frustrate the availability of some detailed evidence. Further detailed evidence could therefore be provided as part of any response from ABCA during the subsequent consultation which will take place over the coming summer.

I look forward to hearing from you and am very happy to discuss the details of this request by phone as required.

Yours sincerely

**Gemma Davies**

Assistant Director Economic Growth  
gemma.davies@shropshire.gov.uk  
(01743) 258985

13 May 2019

Gemma Davies  
Assistant Director Economic Growth  
Shropshire Council  
Shirehall Abbey  
Foregate  
Shrewsbury  
Shropshire SY2 6ND

Dear Gemma,

Thank you for your letter of 26<sup>th</sup> April.

We are encouraged by the Council's decision to engage positively with the Black Country local authorities with a view to explore the opportunity to accept a proportion of our unmet housing and employment land needs. In this context, we are grateful of being given the opportunity to provide additional evidence to enable you to make a positive recommendation to members to allocate land at M54 junction 3 for employment-led mixed use development.

Your letter seeks information on five specific issues and our response is set out below:

1. Green Belt Study. The Black Country local authorities and South Staffordshire Council commissioned a Green Belt Study and Landscape Sensitivity Assessment from LUC consultants in September 2018. This work has been completed in draft form and we anticipate the final Report being completed in May of this year. The Black Country authorities have also commissioned a Historic Landscape Characterisation Assessment and a suite of Conservation Area appraisals to support this work and these studies should be completed to the same timescale. This work will provide a comprehensive and detailed assessment of the scale of environmental constraints across the Black Country green belt in the light of the need to explore opportunities to meet our housing and employment land requirements.
2. Alternative approaches. The Black Country has a significant level of unmet need in the order of 22,000 homes and 300ha of employment land up to 2036. Meeting this need is a key challenge for the Black Country Plan and we are addressing it through a combination of understanding new opportunities within the Black Country administrative area but outside the existing urban area and ongoing discussions with neighbouring authorities through the Duty to Cooperate. The status of this work is summarised below.



The status of the Black Country Green Belt Study and associated work is summarised above. At this stage, it is not possible to advise on the extent to which the work will identify additional housing or employment land capacity to accommodate the shortfall. However, I draw your attention to the February 2018 Greater Birmingham HMA Strategic Growth Study which includes a strategic green belt assessment and sought to identify broad areas of search for future housing growth. The Study confirms that, at this strategic level, the majority of the Black Country green belt makes a principal contribution towards green belt purposes, and its capacity to accommodate large scale development is limited. The Study can be accessed via the following link - <http://blackcountrycorestrategy.dudley.gov.uk/t2/>

Through the Duty to Cooperate, in July 2018 ABCA wrote to all local authorities within the Birmingham and Black Country Housing Market Area (HMA), and those other local authorities which have a functional or physical relationship with the Black Country to understand if they would consider accommodating some of our unmet housing and employment land needs. The responses to this letter are published on the Black Country Plan website (<http://blackcountrycorestrategy.dudley.gov.uk/t1/p5/>). The responses to this letter were mixed, and no local authorities have made a binding commitment to contributing towards addressing the shortfall. A number confirmed that they would be testing their ability to make a contribution through the Local Plan preparation process – most notably South Staffordshire and Shropshire. In addition, and since replying to this letter, both Lichfield and Cannock Chase Councils have progressed their Local Plans by publishing consultation documents which include a potential contribution to meeting wider HMA needs.

The South Staffordshire Local Plan Issues and Options Report (2018) includes a preferred housing target which is based on a 4,000 home contribution towards the HMA, the Lichfield Local Preferred Options Consultation (2019) includes a proposal to test between 3-4,500 homes to meet the needs of the HMA, and the approved Cannock Chase Local Plan Issues and Options consultation (2019) proposes that the Plan will test accommodating between 500 and 2,500 homes of unmet need from the HMA. In total, these proposals could deliver up to 11,000 homes over and above locally generated needs towards the unmet needs of the HMA. However, this contribution would not necessarily be exclusive to the Black Country and would need to have regard to any shortfalls across the HMA as a whole, including needs arising in Birmingham. This 'discounting' would reduce the contribution towards the Black Country, and a significant shortfall would remain.

With the exception of Shropshire, and those areas summarised above, other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs.

In this context, the strategic opportunity at M54 J3 of some 50ha of employment land, supported by provision of 3,000 homes to contribute towards meeting both the employment and housing needs of the Black Country would therefore make significant quantitative headway in addressing unmet needs for both employment land and housing in the Black Country.

3. Statement of Common Ground. I confirm that the Black Country see a Statement of Common Ground as an appropriate mechanism to formalise any issues of strategic cross-boundary significance including housing and employment land.
4. We are encouraged that the M54 corridor is identified as a strategic opportunity in the West Midlands Combined Authority Strategic Investment and Delivery Plan (SIDP). The SIDP was approved by the WMCA Housing and Land Board in February 2019, which includes the four Black Country as constituent members. Our response to the Shropshire Preferred Sites consultation recognised the opportunity for further investment in this location to strengthen the role of the M54 Corridor and to complement nationally significant clusters of aerospace and high technology manufacturing activity in the Black Country around M54 Junction 2.
5. The 2019 West Midlands Strategic Employment Study (WMSES) is anticipated to be completed in May-June of this year with publication to follow. The work flows from the 2015 Strategic Employment Sites Study which found that the Black Country and Southern Staffordshire has a severe lack of strategic employment land on sites of a minimum of some 25ha in size to meet demand for large industrial units. This conclusion is consistent with the technical work undertaken to support the Black Country Plan, in particular the 2017 Economic Development Needs Assessment (EDNA).

I trust you find this information helpful and if you require any further details please contact me.

Yours sincerely,

Ian Culley  
Lead Planning Manager – Regional Strategy  
Planning  
City Of Wolverhampton Council (on Behalf of the Black Country Authorities)

Direct: 01902 555636  
Email: [ian.culley@wolverhampton.gov.uk](mailto:ian.culley@wolverhampton.gov.uk)

**From:** Gemma Davies

**Sent:** 27 June 2019 14:45

**To:** Ian Culley

**Cc:** Paula Ryan

Adrian Allman

Edward West

Dan Corden

**Subject:** FW: Black Country Authority Response to Letter of 26 April

**Importance:** High

Hi Ian

Good to talk with you yesterday afternoon. I will update our Cabinet members this afternoon and let you know when this is completed.

This is the response that we are proposing to put into the public domain along with my letter to you on Monday as part of our evidence for this stage of consultation.

Please confirm that you are happy for this to be included and shared publically.

Kind regards

Gemma

Gemma Davies

Assistant Director Economic Growth

Shropshire Council

**From:** Michele Ross

**Sent:** 13 May 2019 12:22

**To:** Gemma Davies

**Cc:** Ian Culley

; Mike Smith

; Andy Miller

Carl Mellor

; Elizabeth

Vesty

; Adrian Cooper

; Vicki Popplewell

**Subject:** Black Country Authority Response to Letter of 26 April

**Sensitivity:** PROTECT

Hi Gemma,

On behalf of the Black Country authorities, please find attached a response to your letter of 26<sup>th</sup> April. Ian is on leave this week so if you have any queries please get in touch.

Kind Regards,

Michele Ross

Lead Planning Manager (Sub - Regional Strategy)

City of Wolverhampton Council

BC Plan - Meeting

FileMeetingScheduling AssistantInsertDrawFormat TextReviewHelpTell me what you want to do

DeleteCopy to My CalendarForward

Calendar

ResourceFinder

Resource Central

MeetingNotes

Meeting Notes

AcceptTentativeDeclinePropose New Respond

Respond

Show As: Busy

Options

Reminder: None

Options

Categorize

Tags

PrivateHigh ImportanceLow Importance

Tags

Dictate

Voice

Accepted on 01/07/2019 08:41.

BC Plan

Organizer

Gemma Davies

Sent Thu 27/06/2019 11:33

Time

11 July 2019 10:00-11:30

Location

MR3 West Wing

Response

Accepted

Change Response

In Shared FolderCalendar

Last modified by Adrian Cooper on 13/07/2021

Type here to search

14:57

24/08/2022

21

Page 65

**From:** [Adrian Cooper](#)  
**To:** [Robert Macey](#); [Gemma Davies](#)  
**Cc:** [Dan Corden](#)  
**Subject:** RE: Black Country  
**Date:** 11 July 2019 15:49:15

---

Thanks Rob,

We also felt that it went well and that we were able to deal effectively with the questions. We had a very productive meeting with colleagues from the BC today. Their shortfall looks set to increase to 25,000 homes and around 380Ha of employment land reflecting a change to the Plan period which will now run to 2038.

They will respond to our current consultation, but are also proposing to prepare a 'position paper' for agreement by ABCA which will deal with the key issues and information which we require. They are amenable to preparing a formal 'Statement of Common Ground' with us for submission to our Plan Examination.

They are also keen to support us in seeking investment for strategic infrastructure in the M54 corridor from the WMCA in a way which manages the risk that this is presented as the WMCA directly supporting the delivery of development on Green Belt land.

Please contact Dan Corden if you have any queries about the consultation events at Ironbridge or Tern Hill in my absence next week.

Kind Regards

[Adrian Cooper](#) MA (Hons) MSc MSc MRTPI  
Planning Policy & Strategy Manager, Economic Growth  
Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury SY2 6ND  
Chair, West Midlands Resource Technical Advisory Body  
<http://www.westmidlandsiep.gov.uk/rtab>  
Chair, West Midlands Aggregates Working Party

---

**From:** Robert Macey  
**Sent:** 11 July 2019 15:19  
**To:** Gemma Davies

Adrian Cooper

**Subject:** Black Country

Hi Both,

If someone could feed back to me on your meeting that would be helpful please.

Thank you for last night I think it went well.

Regards,

Robert Macey

Shropshire Councillor for Gobowen, Selattyn and Weston Rhyn  
Portfolio Holder for Housing and Strategic Planning

This email and any attachments to it (the 'Email') are intended for a specific recipient(s) and its contents may be confidential, privileged and/or otherwise protected by law. If you are not the intended recipient or have received this Email in error, please notify the sender immediately by telephone or email, and delete it from your records. You must not disclose, distribute, copy or otherwise use this Email.



**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL  
MONITORING WORKING GROUP**

**Thursday 19<sup>th</sup> September 2019, 14:00 – 16:00, Room 116, 16 Summer Lane, Birmingham,  
B19 3SD**

**AGENDA**

1. Apologies / introductions and purpose of meeting
2. Notes of last meeting
3. TfWM land use monitoring data
4. GBBCHMA - Refreshed Position Statement
5. WMCA Housing Deal – Monitoring progress towards 215,000 homes
6. SoCG scoping note
7. Local Plan updates (inc. beyond HMA area)
8. Next steps – Statement (s) of Common Ground
9. Date of next meeting



<p align="center"><b>Greater Birmingham and Black Country Housing Market Area Working Group</b></p> <p align="center"><b>Notes of meeting 5 November 2019,</b></p> <p align="center"><b>Room 116, WMCA Offices, 16 Summer Lane, Birmingham</b></p>		
<p><b>In attendance:</b> Ashley Baldwin (Lichfield), Ian Culley (Wolverhampton), , Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Sahar Khan (Birmingham, Mike Dittman (North Warwickshire), Andy Donnelly (West Midlands Metropolitan Authorities), Sarah Jones (Cannock Chase), Mike Dunphy (Bromsgrove and Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Ian Stevens (Telford and Wrekin), Pat Willoughby (WMCA), Vicki Popplewell (Dudley), Ross Parker (Coventry), Adrian Cooper (Shropshire), Kelly Harris (South Staffordshire)</p>		
		Actions
1	<b>Apologies:</b>	
1.1	Richard Powell (Tamworth), Victoria Chapman (Rugby)	
2	<b>Notes of last meeting</b>	
2.1	████████████████████	
3	<b>TfWM monitoring</b>	
3.1	████████████████████████████████████████ ████████████████	
4	<b>GBBCHMA Position Statement / Monitoring towards Housing Deal 215,000</b>	
4.1	Latest data submitted (April 2018) shows that shortfall to 2031 largely been met. Black Country, however, advised that it was reviewing its urban capacity work, particularly employment sites likely to come forward and that this was likely to result in a reduction in capacity.	
4.2	Agreed that Black Country authorities to provide an update by the end of October for consideration at a future meeting of this group to be arranged for early November. Intention that this evidence in public domain in November.	BC authorities
4.3	████████████████████████████████████████ ████████████████████████████████████████ ████████████████████████████████████████ ████████████	
4.4	████████████████████████████████████████ ████████████████████████████████████████	

5	<b>Local Plan reviews</b>	AD
5.1	<b>Lichfield</b> [REDACTED] [REDACTED]	ALL
5.2	<b>South Staffordshire</b> [REDACTED] [REDACTED] [REDACTED]	
5.3	<b>Cannock Chase</b> [REDACTED]	
5.4	<b>North Warwickshire</b> [REDACTED] [REDACTED] [REDACTED]	
5.5	<b>Shropshire</b> – Strategic Sites phase of consultation now completed. Regulation 19 plan scheduled for March 2020, with submission to SoS by end of July.	
5.6	<b>Bromsgrove</b> [REDACTED] [REDACTED]	
5.7	<b>Redditch</b> [REDACTED]	
5.8	<b>Birmingham</b> [REDACTED] [REDACTED] [REDACTED]	
5.9	<b>Stratford on Avon</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
5.10	<b>Coventry</b> [REDACTED] [REDACTED]	
5.11	<b>Telford and Wrekin / Solihull</b> [REDACTED]	
6	<b>SoCG Scoping Note</b>	
6.1	[REDACTED] [REDACTED]	ALL
7	<b>Any other business</b>	
7.1	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	AD

8	<b>Date of next meeting</b>	
9.1	Next meeting scheduled for 11 <sup>th</sup> December 2019 @ 10:00, room 116, WMCA offices. Interim meeting for early November to be scheduled (see 4.2)	



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW  
Date: 30 September 2019  
Please ask for: Christine Williams

Gemma Davies  
Head of Economic Growth  
Shropshire Council  
Shirehall Abbey  
Foregate  
Shrewsbury  
Shropshire SY2 6ND

Dear Ms Davies

**Shropshire Local Plan Review – Strategic Sites consultation**

Thank you for consulting the Black Country authorities on the Shropshire Local Plan Review. This letter is to confirm that following our meeting on 25 September 2019, the Association of Black Country Authorities (ABCA) endorsed the officer response sent to you by Michele Ross on 9 September 2019 (copy enclosed).

We would welcome the opportunity to continue to work with Shropshire District Council in a positive and constructive manner through the preparation of the Local Plan Review.

We trust you find these comments helpful and look forward to further discussions with you. If you would like to discuss our response please contact Ian Culley, Lead Planning Manager at Wolverhampton Council.

Yours sincerely

Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council

Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council

Councillor Yvonne Davies  
Leader  
Sandwell Metropolitan Borough Council

Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council

Dr Helen Paterson, Secretary to ABCA  
Walsall Metropolitan Borough Council,  
The Civic Centre, Darwall Street, Walsall, WS1 1TP.

## **APPENDIX 1**



9 September 2019

Gemma Davies  
Head of Economic Growth  
Shropshire Council  
Shirehall Abbey  
Foregate  
Shrewsbury  
Shropshire SY2 6ND

Dear Gemma,

### **Shropshire Local Plan Review – Strategic Sites consultation**

Thank you for consulting the Black Country authorities on the Local Plan Review.

This letter contains the response of the Association of Black Country Authorities (ABCA) to the Strategic Sites Consultation. In summary, ABCA strongly supports the potential for land at M54 junction 3 to be allocated in the next stage of the Local Plan review. We consider it presents a unique and once in a generation opportunity to drive forward the realisation of Shropshire's economic growth ambitions and at the same time form part of the strategic solution to meeting housing and employment land needs arising in the Black Country. Our detailed reasoning and justification for this position is set out below.

### **Background**

You will recall that we wrote to you in July last year regarding the issue of housing and employment need across the Black Country and how it could be met. The letter asked for information on your Plan-making programme and to understand the opportunity for housing and employment development proposals identified in your Plan to meet needs arising from the Black Country.

In our response to the subsequent Preferred Sites consultation in November last year we welcomed the references in the document to 'supporting the growth aspirations of neighbouring areas' and within this context the spatial focus on the north and east of the County. This approach builds on existing physical and functional relationships between the Black Country and Shropshire, and recognises the opportunity for the Plan to accommodate mutually supportive cross-boundary growth needs in a sustainable manner.

### **The Strategic Sites consultation**

## **APPENDIX 1**

We fully endorse the references in the Strategic Sites consultation document to the junction 3 site as representing a 'once in a generation' opportunity to meet cross-boundary needs, through delivery of nationally significant employment opportunities, high quality housing and a local centre to provide services, facilities and infrastructure as part of a planned new settlement within an important strategic corridor. We also recognize that a number of significant issues need to be resolved before the Council would be able to choose the site as a preferred location for development and these issues are listed in paragraph 3.28 of the Strategic Sites consultation document:

1. Assessment of alternative options available to the Black Country for meeting the housing and employment needs arising in the Black Country;
2. The outcome of the Black Country Green Belt review;
3. Infrastructure capacity assessment to identify key impacts and investment requirements;
4. Infrastructure funding;
5. The views of neighbouring authorities, Government agencies and major infrastructure providers; and
6. Further evidence to support the economic development context.

We address these issues in turn below, focussing on (1) and (2).

1. **Alternative options.** The Strategic Sites consultation report correctly summarizes that the Black Country has a significant level of unmet need in the order of 22,000 homes and 300ha of employment land up to 2036. Following a review of our Plan timetable over the Summer of this year, we can confirm that the Plan will have an extended term to 2038, extending the gap further to around 26,000 homes and up to 380ha of employment land.

We recognize that paragraph 137 of the NPPF requires the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting identified development needs before concluding that exceptional circumstances exist to justify changes to the Green Belt. In this context, this requires Shropshire Council to be satisfied that the Black Country can show that:

- a) We have made as much use as possible of suitable brownfield sites and underutilized land;
- b) We have optimized the density of development;
- c) We have engaged with neighbouring authorities about whether they could accommodate some of this identified need, as demonstrated through the statement of common ground.

In terms of tests (a) and (b) we have fully explored the capacity of the Black Country urban area by making use of all suitable and deliverable land and buildings identified in the most recent Strategic Housing Land Availability Assessments (SHLAAs) and assessing the potential impact of increasing

## **APPENDIX 1**

densities in accessible locations, as set out in the most recent Urban Capacity Review report. We intend to update and re-publish this evidence in November 2019.

In relation to test (c), we confirm that we have engaged with neighbouring authorities to determine whether there are firstly any non-Green Belt locations which could be brought forward to meet our needs, and secondly, through the Plan review process, whether suitably located Green Belt locations could be brought forward. Through the Duty to Cooperate, in July 2018 ABCA wrote to all local authorities within the Birmingham and Black Country Housing Market Area (HMA), and those other local authorities which have a functional or physical relationship with the Black Country to understand if they would consider accommodating some of our unmet housing and employment land needs. The responses to this letter are published on the Black Country Plan website (<http://blackcountrycorestrategy.dudley.gov.uk/t1/p5/>).

The responses to this letter were mixed, and no local authorities have made a binding commitment in the form of the required statement of common ground to contributing towards addressing the shortfall. A number confirmed that they would be testing their ability to make a contribution through the Local Plan preparation process – most notably South Staffordshire and Shropshire. In addition, and since replying to this letter, both Lichfield and Cannock Chase Councils have progressed their Local Plans by publishing consultation documents which include a potential contribution to meeting wider HMA needs.

The South Staffordshire Local Plan Issues and Options Report (2018) includes a preferred housing target which is based on a 4,000 home contribution towards the HMA, the Lichfield Local Preferred Options Consultation (2019) includes a proposal to test between 3-4,500 homes to meet the needs of the HMA, and the approved Cannock Chase Local Plan Issues and Options consultation (2019) proposes that the Plan will test accommodating between 500 and 2,500 homes of unmet need from the HMA. In total, these proposals could deliver up to 11,000 homes over and above locally generated needs towards the unmet needs of the HMA. However, this contribution would not necessarily be exclusive to the Black Country and would need to have regard to any shortfalls across the HMA as a whole, including needs arising in Birmingham, where appropriate. This ‘discounting’ would reduce the contribution towards the Black Country, and a significant shortfall would remain.

In summary, with the exception of Shropshire, and those areas summarised above, other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs. We take the view the Black Country has addressed the requirements of test (c) of paragraph 137, and we therefore consider that exceptional circumstances exist that can justify the release of Green Belt land in Shropshire.

## **APPENDIX 1**

2. **Green Belt assessment.** The Black Country local authorities and South Staffordshire Council commissioned a Green Belt Study and Landscape Sensitivity Assessment from LUC consultants in September 2018. This work has been completed in draft form and we anticipate the final Report being published in November of this year. The Black Country authorities have also commissioned a Historic Landscape Characterization Assessment and a suite of Conservation Area and Ecological appraisals to support this work and these studies should be completed to the same timescale. This work will provide a comprehensive and detailed assessment of the scale of environmental constraints across the Black Country green belt. This work is being used as a key element of the site assessment workstream which will directly inform the draft Plan.

At this stage, it is not possible to advise with any precision on the extent to which the work will identify additional housing or employment land capacity within the Black Country Green Belt to accommodate the shortfall. However, I draw your attention to the February 2018 Greater Birmingham HMA Strategic Growth Study which includes a strategic Green Belt assessment and sought to identify broad areas of search for future housing growth. The Study confirms that, at this strategic level, the majority of the Black Country Green Belt makes a principal contribution towards green belt purposes, and its capacity to accommodate large scale development is limited. The Study can be accessed via the following link -

<http://blackcountrycorestrategy.dudley.gov.uk/t2/>

While the Green Belt assessment and associated workstreams focus on physical capacity, it is also appropriate to consider issues of market deliverability. In the case of the Birmingham Plan, the Peter Brett Associates (PBA) Delivery Study<sup>1</sup> concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan<sup>2</sup>. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands. Given that the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for delivery of housing, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained physical capacity identified within the Green Belt, it may well be that a Delivery Study (based on similar principles to that completed by PBA for Birmingham), could reasonably conclude that these two nominal housing market areas could only be expected to deliver up to 5,000 homes each over the 15-year Plan period, based on upon what the market can be expected to deliver. This would therefore only provide up to 10,000 homes in total leaving a significant shortfall to be met in neighbouring authorities.

---

<sup>1</sup> [https://www.birmingham.gov.uk/downloads/file/1750/pg3\\_housing\\_delivery\\_on\\_green\\_belt\\_options\\_2013pdf](https://www.birmingham.gov.uk/downloads/file/1750/pg3_housing_delivery_on_green_belt_options_2013pdf)

<sup>2</sup>

[https://www.birmingham.gov.uk/downloads/file/1211/strategic\\_housing\\_market\\_assessment\\_2013\\_housing\\_targets\\_2011\\_to\\_2031\\_technical\\_paper](https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper)



## **APPENDIX 1**

For these reasons, we do not think it would be reasonable to conceive that there will be sufficient deliverable capacity in the Black Country Green Belt of a scale to meet our identified needs.

The Black Country has a strong functional economic relationship with Shropshire. 2011 commuting patterns between the Black Country and Shropshire suggest that some 2,180 working age residents from the Black Country travelled to work in Shropshire and that 4,615 residents from Shropshire travelled to work in the Black Country. The strongest relationship is with Wolverhampton, where some 1,058 residents travelled to work in Shropshire and 2,346 residents from Shropshire travelled to work in Wolverhampton.

When turning to migration data, between 2010/11 and 2017/18 the total number of residents exported from the Black Country to Shropshire was 16,100 and 7,320 exported from Shropshire to the Black Country. This equated to a net total of 8,810 people migrating from the Black Country to Shropshire.

In this context, the site identified at junction 3 of the M54 has direct access into the Black Country via the motorway and the existing railway station at Cosford, with a journey time of less than 20 minutes to Wolverhampton railway station and around 30 minutes to Sandwell & Dudley railway station. This degree of proximity and connectivity makes it well placed to accommodate housing and employment needs arising within the Black Country. In addition, whilst the Black Country authorities' first preference for development for employment would be in locations within or adjoining our existing urban areas, the future development of Cosford might provide opportunities that would not arise elsewhere.

3. **Infrastructure** capacity assessment to identify key impacts and investment requirements. We understand that the promoter of the site at M54 junction 3 is providing a range of evidence to address this issue and the Black Country local authorities are happy to assist the Council if you require any information from us.
4. **Infrastructure funding.** We are encouraged that the M54 corridor is identified as a strategic opportunity in the West Midlands Combined Authority Strategic Investment and Delivery Plan (SIDP), approved by the WMCA Housing and Land Board in February 2019. We also note that the M54/A5 Corridor is identified within the Economic Growth Strategy for Shropshire as a strategic corridor. This degree of alignment with regional and sub-regional economic development strategies means that growth opportunities within the Corridor could be well-placed to secure funding from a range of sources.
5. **The views of neighbouring authorities.** As stated above, the Black Country local authorities are supportive of the junction 3 allocation of the site in the Local Plan review.

## **APPENDIX 1**

6. **Further evidence** to support the economic development context. The 2019 West Midlands Strategic Employment Study (WMSES) is anticipated to be completed in August of this year with publication to follow. The work flows from the 2015 Strategic Employment Sites Study, which found that the Black Country and Southern Staffordshire has a severe lack of strategic employment land on sites of a minimum of some 25ha in size to meet demand for large industrial units. This conclusion is consistent with the technical work undertaken to support the Black Country Plan, in particular the 2017 Economic Development Needs Assessment (EDNA).

We also note the conclusions and recommendations of the M54 Growth Corridor – Strategic Options Study commissioned by Shropshire Council and completed by Avison Young in June of this year. This Report recommends that the M54 Corridor as being ‘ripe for investment’ and that the Council should bring forward strategic allocations to meet market demand to drive forward economic prosperity and retain talent in the County.

The Report recommends that the junction 3 site should be prioritized as a key opportunity, recognizing the substantial economic benefits that could arise from the development given its potential to attract key growth sectors and close proximity to RAF Cosford. At a strategic level, Table 5.1 of the Report advises that ‘The site could contribute significantly to the realization of Shropshire’s economic growth ambitions as it would provide both employment and residential development’.

### **Summary**

The M54 junction 3 site has the potentially to deliver a strategically significant ‘game changing’ housing and economic development opportunity to the mutual benefit of Shropshire and the Black Country. Our response above has addressed the key questions raised in the Strategic Sites consultation document, and further evidence to substantiate our position will follow as work on the Black Country Plan progresses. Specifically, a tranche of evidence including our Green Belt assessment will be published in November this year with the draft Plan consultation programed for the Autumn of 2020.

In the meantime, the Black Country Council’s would welcome the opportunity to continue to work with Shropshire Council in a positive and constructive manner through the preparation of the Local Plan Review.

I trust you find this information helpful and if you require any further details please contact me.

Yours sincerely,

Michele Ross  
Lead Planning Manager – Sub-Regional Strategy

## **APPENDIX 1**

Planning

City Of Wolverhampton Council (on Behalf of the Black Country Authorities)

**FW: Greater Birmingham HMA Meeting - Meeting**

---

**Accepted on 31/10/2019 08:49.**

Organizer: ☐ Ian MacLeod

Subject: **FW: Greater Birmingham HMA Meeting**

Location: Room 109, West Midlands Combined Authority Office, 16 Summer Lane, Birmingham, B19 3SD

Start time: Tue 05/11/2019 14:00 All day event

End time: Tue 05/11/2019 16:00

---

Hi Ed – would you be able to attend this?

-----Original Appointment-----  
From: Ian MacLeod  
Sent: 03 October 2019 17 13

To: Ian MacLeod; Adrian Cooper; Andrew Donnelly; Andy Miller (Sandwell); Ashley Baldwin (Lichfield); Craig Jordan (Lichfield); Dan Corden; Development Plan (Tamworth); Dorothy Barratt (North Warwickshire); Gary Palmer (Solihull); Gavin Ashford (Telford); Ian Culley (Wolverhampton); Ian Stevens (Telford); John Carraro (Stratford); Katherine Moreton (Nuneaton and Bedworth); Kelly Harris (South Staffordshire); Mark Andrews (Coventry); Martin Dando; Maurice Barlow (Solihull); Michele Ress (Wolverhampton); Mike Dunphy (Bromsgrove and Redditch); Mike Smith (Walsall); Patricia McLaughlin (Sandwell); Patricia Willoughby (West Midlands Combined Authority); Philip Clarke; Richard Powell (Tamworth); Richard Rob Haigh (Coventry); Ruth Bamford; Sarah Jones (Cannock Chase); Steve Maxey (North Warwickshire); Susan Bird (Cannock Chase); Uyen Phan Han; Vicki Poplewell (Dudley); Wayne Chapman (Rugby)

Subject: Greater Birmingham HMA Meeting

When: 05 November 2019 14:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London

Where: Room 109, West Midlands Combined Authority Office, 16 Summer Lane, Birmingham, B19 3SD

---

The information contained within this e-mail (and any attachment) sent by Birmingham City Council is confidential and may be legally privileged. It is intended only for the named recipient or entity to whom it is addressed. If you are not the intended recipient please accept our apologies and notify the sender immediately. Unauthorised access, use, disclosure, storage or copying is not permitted and may be unlawful. Any e-mail including its content may be monitored and used by Birmingham City Council for reasons of security and for monitoring internal compliance with the office policy on staff use. E-mail blocking software may also be used. Any views or opinions presented are solely those of the originator and do not necessarily represent those of Birmingham City Council. We cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended.

---

In Shared Folder | Calendar

Last modified by Edward West on 05/11/202

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL  
MONITORING WORKING GROUP**

**Tuesday 5 December 2019, 14:00 – 16:00, Room 109, 16 Summer Lane, Birmingham, B19  
3SD**

**AGENDA**

1. Apologies / introductions
2. Notes of last meeting
3. Refreshed GBBCHMA Position Statement (Updated with new information since last meeting)
  - Approach to discounting
  - Approach to post-2031 period
  - Arrangements for publishing statement
4. WMCA Housing Deal – Monitoring progress towards 215,000 homes
5. Local Plan review updates
6. Any other business
7. Date of next meeting

<p align="center"><b>Greater Birmingham and Black Country Housing Market Area Working Group</b></p> <p align="center"><b>Notes of meeting 5 November 2019,</b></p> <p align="center"><b>Room 116, WMCA Offices, 16 Summer Lane, Birmingham</b></p>		
<p><b>In attendance:</b> Patrick Jervis (Lichfield), Ian Culley (Wolverhampton), Michele Ross (Wolverhampton) Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Mike Dittman (North Warwickshire), Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Patrick Walker (South Staffordshire), Eddie West (Shropshire), Katherine Moreton (Nuneaton and Bedworth), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley)</p>		
		Actions
1	<b>Apologies:</b>	
1.1	Ian Stevens (Telford and Wrekin), Adrian Cooper (Shropshire), Kelly Harris (South Staffordshire), Victoria Chapman (Rugby), Dorothy Barratt (North Warwickshire)	
2	<b>Notes of last meeting</b>	
2.1	[REDACTED]	
2.2	[REDACTED]	
3	<b>Local Plan reviews</b>	
3.1	<b>Black Country</b> – Evidence is not been published until after the General election, main documents relate to Green Belt assessment and urban capacity refresh. Regulation 18 local plan to be published for consultation Autumn 2020.	
3.2	<b>South Staffordshire</b> [REDACTED]	
3.3	<b>Stratford on Avon</b> [REDACTED]	
3.4	<b>Bromsgrove</b> [REDACTED]	

3.5	<b>Redditch</b> [REDACTED]	
3.6	<b>Lichfield</b> [REDACTED] [REDACTED]	
3.7	<b>Cannock:</b> [REDACTED] [REDACTED]	
3.8	<b>Solihull</b> [REDACTED]	
3.9	<b>Birmingham</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
3.10	[REDACTED] [REDACTED]	
3.11	<b>Shropshire</b> – Timetable for Preferred Option may be delayed from published March date as awaiting results of Black Country evidence refresh. Decision on M54 J3 strategic proposal not yet reported to members for consideration.	
3.12	<b>North Warwickshire</b> [REDACTED] [REDACTED] [REDACTED]	
3.13	<b>Nuneaton and Bedworth</b> [REDACTED] [REDACTED]	
3.14	[REDACTED] [REDACTED]  <ul style="list-style-type: none"> <li>■ [REDACTED] [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> </ul>	
3.15	[REDACTED] [REDACTED]	
3.16	[REDACTED] [REDACTED] [REDACTED]	
3.17	Black Country refreshed capacity suggested loss of 6,500 housing units from former employment sites that it was now considered would not come	

	forward. This increases shortfall pre 2031 to 6,800 units from 300 as presented at September meeting).	
3.18	Stated that would be discounting remaining sites through SHLAAs, which it was estimated could reduce capacity by approximately further 5,000. Clarified that this was brownfield or 'urban' capacity and any potential Green Belt release yet to be factored in.	
3.19	[REDACTED]	
3.20	[REDACTED]	
3.21	[REDACTED]	
3.22	[REDACTED]	
3.23	[REDACTED]	
3.24	[REDACTED]	
3.25	[REDACTED]	
3.26	[REDACTED]	
3.27	[REDACTED]	
3.28	[REDACTED]	
3.29	[REDACTED]	
3.30	Main points resulting from discussion summarised as follows:	
3.31	Black Country evidence critical in terms of other authorities having justification for going beyond LHN (South Staffordshire, Lichfield, Shropshire)	
3.32	Black Country to firm up position, urban capacity on brownfield sites and likely Green Belt release. Black Country authorities invited to share their evidence on these matters in confidence with other members of group. Noted that Coventry and Warwickshire HMA authorities had peer reviewed each other's analysis.	BC authorities



3.33	[REDACTED]	
3.34	[REDACTED]	
3.35	[REDACTED]	AD
4	[REDACTED]	
4.1	[REDACTED]	
4.2	[REDACTED]	
5	<b>Any other business</b>	
5.1	None	
6	<b>Date of Next Meeting</b>	
6.1	Wednesday 11 December, Room 116, WMCA offices, 16 Summer Lane @10:00	

Greater Birmingham HMA - Meeting

---

**File**   **Meeting**   **Insert**   **Format Text**   **Review**   Tell me what you want to do...

Attach File   Outlook Item   Business Card   Signature Card  
 Include

Tables   Pictures   Online Pictures   Shapes Illustrations   SmartArt   Chart   Screenshot  
 Hyperlink Links   Bookmark   Text Box   Quick Parts   WordArt   Date & Time Object

Drop Cap   Equation Symbol Horizontal Line   Symbols

---

Accepted on 12/11/2019 12:30.

Organizer: ☐ Ian MacLeod

Sent: Tue 12/11/2019 10:23

Subject: Greater Birmingham HMA

Location: West Midland Combined Authority Offices (WMCA), Room 116, 16 Summer Lane, Birmingham B19 3SD

Start time: Wed 11/12/2019 10:00 ☐ All day event

End time: Wed 11/12/2019 12:00

---

-----Original Appointment-----  
**From:** Ian MacLeod  
**Sent:** 23 July 2019 15:11  
**To:**

**Subject:** Greater Birmingham HMA  
**When:** 11 December 2019 10:00-12:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.  
**Where:** West Midland Combined Authority Offices (WMCA), Room 116, 16 Summer Lane, Birmingham B19 3SD

**From:** Andrew Donnelly  
**Sent:** Friday, July 19, 2019 3:40 PM

**Subject:** Future HMA meeting dates

Colleagues

Please note that the dates for future GBBCHMA / WMCA monitoring meetings have been arranged as follows:

- Thursday 12 September 2019 @14:00
- Wednesday 11 December 2019 @10:00
- Monday 2<sup>nd</sup> March 2020 @ 14:00
- Tuesday 2<sup>nd</sup> June 2020 @ 14:00

Please note, meetings will take place at WMCA's offices (room 116) 16 Summer Lane, Birmingham B19 3SD. This is because a larger room is required to accommodate additional representatives from Warwick, Nuneaton and Bedworth and Rugby.

Regards,

In Shared Folder   Calendar

Last modified by Edward West on 13/12/2021

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL  
MONITORING WORKING GROUP**

**Wednesday 11 December 2019, 10:00 – 12:00, Room 116, 16 Summer Lane, Birmingham,  
B19 3SD**

**AGENDA**

1. Apologies / introductions
2. Notes of last meeting
3. Black Country Urban Capacity Refresh (presentation)
4. Position Statement refresh
  - Implications of item 3
  - Updating to 2018/19
  - Agreeing discounting / buffer assumptions
  - Extending beyond 2031
5. WMCA Housing Deal – Monitoring progress towards 215,000 homes
  - Implications of item 03
  - Completions 2018 / 19
6. Local Plan review updates
7. Strategic Employment Sites Study (Phase Two)
8. TfWM monitoring
9. Any other business
10. Date of next meeting

<p align="center"><b>GBBCHMA / WMCA Housing Deal Monitoring Group</b></p> <p align="center"><b>Actions from meeting 11 December 2019 @ 10:00.</b></p> <p align="center"><b>Room 116, WMCA Offices, 16 Summer Lane, Birmingham</b></p>	
<p><b>In attendance:</b> Patrick Jervis (Lichfield), Ian Culley (Wolverhampton), Michele Ross (Wolverhampton) Ian MacLeod (Birmingham, Chair), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Kelly Harris (South Staffordshire), Eddie West (Shropshire), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley), Ian Stevens (Telford and Wrekin), Mark Watkins (Sandwell), Sahar Khan (Birmingham)</p>	
<b>Actions</b>	
1	<b>Apologies:</b>
1.1	Dorothy Barratt / Mike Dittman (North Warwickshire) Katherine Moreton (Nuneaton and Bedworth).
2	<b>Notes of last meeting</b>
2.1	[REDACTED]
3	<b>Black Country Urban Capacity refresh / Green Belt / Landscape Assessment</b>
3.1	The focus of the meeting was to receive presentations on the Black Country Urban Capacity Refresh and Green Belt / Landscape Assessment. Noted that Urban Capacity Refresh document would be in the public domain shortly. <b>ACTION:</b> Agreed to circulate Urban Capacity Refresh presentation.
4	<b>Position Statement Refresh</b>
4.1	[REDACTED]
4.2	[REDACTED]
5	<b>WMCA 215,000 Housing Deal Monitoring</b>
5.1	[REDACTED]

6	<b>Strategic Employment Sites Study Phase Two</b>
6.1	
7	<b>TfWM land use monitoring and demographic services</b>
7.2	
8	<b>AOB</b>
8.1	
9	<b>Date of next Meeting</b>
9.1	Actual date to be determined but to be arranged for end of January.

**GREATER BIRMINGHAM AND BLACK COUNTRY HMA / WMCA HOUSING DEAL  
MONITORING WORKING GROUP**

**Wednesday 12 February 2019, 14:00 – 16:00, Room 109, 16 Summer Lane, Birmingham,  
B19 3SD**

**AGENDA**

1. Apologies / introductions
2. Actions from last meeting
3. GBBCHMA Position Statement refresh
  - Checking 2018/19 data
  - Finalising discount / lapse rate assumptions and buffers
  - Target date for completion
4. WMCA Housing Deal – Monitoring progress towards 215,000 homes
5. Local Plan review updates
6. TfWM monitoring
7. Strategic Employment Sites Study (Phase Two)
8. Any other business
9. Date of next meeting

<b>GBBCHMA / WMCA Housing Deal Monitoring Group</b>  <b>Agreements and Actions from meeting 12 February 2020 @ 14:00.</b>  <b>Room 109, WMCA Offices, 16 Summer Lane, Birmingham</b>	
<b>In attendance:</b> Patrick Jervis (Lichfield), John Careford (Stratford on Avon), Martin Dando (Birmingham), Andy Donnelly (West Midlands Metropolitan Authorities), Sushil Birdi (Cannock Chase), Mike Dunphy (Bromsgrove / Redditch), Mike Smith (Walsall), Gary Palmer (Solihull), Patricia McCullagh (Sandwell), Dan Corden (Shropshire), Patricia Willoughby (WMCA), Vicki Popplewell (Dudley), Ian Stevens (Telford and Wrekin), Uyen Phan Han (Birmingham), Ed Fox (South Staffordshire)	
<b>Actions</b>	
1	<b>Apologies:</b>
1.1	Katherine Moreton (Nuneaton and Bedworth). Ian Culley (Wolverhampton), Michele Ross (Wolverhampton), Kelly Harris (South Staffordshire), Ian MacLeod (Birmingham)
2	<b>Actions from last meeting</b>
2.1	[REDACTED]
3	<b>GBBCHMA Position statement Refresh</b>
3.1	Noted that Black Country figures require slight adjustment for net demolitions so that consistent with urban capacity work: <b>ACTION BC authorities to provide to AD (Dudley already provided)</b>
3.2	[REDACTED]
3.3	[REDACTED]
3.4	[REDACTED]
3.5	[REDACTED]
3.6	[REDACTED]

3.7	[REDACTED]
3.8	[REDACTED]
3.9	[REDACTED]
3.10	[REDACTED]
3.11	[REDACTED]
3.12	[REDACTED]
4	<b>WMCA Housing Deal Monitoring</b>
4.1	[REDACTED]
4.2	[REDACTED]
5	<b>Local Plan review updates</b>
5.1	Agreed that circulated schedule to be updated before / at each meeting and extended to include other non-HMA authorities. <b>ACTION AD</b>
6	<b>TfWM Monitoring</b>
6.1	[REDACTED]
8	<b>Strategic Employment Sites Phase Two study</b>



8.1	<div></div> <div></div> <div></div>
9	Any other business
9.1	<div></div> <div></div>
9	<b>Date of next Meeting</b>
9.1	Tuesday 24 <sup>th</sup> March ,13:00 to 15:00. Venue to be confirmed.

Eddie West / Ian Culley Catch Up - Meeting

File Meeting Insert Format Text Review Tell me what you want to do...

Cancel Meeting Copy to My Calendar Forward Appointment Scheduling Assistant Tracking Skype Meeting Join Teams Meeting Meeting Options Resource Finder Contact Attendees Address Book Check Names Response Options Show As: Busy Reminder: None Recurrence Time Zones Categorize Private High Importance Low Importance Meeting Notes Viva Insights View Templates My Templates

Attendee responses: 1 accepted, 0 tentatively accepted, 0 declined.

To: Ian.Culley

Subject: Eddie West / Ian Culley Catch Up


Location: Rooms...

Start time: Tue 26/04/2020 15:30 All day event

End time: Tue 28/04/2020 18:00

[Join Microsoft Teams Meeting](#)

Learn more about Teams | Meeting options



In Shared Folder Calendar

Last modified by Edward West on 29/04/2022

**GC10** Shropshire Council and ABCA - Timeline of DtC activity - Email to I Culley from E West 7.7.20  
@ 21.46

Dear Ian,

Further to our recent conversations please see attached letter outlining the Council's offer of assistance to support unmet need in the emerging Black Country Plan.

If you have any queries let me know.

Kind regards,

Eddie

Eddie West

Interim Planning Policy and Strategy Manager

Shropshire Council

Tel 01743 254617

e-mail: [edward.west@shropshire.gov.uk](mailto:edward.west@shropshire.gov.uk)

Reply

Reply all

Forward

## **GC10A - Shropshire Council and ABCA - Timeline of DtC activity - Shropshire Council Local Plan Review – Cross Boundary Needs**

**FAO Ian Culley  
Lead Planning Manager (Regional Strategy)  
City of Wolverhampton Council**

Shropshire Council  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire SY2 6ND

12 July 2022

Dear Ian,

### **Shropshire Council Local Plan Review – Cross Boundary Needs**

As you are aware the emerging Shropshire Local Plan is progressing towards the Post-submission (Regulation 19) consultation stage at the end of July 2020, and following consultation on this in the summer, the Council are aiming to submit the Local Plan to the Secretary of State in January 2021. The Duty to Cooperate is an important feature of this process, and to this end the discussions we have had over the past few month have been invaluable in seeking to identify relevant cross boundary issues, and informing how each Local Planning Authority area should be seeking to respond to the challenge in a positive manner.

It is noted that a number of relevant evidence base documents have been prepared to inform the preparation of the emerging Black Country Plan, including the Urban Capacity Study and Green Belt Assessment, and that these have been used to inform discussions on the scale of any cross boundary support required. It is acknowledged the conclusions of these studies recognise there is likely to be a significant proportion of housing and employment need that cannot realistically be accommodated in the Black Country area up to 2038. As a result of this evidence it is accepted that the Association of Black Country Authorities (ABCA) are seeking to have open and constructive discussions with neighbouring and closely related areas in seeking to distribute this unmet need more widely, whilst also seeking to ensure this is achieved in a sustainable manner. It is equally recognised that there are clear functional linkages between Shropshire and the Black Country that makes the issue of cross boundary need a necessary and reasonable consideration for both Planning Authorities.

The emerging Shropshire Local Plan seeks to positively encourage sustainable growth and proposes a housing requirement of around 30,800 dwellings and 300 hectares of employment land to be delivered over the plan period from 2016-2038. Alongside the County's significant number of completions and commitments since the start of the plan period, the emerging Local Plan proposes additional land allocations based upon the delivery of an 'urban focussed' strategy. This seeks, in the first instance, to support the sustainable growth of Shropshire's existing Strategic and Principal Centres. Importantly, the emerging Local Plan also encourages the development of two significant brownfield sites at the former Ironbridge Power Station and Clive Barracks at Tern Hill, near Market Drayton on the A41, as well as a proposed extension of the existing RAF Cosford site for military and associated purposes.

On the basis of our constructive discussions, and having given due consideration to the evidence provided regarding the ongoing challenges with the Black Country's ability to meet all their needs within their area, subject to Cabinet approval on 20<sup>th</sup> July, the principle for Shropshire to formally accept up to 1,500 dwellings of the Black Country's housing need over the period to 2038 is supported by Shropshire Council. If agreed, it is proposed that this additional housing need will be incorporated into Shropshire's overall emerging housing requirement of 30,800 dwellings between 2016 and 2038, and delivered in accordance with the overall strategic approach to the distribution of growth. This additional housing need would not therefore be proposed to be accommodated on any single site allocation, and it is therefore not anticipated this will require any further release of Shropshire's Green Belt.

By way of caveat, this offer of assistance is based upon the current housing need position in Shropshire. We are aware the Government have recently published updated sub-national household projections for the period to 2038. If, having considered this updated position, alongside any potential revision in the nationally prescribed methodology for calculating an area's housing need, Shropshire Council may need to review their ongoing ability to accept any additional housing need whilst continuing to ensure this is delivered in a sustainable manner. This offer should therefore be kept under review as we progress through the submission and examination process.

If this position is acceptable in principle with the Black Country authorities, Shropshire would welcome the opportunity to formalise this thorough a Statement of Common Ground agreed between the two Local Planning Authority areas, to inform the submission of the Local Plan to Government.

Yours sincerely,

Eddie West

Interim Planning Policy and Strategy Manager  
Shropshire Council

Microsoft Word ribbon: File, Meeting, Insert, Format Text, Review, Tell me what you want to do...

Meeting ribbon tabs: Cancel Meeting, Copy to My Calendar, Forward, Appointment, Scheduling Assistant, Tracking, Skype Meeting, Join Teams Meeting, Meeting Options, Resource Finder, Contact Attendees, Address Book, Check Names, Response Options, Show As, Reminder, Recurrence, Time Zones, Categorize, Private, High Importance, Low Importance, Meeting Notes, Viva Insights, View Templates, My Templates.

Attendee responses: 1 accepted, 0 tentatively accepted, 0 declined.

To: Ian Culley

Subject: Ian Culley / Eddie West Catch up

Location: [Dropdown menu]

Start time: Thu 21/05/2020 15:00 [Calendar icon] [Dropdown menu] ☐ All day event

End time: Thu 21/05/2020 16:00 [Calendar icon] [Dropdown menu]

Join Microsoft Teams Meeting

Learn more about Teams | Meeting options

Shropshire Council logo

In Shared Folder [Calendar icon] Calendar

Last modified by Edward West on 23/05/2022

## **Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)**

### **1 Introduction**

1.1 This third position statement sets out housing need and land supply in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. It draws on the baseline established in the Strategic Growth Study (SGS, GL Hearn/ Wood, 2018)<sup>2</sup>, which was commissioned by the 14 Local Planning Authorities; the baseline primarily monitored progress on meeting the 37,900 home shortfall established in the Birmingham Development Plan (BDP adopted 2017). It also considered potential options for addressing the shortfall. The study was published on all participating local authorities' websites along with an initial position statement<sup>3</sup> and a further update in September 2018<sup>4</sup>. For the avoidance of doubt, this Position Statement relates to the GBBCHMA, and not the West Midlands Combined Authority's Housing Package, which applies to a different geography and timeframe.

1.2 This Position Statement extracts the most relevant information regarding housing need and supply from the SGS and updates the land supply position from 31<sup>st</sup> March 2017 to 31<sup>st</sup> March 2019. It also sets out progress and timetables for plan reviews including likely increases in capacity up until July 2020. The purpose of this statement is to provide a starting point from which future Statements of Common Ground, as required by the revised 2019 National Planning Policy Framework (NPPF), can develop.

1.3 Policy TP48 of the BDP states that:

*The Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city. This will focus on:*

- *The progress of neighbouring Councils in undertaking Local Plan reviews to deliver housing growth to meet Birmingham's needs.*
- *The progress of neighbouring Councils in delivering the housing targets set out in their plans.*
- *The extent to which a 5-year housing land supply is maintained in neighbouring areas.*

1.4 Policy TP48 goes on to state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham's capacity by means of a full or partial BDP review after three years.

---

<sup>1</sup>Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Borough Council, Lichfield District Council, Redditch Borough Council, Solihull Metropolitan Borough Council, Tamworth Borough Council, North Warwickshire District Council, Stratford-on-Avon District Council, Sandwell Borough Council, South Staffordshire District Council, Walsall Borough Council, Wolverhampton City Council.

<sup>2</sup>[https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)

<sup>3</sup>[https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)

<sup>4</sup>[https://www.birmingham.gov.uk/downloads/file/10619/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study\\_position\\_statement](https://www.birmingham.gov.uk/downloads/file/10619/greater_birmingham_hma_strategic_growth_study_position_statement)



- 1.5 January 2020 signalled three years since adoption of the BDP. In December 2019 Birmingham City Council published an updated Local Development Scheme (LDS)<sup>5</sup>, which concluded that an early review was not required. This stated that:

*'the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022'*

- 1.6 The 2018 Position Statement also provided a specific context for the North Warwickshire Local Plan review. Examination hearings have now ended and progress towards the next Modifications Stage of the Local plan process has been delayed by the COVID 19 crisis. It is expected this will start in autumn 2020 prior to the Inspector's final report. Elsewhere, there has been significant progress in reviewing local plans and updating evidence bases, as set out later in this statement

## **2 Housing Need – Summary of Strategic Growth Study findings**

### **Objective Assessments of Need for Individual Authorities**

- 2.1 When the SGS was published the Objective Assessment of Need (OAN) was the method whereby local authorities' housing needs were assessed and where this could not be met, the basis upon which shortfalls were calculated. The starting point for determining an OAN was the official household projections. If necessary, these were adjusted upwards to reflect market signals, affordable housing, past policy constraints and whether there is likely to be a sufficient labour supply to meet future job growth.
- 2.2 Within the GBBCHMA, eight local plans have been adopted post NPPF using the OAN method. South Staffordshire and the Black Country do have a plan including an OAN tested at examination. Solihull has a post NPPF adopted local plan, but it does not include an OAN following legal challenge in 2014. All three of these plan making areas, however, have technical studies published in 2016, which established OANs as the basis for going forward.

---

<sup>5</sup> <https://www.birmingham.gov.uk/lDs>

**Table 1: GBBCHMA Authority Plans and Objective Assessments of Need (OAN)**

Local Authority	Plan Period	OAN	OAN dpa	Study
<b>Birmingham</b>	2011-31	89,000	4450	PBA Stage 2 Study
<b>Bromsgrove</b>	2011-30	6,648	350	Amion/ Edge Housing Needs Assessment Report, Aug-14
<b>Cannock Chase</b>	2006-28	5,800	264	NLP Implications of CLG 2011 Household Projections, 2013
<b>Lichfield</b>	2008-29	8,600	430	NLP Implications of CLG 2011 Household Projections, 2013
<b>Redditch</b>	2011-30	6,400	337	Amion/ Edge Housing Needs Assessment Report, Aug-14
<b>Solihull</b>	2014-33	14,277 <sup>6</sup>	751	PBA 2016
<b>Tamworth</b>	2006-31	6,250	250	NLP Implications of CLG 2011 Household Projections, 2013
<b>North Warwickshire</b>	2011-29	3,150	175	2013 Cov/War SHMA Update
<b>Stratford-on-Avon</b>	2011-31	14,600	730	ERM 2016
<b>Black Country<sup>7</sup></b>	2014-36	78,190	3554	PBA 2016
<b>South Staffordshire</b>	2014-36	5,933	270	PBA 2016
<b>HMA Total</b>	-	-	11,513	

**Source:** *Strategic Growth Study table 6*

- 2.3 Comparing OANs on a like for like basis is very difficult as the methods by which they were prepared, and assumptions made vary significantly. Furthermore, as they were prepared at different times the demographic and employment data used may not be comparable. Plans also have different start and end dates making direct comparison difficult. Table 1 shows the OAN identified through existing local authority studies for each plan area and includes an annual rate for direct comparison. In reality, however, planned delivery is often staggered over time and the housing requirement is expressed as a trajectory.
- 2.4 Having established an OAN, local plans must then consider whether this can be met in full in their area and, if not, whether it can be accommodated by neighbouring local authorities. The final plan's housing requirement may be higher or lower than the OAN dependent upon circumstances.
- 2.5 As is shown in Table 2 (replicated from the SGS), there are three adopted plans in the GBBCHMA that have not been able to accommodate their OAN; this generates an overall unmet need of 40,325. These are:
- Birmingham 38,000
  - Tamworth 1,825
  - Cannock Chase 500

<sup>6</sup> Solihull's OAN figure includes an upward adjustment to take account of under-provision between 2011 and 2014.

<sup>7</sup> Joint Core Strategy for Dudley, Sandwell, Walsall and Wolverhampton

**Table 2: Plan Housing Requirements and Unmet Need in the GBBCHMA Authorities as published in SGS 2018**

Local Authority	Current / Emerging Plan	Plan Period	Plan Requirement	Annual Requirement dwellings per annum (dpa)	Unmet Need	Provision for GBBCHMA Unmet Need
<b>Birmingham</b>	Adopted Jan 2017	2011-31	51,000	2,550	-38,000	
<b>Bromsgrove</b>	Adopted Jan 2017	2011-30	7,000	368	0	
<b>Cannock Chase</b>	Adopted 2014	2006-28	5,300	241	-500	
<b>Lichfield</b>	Adopted Feb 2015	2008-29	10,030	478	0	1,000
<b>Redditch</b>	Adopted Jan 2017	2011-30	6,400	337	0	
<b>Solihull</b>	Draft Plan Nov 16	2014-33	15,029	791	0	2,000
<b>Tamworth</b>	Adopted Feb 2016	2006-31	4,425	177	-1,825	
<b>North Warwickshire</b>	Draft Plan 2017	2011-31	9,070	454		4,410
<b>Stratford-on-Avon</b>	Adopted July 2016	2011-31	14,600	730	0	2,720
<b>Black Country</b>	Adopted Feb 2011	2009-26	63,000	3,150	0	
<b>South Staffordshire</b>	Adopted Dec 2012	2006-28	3850	175	0	
<b>HMA Total</b>				9,451	-40,325	10,130

**Source:** *Strategic Growth Study table 7*

- 2.6 As set out in Table 2, at the time the SGS was published, four plans either adopted or emerging made a formal commitment to meeting part of this unmet need.
- 2.7 Solihull's Draft Local Plan included a commitment to test accommodating a 2,000 dwelling contribution towards Birmingham's unmet needs
- 2.8 Lichfield's adopted plan has made provision for a 500 dwelling unmet need from Cannock Chase and a 500 dwelling unmet need from Tamworth. This is part of the overall unmet need in the GBBCHMA.
- 2.9 Both North Warwickshire and Stratford-on-Avon sit within two HMAs - the GBBCHMA and the Coventry and Warwickshire Housing Market Area (CWHMA). The CWHMA authorities have an agreed Memorandum of Understanding (MoU) regarding the distribution of housing provision which states that 2880 dwellings in Stratford-on-Avon and North Warwickshire's local plans are to meet unmet needs within the CWHMA, arising from Coventry. Appendix 1 shows the extent of both HMAs and their overlap.
- 2.10 The Coventry and Warwickshire MoU (tested through the Coventry City Council & Warwick District Council examinations) estimates that the Stratford on Avon plan

provides 5,440 dwellings more than demographic need and this is apportioned 50/50 between the GBBCHMA and C&WHMA, equivalent to 2,720 each. North Warwickshire is making provision through its submitted Local Plan to meet 4,410 of the GBBCHMA shortfall, which specifically includes 500 homes towards Tamworth's unmet needs.

- 2.11 Whilst not specifically referenced in Table 2, the adopted Bromsgrove Local Plan 2011-30 (January 2017) meets a 3,600 homes shortfall, which could not be accommodated by the neighbouring Redditch Local Plan 2011 - 30 (January 2017). The two plans were prepared, examined and adopted simultaneously, so the shortfall was met as soon as its existence was known.

### **Local Plan Reviews as at July 2020**

- 2.12 Since the publication of the 2018 Position Statement, progress has been made in reviewing local plans, this along with actual and emerging shortfalls and potential contributions to meeting these is summarised in Appendix 2.
- 2.13 Caution is urged in interpreting this table as neither the method for calculating housing need nor the plan time frames are necessarily comparable. For example, the adopted Birmingham Plan calculates a shortfall of approximately 38,000 using the OAN method for the period 2011-31, whilst the emerging Black Country shortfall of up to 29,260 is calculated using the newer Local Housing Need (LHN) method for the period 2019 – 38. Using this method, the Black Country's shortfall emerges in 2027/28, with an estimated shortfall of 7,485 up to 2031 (Black Country Urban Capacity Review Update 2019)<sup>8</sup>.

### **Housing Need figure used for the GBBCHMA in the Strategic Growth Study**

- 2.14 As there was no consistent OAN for the GBBCHMA, the SGS considered three baselines based on past demographic trends:
- **The 2014 based Household Projections** as published by MHCLG
  - **Rebased 2014 based Household Projections**, which takes account of growth between 2014 and 2015 as shown in the ONS Mid-Year Population estimates. This simply uses published data for the initial projection year and then applies assumptions on the year on year changes in the official projections thereafter
  - **10 Year Migration Trends** – this considers the difference between the trends in migration over the input period to the SNPP (the 5 years to 2014 for domestic and 6 years for international migration) and those over a ten year period (2005 to 15), and then adjusts future trends in migration based on these.
- 2.15 There is a degree of commonality between the official projection and the variants and the SGS concludes that the rebased 2014 based projection of 205,099 (which includes a vacancy allowance) is a reasonable estimate of housing need for the GBBCHMA over the period 2011 – 31. The SGS only provides overall parameters of need at HMA level and does not disaggregate this to district level.

---

<sup>8</sup> <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf>

- 2.16 Since the SGS was published in 2018, the revised NPPF (2019) changes the approach to assessing local authorities' housing need using a standardised formula known as Local Housing Need (LHN). This takes the 2014 based household projection for each authority and then applies an uplift based on relative affordability, whereby those authorities with higher affordability ratios relative to workplace earnings receive the highest uplift.
- 2.17 In March 2020, however, MHCLG published its Planning for the Future policy paper, which commits to reviewing the formula for calculating LHN to encourage greater building within and near to urban areas and whilst making sure that the country is planning for the delivery of 300,000 new homes a year<sup>9</sup>. Whilst it remains the case that the only shortfall tested through local plan examinations was established under the OAN method, the Black Country emerging shortfall is measured using the LHN method.

### **3 Housing Land Supply**

#### **Update of Existing Supply**

- 3.1 The SGS drew together and analysed information on housing land supply within the GBBCHMA using the following categories:
- i. Completions – net completions over the period from 1 April 2011 to the base date for the latest monitoring information (either 1st April 2016 or 1st April 2017)
  - ii. Sites with Planning Permissions – capacity of all sites with planning permission (full or outline) at the base date.
  - iii. Extant Allocations without Planning Permission – supply from sites allocation in adopted plans (including Neighbourhood Plans) which did not have planning permission (full or outline) at the base date.
  - iv. Allocations in Emerging Plans – capacity of sites proposed to be allocated in emerging Site Allocations Documents (under the current system) and Local Plans (Under the new system)
  - v. Additional Urban Supply – sites within existing urban areas which do not have planning consent and are not allocated in the adopted or emerging Local Plan (including Neighbourhood Plans), but which have been identified as suitable for residential development and could be delivered by 2031 or 2036.
  - vi. Windfalls – GL Hearn assumed that most SHLAAs will include a site size and/or capacity threshold. The proforma requested that this was set out in addition to the assumptions made regarding windfall development.
- 3.2 The SGS established a baseline, which was subsequently updated to a 2017 baseline in the previous Position Statement. Consistent monitoring information is now available as at 31st March 2019 and comparative data is shown in Table 3. As time has elapsed, it is apparent that additional capacity has been identified, mainly within Birmingham. Summaries of the SGS baseline and the 2017 and 2019 updates by local authority are attached as appendices 3 - 6. It is acknowledged that the COVID 19 crisis might impact

---

<sup>9</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/872091/Planning\\_for\\_the\\_Future.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872091/Planning_for_the_Future.pdf)

on completion rates during 2020-21, however there remain over 97,000 homes on sites either allocated in plans or with planning permission.

**Table 3: Housing Land Supply for the GBBCHMA 2011 – 31: SGS baseline, 2017 updates and 2019.**

	<b>SGS Baseline</b>	<b>2017 (published)</b>	<b>2017 Update (revised)<sup>10</sup></b>	<b>2019</b>
	<b>(2011-31)</b>	<b>(2011-31)</b>	<b>(2011-31)</b>	<b>(2011-31)</b>
<b>Total Supply</b>	<b>191,654</b>	<b>197,283</b>	<b>199,238</b>	<b>205,382</b>
<b>of which:</b>				
<b>Completions</b>	35,016	40,092	40,092	63,383
<b>Sites with planning permission</b>	55,759	61,211	61,508	61,058
<b>Allocations in adopted plans</b>	49,485	41,740	42,230	36,007
<b>Proposed allocations in emerging plans</b>	19,443	19,101	19,101	11,413
<b>Additional urban supply</b>	17,114	18,811	19,989	19,410
<b>Windfalls</b>	14,837	16,318	16,318	14,111

### **Non – Implementation Discounts on Supply**

3.3 To provide a realistic assessment of the developable land supply across the HMA, with a view to quantifying what additional land supply needs to be identified, the SGS applies the following discounts:

- A discount of 5% to the supply from sites with planning consent. This recognises that the presence of planning permission provides some basis for considering that a site will be delivered and that some sites in this category are likely to be under construction; but that in some instances planning permission will have been sought for other purposes (such as to raise land values) and some permissions do lapse;
- A discount of 15% to the supply from specific sites without planning consent in the Black Country authorities. A higher discount is considered appropriate in these authorities to take account of the significant proportion of the land supply which comprises occupied employment sites where there are challenges associated with delivery related to assembling land, relocating existing occupiers and development viability.
- A discount of 10% to the supply from specific sites without planning consent in the other authorities within the HMA.

<sup>10</sup> Since publication of the 2018 Position Statement, the 2017 housing land supply data has been revised, this is due to an underestimate of capacity in Dudley of 1955, more detail is available in Appendix 5

3.4 The SGS, however, specifically states that:

*These discounts are judgement based and applied for the purposes of this report only and should not be considered to prejudice what allowance should be made for non-implementation in individual local plans or authorities' land supply assessments, which can take account of locally specific circumstances and evidence.*

- 3.5 In the light of this the previous Position Statement did not apply these blanket discount rates. In order to provide a more realistic estimate of local authorities' capacity, however, this refreshed Position Statement applies discounts for non-implementation in accordance with local practice. It is also apparent that some local authorities include a buffer to their land supply to offer flexibility and reflect local circumstance, but this is not universal. These buffers are not to be confused with those that are applied to ensure a 5-year land supply in accordance with Government guidance. The discounts and buffers applied, where appropriate, are summarised in Table 4 and any discounted figures are reflected in the 2019 data in table 5 and Appendix 6.

**Table 4: Summary of Local Authority discounts for non-implementation and land supply buffers<sup>11</sup>**

Local Authority	Non-implementation Discounts	Buffer to land supply
<b>Birmingham</b>	No	No
<b>Black Country</b>	Sites with planning permission (Inc. conversions) not yet under construction: 10% discount  Housing allocations on occupied employment land: 15% discount  Other housing allocations: 10% discount  Other commitments (SHLAA sites): 10% discount*	No
<b>Solihull</b>	Draft Local Plan made provision for a 10% discount to be applied to sites with planning permission (only to those not commenced), sites identified in land availability assessments and adopted allocations.	The Draft Plan noted there was a surplus of 726 units through comparing supply with the housing requirement. This represents a 'margin' of 11% against the supply from new allocations and is akin to a buffer.
<b>Bromsgrove</b>	No	No
<b>Cannock Chase</b>	15% discount applied to all minor sites in deliverable	No

<sup>11</sup> This table relates to adjustments to housing trajectories and not 5-year Housing Land Supply calculations

	supply and all sites in developable supply (bar those that are under construction and/or constitute a major site which is phased over from deliverable supply)	
<b>Lichfield</b>	Adopted Local Plan includes 5% non-implementation discount based on local evidence and confirmed at Examination in Public.	No, but potential need for buffer of appropriate scale to be considered as Local Plan review progresses.
<b>North Warwickshire</b>	5% flexibility rate on site allocations to ensure flexibility, choice and competition in the market for land.	No
<b>Redditch</b>	No	No
<b>South Staffordshire</b>	A 19% non-implementation rate is applied to small sites (9 or less dwellings), reflecting traditional lapses/delays in delivery on such sites in the District. This is not applied to sites of 10 or more units as these are usually greenfield sites	No
<b>Stratford on Avon</b>	No	Land supply includes a buffer of approximately 10% to offer flexibility
<b>Tamworth</b>	Non-delivery factor of 10% applied by Inspector to secure flexibility	No

\* Walsall other commitments without a lapsed permission have a discount of 15%

**Source:** Local Authorities

### **Potential Supply from Increasing Residential Densities**

- 3.6 The SGS sets out the benefits of higher density housing and notes that equally there are factors such as viability and deliverability in areas which do not commonly deliver higher density development. It does not advocate specific policies; instead it seeks to consider the extent to which an increase in densities could contribute towards addressing the housing shortfall. It estimates that up to 13,000 additional dwellings could be accommodated by applying average densities of 40 dwellings per hectare (dph) in Birmingham and the Black Country and 35 dph elsewhere. It suggests that local authorities should consider increasing densities through changing local plan policies and checking density estimates used when they refresh their SHLAAs; any increases would then filter through into increased capacity.
- 3.7 The 2018 Position Statement did not make any allowance for capacity gains that may arise from increased residential densities, particularly as some of the sites identified by the SGS may have been granted planning permission. Instead, it was for local authorities to estimate likely residential densities when updating their SHLAAS and to



set density standards through policy when reviewing local plans. It was also apparent that the blanket non-implementation discounts reduced capacity by 11,824 dwellings, broadly equivalent to the potential gains from a blanket density uplift. (13,000), so the two broadly cancelled each other. The revised NPPF places greater emphasis on making effective use of land and requires local authorities to consider minimum density policies. The 2019 based data reflects any adjustments local authorities have made to their land supply estimates already and local plan reviews (for example the Black Country) will continue to explore the possibility of increasing densities.

### **Contribution towards the Coventry and Warwickshire Housing Market Area (CWHMA)**

- 3.8 As explained in paragraph 2.9 Stratford-on-Avon and North Warwickshire straddle the GBBCHMA and the CWHMA. Consequently, their entire supply of housing land cannot be assumed to meet GBBCHMA needs. Like Birmingham, Coventry was not able to meet its OAN within its administrative boundary and has signed a MoU with the Warwickshire Districts in order to distribute this unmet need. The agreed MoU states that 2,880 dwellings in Stratford-on-Avon and North Warwickshire's local plans are to meet unmet needs within the CWHMA. Therefore, this contribution must be deducted from the GBBCHMA housing land supply.

### **Potential Contributions from beyond the GBBCHMA**

- 3.9 In line with the SGS, the principal focus of this statement is the GBBCHMA. It is evident, however, that HMAs are not hermetically sealed and that there are population flows between them. The local planning authorities of Telford and Wrekin, and Shropshire, which adjoin the GBBCHMA, have defined separate, single authority HMAs. The adopted plans for both authorities do not make any direct provision to accommodate any of the GBBCHMA shortfall but the Shropshire Draft Plan (Regulation 18) (July 2020)<sup>12</sup> proposes a contribution of 1,500 dwellings towards the Black Country shortfall. The review of the Telford and Wrekin Plan is at an early stage and no formal decision has been made yet regarding the level of growth.

## **4 Comparing Housing Need and Housing Land Supply**

### **Shortfall 2011 - 2031**

- 4.1 Table 5 compares the SGS baseline housing need figure, with the 2017 baseline (published and revised) and 2019 supply estimates for the period 2011 – 31. Over this period there were three plans (Birmingham, Cannock Chase and Tamworth) with shortfalls that had been formally established through public examination. The latest monitoring suggests that the shortfall is now 2,597 dwellings, a fall of 13,728 since the SGS baseline was established. It is considered that the pre 2031 shortfall will continue to fall as local plan reviews progress as indicated in Appendix 2. As these reviews progress it will become clearer as to the extent of their capacity pre and post 2031 and this will be reported in future statements.

---

<sup>12</sup> <https://shropshire.gov.uk/committee-services/documents/s24933/Local%20Plan%20Pre%20Submission%20Draft%20-%20Cabinet%20Report%2020-07-2020.pdf>

### Shortfall post 2031

- 4.2 The Black Country has evidenced a significant shortfall through its 2019 Urban Capacity Review Update of up to 29,260 between 2019 and 2038, against LHN. Whilst this shortfall starts to arise during the term of this position statement and is estimated to be 7,485 up to 2031, the majority (over 20,000 homes), will arise post 2031. This is being considered through the Black Country Plan review and associated Duty to Cooperate discussions with neighbouring local authorities and is subject to revision as more work is undertaken and this will be reported in future statements. The HMA shortfall post 2031 will be further informed by the review of the Birmingham Development Plan when it commences.
- 4.3 Whilst formal shortfalls have only been tested and established over the period 2011 to 2031 it is clear that a further shortfall is emerging post 2031. This shortfall has not been established through adopted or submitted plans, nor tested in emerging draft plans, for those areas giving rise to the shortfall. However, how this emerging shortfall can be met will be the subject of ongoing duty to co-operate discussions.

### Changes in land supply over time

- 4.4 Table 6 sets out the changes in housing capacity for each local authority over time. The data is not directly comparable as the SGS baseline and 2017 updates did not make any discounts for non-implementation or blanket increases for density uplifts. This is justified as the two effectively cancelled each other out. As monitoring has been refined, however, non-implementation discounts and gains due to higher density assumptions have been applied in accordance with local practices. It is considered that this gives a more accurate and consistent reflection of land supply.

**Table 5: Housing Shortfall for the GBBCHMA 2011 – 31: SGS Baseline, 2017 updates and 2019 update**

	<b>SGS Baseline (2011 – 31)</b>	<b>2017 update (published) (2011 - 31)</b>	<b>2017 Update (revised) (2011 – 31)</b>	<b>2019 Update (2011 – 31)</b>
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099	205,099	205,099
Contribution to CWHMA	-2880	-2880	-2880	-2880
Minimum housing requirement	207,979	207,979	207,979	207,979
Supply baseline	191,654	197,283	199,238	205,382
<b>Total shortfall</b>	<b>16,325</b>	<b>10,696</b>	<b>8,741</b>	<b>2,597</b>

- 4.6 Appendices 3 – 6 set out in detail where capacity estimates have changed by local authority and by the development status of the land; this is summarised in Table 6. Birmingham is by far the main source of this increase having identified capacity for a further 13,942 dwellings since 2017, a 27% increase. This is due to many previously unidentified sites coming forward and is consistent with the Birmingham Development Plan Inspector's report,<sup>13</sup> which states that windfall estimates may be exceeded. Elsewhere, previously identified capacity has declined, this is particularly apparent in Sandwell where capacity for 5,106 dwellings has been removed following the Black Country Urban Capacity Review Update 2019. In the main, the sites identified are now expected to remain in active employment use rather than come forward for housing.

**Table 6: Change in housing capacity (2011-31) by Local Authority 2017 (SGS baseline) to 2019<sup>14</sup>**

LPA	2017 SGS	2019	change	%	LPA	2017 SGS	2019	change	%
Birmingham	51458	65400	13942	27%	Sandwell	19930	14824	-5106	-26%
Bromsgrove	5099	5335	236	5%	Solihull	15717	17273	1556	10%
Cannock Chase	4615	4969	354	8%	South Staffordshire	3493	4090	597	17%
Dudley	17918	17514	-404	-2%	Stratford on Avon	16713	16624	-89	-1%
Lichfield	10973	11287	314	3%	Tamworth	4495	5267	772	17%
North Warwickshire	9060	9071	11	0%	Walsall	10879	12155	1276	12%
Redditch	7488	7329	-159	-2%	Wolverhampton	13816	14244	428	3%
					Total	191654	205382	13728	7%

## 5 Options for Addressing Unmet Need

- 5.1 Detailed consideration of where need can be met is ongoing across the authorities, in 2018 an initial piece of work known as the Greater Birmingham Strategic Growth Study was published (see footnote 1). This is an independently prepared, objective study and not a policy statement. It does not commit the participating authorities to any one approach, nor does it exclude the testing of alternatives for where need can be met, but formed a significant part of the evidence base for the commencement of the Local Plan review process.

## 6 Conclusions

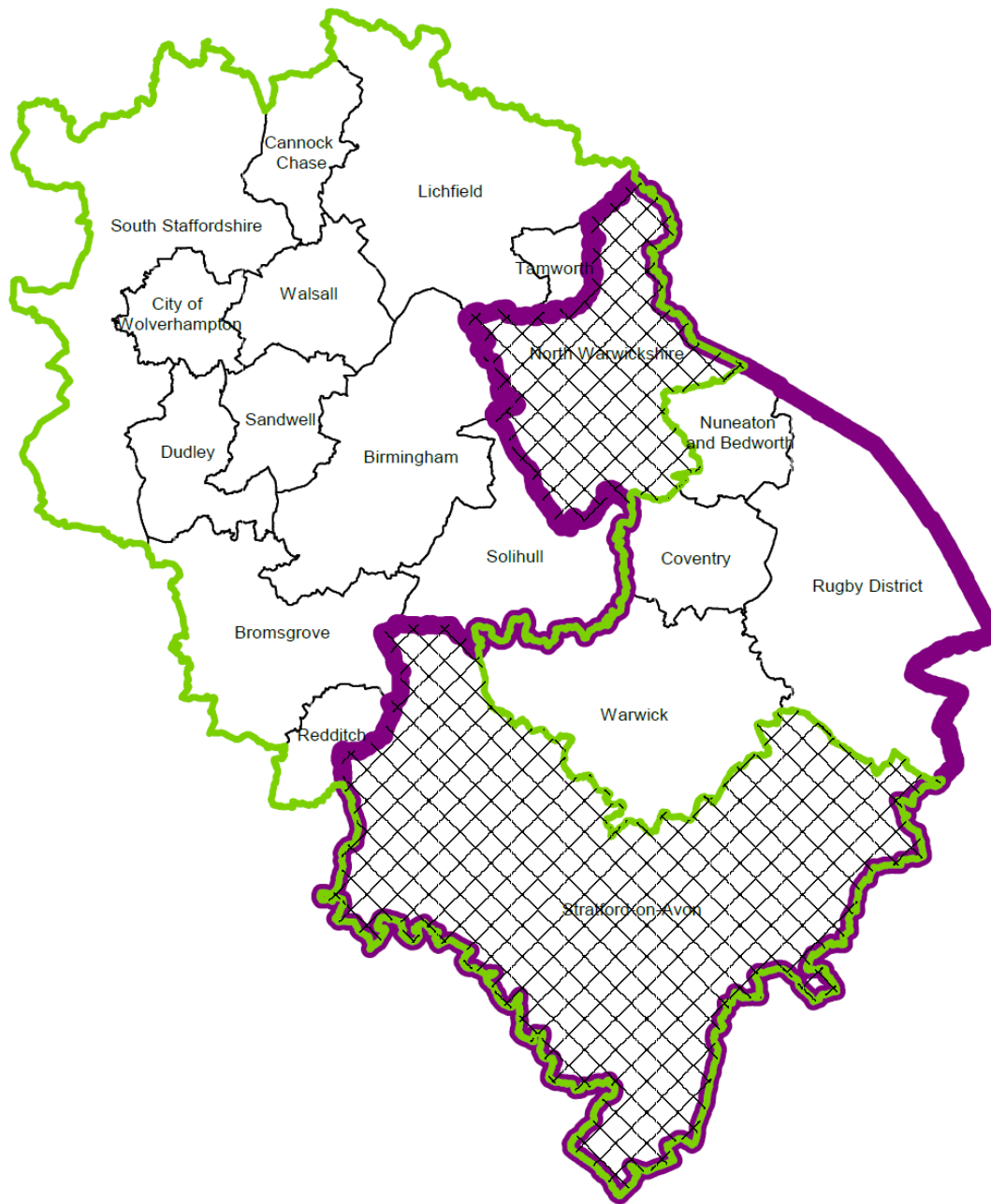
- 6.1 Monitoring since the adoption of the Birmingham Development Plan in 2017 and the publication of the SGS in 2018 suggests that good progress has been made in meeting the HMA shortfall for the period 2011-31. It is conceded that future completions might slow in the short term because of the COVID19 crisis but as of 2019, there were 97,000 homes either allocated in local plans or with planning permission. As the 2019 data includes local adjustments for non-implementation and density increases where local authorities consider this appropriate, it is not directly comparable with the SGS baseline and the 2017 update; however, it is considered that these local adjustments give a more accurate estimate of housing land supply.

<sup>13</sup> [https://www.birmingham.gov.uk/downloads/file/2626/bdp\\_inspectors\\_reportpdf](https://www.birmingham.gov.uk/downloads/file/2626/bdp_inspectors_reportpdf) see paragraph 58

<sup>14</sup> The North Warwickshire Local Plan review extends to 2033, for consistency the final two years of the housing trajectory have been removed

- 6.2 The 2011-31 shortfall is now estimated to be 2,597, a fall of 13,728 since the SGS baseline was established, and it is considered that it will fall further as local plan reviews progress. Most of the additional capacity has come forward in Birmingham where many previously unidentified sites have been granted planning permission. Elsewhere, there have been reductions in capacity estimates, most notably in the Black Country where the Urban Capacity Review Update considers that many employment sites previously identified as suitable for housing will remain in active employment use.
- 6.3 It is, however, now apparent that there will be a HMA shortfall post 2031, with the Black Country alone estimating a shortfall of 29,260, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially other authorities, is not yet known, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated. It is evident, however, that a number of HMA local plan reviews (e.g. South Staffordshire, Lichfield and Cannock Chase) are considering levels of growth above local need, up to and beyond 2031. There may also be scope for contributions from local authorities outside the HMA but with a strong functional link to it, such as Shropshire, to help address the shortfall up to and beyond 2031.

## Appendix 1 Housing Market Areas

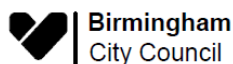


Planning&Development  
1 Lancaster Circus  
Queensway  
Birmingham B4 7DJ.





Date:26/8/2020

Scale 1:

© Crown Copyright and database rights 2020 Ordnance Survey 100021326



### KEY

-  Coventry and Warwickshire Housing Market Area
-  Greater Birmingham and Black Country Housing Market Area
-  Areas Of Overlap
-  Local Authority Boundaries

## Appendix 2: GBBCHMA Local plan review progress including shortfalls and contributions

Local Authority	Plan timeframe	Dwelling shortfall	Latest published document and link	Next key stages
Birmingham (adopted)	2011-31	37,900	<p>The 2011-19 AMR states that an early review (after three years BDP adopted January 2017) is not required.</p> <p><a href="https://www.birmingham.gov.uk/downloads/file/14798/authority_monitoring_report_2018_to_2019">https://www.birmingham.gov.uk/downloads/file/14798/authority_monitoring_report_2018_to_2019</a></p>	<p>The revised LDS states that... 'the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022.'</p> <p><a href="https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2">https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2</a></p>
Black Country (review)	2019 – 2038 (UCR)	29,260	<p>Issues and Options document published Summer 2017.</p> <p><a href="https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf">https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf</a> estimates shortfall of 21,670 homes over the period 2014-36 plus 3000 to test to meet Birmingham's needs.</p> <p>Urban Capacity Review (UCR), December 2019.</p> <p><a href="https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf">https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf</a></p> <p>revises estimate of shortfall to 29,260 (2019-2038) against an overall LHN of 71,459, with an estimated shortfall of 7,485 up to 2031. The UCR estimates that up to a further 2,370 homes could be brought forward in the urban area through the new Black Country Plan via density uplifts and additional capacity in Strategic Centres. This will be tested further through the plan review and is not included in the figures elsewhere in this statement.</p>	<p>Regulation 18 consultation August – September 2021</p> <p>Regulation 19 pre-submission consultation August – September 2022</p> <p>Submission to SoS March 2023</p> <p>Examination April 2023 – March 2024</p> <p>Adoption April 2024</p> <p><a href="https://blackcountryplan.dudley.gov.uk/t2/p1/">https://blackcountryplan.dudley.gov.uk/t2/p1/</a></p>
<b>Total</b>		<b>67,160</b>		

Local Authority	Plan timeframe	Dwelling contribution	Latest published document and link	Next key stages
South Staffordshire (review)	2018--38	Up to 4,000	Spatial Housing Strategy & Infrastructure Delivery, October 2019 <a href="https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm">https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm</a>	Preferred Options – Summer 2021. Publication – Summer 2022.  Submission of Local Plan – Winter 2022.  Local Plan Examination – Spring 2023  Adoption of Local Plan – Winter 2023  <a href="https://www.sstaffs.gov.uk/doc/181628/name/LDS%20June%202020%20Final%20for%20Website.pdf/">https://www.sstaffs.gov.uk/doc/181628/name/LDS%20June%202020%20Final%20for%20Website.pdf/</a>
Lichfield (review)	2018-40	4,500	Preferred Option, consultation completed January 2020. <a href="https://democracy.lichfielddc.gov.uk/ieListDocuments.aspx?CId=138&amp;MId=1533&amp;Ver=4">https://democracy.lichfielddc.gov.uk/ieListDocuments.aspx?CId=138&amp;MId=1533&amp;Ver=4</a>	Publication (regulation 19 consultation) Winter 2020 / 21  Submission Spring 2021
Cannock Chase (review)	2018-36	500-2,500	Issues and Options, May 2019 <a href="https://www.cannockchasedc.gov.uk/residents/planning/planning-policy/cannock-chase-local-plan">https://www.cannockchasedc.gov.uk/residents/planning/planning-policy/cannock-chase-local-plan</a>	The LDS is being updated in the light of the COVID 19 crisis
Solihull (review)	2018-2035	2,000	Supplementary consultation, July 2019 <a href="https://www.solihull.gov.uk/lpr">https://www.solihull.gov.uk/lpr</a>	LDS Updated in January 2020  <a href="https://www.solihull.gov.uk/Portals/0/Planning/Local_Development_Scheme_Jan_2020.pdf">https://www.solihull.gov.uk/Portals/0/Planning/Local_Development_Scheme_Jan_2020.pdf</a>  Submission draft Summer 2020  Examination Winter 2020 – 21  Adoption Spring Summer 2020/21

North Warwickshire (review)	2014-2033	3,790 + 620	<a href="https://www.northwarks.gov.uk/info/20002/planning/1444/local_plan_examination">https://www.northwarks.gov.uk/info/20002/planning/1444/local_plan_examination</a>  Plan examination commenced September 2018. Makes a direct 10% contribution to BDP shortfall (3,790 which includes 500 to meet unmet Tamworth need), plus an additional 940 above own demographic need for workforce / economic uplift apportioned 65% GBBCHMA / 35% C&WHMA (620/320). Principles of latter tested through Warwick District Council and Coventry City Council examination hearings.	Further progression of examination was dependent on outcome of the HIF bid for A5 highway works, then hearings were suspended due to the Covid 19 crisis. MCHLG and Highways England have now confirmed to the County Council that the A5 highway funding will be delivered outside of HIF Bid process and primarily through the RIS process-
Bromsgrove (review)	2023-40 (provisional)	To be determined	District Plan Review Update and Call for Sites Consultation (September 2019). Yet to be determined what share of shortfall to be tested / accommodated.	Two rounds on consultation have taken place, including a call for sites. Preferred option being worked and timetable for publication to be confirmed.
Stratford on Avon (adopted)	2011-2031	2,720	Site Allocations Plan being prepared identifying further circa 2,900 homes for reserve purposes, including contributing towards housing arising from outside Coventry & Warwickshire, although releasing reserve sites for other reserve purposes may also contribute to GBBCHMA. Revised Preferred Options Site Allocations Plan being prepared for consultation autumn 2020.  <a href="http://www.stratford.gov.uk/siteallocations">www.stratford.gov.uk/siteallocations</a>	Policy CS.17 commits LPA to undertaking plan review if scale of unmet needs arising from outside the District needing to be met within the District cannot be adequately be met without a review.  Work is expected to commence on the plan review in autumn 2020.  <a href="http://www.stratford.gov.uk/corestrategy">www.stratford.gov.uk/corestrategy</a>
Tamworth (adopted)	2006-31	N/A	Local plan adopted 2016 and reliant on North Warwickshire and Lichfield to deliver surplus housing and employment land for needs which cannot be met in Tamworth. LDS indicates pre submission consultation document to be available early 2020. <a href="https://www.tamworth.gov.uk/sites/default/files/planning_documents/Local-Development-Scheme.pdf">https://www.tamworth.gov.uk/sites/default/files/planning_documents/Local-Development-Scheme.pdf</a> . Tamworth, however, is	Local authority has determined that the adopted local plan requires changes required that would best be addressed by the production of a new plan. The current LDS contained an unrealistic timeframe and is now out of date. New LDS to be prepared taking account of the potential impact of Covid 19.



			unlikely to be able to meet any needs from wider HMA due to its own capacity constraints.	
Redditch (adopted)	2011-30	N/A	Redditch has shortfall of 3,600 dwellings, which is been met through the adopted Bromsgrove local plan. There is no timetable for reviewing the Redditch local plan and consequently it is unlikely to be able to meet any wider HMA need.	Plan making timetable to be published in due course.
Total		<b>18,130 - 20,130</b>		

### Appendix 3: GBBCHMA - Land supply summary table 2011 - 31 SGS baseline

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
Sites with planning permission	16,668	1,073	2,660	3,320	5,426	1,135	1,295	4,142	2,262	937	8,254	3,133	2,623	2,831	55,759
Allocations - Adopted Plans	9,435	1,871	81	8,752	1,200		4,694	10,417	2,470		5,605	455	106	4,399	49,485
Proposed Allocations - (current SADs / new Local Plans)	335		861		2,552	6,158			6,842	891			1,804		19,443
Additional Urban Supply	10,489	165	134	1,200		38	359	685	286	70			1,646	2,042	17,114
Windfall	4,525	440	154	1,650	605	660	121	1,320	1,650	330	407	407	891	1,677	14,837
Completions	10,006	1,550	725	2,996	1,190	1,069	1,019	3,366	2,207	1,265	2,447	500	3,809	2,867	35,016
Total	51,458	5,099	4,615	17,918	10,973	9,060	7,488	19,930	15,717	3,493	16,713	4,495	10,879	13,816	191,654
Supply baseline to 2030/31	41,452	3,549	3,890	14,922	9,783	7,991	6,469	16,564	13,510	2,228	14,266	3,995	7,070	10,949	156,638

### Appendix 4: GBBCHMA – Land supply summary table 2011 – 2031 (as at 1<sup>st</sup> April 2017)

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
Sites with planning permission	17,298	1,073	2,545	3,489	5,426	1,135	1,295	3,345	3,437	937	10,447	3,133	2,623	5,038	61,221
Allocations - Adopted Plans	8,587	1,871	81	7,080	1,200		4,694	10,606	1,146		2,190	455	106	3,724	41,740
Proposed Allocations - (current SADs / new Local Plans)	159		695		2,552	6,158			6,842	891			1,804		19,101
Additional Urban Supply	13,757	165	362	612		38	359	725	221	70			1,646	856	18,811
Windfall	5,910	440	140	1,991	605	660	121	1,309	1,500	330	370	407	891	1,644	16,318
Completions	10,887	1,550	1,097	3,784	1,190	1,069	1,019	4,267	2,649	1,265	3,562	500	3,809	3,444	40,092
Total	<b>56,598</b>	<b>5,099</b>	<b>4,920</b>	<b>16,956</b>	<b>10,973</b>	<b>9,060</b>	<b>7,488</b>	<b>20,252</b>	<b>15,795</b>	<b>3,493</b>	<b>16,569</b>	<b>4,495</b>	<b>10,879</b>	<b>14,706</b>	<b>197,283</b>
Remaining capacity to 2030/31	45,711	3,549	3,823	13,172	9,783	7,991	6,469	15,985	13,146	2,228	13,007	3,995	7,070	11,262	157,191

**Appendix 5: GBBCHMA - Land supply summary table 2011 - 31 (as at 1<sup>st</sup> April 2017 (REVISED))**

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
<b>Sites with planning permission</b>	17,298	1,073	2,545	3,776	5,426	1,135	1,295	3,345	3,437	937	10,447	3,133	2,623	5,038	61,508
<b>Allocations - Adopted Plans</b>	8,587	1,871	81	7,570	1,200		4,694	10606	1,146		2,190	455	106	3,724	42,230
<b>Proposed Allocations - (current SADs / new Local Plans)</b>	159		695	0	2,552	6,158			6842	891			1,804		19,101
<b>Additional Urban Supply</b>	13757	165	362	1790		38	359	725	221	70			1,646	856	19,989
<b>Windfall</b>	5910	440	140	1991	605	660	121	1,309	1,500	330	370	407	891	1,644	16,318
<b>Completions</b>	10,887	1,550	1,097	3,784	1,190	1,069	1,019	4,267	2,649	1,265	3,562	500	3,809	3,444	40,092
<b>Total</b>	<b>56,598</b>	<b>5,099</b>	<b>4,920</b>	<b>18,911</b>	<b>10,973</b>	<b>9,060</b>	<b>7,488</b>	<b>20,252</b>	<b>15,795</b>	<b>3,493</b>	<b>16,569</b>	<b>4,495</b>	<b>10,879</b>	<b>14,706</b>	<b>199,238</b>
<b>Rmainining capacity to 2030-31</b>	45,711	3,549	3,823	15,127	9,783	7,991	6,469	15,985	13,146	2,228	13,007	3995	7,070	11,262	159,146

**Appendix 6: GBBCHMA - Land supply summary table 2011 - 31 (as at 1<sup>st</sup> April 2019)**

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
<b>Sites with planning permission</b>	21,305	560	2,227	2,569	6,221	1,279	753	2,966	3,425	1,319	8,036	3,328	2,412	4,658	61,058
<b>Allocations - Adopted Plans</b>	7,837	1,871	69	6,500	1,877	0	4,516	4646	1,146	691	1,770	460	1,788	2,836	36,007
<b>Proposed Allocations - (current SADs / new Local Plans)</b>	251	0	0	0	0	5,612	0	0	5370	0	180	0	0	0	11,413
<b>Additional Urban Supply</b>	12923	163	605	1457	0	10	178	251	1114	17	0	0	1,709	983	19,410
<b>Windfall</b>	4760	400	112	1701	385	600	88	1,224	2,000	270	370	456	927	818	14,111
<b>Completions 2011/2 - 18/19</b>	18,324	2,341	1,956	5,287	2,804	1,570	1,794	5,737	4,218	1,793	6,268	1023	5,319	4,949	63,383
<b>Total</b>	<b>65,400</b>	<b>5,335</b>	<b>4,969</b>	<b>17,514</b>	<b>11,287</b>	<b>9,071</b>	<b>7,329</b>	<b>14,824</b>	<b>17,273</b>	<b>4,090</b>	<b>16,624</b>	<b>5,267</b>	<b>12,155</b>	<b>14,244</b>	<b>205,382</b>
<b>Remaining capacity to 2030-31</b>	47,076	2,994	3,013	12,227	8,483	7,501	5,535	9,087	13,055	2,297	10,356	4244	6,836	9,295	141,999

Shropshire Council  
Legal and Democratic Services  
Shirehall  
Abbey Foregate  
Shrewsbury SY2 6ND

Friday, 10 July 2020

**Committee: Cabinet**

**Date: Monday, 20 July 2020**

**Time: 1.00 pm**

**Venue: THIS IS A VIRTUAL MEETING - PLEASE USE THE LINK ON THE AGENDA TO LISTEN TO THE MEETING**

**Members of the public will be able to listen to this meeting by clicking on this link:**

**[Link to Cabinet Meeting 20/7/20](#)**

Please note that this meeting will be made available through Microsoft Teams Live Events - your device will need to meet the minimum specification as detailed on the Microsoft website at this link: [Device Specification](#)

- You will need to download MS Teams (free) and click on the link to listen to the meeting if you are using a PC
- If using a mobile device, you will need to download the MS Teams app (free) before clicking the link
- Use the link at 11.00 am on the day of the meeting and click on 'Join as Guest'
- You may receive an error message or a request for login details if you try to gain access before 11.00 am

You are requested to attend the above meeting.  
The Agenda is attached

Claire Porter  
Head of Legal and Democratic Services (Monitoring Officer)

**Members of Cabinet**

Peter Nutting (Leader)  
Steve Charmley (Deputy Leader)  
Gwilym Butler  
Dean Carroll  
Lee Chapman  
Steve Davenport  
Robert Macey  
David Minnery  
Lezley Picton  
Ed Potter

**Deputy Members of Cabinet**

Your Committee Officer is:

**Amanda Holyoak** Senior Democratic Services Officer

Tel: 01743 257714

Email: [amanda.holyoak@shropshire.gov.uk](mailto:amanda.holyoak@shropshire.gov.uk)

# AGENDA

## **1 Apologies for Absence**

## **2 Disclosable Pecuniary Interests**

## **3 Minutes**

To approve as a correct record and sign the minutes of the Cabinet meeting held on 6<sup>th</sup> July 2020 [to follow].

## **4 Public Question Time**

To receive any questions or petitions from members of the public, notice of which has been given in accordance with Procedure Rule 14. Deadline for notification is not later than 1.00pm on 16<sup>th</sup> July 2020.

## **5 Member Question Time**

To receive any questions of which members of the council have given due notice, the deadline for notification for this meeting is 5.00pm on Wednesday 15<sup>th</sup> July 2020.

## **6 Scrutiny Items**

## **7 Shropshire Local Plan Review - Pre-submission Consultation Document (Pages 1 - 514)**

Lead Member – Robert Macy - Portfolio Holder for Housing and Strategic Planning.

Report of Director of Place to follow.

Contact: Mark Barrow, 01743 258919

## **8 Hardship Fund - Additional Discretionary Support (Pages 515 - 528)**

Lead Member – David Minnery – Portfolio Holder for Finance and Corporate Support.

Report of the Director of Finance, Governance and Assurance to attached.

Contact: James Walton, 01743 258915

## **9 Exclusion of the Press and Public**

To resolve that, in accordance with the provision of Schedule 12A of the Local Government Act 1972 and Paragraph 10.4(3) of the Council's Access to Information Rule, the public and press be excluded from the meeting during consideration of the following items.

## **10 Exempt Minutes**

To approve as a correct record and sign the exempt minutes of the Cabinet meeting held on 6<sup>th</sup> July 2020 [to follow].

0



Committee and Date

Cabinet  
20<sup>th</sup> July 2020

Item

Public

**SHROPSHIRE LOCAL PLAN REVIEW:  
Pre Submission Draft (Regulation 19)**

**Responsible Officer** Mark Barrow, Executive Director Place  
e-mail: mark.barrow@shropshire.gov.uk Tel: 01743 258919

**1. Summary**

- 1.1 The principle purpose of this report is to seek Cabinet approval for the Pre-Submission Draft of the Shropshire Local Plan and to trigger a period of public consultation in line with Government Regulations. On a directly related issue, the report also seeks approval in principle to accept an element of unmet housing need from the Association of Black Country Authorities (ABCA), and for this housing to be incorporated into the overall housing requirement for Shropshire to 2038.
- 1.2 The purpose of the Shropshire Local Plan is to plan effectively for growth over the long term, in this case to 2038. The Plan should respond to local issues, including settlement and site specific evidence and from public consultation responses, but should also respond to national policy and guidance. As such the Plan establishes a long term housing requirement for the county to 2038, based in part on the nationally defined housing need for Shropshire, but also taking into account localised factors, in particular the need to support economic growth and to deliver more affordable and lower cost housing. Additional employment and necessary infrastructure improvements are planned alongside housing development in seeking balanced and sustainable growth.
- 1.3 The Pre-submission version of the Local Plan has been informed by four previous stages of public consultation since 2017 as part of the 'Regulation 18' stage of preparation. These stages have sought views on a range of issues including County wide growth proposals; the distribution of that growth; settlement specific strategies; proposed site allocations to guide future growth; and the inclusion of a number of 'strategic sites' on land outside recognised settlements for large-scale mixed-use development. Alongside this the Council have developed a range of evidence base documents to inform proposals.
- 1.4 The Pre-submission Draft of the Plan represents the Council's 'Regulation 19' version of the Plan. In line with national regulations the Council will seek representations through a consultation process on the Pre-Submission Draft Plan. The public and other stakeholders will be asked to make representations by considering whether the pre-submission version of the Local Plan is 'sound' based upon a set of nationally prescribed criteria. It is the intention to seek a period of eight weeks for this consultation period, which is in excess of national minimum requirements.

## **2. Recommendations**

- A. That Cabinet approves the Pre-Submission Version of the Local Plan for a period of public consultation in order to seek representations on the soundness of the Plan;
- B. That Cabinet agrees the principle of Shropshire Council accepting up to 1,500 dwellings from the Association of Black Country Authorities (ABCA) as part of the Duty to Cooperate, and for these to be incorporated into Shropshire's overall housing requirement up to 2038 and to be distributed in accordance with the overall Strategic Approach to the distribution of growth.
- C. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitat Regulation Assessment and the Consultation Strategy.

## **REPORT**

### **3. Risk Assessment and Opportunities Appraisal**

- 3.1 The current Local Plan Review is designed to help ensure that the Local Plan remains the starting point and platform for planning decisions during the period to 2038. Local Planning Authorities should ensure they have an up-to-date Local Plan and for this process to enable an ongoing housing land supply sufficient to accommodate at least five years' worth of the area's housing requirement. Whilst the Council's current Core Strategy and SAMDev Plans (combined equating to the Local Plan for the area) are considered up-to-date, there is a risk that should the Local Plan not be reviewed in an appropriate timescale, the ongoing ability for the Council to manage growth in a plan-led manner will be weakened.
- 3.2 The pre-submission version of the Local Plan is a statutory stage of plan making and should represent an advanced and fully formed version of the Plan. This is the first occasion the emerging Local Plan has been published and consulted on in its full format, incorporating the various elements of previous stages of consultation into a single document. The four previous stages of consultation (listed in para 1.3) were part of the more informal Regulation 18 stage of preparation and focussed on specific issues. These stages have allowed the Council to respond where necessary to consultation responses and additional evidence, and to develop the Local Plan into the Pre-Submission version.

- 3.3 If agreed, the Council will consult on the Pre-Submission Draft version of the Local Plan in summer 2020. In accordance with most up-to-date plan preparation timetable, agreed in April 2020 in light of the Covid 19 national emergency, it is proposed to seek Full Council approval to submit the Local Plan to the Secretary of State in December 2020 for Independent Examination. It is anticipated the Examination process will last at least 12 months, and it is therefore hoped to move to adoption of the Local Plan in early 2022, subject to a successful Examination process.
- 3.4 It is considered the significant amount of consultation carried out thus far has helped to inform the plan's preparation in a meaningful and constructive manner and reduced the risk to the Council of a challenge on the Plan's soundness on these grounds. However, given the high level of interest in the Plan and the nature of the issues it deals with, it is considered there is a significant likelihood the consultation on the pre-submission version of the Plan will generate a significant level of response. This should not be considered a risk in its own right, and indeed ensuring the public and other stakeholders have a meaningful opportunity to comment on the plan is essential to its 'soundness'. Instead the risk lies in the resource implications of a high response level, and the resulting consequences on plan preparation timetable. There is little to mitigate this risk.
- 3.5 The key purpose of the Regulation 19 consultation stage is to allow consultees the opportunity to make representations on the 'soundness' of the Local Plan. All representations made will be considered by a Planning Inspector appointed to independently examine the Local Plan, currently scheduled to take place in 2021. Ahead of the submission of the Local Plan for examination, scheduled for January 2021, the Council's ability to respond to representations made through the consultation is more limited than at the Regulation 18 consultation stages. Indeed, whilst the Council will be able to agree minor modifications to the Local Plan ahead of its Submission to the Secretary of State this does not extend to making more significant changes, such as the inclusion of an additional site allocation.
- 3.6 However, if, through the Regulation 19 consultation process, it is decided there is a need for the Council to make a significant change to the Plan, the Council does have the ability to propose these changes as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. Again the risk to the Council in this scenario is one of timeframe, and a new Local Development Scheme (LDS) setting out the Local Plan preparation timetable would need to be agreed. The extensive consultation the Council has carried out at the Regulation 18 stages has mitigated this risk, but it should be recognised that there is always the possibility of new evidence being presented through the Regulation 19 process which could lead to a need to propose a more significant alteration to the Plan.

#### **4. Financial Implications**

- 4.1 Planned growth provides the best possible opportunity for Shropshire Council to harness growth potential by providing a stable platform for investors and developers. Growth also provides an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure. New growth simultaneously imposes an additional burden on local services and



provides opportunities to secure investment to improve local facilities which are the responsibility of Shropshire Council and other public service providers.

- 4.2 The Local Plan process is subject to a number of costs, both during preparation principally due to the need to commission evidence base documents to inform both site allocations and development management policies, and through the Examination process, principally through the cost of the Planning Inspectorate. These costs are both necessary and unavoidable in the pursuit of a 'sound' Plan.
- 4.3 Equally there is a financial risk to the Council of not pursuing a review of the Local Plan in a timely manner, most notably through the likelihood of increased levels of planning appeals as a result of increased challenges to the integrity of the currently adopted Core Strategy and SAMDev plan.

## **5 Background**

- 5.1 The National Planning Policy Framework (NPPF) confirms that the planning system should be genuinely plan-led, and that up-to-date Plans should provide a positive vision for the area; a framework for addressing housing need and other economic, social and environmental priorities. The NPPF also states that Plans should be a platform for local people to shape their surroundings.
- 5.2 Whilst Shropshire currently has an up-to-date Local Plan through the adopted Core Strategy and SAMDev documents, there is clearly a significant onus on authorities to regularly update these plans in order to keep them up-to-date. The need for an early review of the Local Plan was also a requirement of the SAMDev Inspector's Report in 2015. However, it should equally be recognised that Plan making does take time; an inevitable consequence of necessary and constructive community engagement, and the need for policies and proposals to be supported by robust evidence. With this in mind, the Council began an early review of the Local plan in 2017, with the Pre-Submission draft (Appendix 1) being the consolidated outcome of this process.
- 5.3 The Pre-Submission version of the Local Plan contains the following broad elements:
- Strategic approach to growth and distribution of development;
  - Localised Strategies for individual settlements;
  - Strategic Sites;
  - Development Management policies to guide all development

### ***Strategic approach to growth and distribution of development***

- 5.4 Policy SP2 of the Pre-Submission Draft of the Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land, equating to around 1,400 dwellings and 15ha of employment land per annum. This represents a marginally lower growth level than that proposed in the

Preferred Scale and Distribution of Growth consultation carried out in early 2018, and is broadly in line with past rates of growth seen in the County.

- 5.5 This level of housing growth proposed across the 22 years covered by the Plan Period seeks to respond in the first instance to the most up-to-date calculation of housing need in the County as a basis, currently 25,894 dwellings over the Plan Period, and then accommodates an additional uplift in this capacity in order to respond positively to the overall 'high growth' strategy. It is considered this uplift will further support the delivery of family and affordable housing to support local needs; increase the opportunity for specialist housing and the needs of other groups; support the diversification of the workforce; support greater opportunities to support the Council's wider economic growth aspirations; and support the opportunity for the Council to respond positively to appropriate cross boundary needs.
- 5.6 The approach to distribution of development reflects the Council's previously stated preferred option, favouring an 'urban focussed' approach. It is considered that by virtue of the infrastructure and services Shropshire's largest settlements generally provide, there is a greater opportunity to deliver larger scale mixed use schemes, in doing so providing better conditions to support additional employment delivery and providing a better balance of growth.
- 5.7 It is a requirement of Local Planning Authorities to undertake a duty to cooperate with neighbouring and closely related Local Planning Authority areas. Council officers have been engaged in discussions with these areas over the course of the plan preparation process. Ahead of the proposed submission of the Local Plan in January 2021, a series of Statements of Common Ground will be prepared and agreed with these areas.
- 5.8 Based upon the discussions to this point the only cross boundary issue requiring recognition and intervention in the Local Plan is with the Association of Black Country Authorities (ABCA) as part of the ongoing preparation of their Black Country Local Plan. The issue relates to the lack of capacity in the ABCA area to accommodate all their defined housing and employment needs in their area in a sustainable manner. This has resulted in ongoing discussions and agreement with a number of surrounding Planning Authority areas to accommodate varying amounts of this unmet need.
- 5.9 Effective and on-going joint working between strategic policy-making authorities is an important part of plan-making as part of the Duty to Cooperate. With this in mind, and further to discussions with the Black County Authorities, it is proposed that the Shropshire housing requirement of 30,800 dwellings incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, resulting from constraints to their housing supply opportunities to 2038. It is considered this offer responds positively and constructively to the needs of ABCA, an area with close links to Shropshire, and provides an opportunity for Shropshire Council to accommodate this need as part of its overall housing requirement, and to distribute this need in line with its agreed pattern of development outlined in Policy SP2 of the Local Plan.

### ***Localised Strategies for individual settlements***

- 5.10 In following the urban focussed approach the majority of the County's growth is captured in settlement specific strategies for Shropshire's network of Market Towns. For the majority of areas this includes proposed site allocations and guidelines on how development on these sites will be managed. It should be remembered that whilst the allocation of a site provides an 'in principle' support that development in this location can be supported, these will continue to be subject to the grant of future planning approval. Where local communities are currently preparing Neighbourhood Plans this has been reflected within the proposed strategies.
- 5.11 Whilst the focus of the plan is on the urban area, it continues to be important to plan effectively for Shropshire's rural areas, but in doing so recognising that growth opportunities in these areas should be more closely aligned with the ability of villages to provide a standard of services and facilities. For this reason the Council opted early in the plan preparation process to provide a consistent methodology to the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The conclusions of this process are included in schedule SP2.2 of the Pre-Submission Draft Plan, which identifies those areas which are proposed to act as Community Hubs. Policy SP7, along with individual Settlement specific policies, seeks to provide a framework for how development will be managed in these areas effectively and in keeping with the local character.

### ***Strategic Sites***

- 5.12 The Pre-Submission version of the Local Plan proposes to allocate three strategic settlements/sites at the following locations:
- The Former Ironbridge Power Station which will form a new strategic settlement;
  - Clive Barracks, Tern Hill which will form a new strategic settlement; and
  - RAF Cosford which will facilitate MOD use and associated activities

### ***Former Ironbridge Power Station***

- 5.13 The former Ironbridge power station occupies a 350 acre site south of the River Severn near Buildwas. The power station ceased operation in 2015 and was purchased by Harworth Group in 2017 with a view to regenerating the site. The proposed inclusion of the site for inclusion within the Local Plan was consulted on as a preferred option in summer 2019. An outline planning application was subsequently submitted to the Council in December 2019 for a major mixed use development including 1,000 dwellings. Whilst the planning application is yet to be determined, it remains appropriate for the Council to continue to seek the site's inclusion within the Local Plan. It is expected that subject to the grant of planning approval, the site will be fully developed by the end of the plan period. The proposed development guidelines for the site are included in Policy S20 of the Pre-Submission Draft Local Plan

### ***Clive Barracks, Tern Hill***

- 5.14 Clive Barracks is a 50 hectare military site on the A41 near Market Drayton which is currently home to the Royal Irish Regiment. MOD announced the intention to redevelop the site in March 2016, and have subsequently confirmed they now plan to complete the vacation and disposal of the site by 2025. The proposed inclusion of the site for inclusion within the Local Plan to form a significant mixed use proposal was consulted on as a preferred option in summer 2019. Local engagement on the site up to this point has helped to shape the proposed development guidelines for the site, which is proposed to provide employment land and around 750 homes as part of a new settlement, together with local services and facilities. Given the timeframe of the proposed disposal of the site, it is expected that around 600 homes will be delivered during the plan period to 2038. The proposed development guidelines for the site are included in Policy S19 of the Pre-Submission Draft Local Plan.

*RAF Cosford*

- 5.15 The national defence review has confirmed RAF Cosford as a key Ministry of Defence asset, but it is considered the potential for the area to meet its future operational defence requirements is restricted by its Green Belt location. Having considered the impact on national Green Belt objectives, as well as the benefits of doing so, it is considered there are exceptional circumstances for the site to be released from the Green Belt. In summary the strategic site will build upon its existing role as a centre of excellence for both UK and International Defence Training, host a specialist aviation academy, support opportunities to co-locate other Ministry of Defence units and activities, facilitate the intensification and expansion of the RAF Museum Cosford and allow the formation of a new headquarters for the Midland Air Ambulance Charity. The proposed development guidelines for the site are included in Policy S21 of the Pre-Submission Draft Local Plan

***Other Strategic Site Considerations***

- 5.16 As part of the Strategic Sites consultation in summer 2019 the Council confirmed it was considering the potential inclusion of land north of Junction 3 on the M54 within the Local Plan. The land, which covers around 400 hectares and lies wholly within the Green Belt, is being actively promoted to include around 3,000 dwellings and 50ha of employment land, as well as the inclusion of local facilities and services. Whilst the Strategic Sites consultation in 2019 clearly established the site was not at that stage preferred for development, given the scale of the proposal the Council nevertheless considered it was important to seek community views.
- 5.17 In weighing up the site specific considerations, both positive and negative, and giving consideration to the consultation responses on this matter, it is considered there is insufficient justification to progress an exceptional circumstances argument for the release of this land from the Green Belt. The site is therefore not included within the Pre-Submission version of the Local Plan.

### **Green Belt Release**

- 5.18 Green Belt is perhaps one of the most widely known designations in the planning system. Green Belts cover parts of many local authority areas; in Shropshire's case significant areas in the east of the County are covered by the West Midlands Green Belt designation. The key purposes of the designation is to check unrestricted sprawl; prevent neighbouring towns merging; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.
- 5.19 Permanence is a key feature of Green Belt boundaries, and their extent should only be altered where exceptional circumstances apply. It is however, appropriate for Local Plans to review Green Belt boundaries when required, and in Shropshire's case this was prompted in 2015 by the conclusions of the SAMDev Inspector's Report, which instructed that a review of Shropshire's Green Belt be carried out as part the Local Plan review process. To this end, in 2017 the Council commissioned a Green Belt Assessment in order to assess the extent to which the land within the Green Belt in Shropshire performs against the purposes of Green Belts (outlined in para 5.18). This was followed in 2018 by the publication of a Green Belt Review, which provides an assessment of the harm to the Green Belt purposes should particular parts of the Green Belt be released. The Council therefore have a comprehensive evidence base with which to support decision taking.
- 5.20 It is important to note that before seeking to release land from the Green Belt, the NPPF places a clear need for the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to accommodating the needs of RAF Cosford, and having considered local circumstances of need, the Pre-Submission version of the Local Plan proposes the removal of land from the Green Belt for allocations for employment development within the plan period to 2038 in Shifnal and Bridgnorth, and for mixed use and housing development in Alveley. The Draft Plan also seeks the removal of land from Green Belt for to act as 'safeguarded land' for potential development beyond the plan period in Albrighton, Shifnal and Alveley.
- 5.21 The council are aware there has been a particular focus recently on development options at Bridgnorth, which acts as Shropshire's third largest settlement but which is constrained by Green Belt on its eastern side. In 2018 as part of the Preferred Sites consultation the Council proposed the allocation of land at Stanmore, within the Green Belt, for a new mixed use Garden Village in order to meet the growth requirement for the town within the plan period. Whilst a full exceptional circumstances argument was not advanced at this point, it was felt this option represented a sustainable option for the town, in part given the lack of reasonable alternatives available being presented in non-Green Belt locations. It is acknowledged there was a significant level of opposition to this proposal expressed through the preferred options consultation process.
- 5.22 In March 2020, the Council became aware of a new major development option for the town being presented by Taylor Wimpey. This proposed the inclusion of land to the south of the A458, which falls principally in the Tasley parish area, for the creation of an alternative Garden Village of a similar scale

and nature to the Stanmore proposal. This land is not within the Green Belt. This has been a significant new consideration in the process. In meeting the policy requirements of the NPPF concerning the release of Green Belt, it has been necessary for officers to reassess the continued suitability of the Stanmore proposal. This further site assessment process will be included in the evidence base material upon publication of the Pre-Submission draft for consultation, but in advance of this Appendix 2 of this report specifically sets out the officer considerations and conclusions on this issue.

- 5.23 In summary, having considered the competing site proposals against a full range of material issues, it is recommended that the Tasley Garden Village proposal should be preferred for development to support a comprehensively planned mixed use development to meet the housing needs of Bridgnorth over the plan period. Conversely, it is now recommended that the majority of the Stanmore proposal should remain designated as Green Belt and should not be identified for future development. The exception to this is land north and west of the existing Stanmore Industrial Park, where it continues to be considered the release of land from the Green Belt would be beneficial in supporting the future expansion needs of the Industrial Park to meet employment requirements.
- 5.24 It is acknowledged this is a significant change of position from that proposed in the Preferred Options document in November 2018. However, it remains necessary for the Council to be responsive to new evidence and site promotions throughout the plan making process. In this instance, the impact on the objectives of the Green Belt is a significant policy consideration which has been taken into account, but equally the wider site assessment process leads to the conclusion that the Tasley Garden Village is capable of delivering a sustainable mixed use scheme. Whilst it is acknowledged Taylor Wimpey have carried out localised engagement on the proposal during May and June, the community will have the opportunity through the Regulation 19 consultation process to have their say on the soundness of the Plan to Shropshire Council.

### ***Strategic and Development Management Policies to Guide New Development***

- 5.25 The NPPF states that Local Plans should contain policies that are clearly written and unambiguous, and that a development plan must include strategic policies to address an area's priorities for the development and use of land in its area. A local Plan can also include a series of non-strategic (or detailed) policies to address other more specific issues.
- 5.26 The Pre-Submission version of the Local Plan contains 35 Strategic and Development Management policies, covering a wide spectrum of issues and considerations relevant to the pursuit of sustainable development including climate change; supporting high quality design; managing development in the countryside; delivering affordable housing; ensuring a suitable mix of tenures in new residential development; and managing and minimising flood risk. When adopted these policies will replace the current development management policies in the Core Strategy and the SAMDev Plan.

- 5.27 Whilst the Local Plan should be the starting point for taking decisions on planning applications it does not sit in isolation. To this end many of the proposed development management policies make reference to other strategies being prepared by the Council, including the adopted Economic Growth Strategy 2017-2021, and the emerging Housing and Climate Change Strategies. In doing so these strategies will be a material factor in decision making.

## 6 Next steps

- 6.1 Subject to Cabinet approval, the Pre-Submission Draft of the Local Plan, along with the associated documents will be published for consultation for a period of eight weeks. It is proposed this consultation will begin on Monday 3<sup>rd</sup> August and run until Wednesday 30<sup>th</sup> September, subject to the considerations outlined in para 6.2. Throughout the plan preparation process officers have sought to engage constructively with communities, Parish and Town councils, and elected representatives on emerging preferred options. Whilst in many cases this has led to a consensus of opinion on issues, it is recognised there remains areas where there is likely to be opposition to proposals and that in some areas elected representatives have voiced their objections to proposals included within the Pre-Submission Draft Plan. The statutory consultation process is an opportunity for communities, Parish and Town Councils and elected representatives to submit their comments on the soundness of the Plan, and these will be considered ahead of the proposed submission of the Local Plan to Government for examination in January 2021.
- 6.2 The Consultation on the Pre-Submission Draft of the Local Plan must meet the Town and Country Planning (Local Planning) (England) Regulations 2012, as a minimum. For clarity this means the Pre-Submission Draft of the Local Plan must be made available for inspection at the Council's principal office (in this case Shirehall) and at such other places within the authority area as the Council consider appropriate, which has in previous stages of consultation been libraries. It is acknowledged that due to the Covid 19 national emergency there have been restrictions placed on public access into Council premises, and it is recognised that this will need to be addressed as a matter of priority before the consultation can begin. Consultation arrangements must also meet the requirements of the Council's Statement of Community Involvement (SCI). A significant number of organisations and individuals will continue to be notified directly of the publication of the consultation documents in accordance with the SCI. Electronic responses are encouraged to reduce printing and distribution costs and to reduce the time spent collating and analysing paper responses.

<p><b>List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)</b></p>
------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Cabinet Member (Portfolio Holder)</b>
Robert Macey, Portfolio Holder for Housing and Strategic Planning
<b>Local Members</b>
<b>Appendices</b> <ol style="list-style-type: none"><li>1. Shropshire Local Plan 2016-2038: Pre-Submission Draft Local Plan plus associated mapping</li><li>2. Assessment of Garden Village Proposals in Bridgnorth</li></ol>





Date: Monday, 7 September 2020

Time: 1.00 pm

Venue: THIS IS A VIRTUAL MEETING - PLEASE USE THE LINK ON THE AGENDA TO LISTEN TO THE MEETING

Contact: Amanda Holyoak, Senior Democratic Services Officer  
Tel: 01743 257714  
Email: [amanda.holyoak@shropshire.gov.uk](mailto:amanda.holyoak@shropshire.gov.uk)

## CABINET

### TO FOLLOW REPORT (S)

#### **3 Minutes (Pages 1 - 10)**

To approve as a correct record and sign the minutes of the Cabinet meeting held on 6 July 2020 and 20 July 2020 TO FOLLOW

This page is intentionally left blank



## Committee and Date

Cabinet

7<sup>th</sup> September 2020

## **CABINET**

### **Minutes of the meeting held on 20 July 2020**

#### **Virtual Meeting**

**1.00 - 2.40 pm**

**Responsible Officer:** Julie Fildes

Email: [julie.fildes@shropshire.gov.uk](mailto:julie.fildes@shropshire.gov.uk) Tel: 01743 257723

#### **Present**

Councillor Peter Nutting (Chairman)

Councillors Steve Charmley (Deputy Leader), Gwilym Butler, Dean Carroll, Lee Chapman, Steve Davenport, Robert Macey, David Minnery, Lezley Picton and Ed Potter

#### **115 Apologies for Absence**

No apologies for absence were received.

#### **116 Disclosable Pecuniary Interests**

Councillor Ed Potter declared that through his employment he was connected with sites and customers promoting sites in relation to Agenda Item 7, and as such would withdraw from the meeting and take no part in the discussion during that item.

#### **117 Minutes**

Consideration of the minutes from the meeting on 6<sup>th</sup> July was deferred to the next meeting of the Committee.

#### **118 Public Question Time**

Twenty-five public questions were received in relation to the Shropshire Local Plan Review. The questions were circulated to Members before the meeting commenced.

The full questions submitted and the responses provided are attached to the signed minutes and the web page for the meeting.

#### **119 Member Question Time**

Member questions and supplementary questions were received as follows:

- Relating to land identified for future housing development in the proposed Local Plan for the Much Wenlock area, from Councillor David Turner;
- Relating to consideration of climate change, the provision of a printed extract for Members and the greater use of social media during the consultation process for the proposed Local Plan, from David Vasmer

The questions submitted, supplementary questions and the responses provided are attached to the signed minutes and the webpage for the meeting

## 120 **Scrutiny Items**

There were no scrutiny items.

## 121 **Shropshire Local Plan Review - Pre-submission Consultation Document**

The Portfolio Holder for Housing and Strategic Planning introduced the report, explaining that the Local Plan had reached the Pre-Submission Draft stage and was subject to further consultation stages.

He continued that following representations and further consideration, he was minded to propose an extension the current Section 18 consultation stage. He proposed that Recommendation A as set out in the report be amended to 'That Cabinet approves the Pre-Submission Version of the Local Plan for a period of public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in order to seek representations on the soundness of the Plan.' This was duly seconded.

Councillors Biggins, Milner, Turner, Wood, Winwood and Lynch were in attendance to raise concerns relating to their Ward areas. These were noted, and the Leader assured the Members that they would be able to submit the issues identified through the consultation process with the extension of the Section 18 consultation period.

A member asked for further clarification of the points system in regard to providing housing provision for neighbouring Local Authority areas. The Principal Planning Officer confirmed that the number of homes to meet the cross boundary unmet housing requirement was contained within the housing projection and was not additional to it.

Members welcomed the proposed extension of the Section 18 consultation period. The Leader advised that to meet deadlines an additional Cabinet meeting in November and an additional Council meeting in January may be required. He continued that Officers would scope out a revised timetable.

### **RESOLVED:**

- i) That the Pre-Submission Version of the Local Plan for a period of public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in order to seek representations on the soundness of the plan, be approved;
- ii) That the principle of Shropshire Council accepting up to 1,500 dwellings from the Association of Black Country Authorities (ABCA) as part of the Duty to Cooperate, and for these to be incorporated into Shropshire's overall housing requirement up to 2038 and to be distributed in accordance with the overall Strategic Approach to the distribution of growth be agreed.
- iii) That authority be delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional

minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitat Regulation Assessment and the Consultation Strategy.

## **122 Hardship Fund - Additional Discretionary Support**

The Portfolio Holder for Finance and Corporate Support introduced the report by outlining the scheme and proposed recommendation. He confirmed that the Government Scheme allowed a maximum payment of £150.

### **RESOLVED:**

That the proposals for expenditure of uncommitted grant by paying an extra £50.00 to working age council tax support claimants (maximising the award for these claimants to £200) be approved and the Director of Finance, Governance and Assurance in consultation with the Portfolio Holder - Finance and Corporate Support, be delegated to finalise arrangements for expenditure of the grant.

## **123 Exclusion of the Press and Public**

### **RESOLVED:**

That in accordance with the provisions of Schedule 12A of the Local Government Act 1972 and Paragraph 10.4 (3) of the Council's Access to Information Rules, the public and press be excluded from the meeting for the following item.

## **124 Exempt Minutes**

Consideration of the exempt minutes from the meeting on 6<sup>th</sup> July 2020 was deferred to the next meeting of the Committee.

Signed ..... (Chairman)

Date: .....

This page is intentionally left blank

**CABINET**

**Minutes of the meeting held on 6 July 2020 at 1pm  
Virtual Meeting**

**Responsible Officer:** Julie Fildes

Email: julie.fildes@shropshire.gov.uk Tel: 01743 257714

**Present**

Councillor Peter Nutting (Leader)

Councillors Steve Charmley (Deputy Leader), Gwilym Butler, Dean Carroll, Lee Chapman, Steve Davenport, Robert Macey, David Minnery, Lezley Picton and Ed Potter

**102 Apologies for Absence**

No apologies were received.

**103 Disclosable Pecuniary Interests**

None were declared.

**104 Minutes**

**RESOLVED:**

That the minutes of the meeting held on 15<sup>th</sup> June 2020 be approved as a correct record to be signed by the Leader.

**105 Public Question Time**

The Director of Legal and Democratic Services read out questions submitted by the following members of the public:

Rob Wilson – regarding the Emergency Active Travel Fund

Diane Peacock - regarding Covid 19

The full questions and responses provided by Portfolio Holders are attached to the signed minutes.

**106 Member Question Time**

The following Members were invited to ask their questions by the Leader. The full questions and responses provided are attached to the signed minutes.

Councillor Julian Dean asked questions regarding Shropshire Council's Annual Workforce Diversity Monitoring Report and Annual Service User Diversity Report. By way of a supplementary question he asked if it would be possible to give further consideration to how the Council heard from communities with protected characteristics. The Leader said he would ask officers to consider this going forward.

Councillor Roger Evans asked questions regarding the recent closure of a main road in his electoral division, the adherence of the closure with the times advertised and the lack of adequate notice for residents and businesses to plan alternative arrangements.

Councillor David Vasmer asked a question about the sale of the former training and development centre on Racecourse Crescent. In response to a follow up question the Portfolio Holder said every option was still open at this stage.

Councillor David Vasmer also asked if there would be a review of the need of the NWRR in the light of the impact on the roads of the Council working in new ways post Covid. In response to a follow up question about expected guidance from the Department of Transport, the Portfolio Holder said the Council was in constant discussions with the Department of Transport and up to the minute guidance taken.

Councillor Andy Boddington asked a question also from Councillors Viv Parry and Tracey Huffer about urgent road closures under experimental traffic regulation orders and what assessments took place in advance of these in relation to impact on people with disabilities, mobility issues and retail and service trades. In response to a supplementary question about bus routes into Ludlow during closures, the Portfolio Holder invited Councillor Boddington to contact him outside of the meeting.

## **107 Scrutiny Items**

There were no scrutiny items.

## **108 Financial Outturn 2019/20**

The Portfolio Holder for Finance and Corporate Support presented the report of the Director of Finance, Governance and Assurance providing details of the revenue and capital outturn position for 2019/20. There had been an overspend of £1.692m which represented a variance of 0.3% of the gross budget. The Leader said he felt this was a reasonable amount considering the extremely challenging year.

In response to a question from the Leader of the Liberal Democrat Group regarding the implications of not meeting planned savings and whether there was a likelihood of future recruitment and spending freezes, the Portfolio Holder stated that there were a number of reasons savings had not been met in 2019 – 2020, some of which had been due to floods and the pandemic but some others had been due to be delivered via income generation. There was confidence that the planned savings would be achieved and alternative means of delivering services were being considered.



The Leader said he was confident that one-off funding would be received from government in relation to the pandemic and that the local government funding review would address some of the underlying issues with revenue budgets. Any vacancy was always carefully considered and recruitment did not proceed unless absolutely necessary.

## **RESOLVED:**

- i) that that the outturn for the revenue budget for 2019/20 is a controllable overspend of £1.692m be noted. This represents 0.3% of the original gross budget of £568.489m.
- ii) that had £0.460m of the Council's General Fund not been applied in response to the Storm Dennis emergency event, and had £0.387m Coronavirus funding not been applied to revenue at year end, the controllable outturn position would have been an overspend of £2.539m be noted.
- iii) that the level of the General Fund balance after adjusting for the outturn overspend and insurance position stands at £13.510m, which is significantly below the recommended level be noted.
- iv) that the outturn for the Housing Revenue Account for 2019/20 is an underspend of £4.106m and the level of the Housing Revenue Account reserve stands at £10.140m (2018/19 £9.813m) be noted.
- v) the increase in the level of Earmarked Reserves and Provisions (excluding delegated school balances) of £1.931 in 2019/20 and the reasons for this be noted.
- vi) that the level of school balances stand at £1.891m (2018/19 £4.178m) be noted.
- vii) That the net budget variations of £9.710m to the 2019/20 capital programme, detailed in Appendix 5 / Table 11 and the re-profiled 2019/20 capital budget of £70.982m be approved.
- viii) That the re-profiled capital budgets of £127.309m for 2020/21, including slippage of £11.773m from 2019/20, £89.835m for 2021/22 and £103.110m for 2022/23 as detailed in Appendix 5 / Table 15 be approved.
- ix) that the outturn expenditure set out in Appendix 5 of £59.209m, representing 83% of the revised capital budget for 2019/20 be approved.
- x) That retaining a balance of capital receipts set aside of £19.619m as at 31st March 2020 to generate a one-off Minimum Revenue Provision saving of £0.693m in 2020/21.2m be approved.

## **109 Treasury Management Update Quarter 4 2019/20**

The Portfolio Holder for Finance and Corporate Support presented the report of the Director of Finance, Governance and Assurance outlining the Treasury Management

activities of the last quarter. Both he and the Leader congratulated the internal treasury team for yet again achieving a return which outperformed the benchmark - achieving 1.03% on the Council's cash balances. This outperformed the benchmark by 0.59%, and amounted to an additional income of £232,080

**RESOLVED:** that the position as set out in the report be approved.

#### 110 **Financial Strategy 2021-22**

The Leader presented the report of the Director of Finance, Governance and Assurance on the Financial Strategy. He said the current situation was fast moving, announcements from government were ongoing and the position would be reviewed in the Autumn when things were clearer.

The Portfolio Holder for Finance and Corporate Support said he was confident covid costs would be met by the government, that the required savings would be made and a balanced position would be achieved for the next two financial years.

The Leader reported that all Council activity was under review and consideration was being given to more services being delivered remotely and to providing more of a council presence in market towns.

**RESOLVED:**

- i) that the revised financial projections for the Council leading to a forecast funding gap of £18.5m in the 2020/21 Financial Year, and the options identified to resolve this be noted.
- ii) That the revised financial projections for the 2021/22 Financial Year leading to a forecast funding gap of £33.3m in that year be noted.
- iii) that with additional government intervention to support the shortfall in Covid-19 costs in 2020/21, confirmation of one-off grants for 2021/22, delivery of existing savings targets in both financial years and utilisation of the Financial Strategy Reserve, a balanced budget over the two financial years can still be achieved, be noted.

#### 111 **Shropshire Council Equality Objectives Action Plan 2020 to 2024**

The Leader presented the report on Shropshire Council Equality Objectives, pointing out its timely nature as current affairs around the world had served as an unwelcome reminder of the racial injustice and inequality in society today. These events had highlighted the need for the Council to be aware in its daily operations in particular around discrimination. He reported that he had personally reflected on the need to drive out discrimination and ensure equality and had reviewed the content of the Council's equality training and fully endorsed the work of officers and communities in a commitment to develop understanding of these issues.

The Action Plan set out a range of actions to ensure that the Council was not complacent or complicit in particular forms of discrimination. It also set out actions to address the disproportionate impact of the Covid-19 pandemic which had exposed health inequalities in the population, making work around equality, diversity and inclusion of even greater importance.

The Council had always been committed to equality and valuing diversity in its workforce and local communities. The goal was to ensure this commitment was embedded in day to day practices with all customers, colleagues and partners, alongside open dialogue and ongoing engagement with all communities in Shropshire.

.....  
All at the Council had a role to play to bring about positive change by promoting equality and would lead by example and not tolerate discrimination, harassment or victimisation of any kind and he commended the action plan to Members.

**RESOLVED:**

- i. That the publication of Shropshire Council's Equality Objectives Action Plan for 2020 to 2024, in order to meet legal requirements for compliance with the Public Sector Equality Duty placed upon the Council through the Equality Act 2010 be approved. (Appendix A)
- ii) That the progress made in this policy arena over the last four years, and the necessary and optimum linkages to be made between this document and associated corporate and partnership documentation, as part of good practice approaches towards meeting the needs of the diverse communities served by the Council and partners be noted. (Appendix B)
- iii) That to receive a progress report on equality developments at local and national level at a timely future date, at which point further recommendations may be tabled, specifically with regard to the impacts of the Covid-19 pandemic upon groupings and communities in Shropshire be approved.

**112 Exclusion of the Press and Public**

**RESOLVED:**

That in accordance with the provision of Schedule 12A of the Local Government Act 1972 and Paragraph 10.4(3) of the Council's Access to Information Rule, the public and press be excluded from the meeting during consideration of the following items be approved.

**113 Options for Temporary Accommodation**

This item was WITHDRAWN

**114 Proposed Highways and Environment Term Maintenance Contract Year 1 Settlement and Contract Amendment**

**RESOLVED:**

That the two recommendations detailed in the report be approved.

Signed

(Chairman)

.....

Date:

.....

Agenda Item No	Topic	Decision
7	Shropshire Local Plan Review - Pre-submission Consultation Document	<p><b>RESOLVED:</b></p> <ul style="list-style-type: none"> <li>i) That the Pre-Submission Version of the Local Plan for a period of public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in order to seek representations on the soundness of the plan, be approved;</li> <li>ii) that the principle of Shropshire Council accepting up to 1,500 dwellings from the Association of Black Country Authorities (ABCA) as part of the Duty to Cooperate, and for these to be incorporated into Shropshire's overall housing requirement up to 2038 and to be distributed in accordance with the overall Strategic Approach to the distribution of growth be agreed.</li> <li>iii) That authority be delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitat Regulation Assessment and the Consultation Strategy.</li> </ul>
8	Hardship Fund - Additional Discretionary Support	<p><b>RESOLVED:</b></p> <p>That the proposals for expenditure of uncommitted grant by paying an extra £50.00 to working age council tax support claimants (maximising the award for these claimants to £200) be approved and the Director of Finance, Governance and Assurance in consultation with the Portfolio Holder - Finance and Corporate Support, be delegated to finalise arrangements for expenditure of the grant.</p>
A1		
A2		



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW  
Date: 4 August 2020  
Please ask for: [REDACTED]  
Direct Line: [REDACTED]

Dear Colleagues

**Black Country Plan Review**

**Duty to Co-operate: Strategic Housing and Employment land Issues**

As you will be aware, the Black Country Authorities are currently in the process of reviewing the Black Country Core Strategy, which is now called the Black Country Plan. As a key part of this review we completed our Issues and Options consultation in September 2017, which included a call for sites. In light of the impacts of Covid-19 we have now published a revised timetable for the Black Country Plan review (<https://blackcountryplan.dudley.gov.uk/t2/p1/>).

In line with the new timetable, we are now finalising evidence and preparing a Draft Plan for consultation in summer 2021. We aim to produce a Publication Plan in summer 2022 and adopt the Plan in early 2024. In order to ensure the adopted Plan covers a period of at least 15 years we will be extending the Plan period to 2039.

We are keen to continue to work with neighbouring authorities, including yours, on strategic matters. You may recall that we contacted you in July 2018 asking your authority to consider whether it would be able and willing to accommodate any identified housing or employment land needs arising from the Black Country. We were pleased to receive a number of positive responses to this request and note that a number of authorities have since progressed their Local Plan reviews in a consistently positive manner. We also held a Duty to Co-operate meeting in January 2020 when we took the opportunity to update neighbouring authorities on key strategic planning matters.

The purpose of this letter is to provide a further update on the strategic issues of housing and employment land needs arising in the Black Country over our Plan period, and how these can be met, and to ask your authority to respond to specific questions on these issues. These are the most pressing strategic issues which we need to address to enable us to fully develop our Draft Plan, in line with the new timetable.

[REDACTED], Secretary to ABCA  
Walsall Metropolitan Borough Council,  
The Civic Centre, Darwall Street, Walsall, WS1 1TP.

Web: [www.walsall.gov.uk](http://www.walsall.gov.uk)

## **Strategic Housing Issues**

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able to accommodate all of our identified housing needs within the urban area of the Black Country.

This view is supported by our urban housing supply estimates, which are detailed in the 2019 UCR. The UCR continues to focus on a brownfield first approach, building on the success of the current strategy, and making every endeavour to accommodate as much of our development needs as possible in our urban areas before considering other locations in the Black Country or beyond. However, even by increasing densities and looking to other sources of urban land supply, it is clear that we cannot accommodate all our housing needs within the urban area. Current estimates are that we have a shortfall in the region of 27,000 homes up to 2038. We are in the process of updating the UCR to reflect the most up-to-date information and hope to publish this update by the end of the year. However, it is very unlikely that this update will result in a significant increase in urban housing supply over the Plan period.

## **Strategic Employment Land Issues**

Turning to employment land, the Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 300 ha of land, leaving a shortfall of between 292 ha and 570 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area including a review of opportunities within our existing employment areas through the Black Country Employment Area Review (BEAR). While this work will yield some additional capacity, it will not make a significant impact upon addressing our unmet need.

## **Potential contributions from Non-Green Belt Areas**

The Black Country clearly has development needs which cannot be met within the non-green belt areas of the Black Country. In this event, national policy (reference NPPF para 137) requires that, if there are non-green belt areas in neighbouring authorities which can be brought forward to meet Black Country development needs, these should be clearly identified first, before considering release of land from the green belt. To date, no existing adopted Local Plans are making such a contribution.

██████████, Secretary to ABCA  
Walsall Metropolitan Borough Council,  
The Civic Centre, Darwall Street, Walsall, WS1 1TP.

Web: [www.walsall.gov.uk](http://www.walsall.gov.uk)

**Therefore, we would request that your authority confirms if your existing or emerging Local Plan is seeking to deliver levels of housing and / or employment land in excess of local needs on non-green belt land and, if so, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.**

### **Green Belt Areas**

The Black Country authorities have undertaken a Green Belt and Landscape Sensitivity Assessment, which has shown that the Black Country Green Belt makes a principal contribution towards Green Belt purposes and its capacity to undertake large-scale development is limited.

Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study<sup>1</sup> concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan<sup>2</sup>. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands.

As the majority of the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for potential delivery of housing in the Green Belt, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham, may reasonably conclude that the housing market areas in Dudley and Walsall could only be expected to deliver up to a maximum of 5,000 homes in each of the two boroughs (providing a maximum total of 10,000 homes) over the 15-year Plan period. We hope to publish further delivery evidence to refine this figure by the end of the year. On the basis of this approach, the Black Country is facing a 'gap' of some 17,000 homes that cannot be accommodated within the Black Country.

Turning to employment, the call for sites stage identified few additional sites for consideration on land within the Black Country Green Belt. We are considering

---

<sup>1</sup> [https://www.birmingham.gov.uk/downloads/file/1750/pg3\\_housing\\_delivery\\_on\\_green\\_belt\\_options\\_2013pdf](https://www.birmingham.gov.uk/downloads/file/1750/pg3_housing_delivery_on_green_belt_options_2013pdf)

<sup>2</sup>

[https://www.birmingham.gov.uk/downloads/file/1211/strategic\\_housing\\_market\\_assessment\\_2013\\_housing\\_targets\\_2011\\_to\\_2031\\_technical\\_paper](https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper)



these proposals but it is not anticipated that this will provide significant additional capacity.

Taking into account the likely housing and employment land capacity of the Black Country Green Belt, even if the maximum contributions from neighbouring authorities set out in the Duty to Cooperate table above are brought forward, there remains a significant level of unmet need in the order of at least 4,500 - 6,500 homes and up to 292 ha-570ha of employment land.

**Therefore, we would request that your authority confirms if your existing or emerging Local Plan is seeking to deliver levels of housing or employment land in excess of local development needs on land currently designated as green belt and, if so, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.**

### **Duty to Cooperate progress**

As set out above, we were pleased to receive a number of positive responses to our Duty to Cooperate letter of July 2018 and a number of authorities have since progressed their Local Plan reviews in a consistently positive manner. Potential contributions to housing and employment land from neighbouring authorities indicated through our engagement under the Duty to Cooperate to date are summarised in the table below:

<b>Local Plan and timescale</b>	<b>Plan stage</b>	<b>Potential housing contribution</b>	<b>Potential employment land contribution (ha)</b>
South Staffordshire	Issues and Options (November 2018) & Spatial Housing Strategy and Infrastructure Delivery consultation (October 2019)	Up to 4,000* (majority Green Belt release)	Contributions to be sought from District's employment land surplus, including West Midlands Interchange (majority Green Belt release)**
Lichfield	Preferred Options (November 2019)	Up to 4,500* (part may be outside the Green Belt)	0
Cannock	Issues and Options (May 2019)	Up to 500-2,500* (all Green Belt release)	0
Shropshire	Publication (Summer 2020)	1,500 (may be outside the Green Belt)	0
<b>Total</b>		<b>Up to 10,500-12,500</b>	<b>TBD**</b>

\* - potential contribution to needs arising across the Birmingham and Black Country Housing Market Area and not at this stage wholly apportioned to the Black Country.  
\*\* dependent on the outcome of ongoing work to determine the extent of surplus South Staffordshire Green Belt employment land release that can reasonably be attributed to the Black Country's employment land needs

This suggests that the combined housing and employment land capacity of non-green belt areas and green belt in neighbouring authorities is unlikely to be sufficient to address Black Country housing and employment land shortfalls up to 2039.

### **Statement of Common Ground**

**Looking ahead to the Duty to Cooperate work needed to support the emerging Black Country Plan, we would like to invite your authority to take part in developing a single Statement of Common Ground (SoCG) covering strategic issues for the Black Country Plan up to 2039, with the initial focus on housing and employment land issues.**

We are keen to involve as many relevant authorities as possible in developing the strategic housing and employment land related parts of the SoCG, including Greater Birmingham and Black Country Housing Market Area authorities and other neighbouring authorities with an existing or potential housing market or functional economic relationship to the Black Country. The SoCG will evolve as the BCP review progresses, and it is intended to agree and publish an up-to-date SoCG for each key stage of the review process.

We hope that the SoCG will ultimately be supported by a separate agreement on strategic housing issues between relevant authorities, setting out how and where the combined Black Country and Birmingham housing shortfalls will be met over the Black Country Plan and Birmingham Plan review periods, which can be relied upon at our Examinations in Public and form the basis for partnership working in the years following the adoption of our Plans.

### **Timetable for Responses**

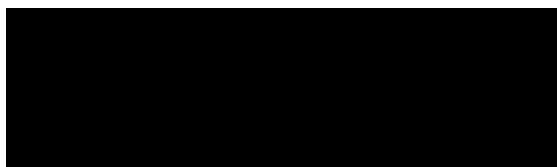
**We ask that you consider the requests set out in this letter and respond in writing to: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk) within two months of the date of this letter. If you wish to discuss the contents of this letter before responding, by phone or at a meeting, please get in touch.** We appreciate that this letter may raise difficult issues that need thorough consideration from both officers and Councillors. However, given the time that has already passed since the Black Country initially identified a significant housing shortfall in 2018 and the wider work already undertaken across the Greater Birmingham Housing Market Area, we would be grateful if you could adhere to these timescales. **If you anticipate a delay in being able to provide a response, it would be helpful if you could let us know as soon as possible.**

We will be inviting your authority to attend a meeting in October 2020 to discuss the responses we have received to this letter and to agree a way forward, with the view to developing a Statement of Common Ground to accompany the Draft Black Country Plan by spring 2021.

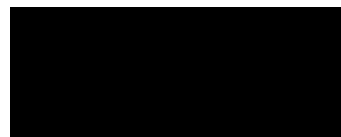
Given the need to adhere to the current Black Country Plan timetable, if we do not receive a response from your authority on these issues by September 2020 we will assume that your authority is not considering making a contribution towards Black Country housing or employment land needs and does not wish to take part in developing our Statement of Common Ground, and this will be noted in our Duty to Cooperate records.

We look forward to working with you on strategic matters during the course of our review work.

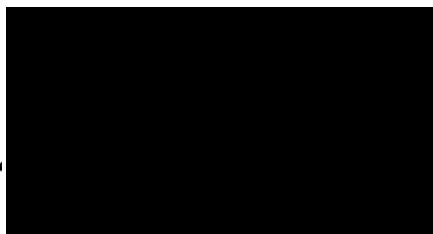
Yours sincerely



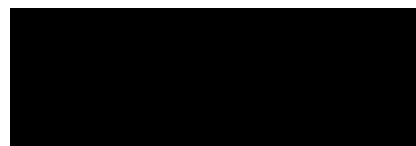
Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council



Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council



Councillor Maria Crompton  
Deputy Leader  
Sandwell Metropolitan Borough Council



Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council

**GC10b** Shropshire Council and ABCA - Timeline of DtC activity - Email from I Culley to E West 12.8.20 @ 12.05

Sensitivity: PROTECT

Hi Eddie and hope you are OK.

I'd be grateful of a quick catchup with you over the next week if possible – the Council should have recd the DtC letter as discussed a couple of weeks ago but obviously the White Paper has been published since then.

Monday morning would be good for me.

Kind regards

Ian

Ian Culley  
Lead Planning Manager (Regional Strategy)  
Tel. Office: 01902 555636

[E-mail: Ian.Culley@wolverhampton.gov.uk](mailto:Ian.Culley@wolverhampton.gov.uk)  
City of Wolverhampton Council

Local Plan catchup - Meeting

File

Meeting

Insert

Format Text

Review

Tell me what you want to do...

Save & Close

Delete

Copy to My Calendar

Calendar

Forward

Appointment

Scheduling Assistant

Join Teams Meeting

Resource Finder

Accept

Tentative

Decline

Propose New Time

Respond

Show As: Busy

Reminder: None

Recurrence

Time Zones

Categorize

Private

High Importance

Low Importance

Send to OneNote

Viva Insights

Accepted on 12/08/2020 13:47.

Organizer: ☐ Ian Culley

Subject: Local Plan catchup

Location: Microsoft Teams Meeting

Start time: Mon 17/08/2020 11:00 ☐ All day event

End time: Mon 17/08/2020 11:30

Sent: Wed 12/08/2020 13:47

[Join Microsoft Teams Meeting](#)

[Learn more about Teams](#) | [Meeting options](#)

STAY ALERT ▶ CONTROL THE VIRUS ▶ SAVE LIVES

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICTED information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

In Shared Folder: Calendar

Last modified by Edward West on 19/08/2022

## **GC10d** Shropshire Council and ABCA - Timeline of DtC activity - Draft letter email E West to I Culley 29.9.20 @ 20.08

Hi Ian,

I have drafted the letter as discussed and it is currently with my Director and Portfolio holder for agreement. I understand the importance to get this draft over to you as soon as possible tomorrow morning. By way of comfort this is what I am saying about the employment land position...

"As currently drafted the Shropshire Local Plan does not make provision to accept any unmet employment need from the Black Country. It is however noted that your letter of 4<sup>th</sup> August states that, based upon your employment land supply evidence, the Black Country Plan faces a likely shortfall of between 292 and 570 hectares depending on the growth scenario applied.

The draft Shropshire Local Plan seeks to provide a balance of housing and employment opportunities. Indeed supporting sustainable opportunities for both localised and more strategic employment opportunities is a key objective of the Plan. In seeking to achieve this balance, the draft Plan identifies the need to deliver 300 hectares of employment land between 2016 and 2038. Whilst much of this growth has already been identified through current committed sites across the County, there has been a need to identify additional employment sites in some of Shropshire's higher level settlements, including in Shrewsbury, Bridgnorth, Shifnal, as well as being part of wider redevelopment opportunities on major redevelopment sites at Clive Barracks (Tern Hill) and the former Ironbridge Power Station. In the case of Bridgnorth and Shifnal this has led to the need to identify Green Belt release, which we have sought to justify as part of an Exceptional Circumstances argument.

As in the case of unmet housing need, Shropshire Council will be willing to consider the potential to accept an element of unmet employment need from ABCA. At this stage this is a commitment in principle, and will need to be explored further between the parties as part of the ongoing discussion on the Statement of Common Ground in the coming weeks. Clearly these discussions will also need to reflect upon the outcome of the current consultation on the draft Shropshire Local Plan, as well as any additional evidence produced over the coming months, which in Shropshire's case will include an Economic Development Needs Assessment (EDNA). It is also considered that any subsequent agreement on the unmet employment need should be of a scale which would neither lead the Council to exceed its balanced employment growth level (300 hectares over the Plan period) nor lead to the delivery of the Urban Focus strategy being compromised.

We look forward to continuing to work constructively with ABCA over the coming months in seeking to formalise the Duty to Co-operate position through a Statement of Common Ground."

Until such time as I get approval please can you treat this as confidential. Hopefully I'll get you the full draft over in the morning.

Thanks

Eddie

Eddie West

Interim Planning Policy and Strategy Manager

Shropshire Council

Tel 01743 254617

e-mail: [edward.west@shropshire.gov.uk](mailto:edward.west@shropshire.gov.uk)

**GC10c** Shropshire Council and ABCA - Timeline of DtC activity - LP Review email from E West to I Culley 22.9.20

Hi Ian,

Yes nice break thanks, now back to the mayhem. I would welcome a catch up. Thursday pm is good for me at a time to suit.

Thanks

Eddie

**From:** Ian Culley <Ian.Culley@wolverhampton.gov.uk>

**Sent:** 22 September 2020 09:40

**To:** Edward West <edward.west@shropshire.gov.uk>

**Subject:** Local Plan Review

**Sensitivity:** PROTECT

Hi Eddie and I hope you had a good break.

Could we have a catchup this week please – I need to finalise the Report to ABCA Leaders.

I can make myself available to suit – the only exception being this afternoon and tomorrow 2.30-3.30.

Kind regards

Ian

Ian Culley

Lead Planning Manager (Regional Strategy)

Tel. Office: 01902 555636

[E-mail: Ian.Culley@wolverhampton.gov.uk](mailto:Ian.Culley@wolverhampton.gov.uk)

City of Wolverhampton Council

catchup - Meeting

FileMeetingInsertFormat TextReviewTell me what you want to do...

Save & Close

Calendar

Forward

Appointment

Scheduling Assistant

Join Teams Meeting

Resource Finder

Accept

Tentative

Decline

Propose New Time

Respond

Show As

Busy

Reminder: None

Recurrence

Time Zones

Categorize

Private

High Importance

Low Importance

Send to OneNote

Viva Insights

Accepted on 23/09/2020 09:12.

Organizer: Ian Culey

Subject: catchup

Location: Microsoft Teams Meeting

Start time: Thu 24/09/2020 14:00

End time: Thu 24/09/2020 14:30

Sent: Wed 23/09/2020 08:50

Join Microsoft Teams Meeting

Learn more about Teams | Meeting options

STAY ALERT ▶ CONTROL THE VIRUS ▶ SAVE LIVES

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICTED information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

In Shared Folder: Calendar



# APPENDIX 1



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW  
Date: 30 September 2020  
Please ask for:  
Direct Line:

Via email : [Planningpolicy@Shropshire.gov.uk](mailto:Planningpolicy@Shropshire.gov.uk)

Dear Colleagues

## **Shropshire Local Plan – Regulation 18 Consultation**

Thank you for giving the opportunity for the Association of Black Country Authorities (ABCA) to respond to the Shropshire Local Plan Regulation 18 consultation. This letter provides our formal response to the consultation.

### **Background**

ABCA have engaged with all previous stages of the Local Plan review in a constructive and cooperative manner. Our principal issue relates to the opportunity for the Local Plan to respond positively to help address the identified shortfall of land to meet housing and employment land needs arising in the Black Country, while at the same time helping to drive forward the realisation of Shropshire's economic growth ambitions.

In this context, we responded to the Local Plan Strategic Sites consultation in September 2019, strongly supporting the opportunity at Junction 3 of the M54 to provide a new mixed-use community including some 3,000 homes, 50ha of employment land with associated open space and community facilities. We specifically noted that this opportunity was well placed to meet needs arising in the Black Country given the strong physical and functional relationship.

We note that the Regulation 18 Plan does not include the allocation of land at junction 3, but recognise that the Regulation 18 Plan does respond to the Duty to Cooperate, particularly in relation to housing. We are disappointed that there is no equivalent proposal in respect of employment land, and so ABCA must object to the Regulation 14 Plan on this basis. We would welcome the opportunity to work with the Council in understanding the approach taken in the Regulation 18 Plan towards employment land, including evidence submitted by the promoters of the Junction 3 site as part of the Black Country Plan Call for Sites in August of this year.

We set out our detailed response to the consultation below.

### **Housing**

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able

Dr Helen Paterson, Secretary to ABCA  
Walsall Metropolitan Borough Council,  
The Civic Centre, Darwall Street, Walsall, WS1 1TP.  
Tel: 01922 650000  
Web: [www.walsall.gov.uk](http://www.walsall.gov.uk)

to accommodate all of our identified housing needs within the urban area of the Black Country.

We therefore strongly support the Local Housing requirement of 30,800 homes as set out in Policy SP2 of the Regulation 18 Local Plan in terms of it incorporating 1,500 dwellings to support the housing needs of the emerging Black Country Plan. We agree that this reflects a positive approach to cross-boundary cooperation and responds to the functional relationship between the two areas.

We note that this contribution will be accommodated through the distribution of development proposed in the Regulation 18 Plan, and consider that allocations in the principal settlements in the eastern areas of the County closest to the Black Country including Shifnall and Bridgnorth are well placed to meet this need.

However, we are concerned that the Local Plan does not contain a mechanism which would allow the Council to trigger a partial review of the Plan in the light of the rate and location of housing delivery or in the event of a greater need for additional housing - either associated with meeting the needs of Shropshire, or adjacent housing market areas including the Black Country. We would be happy to work with you to explore these mechanisms in more detail.

#### Employment land

Turning to employment land, the Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 305 ha of land, leaving a shortfall of between 263 ha and 500 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area but this exercise will not make a significant impact upon addressing our unmet need.

We are therefore concerned that the Regulation 18 Plan does not seek to make a contribution to meeting employment land needs arising in the Black Country. The evidential basis of the Local Plan employment target of 300ha as set out in Policy SP2 is not clear and so it is not possible to determine whether within this requirement, there exists any 'headroom' above locally generated needs and / or associated with the housing contribution, that could be attributed to meeting needs arising in the Black Country without the need for additional allocations. This evidential gap should be addressed through the commissioning of an Economic Development Needs Assessment (EDNA) consistent with the guidance contained in the Governments Planning Practise Guidance (PPG) - <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>.

We also note information prepared by the Bradford Estate in relation to the Junction 3 site as submitted to the Black Country Call for Sites in August of this year. This includes an assessment of the need for Strategic Employment Land to serve the M54 and wider sub-region, recognising the opportunity of an employment-only scheme at Junction 3 to address this need.

We request further engagement with the Council through the Duty to Cooperate to explore how the Local Plan can respond to these issues.

### Minerals and Waste issues

The welcome the approach set out in Policies DP31-DP35 in relation to minerals and waste management infrastructure. There is evidence that facilities in Shropshire provide for both minerals and waste requirements arising in the Black Country. The availability of aggregates is currently in excess above minimum guidelines and the Plan does not propose any additional site allocations. Turning to waste management, existing consented facilities are anticipated to provide sufficient capacity to accommodate forecast throughput negating the need for additional facilities.

### Summary

In summary, we consider that the Regulation 18 Plan is responding to the Duty to Cooperate in relation to housing and minerals and waste issues. But we advise that further work and dialogue with the Black Country is required in relation to employment land. We suggest that a meeting is convened as soon as possible to scope out this work by contacting Ian Culley (Lead Planning Manager, Regional Strategy) at the City of Wolverhampton Council. ([ian.culley@wolverhampton.gov.uk](mailto:ian.culley@wolverhampton.gov.uk)).

Yours sincerely

Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council

Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council

Councillor Maria Crompton  
Deputy Leader  
Sandwell Metropolitan Borough Council

Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council

Local Plans catchup - Meeting

File Meeting Insert Format Text Review Tell me what you want to do...

Save & Close Delete Forward Appointment Scheduling Assistant Join Teams Meeting Resource Finder Accept Tentative Decline Propose New Time Respond Show As Busy Reminder: None Recurrence Time Zones Categorize Private High Importance Low Importance Send to OneNote Viva Insights

Accepted on 21/10/2020 11:08.

Organizer: Ian Culley Sent: Thu 15/10/2020 12:31

Subject: Local Plans catchup

Location: Microsoft Teams Meeting

Start time: Thu 22/10/2020 08:30 All day event

End time: Thu 22/10/2020 09:30

Hi Eddie - is this convenient?

[Join Microsoft Teams Meeting](#)

+44 20 3787 4277 United Kingdom, London (Tel)

Conference ID: 803 654 3567

Local numbers | Reset PIN | Learn more about Teams | Meeting options

**TIER 2** **ALERT LEVEL: HIGH** **NEW RESTRICTIONS** WOLVERHAMPTON.GOV.UK

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICT information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

In Shared Folder: Calendar

Local Plan catchup - Meeting

File

Meeting

Insert

Format Text

Review

Tell me what you want to do...

Save & Close

Calendar

Forward

Appointment

Scheduling Assistant

Join Teams Meeting

Resource Finder

Accept

Tentative

Decline

Propose New Time

Respond

Show As: Busy

Reminder: None

Recurrence

Time Zones

Categorize

Private

High Importance

Low Importance

Send to OneNote

Viva Insights

Accepted on 10/11/2020 15:34.

Organizer: Ian Culley

Sent: Tue 10/11/2020 13:58

Subject: Local Plan catchup

Location: Microsoft Teams Meeting

Start time: Fri 13/11/2020 14:30

End time: Fri 13/11/2020 15:00

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting

Or call in (audio only)

+44 20 3787 4277 164973705# United Kingdom, London

Phone Conference ID: 164 973 705#

Find a local number | Reset PIN

Learn More | Meeting options

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICT information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

In Shared Folder: Calendar

Page 161

**GC10f** Shropshire Council and ABCA - Timeline of DtC activity - Regulation 19 consultation email from E West to I Culley

14.12.20 @ 12.28

Hi Ian,

I'm well thanks, hope all ok with you as well.

We're starting our Reg19 on Friday 18<sup>th</sup> Dec, running for seven weeks to Friday 5<sup>th</sup> Feb. We do just need to get past the call in period for the Cabinet decision though (5pm today).

I would welcome a catch up early in the new year to begin to finalise the Statement of Common Ground if possible.

Thanks

Eddie

Eddie West

Interim Planning Policy and Strategy Manager

Shropshire Council

Tel 01743 254617

e-mail: [edward.west@shropshire.gov.uk](mailto:edward.west@shropshire.gov.uk)

**From:** Ian Culley <[Ian.Culley@wolverhampton.gov.uk](mailto:Ian.Culley@wolverhampton.gov.uk)>

**Sent:** 14 December 2020 10:28

**To:** Edward West <[edward.west@shropshire.gov.uk](mailto:edward.west@shropshire.gov.uk)>

**Subject:** Reg 19 consultation

**Sensitivity: PROTECT**

Good morning Eddie and I hope all is well with you.

Do you have a timetable for the Reg 19 consultation please? The context is the relationship to the next ABCA Leaders meeting which is arranged for the 17<sup>th</sup> February. My understanding from our last discussion was that the consultation would run until the end of the first week in February and so we may need to submit our response ahead of the formal Leaders meeting.

Kind regards

Ian

Ian Culley

Lead Planning Manager (Regional Strategy)

Tel. Office: 01902 555636

[E-mail: Ian.Culley@wolverhampton.gov.uk](mailto:Ian.Culley@wolverhampton.gov.uk)

City of Wolverhampton Council

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICTED information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation

of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

Reply  
Forward

Shropshire Council  
Legal and Democratic Services  
Shirehall  
Abbey Foregate  
Shrewsbury  
SY2 6ND

Date: Friday, 27 November 2020

**Committee:**  
**Cabinet**

**Date:** Monday, 7 December 2020  
**Time:** 1.00 pm  
**Venue:** VIRTUAL MEETING

*Members of the public will be able to listen to this meeting by clicking on this link:*  
[www.shropshire.gov.uk/Cabinet7Dec2020](http://www.shropshire.gov.uk/Cabinet7Dec2020)

- Please note that this meeting will be made available through Microsoft Teams Live Events - your device will need to meet the minimum specification as detailed on the Microsoft website at this link: [Device Specification](#)
- You will need to download MS Teams (free) and click on the link to listen to the meeting if you are using a PC
- If using a mobile device, you will need to download the MS Teams app (free) before clicking the link
- Use the link at 1.00 pm on the day of the meeting and click on 'Join as Guest'
- You may receive an error message or a request for login details if you try to gain access before 1.00 pm

You are requested to attend the above meeting.  
The Agenda is attached

Claire Porter, Director of Legal and Democratic Services (Monitoring Officer)

**Members of Cabinet**

Peter Nutting (Leader)  
Steve Charmley (Deputy Leader)  
Gwilym Butler  
Dean Carroll  
Lee Chapman  
Steve Davenport  
Robert Macey  
David Minnery  
Lezley Picton  
Ed Potter

**Committee Officer:** Amanda Holyoak, 01743 257714 [amanda.holyoak@shropshire.gov.uk](mailto:amanda.holyoak@shropshire.gov.uk)



# AGENDA

## **1 Apologies for Absence**

## **2 Disclosable Pecuniary Interests**

## **3 Minutes (Pages 1 - 4)**

To confirm the minutes of the meeting held on 2 November 2020, attached

## **4 Public Question Time**

To receive any questions from members of the public, notice of which has been given in accordance with Procedure Rule 14. Deadline for notification is not later than 1.00 pm on Thursday 3 December 2020

## **5 Member Question Time**

To receive any questions of which Members have given due notice, the deadline for notification for this meeting is 5.00 pm on Wednesday 2 December 2020

## **6 Scrutiny Items**

## **7 Shropshire Local Plan - Pre Submission (Regulation 19) version (Pages 5 - 574)**

Lead Member – Councillor Robert Macey – Portfolio Holder for Housing and Strategic Planning

Report of Director of Place attached (Appendix 4 is TO FOLLOW)

Contact: Mark Barrow 01743 258916

## **8 Leisure Facilities Strategy (Pages 575 - 950)**

Lead Member – Councillor Lezley Picton – Portfolio Holder for Culture, Leisure, Waste and Communications

Report of Director of Place

Contact: Mark Barrow 01743 258916

## **9 Preferred Providers for Free Schools in Shrewsbury**

Lead Member – Councillor Ed Potter – Portfolio Holder for Children's Services

Report of the Director of Children's Services TO FOLLOW

Contact: Karen Bradshaw 01743 254201

**10 Shifnal Town Centre and Highways Improvement Scheme (Pages 951 - 974)**

Lead Member – Councillor Steve Davenport – Portfolio Holder for Highways and Transport

Report of Director of Place

Contact: Mark Barrow 01743 258916

0



Committee and Date

Cabinet  
7<sup>th</sup> December 2020

Item

Public

**SHROPSHIRE LOCAL PLAN REVIEW:  
Pre Submission Draft (Regulation 19)**

**Responsible Officer** Mark Barrow, Executive Director Place  
e-mail: mark.barrow@shropshire.gov.uk Tel: 01743 258919

**1. Summary**

- 1.1 The principle purpose of this report is to seek Cabinet approval for the Pre-Submission Draft of the Shropshire Local Plan and to trigger a period of public consultation in line with Government Regulations. This is referred to as Regulation 19 stage of Plan preparation, and signifies the point in the process where the Council has concluded its earlier consultations under Regulation 18, which in Shropshire's case has included five separate public consultation stages.
- 1.2 On a directly related issue, the report also seeks approval in principle to accept an element of unmet employment land need from the Association of Black Country Authorities (ABCA), and for this employment need to be incorporated into the overall employment requirement for Shropshire to 2038. This follows on from Cabinet's decision in July 2020 to accept the principal of Shropshire Council to accept up to 1,500 dwellings from ABCA's identified housing need and represents an important aspect of the ongoing Duty to Cooperate legal process.
- 1.3 The Cabinet paper also seeks approval of an amended timeframe for the production of the Local Plan, which must be set out in the Local Development Scheme (LDS). In order for a Local Plan to be 'legally compliant' it must be produced in accordance with the timeframe set out in the LDS – hence the need to amend it. This has been necessary in order for the Council to give meaningful consideration to the responses made to the public consultation on the Regulation 18 Pre-Submission Draft version of the Plan.
- 1.4 The purpose of the Shropshire Local Plan is to plan effectively for growth over the long term, in this case to 2038. The Plan should respond to local issues, including settlement and site specific evidence and from public consultation responses, but should also have full regard to national planning policy and guidance. As such the Plan establishes a long term housing requirement for the county to 2038, based in part on the nationally set methodology, but also taking into account localised factors, in particular the need to support economic growth and to deliver more affordable and lower cost housing.
- 1.5 The Local Plan seeks to set an appropriate and 'sound' strategy for the County. It is the role of the Regulation 19 stage of consultation to seek

representations on the 'soundness' of the Plan based on a number of specified criteria in the National Planning Policy Framework.

- 1.6 The 'Regulation 19' Pre-submission version of the Local Plan has been informed by the following five previous stages of public consultation as part of the 'Regulation 18' stage of preparation:

- Issues and Strategic Options (January 2017);
- Preferred Scale and Distribution of Growth (November 2017);
- Preferred Site Allocations (November 2018);
- Strategic Sites (June 2019);
- Draft Pre-Submission Local Plan (August 2020)

These stages have sought views on a range of issues including County wide growth proposals; the distribution of that growth; settlement specific strategies; proposed site allocations to guide future growth; the inclusion of a number of 'strategic sites' on land outside recognised settlements for large-scale mixed-use development; and a range of strategic and development management policies with which to effectively manage development. Alongside this the Council have developed a range of evidence base documents to inform proposals and policies.

- 1.7 In line with national regulations the Council will seek representations through a consultation process on the Regulation 19 Pre-Submission Draft Plan. The public and other stakeholders will be asked to make representations by considering whether the pre-submission version of the Local Plan is 'sound' based upon a set of nationally prescribed criteria. It is the intention to seek a period of seven weeks for this consultation period, which is in excess of national minimum requirements.

## **2. Recommendations**

- A. That Cabinet approves the Pre-Submission Version (Regulation 19) of the Local Plan (Appendix 1) for public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of seven weeks;
- B. That Cabinet agrees the principle for Shropshire Council to accept up to 30 hectares of employment need from the Association of Black Country Authorities (ABCA) as part of the legal Duty to Cooperate process, in order to supplement the acceptance of up to 1,500 dwellings from ABCA to 2038 (previously agreed in principle), and for this employment provision to be distributed in accordance with draft policy SP2 of the draft Local Plan.
- C. That Cabinet approves an updated version of the Local Development Scheme (Appendix 3)

- D. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy.

## REPORT

### 3. Risk Assessment and Opportunities Appraisal

- 3.1 A key purpose of the Local Plan is to provide an appropriate strategy to enable an area to grow in a sustainable manner to meet the need for development. The Local Plan is the starting point for taking planning decisions. In recent years the importance of having an up-to-date Local Plan has been amplified by the need for Local Authorities to show a sufficient (at least five years) supply of housing land. Indeed Shropshire has seen first-hand the impact of not having a sufficient housing land supply where some planning decisions are made in an ad hoc manner where Local Plan policies are afforded less weight in decision making.
- 3.2 The most effective way to ensure the Council maintains a sufficient level of housing supply is to keep its Local Plan up-to-date. Whilst the Council's current Core Strategy and SAMDev Plans (combined equating to the Local Plan for the area) are currently considered up-to-date, there is a risk that should the Local Plan not be reviewed in an appropriate timescale, the ongoing ability for the Council to manage growth in a plan-led manner will be compromised.
- 3.3 The pre-submission version of the Local Plan (Appendix 1) is a statutory stage of plan making and represents a very advanced and fully formed version of the Local Plan. It signals the end of the Council's detailed and robust 'Regulation 18' stage of plan making and the transition into the more formal 'Regulation 19' stage. Indeed, since 2017 the Plan has been subject to five separate stages of public consultation. Most recently, between August and September, the Council published and consulted on a full Draft Local Plan as part of the Regulation 18 stage, and Section 5 of this report will provide more detail on the outcomes of this important consultation.
- 3.4 It is considered the Council's approach to consultation has allowed the public and other stakeholders to have a significant opportunity to input into the process and, where appropriate, to shape the emerging Local Plan's proposals. Importantly however, consultation in this context does not mean that a consensus of opinion has been reached in all cases, and it is appropriate to recognise there remains opposing views to some elements of the Local Plan locally, either from residents, local parish and town councils, site promoters or all three. It is the role of the Local Plan's consultation process to allow for these views to be made, and for the Council to respond and reflect upon them, especially if they are advancing material considerations. It is considered the thorough process the Council has engaged in over the last few years, which has followed the requirements of

legislation and the Council's own Statement of Community Involvement (SCI), has allowed this to happen in an effective and meaningful manner.

- 3.5 The Regulation 19 Pre-Submission Draft is the second occasion where the emerging Local Plan has been published and consulted on in a full format. The five previous stages of consultation (listed in para 1.6) were part of the preliminary Regulation 18 stage of preparation; the first four consultations between 2017 and 2019 focussing on specific parts of the process, whilst the fifth stage bringing these elements together with the inclusion of a full set of draft strategic and development management policies.
- 3.6 If agreed, the proposal is to consult on the on the 'Pre-Submission Draft' version of the Local Plan at Regulation 19 for seven weeks between mid-December and the end of January 2021. The updated version of the Local Development Scheme (LDS), included to this report as Appendix 3, recommends a new timetable for the Local Plan. This takes into account the recommendation to consult for a period of seven weeks on the Pre-Submission Local Plan, and charts a realistic timetable to the Submission of the Local Plan to the Government for Examination in April 2021. It should be noted that the proposed seven week period of consultation at Regulation 19 exceeds the statutory minimum requirements and takes into account that the proposed consultation includes the Christmas period. Once submitted, the revised LDS anticipates an Examination process of around 12 months, and it is therefore hoped to move to adoption of the Local Plan in May 2022, subject to a successful Examination process.
- 3.7 The key purpose of the Regulation 19 consultation stage is to allow consultees the opportunity to make representations on the 'soundness' of the Local Plan. All representations made will be considered by a Planning Inspector appointed to independently examine the Local Plan, currently scheduled to take place in 2021. Ahead of the submission of the Local Plan for examination, the Council's ability to respond to representations made through the consultation is more limited than at the Regulation 18 consultation stages. Indeed, whilst the Council will be able to agree minor modifications to the Local Plan ahead of its Submission to the Secretary of State this does not extend to making more significant changes, such as the inclusion of an additional site allocation.
- 3.8 However, if, through the Regulation 19 consultation process, it is decided there is a need for the Council to make a significant change to the Plan, the Council does have the ability to propose these changes as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. Again, the risk to the Council in this scenario is one of timeframe, and a new Local Development Scheme (LDS) setting out the Local Plan preparation timetable would need to be agreed. The extensive consultation the Council has carried out at the Regulation 18 stages has mitigated this risk, but it should be recognised that there is always the possibility of new evidence being presented through the Regulation 19 process which could lead to a need to propose a more significant alteration to the Plan.

#### **4. Financial Implications**

- 4.1 Planned growth provides the best possible opportunity for Shropshire Council to harness growth potential by providing a stable platform for investors and developers (from both the public and private sectors). Growth also provides an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure. New growth simultaneously imposes an additional burden on local services and provides opportunities to secure investment to improve local facilities which are the responsibility of Shropshire Council and other public service providers.
- 4.2 The Local Plan process is subject to a number of costs, both during preparation principally due to the need to commission evidence base documents to inform both site allocations and development management policies, and through the Examination process, principally through the cost of the Planning Inspectorate. This expenditure is both necessary and unavoidable in the pursuit of a 'sound' Plan.
- 4.3 Equally there is a financial risk to the Council of not pursuing a review of the Local Plan in a timely manner, most notably through the likelihood of increased levels of planning appeals as a result of increased challenges to the integrity of the currently adopted Core Strategy and SAMDev plan.

#### **5 Background**

- 5.1 The National Planning Policy Framework (NPPF) confirms that the planning system should be genuinely plan-led, and that up-to-date Plans should provide a positive vision for the area; a framework for addressing housing need and other economic, social and environmental priorities. The NPPF also states that Plans should be a platform for local people to shape their surroundings. This important principle is also central to the recent proposed changes to the Planning system as part of the Government's Planning White Paper.
- 5.2 Whilst Shropshire currently has an up-to-date Local Plan through the adopted Core Strategy and SAMDev documents, there is clearly a significant onus on authorities to regularly update these plans in order to keep them up-to-date. The need for an early review of the Local Plan was also a requirement of the SAMDev Inspector's Report in 2015. However, it should equally be recognised that Plan making does take time; an inevitable consequence of necessary and constructive community engagement, and the need for policies and proposals to be supported by robust evidence. With this in mind, the Council began an early review of the Local Plan in 2017, with the Pre-Submission draft (Appendix 1) being the consolidated outcome of this process.
- 5.3 In July 2020 Cabinet agreed to consult on a full Draft version of the Local Plan. Broadly this plan contained the following sections:
- Strategic approach to growth and distribution of development;
  - Strategic Policies
  - Development Management policies
  - Localised Strategies for individual settlements;

- Policies for new Strategic Sites and Settlements;

***Feedback from the Draft Local Plan consultation (August-September 2020)***

- 5.4 The recent consultation on the Draft Local Plan at Regulation 18 allowed the Council to consult on a full version of the Local Plan for the first time, and to consider responses, before moving to the formal Regulation 19 stage. The consultation process, which spanned for eight weeks between August and September, led to responses from around 2,500 consultees, including from statutory organisations, local organisations, parish and town councils, local residents and site promoters. This is a significant response rate, and officers have reflected upon these responses in moving the Plan forward. Indeed, it should be noted that due to the high response rate, officers have required a further two weeks to consider responses than first assumed, leading to the change in date of Cabinet. A full summary of the consultation responses will be made available as part of the consultation into the Regulation 19 Pre-Submission Plan.

**Changes incorporated into the Regulation 19 Pre-Submission Local Plan**

- 5.5 Officers have reviewed and considered the comments made, alongside any other material issues not previously considered. Revisions are now suggested and have been incorporated into the Regulation 19 version included as Appendix 1 to this report. A detailed summary of all the consultation responses is included as Appendix 4 to this report.
- 5.6 None of the suggested changes alter the core strategic approach to the Plan. There are no changes proposed to the overall levels of local housing and employment growth over the plan period; the approach to the distribution of growth across the County through a settlement hierarchy; and the identification of Community Hubs in the rural area.
- 5.7 The vast majority of the changes which are now proposed relate to relatively minor amendments to policy wording, both with respect to the proposed developer guidelines to site allocations and to strategic and development management policies. Officers are recommending these changes minor changes in response to consultation responses, but also to the need to provide additional clarity to policies. The Plan has also needed to reflect very recent changes to the Use Class Order classification that came into effect on 1 September relating to consolidation of several previous uses into a new Class E Use Class Order comprising commercial, business and service uses.
- 5.8 The proposed Regulation 19 version of the Local Plan proposes a small number of more significant changes to site allocations, in instances where consultation responses have raised new material considerations, and the site assessment process has been revisited. Also it is now proposed to include an additional development management policy concerning Strategic, Renewable and Low Carbon Infrastructure (Draft Policy 26) which includes criteria by



which the Council will consider proposals for wind and non-wind renewable energy infrastructure proposals.

5.9 With regard to the changes to site allocations, in summary it is proposed to:

Remove the following sites from the previous draft version of the Local Plan:

- Church Stretton: Land at Snatchfields for 70 dwellings (CST021);
- Oswestry: Land at Trefonen Road for 30 dwellings (OSW017);
- Weston Rhyn: Land off High Street for 60 dwellings (WRP006)
- Shrewsbury: Land at Battlefield Roundabout for 9ha of employment land (SHR197/VAR)

Include the following site in the Local Plan:

- Weston Rhyn: Land off Trehowell Lane for 60 dwellings (WRP001/VAR)

5.10 In the case of land at Snatchfields, Church Stretton (CST021), following consideration of comments made to the draft Plan, officers have reassessed the ability for the town to deliver its localised housing guideline through a combination of windfall sites within the development boundary, including on Brownfield land, and through the likely delivery of exception and cross-subsidy affordable housing sites, in line with draft policies DP4 and DP7 of the Draft Local Plan. Having undertaken this reassessment it has been concluded that these sources of supply are likely to be sufficient to achieve the localised housing guideline and as such it is considered that there is insufficient justification to warrant the allocation of major housing development in Church Stretton, given its location within the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and the need, documented within the NPPF, to demonstrate that exceptional circumstances exist for such major development within the AONB.

5.11 In the case of land at Trefonen Road, Oswestry (OSW017), following consideration of comments made to the draft Plan, officers acknowledge there are localised highway issues, which although are not considered to be severe, have been re-considered as part of the overall balance of considerations. These considerations have included the site's potential contribution to the overall housing supply in the town, which has been judged to be minimal over the plan period.

5.12 In the case of the proposed change to the site allocation at Weston Rhyn, by way of background, in 2018 the Council preferred site WRP001 for the development of around 60 dwellings. However, at this time it became apparent that the site may not be available for development due to the dated nature of the site promotion material. Therefore, this site was replaced by the adjacent WRP006 as the Preferred Site for the 'Regulation 18 Pre-Submission Draft of the Shropshire Local Plan' in August 2020, also for 60 dwellings. In response to this latest consultation the council have become aware of new promotional material from the promoters of WRP001, which confirms the site's availability as well as proposing new access arrangements. This, alongside the consideration of local concerns relating to access arrangements for WRP006, has led officers to revert to the preference for site WRP001, albeit in a slightly modified format, which also takes in a small element of WRP006. Both sites have therefore been subject

to public consultation during the regulation 18 stage of plan preparation, and importantly they are now subject to a “joint promotion” agreement between the landowners. It is therefore considered preferred options provides a more sustainable solution for the settlement’s housing delivery.

- 5.14 In the case of land at Battlefield Roundabout, Shrewsbury, following consideration of comments made to the draft Plan, which have highlighted concern about development to the east of the A49, as well as consideration given to the implications of the new Class E Use Class Order (which came into operation on 1 September during the consultation period), it is now considered unnecessary to specifically allocate this land for employment purposes. It is therefore considered that Shrewsbury’s employment provision can be met through the delivery of the proposed strategic employment site north of Preston Boats roundabout (SHR166); through other mixed use development proposed, particularly on land to the west of the town; through existing SAMDev allocations, and through additional windfall development where it meets proposed criteria set out in Draft Policies S13 and S14 of the Draft Local Plan.
- 5.15 The updated Site Assessments, which are to be made available as part of the Regulation 19 consultation, provide more detail on the rationale for these proposed changes. Whilst clearly of local significance, it is not considered any of these changes compromise the delivery of the Plan’s Strategic Approach.
- 5.16 It is not proposed to amend any proposed Community Hub settlements, and therefore the schedule of Community Hubs remains the unchanged from that consulted on in August/September 2020, and is now included in Schedule SP2.2 of the Draft Local Plan. Whilst it is recognised there remains some concern locally regarding the methodology behind the identification of Community Hubs within the overall strategic hierarchy, officers remain of the view that the proposed approach offers a sound and consistent basis to make these recommendations. These issues have been given very detailed consideration by officers in arriving at the current position. With regards to Community Cluster settlements, in acknowledging the continuation of the Parish Council ‘opt in’ approach to their identification, it is proposed that the Maesbrook, Dovaston and Knockin Cluster be removed on the request of the Knockin Parish Council, and that Newcastle and Whitcott Keysett be included as a new Community Cluster on the request of Newcastle on Clun Parish Council. All other Community Cluster settlement remain unchanged and are listed in Schedule SP2.3 of the Draft Local Plan.

### ***Strategic approach to growth and distribution of development***

- 5.17 PolicySP2 of the Pre-Submission Draft of the Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land, equating to around 1,400 dwellings and 15ha of employment land per annum. This represents a marginally lower growth level than that proposed in the Preferred Scale and Distribution of Growth consultation carried out in early 2018, and is broadly in line with past rates of growth seen in the County.

- 5.18 This level of housing growth proposed across the 22 years covered by the Plan Period seeks to respond in the first instance to the most up-to-date calculation of housing need in the County, currently 25,894 dwellings over the Plan Period, and then accommodates an additional uplift in this capacity in order to respond positively to the overall 'high growth' strategy. It is considered this uplift will further support the delivery of family and affordable housing to support local needs; increase the opportunity for specialist housing and the needs of other groups; support the diversification of the workforce; support greater opportunities to support the Council's wider economic growth aspirations; and support the opportunity for the Council to respond positively to appropriate cross boundary needs.
- 5.19 It is recognised that the Government has recently consulted on a significant alteration to the way in which housing need is calculated at a local authority level, which in Shropshire's case would lead to a considerable increase in annual housing requirement to a level far in excess of the proposed Local Plan housing requirement. However, the Council have raised significant issues with the Government's proposed methodology, along with many other Local Authorities, and as things stand this proposal has not moved beyond its consultation stage. It is therefore considered appropriate for Shropshire to progress with its Local Plan on the basis of the current housing need methodology.
- 5.20 The approach to distribution of development reflects the Council's previously stated preferred option, favouring an 'urban focussed' approach. It is considered that by virtue of the infrastructure and services Shropshire's largest settlements generally provide, there is a greater opportunity to deliver larger scale mixed use schemes, in doing so providing better conditions to support additional employment delivery and providing a better balance of growth.
- 5.21 It is legal requirement for Local Planning Authorities to fulfil the duty to cooperate with neighbouring and closely related Local Planning Authority areas on strategic matters. The Council has been engaged in discussions with these areas over the course of the plan preparation process. Ahead of the proposed submission of the Local Plan in January 2021, a series of Statements of Common Ground will be prepared and agreed with these areas.
- 5.22 At the July Cabinet, as part of Shropshire's Duty to Cooperate, it was agreed that 'in principle' Shropshire Council would accept up to 1,500 dwellings from the identified housing need of the Association of Black Country Authorities (ABCA) and that this would be incorporated into the housing requirement for Shropshire and distributed in line with the Strategic Approach included in draft Policy SP2. Meeting this 'unmet' need responded positively to the obligations placed on the Council as part of the Duty to Cooperate and has been met with broad support from ABCA. In accepting this need in principle, Shropshire joined a number of other Local Planning Authorities in the West Midlands in doing so.
- 5.23 Whilst ABCA are supportive of Shropshire's approach with regard to meeting unmet housing need, they have also responded to the recent consultation seeking further clarification on the Council's approach to employment land provision and requesting the Council considers accepting an element of their

unmet employment land need. In broad summary, the ABCA's employment land supply provides around 305ha, leaving a shortfall of at least 263 hectares needing to be provided outside the Black Country Local Plan area.

- 5.24 Since July, the Council has further developed its consideration of economic need over the plan period, and an Economic Development Needs Assessment (EDNA) will be published alongside the Regulation 19 consultation. By way of early summary of this position, it is recognised that similar to the proposed housing requirement for the County, the proposed employment land provision of 300 hectares over the plan period is beyond the 'baseline' need scenario when looking at forecasted growth. This position is deliberate and responds to the Council's desire to see a 'step change' in economic growth in the County over the plan period; a position advanced by the Economic Growth Strategy.
- 5.25 With this in mind, it is therefore considered reasonable and appropriate for the Council to supplement its 'in principle' offer of housing need with an 'in principle' offer to meet up to 30 hectares of employment land from ABCA. It is again considered that this need can be accommodated in a sustainable manner in line with the Local Plan's proposed distribution of growth proposed in draft policy SP2, and would not require the identification of additional land in order to ensure its sustainable delivery. This offer is considered to respond effectively to Council's legal obligations under the Duty to Cooperate and if agreed, will be incorporated into the emerging Statement of Common Ground between the two planning areas.
- 5.26 At this advanced stage of plan making there are no other substantive issues arising from the conversations with adjoining authorities as part of the Duty to Cooperate.

### ***Localised Strategies for individual settlements***

- 5.27 In following the urban focussed approach the majority of the County's growth is captured in settlement specific strategies for Shropshire's network of Market Towns. For the majority of areas this includes proposed site allocations and guidelines on how development on these sites will be managed. It should be remembered that whilst the allocation of a site provides an 'in principle' support that development in this location can be supported, these will continue to be subject to the grant of future planning approval where the details of the development will be considered. Where local communities are currently preparing Neighbourhood Plans this has been reflected within the proposed strategies.
- 5.28 Whilst the focus of the plan is on the urban area, it continues to be important to plan effectively for Shropshire's rural areas, but in doing so recognising that growth opportunities in these areas should be more closely aligned with the ability of villages to provide a suitable standard of services and facilities. For this reason the Council opted early in the plan preparation process to provide a consistent methodology to the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The conclusions of this process are included in schedule SP2.2 of the Pre-Submission Draft Plan, which identifies those areas which are proposed to act as Community Hubs. Policy SP7, along with individual Settlement specific policies, seeks to

provide a framework for how development will be managed in these areas effectively and in keeping with the local character.

### ***Strategic Sites and Settlements***

- 5.29 The Pre-Submission version of the Local Plan proposes to allocate three strategic settlements/sites at the following locations:
- The Former Ironbridge Power Station which will form a new strategic settlement;
  - Clive Barracks, Tern Hill which will form a new strategic settlement; and
  - RAF Cosford which will facilitate MOD use and associated activities

#### ***Former Ironbridge Power Station***

- 5.24 The former Ironbridge power station occupies a 350 acre site south of the River Severn near Buildwas. The power station ceased operation in 2015 and was purchased by Harworth Group in 2017 with a view to regenerating the site. The proposed inclusion of the site for inclusion within the Local Plan was consulted on as a preferred option in summer 2019. An outline planning application was subsequently submitted to the Council in December 2019 for a major mixed use development including 1,000 dwellings. Whilst the planning application is yet to be determined, it remains appropriate for the Council to continue to seek the site's inclusion within the Local Plan. It is expected that subject to the grant of planning approval, the site will be fully developed by the end of the plan period. The proposed development principles for the site are included in Policy S20 of the Pre-Submission Draft Local Plan

#### ***Clive Barracks, Tern Hill***

- 5.25 Clive Barracks is a 50 hectare military site on the A41 near Market Drayton which is currently home to the Royal Irish Regiment. MOD announced the intention to close the barracks in March 2016, and have subsequently confirmed they now plan to complete the vacation and disposal of the site by 2025. The proposed inclusion of the site for inclusion within the Local Plan to form a significant mixed use proposal was consulted on as a preferred option in summer 2019. Local engagement on the site up to this point has helped to shape the proposed development guidelines for the site, which is proposed to provide employment land and around 750 homes as part of a new settlement, together with local services and facilities. Given the timeframe of the proposed disposal of the site, it is expected that around 600 homes will be delivered during the plan period to 2038. The proposed development guidelines for the site are included in Policy S19 of the Pre-Submission Draft Local Plan.

#### ***RAF Cosford***

- 5.26 The national defence review has confirmed RAF Cosford as a key Ministry of Defence asset, but it is considered the potential for the area to meet its future operational defence requirements is restricted by its Green Belt location. Having considered the impact on national Green Belt objectives, as well as

the benefits of doing so, it is considered there are exceptional circumstances for the site to be released from the Green Belt. In summary the strategic site will build upon its existing role as a centre of excellence for both UK and International Defence Training, host a specialist aviation academy, support opportunities to co-locate other Ministry of Defence units and activities, facilitate the intensification and expansion of the RAF Museum Cosford and allow the formation of a new headquarters for the Midland Air Ambulance Charity. The proposed development guidelines for the site are included in Policy S21 of the Pre-Submission Draft Local Plan

### ***Other Strategic Site Considerations***

- 5.27 In July, Cabinet agreed with the officer recommendation to omit land adjacent Junction 3, M54 from the Local Plan Review. This decision followed a long period deliberation, including a period of public consultation as part of the Strategic Sites consultation in summer 2019 where the Council confirmed it was considering the potential inclusion of land north of Junction 3 within the Local Plan. For the sake of clarity the land at Junction 3 has been actively promoted for a new garden village consisting of around 3,000 dwellings and 50ha of employment land, as well as the inclusion of local facilities and services. The decision in July recognised that, in the view of the Council, that there were insufficient exceptional circumstances in order to release this land from the Green Belt.
- 5.28 As part of the Regulation 18 consultation on the Draft Local Plan, Bradford Estates (site promoter for Junction 3), whilst maintaining their wider Garden Village proposal, have provided an additional proposition consisting solely of a strategic employment site, without residential development. Given the change in proposal the Council has taken the opportunity to reconsider the proposal. The Site Assessments, which will be published alongside the Regulation 19 consultation, provides a detailed overview of the council's considerations. In summary, it is maintained that in weighing up the competing considerations, including the benefits of providing a strategic employment area, there remains insufficient justification to release this land from the Green Belt. Accordingly it remains the view of officers that land at Junction 3 should not be included in the Local Plan and that this should area should remain as Green Belt.

### ***Green Belt Release***

- 5.29 Green Belt is perhaps one of the most widely known designations in the planning system. Green Belts cover parts of many local authority areas; in Shropshire's case significant areas in the east of the County are covered by the West Midlands Green Belt designation. The key purposes of the designation is to check unrestricted sprawl; prevent neighbouring towns merging; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.
- 5.30 Permanence is a key feature of Green Belt boundaries, and their extent should only be altered where exceptional circumstances apply. It is however, appropriate for Local Plans to review Green Belt boundaries when required,

and in Shropshire's case this was prompted in 2015 by the conclusions of the SAMDev Inspector's Report, which instructed that a review of Shropshire's Green Belt be carried out as part the Local Plan review process. To this end, in 2017 the Council commissioned a Green Belt Assessment in order to assess the extent to which the land within the Green Belt in Shropshire performs against the purposes of Green Belts (outlined in para 5.18). This was followed in 2018 by the publication of a Green Belt Review, which provides an assessment of the harm to the Green Belt purposes should particular parts of the Green Belt be released. The Council therefore have a comprehensive evidence base with which to support decision taking.

- 5.31 It is important to note that before seeking to release land from the Green Belt, the NPPF places a clear need for the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to accommodating the needs of RAF Cosford, and having considered local circumstances of need, the Pre-Submission version of the Local Plan proposes the removal of land from the Green Belt for allocations for employment development within the plan period to 2038 in Shifnal and Bridgnorth, and for mixed use and housing development in Alveley. The Pre-Submission Draft Plan also seeks the removal of land from Green Belt for to act as 'safeguarded land' for potential development beyond the plan period in Albrighton, Shifnal and Alveley.
- 5.32 The Council are aware that over the last few months there has been a particular focus on future development options at Bridgnorth. Bridgnorth acts as Shropshire's third largest settlement but which is constrained by Green Belt on its eastern side. The Regulation 18 consultation on the draft Local Plan in August and September this year proposed a major Garden Village proposal at Tasley as the preferred option to grow the town in a sustainable manner. This represented a significant shift in position from an earlier iteration of the Plan, which had suggested land at Stanmore to the east of the town within the Green Belt as the preferred direction for significant growth as part of the initial Preferred Sites consultation in 2018. It should be recognised that the recent consultation has led to a significant level of opposition to the preferred Tasley proposal. However, it should equally be acknowledged there has also been a significant number of responses welcoming the proposed removal of the proposed Garden Village scheme at Stanmore.
- 5.33 The Council's proposed inclusion of land to the south of the A458 at Tasley within the most recent Draft Local Plan followed an extensive site assessment process. This recognised the site's location outside the Green Belt, but also went further to assess the site against a range of material considerations. The consultation in summer 2020 led to a significant level of response from residents of Bridgnorth, alongside those from local town and parish councils. It also prompted further detailed information from the site promoters of both the Tasley and Stanmore site promoters on a range of material planning considerations. Given the level of new information provided, as well as the significant of level of local interest, the Council has undertaken a re-appraisal of the two site options for the town.
- 5.34 Appendix 2 to this report provides a detailed summary of the site assessment considerations undertaken by the Council since the close of the recent

Regulation 18 consultation. In summary, having considered the competing site proposals against a full range of material considerations, it is maintained that the Tasley Garden Village proposal should be preferred for development to support a comprehensively planned mixed use development to meet the housing needs of Bridgnorth over the plan period. Conversely, it continues to be recommended that the majority of the Stanmore proposal should remain designated as Green Belt and should not be identified for future development. The exception to this is land north and west of the existing Stanmore Industrial Park, where it continues to be considered that the release of land from the Green Belt would be beneficial in supporting the future expansion needs of the Industrial Park to meet employment requirements.

### ***Strategic and Development Management Policies to Guide New Development***

- 5.35 The NPPF states that Local Plans should contain policies that are clearly written and unambiguous, and that a development plan must include strategic policies to address an area's priorities for the development and use of land in its area. A Local Plan can also include a series of non-strategic (or detailed) policies to address other more specific issues.
- 5.36 The Regulation 19 Pre-Submission Draft version of the Local Plan contains a number of Strategic and Development Management policies, covering a wide spectrum of issues and considerations relevant to the pursuit of sustainable development including climate change; supporting high quality design; managing development in the countryside; delivering affordable housing; ensuring a suitable residential mix of development; and managing and minimising flood risk. When adopted, these policies will replace the current development management policies in the Core Strategy and the SAMDev Plan.
- 5.37 Whilst the Local Plan should be the starting point for taking decisions on planning applications it does not sit in isolation. To this end many of the proposed development management policies make reference to other strategies being prepared by the Council, including the adopted Economic Growth Strategy 2017-2021, the emerging Housing and Climate Change Strategies, and the Shrewsbury Big Town Plan. In doing so these strategies will be a material factor in decision making.

## **6 Next steps**

- 6.1 Subject to Cabinet approval, the Pre-Submission Draft of the Local Plan, along with the associated documents will be published for consultation for a period of seven weeks. It is proposed this consultation will begin on Wednesday 16<sup>th</sup> December and run until Wednesday 3<sup>rd</sup> February 2021, subject to the considerations outlined in para 6.2. Throughout the plan preparation process officers have sought to engage constructively with communities, Parish and Town councils, and elected representatives on



emerging preferred options. Whilst in many cases this has led to a consensus of opinion on issues, it is recognised there remains areas where there is likely to be opposition to proposals and that in some areas elected representatives have voiced their objections to proposals included within the Regulation 19 Pre-Submission Draft Plan. The statutory consultation process is an opportunity for communities, Parish and Town Councils and elected representatives to submit their comments on the soundness of the Plan, and these will be considered ahead of the proposed submission of the Local Plan to Government for examination in January 2021. All responses which are made to the Regulation 19 consultation will be made public, and will be submitted to the Planning Inspectorate for consideration at the Independent Examination.

- 6.2 The Consultation on the Pre-Submission Draft of the Local Plan must meet the Town and Country Planning (Local Planning) (England) Regulations 2012, as a minimum. For clarity this means the Pre-Submission Draft of the Local Plan must be made available for inspection at the Council's principal office (in this case Shirehall) and at such other places within the authority area as the Council consider appropriate, which has in previous stages of consultation been libraries. It is acknowledged that due to the Covid 19 national emergency there have been restrictions placed on public access into Council premises, and it is recognised that this will need to be addressed as a matter of priority before the consultation can begin. Consultation arrangements must also meet the requirements of the Council's Statement of Community Involvement (SCI). A significant number of organisations and individuals will continue to be notified directly of the publication of the consultation documents in accordance with the SCI. Electronic responses are encouraged to reduce printing and distribution costs and to reduce the time spent collating and analysing paper responses.

<b>List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)</b>
-----------------------------------------------------------------------------------------------------------------------------------------------------

<b>Cabinet Member (Portfolio Holder)</b>
------------------------------------------

Robert Macey, Portfolio Holder for Housing and Strategic Planning
-------------------------------------------------------------------

<b>Local Members</b>
----------------------

All
-----

<b>Appendices</b>
-------------------

- |                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> <li>1. Shropshire Local Plan 2016-2038: Regulation 19 Pre-Submission Draft Local Plan plus associated Policies Map and Inset Plans</li> <li>2. Bridgnorth Development Options Assessment – November 2020</li> <li>3. Local Development Scheme (LDS) – November 2020</li> <li>4. Summary of Responses on the Regulation 18 Draft Local Plan Consultation</li> </ol> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



**Committee and Date**

Cabinet

18 January 2021

**CABINET**

**Minutes of the meeting held on 7 December 2020**

**Virtual Meeting**

**1.00 pm - 3.38 pm**

**Responsible Officer:** Amanda Holyoak

Email: amanda.holyoak@shropshire.gov.uk Tel: 01743 257714

**Present**

Councillor Peter Nutting (Chairman)

Councillors Steve Charmley (Deputy Leader), Gwilym Butler, Dean Carroll, Lee Chapman, Steve Davenport, Robert Macey, David Minnery, Lezley Picton and Ed Potter

**165 Apologies for Absence**

There were no apologies for absence.

**166 Disclosable Pecuniary Interests**

Councillor Ed Potter declared that he would leave the meeting for the item on the Local Plan as he had an employee with an interest in some sites identified within the Local Plan.

**167 Minutes**

**RESOLVED:**

that the minutes of the meeting held on 2 November 2020 be approved as a correct record.

**168 Public Question Time**

The Director of Legal and Democratic Services confirmed that all preamble, statements of fact and opinions submitted with questions had been circulated and read by Cabinet members but that she would only be reading out the questions submitted.

Questions were submitted by the following members of the public:

Rob Wilson

Graham Tate

Stephen Mulloy

Susan Howle

Lydia Bardsley, Clerk to Clive Parish Council

Les Berryman

Malcolm Andrew, Trefonen Rural Protection Group

Bill Griffiths, Clerk to Tasley Parish Council

Clive Dyson, Bridgnorth Plan Steering Group

Nick Norbury  
Elle Cass, for Nurton Developments Ltd  
Charles Green, CPRE Shropshire  
Zoe Turner, Shifnal Matters  
Henry Carver, Save Bridgnorth Greenbelt

The full questions and answers provided are attached to the signed minutes and available from the webpage for the meeting. <https://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=130&MId=4145&Ver=4>

## 169 Member Question Time

Questions were received from the following Members of the Council:

Ed Bird  
Elliot Lynch & Les Winwood  
David Turner  
Michael Wood  
Kevin Turley  
Robert Tindall  
Tina Woodward  
Tom Biggins  
Simon Jones

The questions submitted and the answers provided to them are attached to the signed minutes and are available from the webpage for the meeting. <https://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=130&MId=4145&Ver=4>

## 170 Scrutiny Items

There were no scrutiny items.

## 171 Shropshire Local Plan - Pre Submission (Regulation 19) version

The Portfolio Holder for Housing and Strategic Planning introduced the report, explaining that its principle purpose was to seek Cabinet approval for the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan and to agree that this be subject to a period of consultation for seven weeks where representations be sought on its soundness.

In picking up one of the points made in a public question, he proposed an amendment to Recommendation D to the report so that it would now include the text in bold below:

“That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan, and the **Local Development Scheme** ahead of its publication for public consultation and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy”

Councillors Barrow, Evans, Lynch, Winwood, Turner, Wood, Turley, Tindall, Lea (on behalf of Councillor Woodward), Biggins, Jones, Dee, and Wild were present and asked questions about the report, the responses to the consultation on the Regulation 18 Pre-submission draft; the proposed Regulation 19 stage of consultation and raised issues relating to their Electoral Divisions. The Portfolio Holder responded to these and outlined the risks of any delay to the process.

The Leader and Portfolio Holder thanked officers for their very professional and hard work to date. The Portfolio Holder also thanked the Members of the Council for their contribution and interest in not only local issues but also the wider policies. He also thanked the Local Housing Group and Local Plan Group for their helpful work throughout the process. Cabinet and officers agreed that the proposed Pre-Submission version of the Local Plan represented a sound and positive framework for the sustainable growth of Shropshire into the future.

**RESOLVED:**

- A. That Cabinet approves the Pre-Submission Version (Regulation 19) of the Local Plan (Appendix 1) for public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of seven weeks;
- B. That Cabinet agrees the principle for Shropshire Council to accept up to 30 hectares of employment need from the Association of Black Country Authorities (ABCA) as part of the legal Duty to Cooperate process, in order to supplement the acceptance of up to 1,500 dwellings from ABCA to 2038 (previously agreed in principle), and for this employment provision to be distributed in accordance with draft policy SP2 of the draft Local Plan.
- C. That Cabinet approves an updated version of the Local Development Scheme (Appendix 3)
- D. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan and the Local Development Scheme ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy.

**172 Leisure Facilities Strategy**

The Portfolio Holder for Culture, Leisure, Waste and Communications introduced the Indoor Leisure Facilities Strategy 2020 – 2038.

**RESOLVED:**

- 1 To adopt the Indoor Leisure Facilities Strategy 2020- 2038
- 2 To note the identified facility needs which will be subject to review within 12 months to further understand the impact of COVID-19.

### 173 Preferred Providers for Free Schools in Shrewsbury

ITEM DEFERRED TO 14 DECEMBER 2020 MEETING

### 174 Shifnal Town Centre and Highways Improvement Scheme

The Portfolio Holder Highways and Transport introduced the report and set out the improvements planned for Shifnal town centre in order to enhance the existing infrastructure.

#### **RESOLVED:**

- That Cabinet recommend to Council approval of the Shifnal Town Centre and Highways Improvement Scheme and allocation of Community Infrastructure Levy funds for the Shifnal area of £1,887,779.00 and £829,000 of Section 106 funds for highway junction improvements for project delivery.
- That Cabinet recommend to Council approval of a tender process and subsequent mobilisation to facilitate delivery of the Shifnal Town Centre Improvement Plan as supported with all parties.
- That Cabinet recommend to Council delegation to the Assistant Director of Infrastructure to amend the project as required in response to the tender outcome.
- That Cabinet recommend to Council approval of the necessary engagement and information process to deliver this project in association with Shifnal Town Council and wider Town groups as required.

Signed ..... (Chairman)

Date: .....

Agenda Item No	Topic	Decision
3	Minutes	<p><b>RESOLVED:</b></p> <p>that the minutes of the meeting held on 2 November 2020 be approved as a correct record.</p>
7	Shropshire Local Plan - Pre Submission (Regulation 19) version	<p><b>RESOLVED:</b></p> <p>A. That Cabinet approves the Pre-Submission Version (Regulation 19) of the Local Plan (Appendix 1) for public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of seven weeks;</p> <p>B. That Cabinet agrees the principle for Shropshire Council to accept up to 30 hectares of employment need from the Association of Black Country Authorities (ABCA) as part of the legal Duty to Cooperate process, in order to supplement the acceptance of up to 1,500 dwellings from ABCA to 2038 (previously agreed in principle), and for this employment provision to be distributed in accordance with draft policy SP2 of the draft Local Plan.</p> <p>C. That Cabinet approves an updated version of the Local Development Scheme (Appendix 3)</p> <p>D. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan and the Local Development Scheme ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy.</p>

Agenda Item No	Topic	Decision
8	Leisure Facilities Strategy	<p><b>RESOLVED:</b></p> <p>1 To adopt the Indoor Leisure Facilities Strategy 2020- 2038</p> <p>2 To note the identified facility needs which will be subject to review within 12 months to further understand the impact of COVID-19.</p>
10	Shifnal Town Centre and Highways Improvement Scheme	<p><b>RESOLVED:</b></p> <ul style="list-style-type: none"> <li>– That Cabinet recommend to Council approval of the Shifnal Town Centre and Highways Improvement Scheme and allocation of Community Infrastructure Levy funds for the Shifnal area of £1,887,779.00 and £829,000 of Section 106 funds for highway junction improvements for project delivery.</li> <li>– That Cabinet recommend to Council approval of a tender process and subsequent mobilisation to facilitate delivery of the Shifnal Town Centre Improvement Plan as supported with all parties.</li> <li>– That Cabinet recommend to Council delegation to the Assistant Director of Infrastructure to amend the project as required in response to the tender outcome.</li> <li>– That Cabinet recommend to Council approval of the necessary engagement and information process to deliver this project in association with Shifnal Town Council and wider Town groups as required.</li> </ul>

Local Plan catchup - Meeting

File

Meeting

Insert

Format Text

Review

Tell me what you want to do...

Save & Close

Delete

Forward

Appointment

Scheduling Assistant

Join Teams Meeting

Resource Finder

Accept

Tentative

Decline

Propose New Time

Respond

Show As: Busy

Recurrence

Time Zones

Categorize

Private

High Importance

Low Importance

Send to OneNote

Viva Insights

Accepted on 06/01/2021 17:44.

Organizer

Jan Culley

Subject

Local Plan catchup

Location

Microsoft Teams Meeting

Start time

Mon 11/01/2021 14:30

All day event

End time

Mon 11/01/2021 15:30

Sent

Wed 06/01/2021 17:18

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting


Or call in (audio only)

+44 20 3787 4277 34280347# United Kingdom, London

Phone Conference ID: 342 803 47#

Find a local number | Reset PIN

Learn More | Meeting options



Latest information:

wolverhampton.gov.uk/covidalert

DISCLAIMER: This email and any enclosures are intended solely for the use of the named recipient. If this email has a protective marking of PROTECT or RESTRICT in its title or contents, the information within must be subject to appropriate safeguards to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage. PROTECT and RESTRICTED information should only be further shared where there is a legitimate need. If you are not the intended recipient, or responsible for delivering it to the intended recipient, you may not copy, disclose, distribute or use it without the authorisation of City of Wolverhampton Council. If you have received this email in error please notify us by email to [postmaster@wolverhampton.gov.uk](mailto:postmaster@wolverhampton.gov.uk) and then delete it and any attachments accompanying it. Please note that City of Wolverhampton Council do not guarantee that this message or attachments are virus free or reach you in their original form and accept no liability arising from this. Any views or opinions expressed within this email are those of the writer and may not necessarily reflect those of City of Wolverhampton Council. No contractual commitment is intended to arise from this email or attachments.

In Shared Folder:

Calendar



**From:** [Edward West](#)  
**To:** ["Ian Culley"](#)  
**Subject:** Draft SoCG - duty to cooperate  
**Date:** 15 July 2021 00:06:00

---

Dear Ian,

Many thanks for the useful and constructive discussion today regarding the progression towards agreeing the Statement of Common Ground, and confirmation that upon agreement at your board on 28<sup>th</sup> July, that the duty to cooperate between Shropshire and the Association of Black Countries (ABCA) on behalf of the Black Country local authorities, would have been fulfilled. Subject to our Council approval to proceed to submission on the draft Local Plan this summer, I will consider your proposed amends and respond by Tuesday 20<sup>th</sup> July.

Many thanks,

Eddie

Eddie West

Planning Policy and Strategy Manager

Shropshire Council

**From:** [Edward West](#)  
**To:** ["Ian Culley"](#)  
**Subject:** Draft SoCG Duty to Cooperate  
**Date:** 30 June 2021 14:14:00  
**Attachments:** [SC - ABCA Draft SoCG June 2021.docx](#)

---

Hi Ian,

Yes, great result and far exceeded my very pessimistic expectations!

I have attached for your consideration a draft SoCG, which I feel sets out the current position with our Duty to Cooperate conversations. Still in draft and would welcome comments, but really this is just setting out where we are with the process to now.

We are seeking full Council agreement to submit the Plan on 15<sup>th</sup> July and papers will be available on 7<sup>th</sup> July. In short we are not proposing to make any minor modifications to the issues you have raised with the early review, but I have set this out as an area of disagreement in the SoCG. I do wonder however, whether your recent review of your own timeframe negates this issue somewhat, given that, according to current timeframes Shropshire is running around 2 years ahead of Black Country now and, realistically, we will need to commence work on a review in any case in 2026 I suspect. I will leave this to you to consider, and either way I don't think it impacts on the Duty to Cooperate, which we feel has been met.

You will notice I have also put a few references to our examination and the potential need for ABCA officers to defend the Black Country evidence if the inspector requires. I mentioned this at our last catch up session and it is a point of concern for us, so hopefully we can agree to this.

Subject to Full council approval on the 15<sup>th</sup> we will likely be submitting in early August, so it would be useful if we can get an agreement on the SoCG before then.

I have taken a quick look at your draft Plan. I have to say there must have been a considerable amount of work gone into this, so really well done to you and colleagues for getting this out on time. I suspect Shropshire Council will wish to comment.

Kind regards,

Eddie

Eddie West

Planning Policy and Strategy Manager  
Shropshire Council



Our Ref: HP/CW  
Date: 26 April 2022

Dear Colleagues,

**Black Country Plan Review**  
**Duty to Cooperate: Strategic Housing and Employment land issues**

The Black Country Authorities (BCAs) are progressing the Black Country Plan (BCP) which will replace the Black Country Core Strategy as the overarching strategic planning and regeneration strategy for the area.

You may recall that we contacted neighbouring authorities including yours, in July 2018 and again in August 2020, to request assistance in accommodating identified housing and / or employment land needs arising from the Black Country. We received a number of positive responses to this request and note that a number of authorities have since progressed their Local Plan reviews in a consistently positive manner. We have also held Duty to Cooperate meetings in January 2020, June 2021 and August 2021 – the latter alongside the commencement of the BCP Regulation 18 consultation.

We were also fully supportive of South Staffordshire Council's convening of a meeting of all local authorities in the Greater Birmingham, Solihull and Black Country Housing Market Area (the HMA) and other neighbouring authorities with a functional relationship with the HMA in December 2021. The BCA suggested a series of actions in advance of that meeting, building on our Duty to Cooperate engagement to date, and which are directly relevant to our strategy of working with you to ensure that the Black Country evidenced growth needs can be met in full.

The purpose of this letter is to update you on progress with the BCP and to outline next steps. We also set out our strategy for ongoing engagement through the Duty to Cooperate with a focus on strategic housing and employment land issues. This includes a set of proposals which we are seeking your response to by way of a series of specific requests.

## Recent progress

1. The Regulation 18 BCP consultation took place between August and October 2021. We received around 20,800 responses and all of the representations can be viewed online via the link - <https://blackcountryplan.dudley.gov.uk/bcp/> . The bulk of feedback centred around the potential use of green belt land for development and we are currently reviewing all of the responses to inform the preparation of the Regulation 19 BCP programmed for consultation in the Autumn of this year.
2. We received responses from a number of neighbouring authorities – Bromsgrove, Cannock Chase, Lichfield, Redditch, Solihull, South Staffordshire, Stafford, Staffordshire and Worcestershire. These representations raised a variety of issues at a strategic level, recognising the broad scale of the shortfall and the need for ongoing and better aligned engagement going forward, in order to ensure a consistent and fair approach be taken to address longer term needs once the final shortfalls are confirmed.
3. The next sections of this letter summarise the current scale of the housing and employment land shortfalls and how we intend to address them.

## Strategic Housing Issues

4. The Regulation 18 BCP identifies a housing shortfall of 28,234 homes over the period 2020-39 (16,346 by 2031 and 11,888 2031-39). This shortfall is based on the most up to date local housing need (including the 35% uplift for Wolverhampton), the most recent housing monitoring information and land supply on sites allocated in the draft BCP including land currently designated as green belt. The Regulation 18 BCP proposes that this shortfall is addressed via the Duty to Cooperate through 'exporting' to sustainable locations in neighbouring areas.
5. As part of the preparation of the Regulation 19 BCP, we are undertaking further evidence gathering in relation to urban land supply. This will involve an update of the existing Urban Capacity Study including a detailed assessment of the implications of the ongoing restructuring of some retail and commercial sectors which may 'free up' space in town and city centres. However, the scale of any additional capacity is likely to be limited and is not anticipated to make significant headway into the shortfall outlined above.
6. As set out above, through the Duty to Cooperate, we are pleased that some Local Plans have responded positively to our request initially raised in 2018 for assistance in addressing our future growth needs. Potential contributions through our Duty to Cooperate engagement to date are outlined in the table below.

**Table 1 – Duty to Cooperate contributions (in order of Local Plan progress)**

<b>Local Plan</b>	<b>Status</b>	<b>Potential contribution to meeting Black Country housing needs</b>	<b>Comments</b>
Solihull	Submission (May 2021)  Examination underway	2,000 (minority)	Contribution is to meet needs arising across the whole of the HMA and not limited to the Black Country, 2,000 HMA contribution noted by Local Plan Inspector February 2022. However, Solihull has a stronger functional relationship with Birmingham than with the Black Country.
Shropshire	Submission (September 2021)  Examination underway	1,500 (all)	Contribution towards the Black Country only, confirmed in Statement of Common Ground (August 2021)
Lichfield	Publication (July 2021)  Submission due April 2022	2,000 (all)	Contribution forms majority of 2,665 contribution to meet the needs of the HMA as a whole.
Cannock Chase	Preferred Options (March 2021)	Up to 500 (majority)	Contribution is to meet needs arising across the whole of the HMA and not limited to the Black Country. However, Cannock Chase has a stronger functional relationship with the Black Country than with Birmingham.
South Staffordshire	Preferred Options (November 2021)	Up to 4,000 (majority)	Contribution is to meet needs arising across the whole of the HMA and not limited to the Black Country. However, South Staffordshire has a stronger functional relationship with the Black Country than with Birmingham.
<b>Total</b>		<b>3,500-10,000</b>	

7. These Plans are providing for a minimum of 3,500 homes to specifically meet Black Country needs and up to some 10,000 homes to meet the needs of the HMA as a whole, a proportion of which will be available to the Black Country.
8. Of these HMA contributions, given the physical proximity and functional relationship between the Black Country and South Staffordshire, it is anticipated that the majority of the 4,000 contribution being tested through the South Staffordshire Local Plan could be available to meet Black Country needs. Conversely, given its relationship to Birmingham, we anticipate that the majority of the 2,000 home contribution from Solihull is unlikely to be available to meet needs arising in the Black Country. Under these scenarios, the contributions from the authorities listed in Table 1 could realistically provide up to some 8,000 homes towards meeting needs arising in the Black Country.
9. In addition, the highest growth scenarios set out in the earlier iterations of the Lichfield and Cannock Local Plans could also provide some 5,550 homes in excess of local needs (in comparison with the 3,165 currently offered). This additional capacity (3,000 homes in total over and above current contributions to the Black Country) has been highlighted by the BCAs and will be tested through the forthcoming Local Plan examinations.
10. Further contributions are being sought from Stafford (of up to 2,000 homes) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin, both at the early stages of their Local Plan reviews. In the case of Telford and Wrekin, the higher growth option set out in the Issues and Options Report could provide some 3,700 homes over and above local needs, and the Black Country is well placed to provide a source of 'need' for this housing. The BCAs see this as being a minimum level of contribution given the historic role of Telford as a New Town to help address issues of overcrowding and living conditions in the West Midlands conurbation, and very high rates of housing completions over and above local needs in recent years. In total, this additional capacity from Stafford and Telford & Wrekin could provide some 5,700 homes towards meeting needs arising in the Black Country.
11. Taking into account this potential extra capacity of up to some 8,700 homes from Stafford, Telford & Wrekin, Lichfield and Cannock, added to current potential contributions (around 8,000 homes), could provide up to some 16,700 homes to meet needs arising in the Black Country.

12. Going forward, it is critical that those contributions currently expressed as meeting needs arising across the HMA as a whole are apportioned to individual Local Plans areas through Statements of Common Ground to provide the BCAs with certainty over the scale of contributions that is available to meet our shortfall. **However, even in the event of a contribution being secured at the higher end of the range of scenarios outlined above, a significant ‘gap’ of some 11,500 homes would remain for the Black Country up to 2039 (with a proportion of this gap arising before 2031). It is therefore critical that additional sources of land must be identified through the Duty to Cooperate if the Black Country is able to show how its identified growth needs can be accommodated.**

Request 1 - We request that any contributions that your authority is making to meet the needs of the HMA as a whole includes an apportionment to solely address needs arising in the Black Country.

Request 2 – We request that you provide confirmation that you have either explored all opportunities to accommodate unmet housing needs arising in the Black Country within your Local Plan work, or that you will actively test opportunities going forward.

### **Strategic Employment Land Issues**

13. As is the case with housing needs, the Black Country is unable to meet its identified employment land requirements in full. The Black Country Plan employment land shortfall to 2039 is 210ha as set out in the Regulation 18 Black Country Plan – this figure the difference between the need of 565ha and an anticipated supply of 355ha. This is consistent with the employment land requirement set out in Policy EMP1 of the draft Black Country Plan and section 4 of the 2021 Black Country EDNA. Para 2.22 of the 2021 EDNA recommends that the split of employment land provided for by the Plan comprise around 30% of B8 activity and 70% for E(g)(ii)(iii)/B2 use class. This means that the total B8 requirement is 170-176ha and for E(g)(ii)(iii)/B2 a requirement of 396-410ha. We are reviewing these requirements in the light of updated economic projections which include a more up to date understanding of the CV-19 recession recovery trajectory. This work may result in a refinement of the requirements but it is highly likely that our shortfall will remain.
14. In accommodating this shortfall, in the first instance we will look to those authorities within the areas of strong economic transactions with the Black Country (South Staffordshire and Birmingham) and areas of moderate economic transactions with the Black Country as identified in the 2017 EDNA (Cannock Chase, Lichfield, Tamworth, Solihull, Bromsgrove and Wyre Forest). In addition, the Shropshire Economic Development Needs Assessment (December 2020) highlights strong labour market linkages between Shropshire and the Black Country.

15. At this stage, we would not identify a specific functional geography for addressing the E(g)(ii)(iii)/B2 shortfall as distinct from the B8 element of the shortfall, but recognise the consented West Midlands Interchange site is reserved exclusively for B8 activity. With this in mind, we refer you to the West Midlands Interchange Apportionment Study produced by Stantec to support the Black Country Plan and published earlier this year (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>). This suggests that a minimum of some 67ha of land at West Midlands Interchange could be apportioned to meet needs arising in the Black Country, with the potential for a larger contribution if other areas within the market area are able to meet their B8 needs in full. This would suggest that the quantitative B8 shortfall could be largely satisfied by this site should the programmed South Staffordshire EDNA update confirm a surplus of employment land against local needs. **This could reduce the Black Country employment land shortfall to 138ha. Any additional surplus of employment land arising from the South Staffordshire EDNA update would reduce the shortfall further.**
16. In terms of other potential contributions, the Shropshire Regulation 19 Local Plan is making a contribution of 30ha of employment land towards needs arising in the Black Country, **reducing the shortfall to some 108ha**. We are engaging with other emerging Local Plans through the Duty to Cooperate including Bromsgrove, Lichfield, Cannock, Telford & Wrekin, Solihull and Stafford, but no contributions have been put forward by those authorities and the BCAs will continue to press this matter through Local Plan examinations, particularly those authorities within the areas of strong economic transactions with the Black Country as listed above. We will also be seeking the participation of authorities listed in paragraph 14, and any others able to contribute to BCA employment shortfalls, in a Statement of Common Ground (SoCG) addressing this issue to inform the Black Country's Regulation 19 plan and will use the responses to this letter to inform the draft SoCG. **As is the case with housing, additional sources of land supply must be identified if the Black Country is able to meet its growth needs in full.**

Request 3 - We request that you provide confirmation that you have either explored all opportunities to accommodate unmet employment land needs arising in the Black Country within your Local Plan work, or that you will actively test opportunities going forward, and that you will be willing to enter into a Statement of Common Ground with the Black Country under the scope set out in paragraph 16 of this letter.

17. We draw your attention to the West Midlands Strategic Employment Sites Study (WMSESS) (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4b/>) published in 2021. The Report was produced by Avison Young and Arcadis consultants and commissioned by three of the West Midlands Local Enterprise Partnerships (the Black Country, Greater Birmingham and Solihull and Coventry Warwickshire) and Staffordshire County Council. The Study updates the 2015 West Midlands Strategic Employment Sites Study which identified a demand for strategic employment sites in the West Midlands, but a lack of suitable sites.



18. The Study advises that based on evidence of past trends in relation to take-up, and assuming that no additional strategic employment sites are brought forward to replace those that remain, the supply of allocated and committed employment land would appear to represent a maximum of 7.41 years supply. As it was in 2015, this represents a limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of 'strategic employment sites', and there is an urgent market demand for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites. The Study identifies five areas where strategic employment sites should be identified and this includes the Black Country and southern Staffordshire.
19. The Study makes a number of recommendations for further work. This is because the shortfall in the availability and future supply of strategic employment sites cannot be robustly quantified without an assessment of market dynamics and projected sector growth patterns through an econometric demand forecast, which would add materially to the findings of this Study and would inform the strategy for delivering a sufficient supply of strategic employment land. The Study has already been given weight in the Local Plan process – most recently through the examination of the North Warwickshire Local Plan and the resulting Policy LP6 – Additional Employment Land.
20. There is clearly a potential relationship between the need to address the Black Country employment land shortfall and the need to bring forward additional strategic employment sites as set out in the WMSESS. Through the HMA Group and liaison with those bodies who were party to the 2021 Study, a draft brief has been prepared to address the recommendations for the 2021 Study and strongly recommend that this work is progressed in partnership with the local planning authorities across the 2021 Study geography, and other areas which share a functional relationship with the Black Country, for example Shropshire.

Request 4 - We request that you indicate whether your authority is willing to participate in the further work to address the recommendations of the WMSESS.

### **Next steps**

21. As set out above, there is a significant level of unmet need for housing and employment land to address evidenced Black Country growth requirements which cannot be met within the Black Country administrative area. There are three elements to our strategy to address the shortfall through the Duty to Cooperate and these are summarised below.

22. In the short term we will be continuing to engage with individual Local Plans to ensure 2018 Growth Study recommendations are maximised and to confirm current contributions to help address the Black Country shortfall, particularly in relation to those housing contributions which have been expressed at HMA level and not yet distinguishing a specific Black Country apportionment. For those Local Plans which are less progressed, we will engage in a positive and robust manner to ensure that the unmet needs of the Black Country are fully recognised and all opportunities to assist in meeting our needs are comprehensively explored. This will include opportunities identified in the 2018 Growth Study.
23. **But these current workstreams may not address our needs in full, and we strongly recommend to you that there is a compelling need to address this matter in a comprehensive and inclusive manner across a wide but functional geography.** We are also mindful of the forthcoming Birmingham Local Plan review and the potential for this to further increase the shortfall arising from the West Midlands conurbation. We outlined our suggestions on a potential programme of work as part of the 15<sup>th</sup> December South Staffordshire Duty to Cooperate meeting. This was shared with you in advance and we attach it to this letter. The key elements of this work programme are:
- To review the extent of the HMA in order to understand if this is the most appropriate geography by which housing needs and mechanisms to accommodate any shortfalls can be considered;
  - To confirm the scale of the housing shortfall across the whole of the HMA over a period of at least 15 years to inform the approach taken by current and emerging Local Plan reviews.
  - A review of whether the growth locations identified in the 2018 Growth Study work remain appropriate and whether new growth areas should be identified for testing through Local Plan preparation. This work may well result in the need for a new Growth Study but we would not want to pre-judge the work before confirming that is the case.
24. This work programme is currently subject to ongoing discussions largely through the HMA officer group, and we recognise that the existing governance arrangements are in need of review to ensure that we have in place mechanisms to manage and oversee the implementation of this work. The nature of these governance arrangements and the parties involved should be informed by the evidence but at this stage, a Statement of Common Ground across the HMA geography and including other authorities which have a functional relationship with it which sets out the nature of how we work together going forward is essential. We strongly encourage your authority to fully engage in this work.

Request 5 - We request that you indicate whether your authority is willing to participate in the further work outlined in the bullet points above, and that your authority would be willing to confirm this commitment through a Statement of Common Ground and review of governance arrangements to deliver these actions.

25. Turning to employment land, as with housing we will pursue a Statement of Common Ground with functionally related authorities to both secure current contributions and engage with less progressed Local Plans through the Duty to Cooperate to establish potential for further contributions. We have set out the compelling need for a follow-up study to address the recommendations of the 2021 West Midlands Strategic Employment Sites Study and have asked if your authority would be willing to participate in this work and assist with its resourcing.
26. Common to both the housing and employment land shortfalls is the final element of our strategy – for Local Plans to include an early review mechanism. This is important given the potential for there could continue to be a shortfall following the current round of Local Plan preparation. This shortfall should trigger the detailed evaluation of opportunities identified from the recommendations of the proposed work outlined above in relation to both housing and employment land through updated Local Plans. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. We consider that a failure to include an early review mechanism is a serious omission and must be addressed in order for the Plan to be sound.

Request 6 - We request that you indicate whether your authority is willing to consider the inclusion of a commitment to an early review mechanism in your emerging Local Plan to enable the consideration of additional growth opportunities outlined in the work listed above in a timely manner should this be necessary.

### **Timetable for responses**

27. Moving forward, the BCAs are progressing the preparation of the Regulation 19 Plan having regard to the issues raised in the Regulation 18 consultation responses and evidence currently under preparation. This includes the Transport Study, updated urban capacity study and employment land update. The Transport Study in particular will provide us with a better understanding of the constraints and opportunities associated with the levels of and location of growth set out in the Regulation 18 Plan with potential implications for the development capacity of some sites.

28. To enable us to meet this timetable, and clear understanding of opportunities through the Duty to Cooperate is critical. **We therefore ask that you consider the requests set out in this letter and respond in writing to: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk) within six weeks of the date of this letter.** If you wish to discuss the contents of this letter before responding, please get in touch. We appreciate that this letter may raise difficult issues that need thorough consideration from both officers and Councillors. However, given the time that has already passed since the Black Country initially identified a shortfall in 2018 and the wider work already being undertaken across the HMA, we would be grateful if you could adhere to these timescales. If you anticipate a delay is being able to provide a response, it would be helpful if you could let us know as soon as possible.

Yours sincerely

Councillor Patrick Harley  
Leader  
Dudley Metropolitan Borough Council

Councillor Mike Bird  
Leader  
Walsall Metropolitan Borough Council

Councillor Kerrie Carmichael  
Leader  
Sandwell Metropolitan Borough Council

Councillor Ian Brookfield  
Leader  
City of Wolverhampton Council