

Statement of Common Ground between Wyre Forest District Council and Birmingham City Council

1) Introduction

Under the National Planning Policy Framework (NPPF, 2019), strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the emerging Wyre Forest District Local Plan Review. It sets out how Wyre Forest District Council has engaged with Birmingham City Council in order to fulfil its Duty to Cooperate requirements.

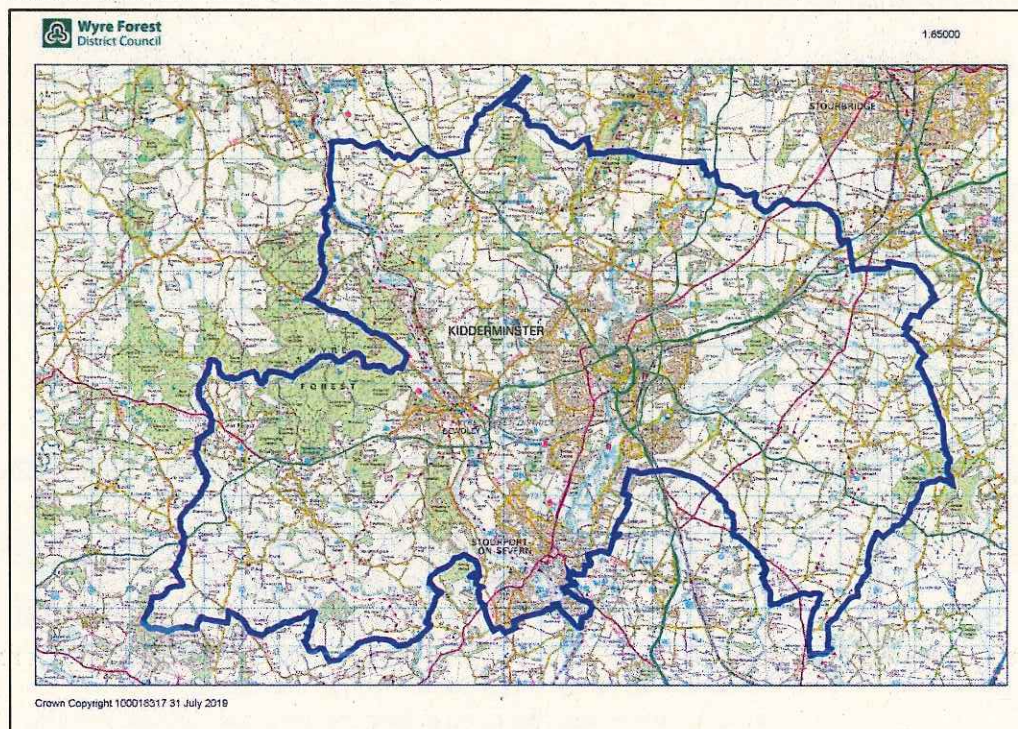
2) Parties Involved

This Statement of Common Ground (SofCG) has been prepared jointly by Wyre Forest District Council (WFDC) and Birmingham City Council (BCC). Birmingham City Council does not share a boundary with Wyre Forest District.

3) Strategic Geography

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan 2016-2036, which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

Figure 1: Map of Wyre Forest District



4) Background / Duty to Cooperate

There has been ongoing engagement between WFDC and Birmingham City Council throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with Birmingham City Council at every stage of plan making. The Local Plan Review consultation periods were as follows:-

- Issues and Options Consultation – September / October 2015
- Preferred Options Consultation – June / August 2017
- Pre-Submission Consultation – November / December 2018
- Pre-Submission Consultation (re-opened) – September / October 2019

Duty to Cooperate meetings have also taken place on the following dates:-

- 9th February 2018
- 18th May 2018
- 18th July 2019
- 3rd October 2019
- 5th December 2019

Minutes of the above meetings can be viewed in Appendix 1.

The above meetings were jointly held with Birmingham City Council and the Black Country Authorities so that cross boundary duty to cooperate discussions could be had together to discuss strategic issues jointly. South Staffordshire Council also attended some of these meetings.

Birmingham City Council was also invited to the following duty to cooperate meetings that WFDC held with the Black Country Authorities. Birmingham City Council sent their apologies for the following meetings and did not attend:-

- 25th September 2018
- 14th March 2019

5) Strategic Matters Identified

Birmingham City Council did not respond to the WFDC Local Plan Pre-Submission consultation that was undertaken in November / December 2018, but did make a representation to the re-opening of the Pre-Submission consultation in September / October 2019. Table 1 shows a summary of the response received from BCC (the full response can be viewed in Appendix 3).

Table 1: Birmingham City Council response to WFDC Local Plan – Amendments to the Pre-Submission Publication Document (July 2019)

	Issues
Birmingham City Council (2019 response)	Birmingham City Council generally welcomes the contents of the consultation document in terms of strategic housing issues identified, to which the Council has confined its comments, and the commitment to an early review of the Plan if evidence leads to continued unmet housing need in neighbouring authorities. We also appreciate the opportunity for continued engagement and working

	with Wyre Forest District Council through the Duty to Co-operate process.
Birmingham City Council (2019 response)	<p><u>Policy AM6A – Development Needs 2016-2036</u></p> <p>Birmingham City Council supports the approach in paragraph B and welcomes the amendments to this policy to recognise the obligations set out in the NPPF in identifying housing needs that cannot be met in neighbouring local authorities.</p> <p>Although Wyre Forest District is not part of the Birmingham and Black Country Housing Market Area, there are some functional relationships with the West Midlands conurbation in terms of migration and commuting patterns (as the document itself states in paragraph AM6.20). The plan therefore needs to explicitly acknowledge that any additional housing growth proposed over and above Local Housing Need (LHN), (once all other factors have been taken into account), can be attributed to meeting established unmet need within neighbouring authorities particularly in the conurbation. This includes Birmingham which has established an unmet housing need of 37,900 through the adoption of the Birmingham Development Plan in 2017.</p> <p>This will ensure that the Wyre Forest District Plan is compliant with the NPPF. The commitment to an early review is therefore welcome particularly if subsequent evidence shows continued unmet need when the Local Plans for both the Black Country and Birmingham are reviewed in the future.</p>

6) Matters that parties agree on

Table 2 below shows the matters that both parties agree on.

Table 2: Matters that both parties agree on

	Issues	WFDC Response
Birmingham City Council (2019 response)	Birmingham City Council generally welcomes the contents of the consultation document in terms of strategic housing issues identified, to which the Council has confined its comments, and the commitment to an early review of the Plan if evidence leads to continued unmet housing need in neighbouring authorities. We also appreciate the opportunity for continued engagement and working with Wyre Forest District Council through the Duty to Co-operate process.	WFDC is pleased that Birmingham City Council broadly supports the amendments to the Pre-Submission Local Plan, and in particular the changes that have been made to Policy 6A of the Local Plan, with the revised wording in part B.
Birmingham City Council (2019 response)	<p><u>Policy AM6A – Development Needs 2016-2036</u></p> <p>Birmingham City Council supports the approach in paragraph B and welcomes the amendments to this policy to recognise the</p>	WFDC is pleased that Birmingham City Council broadly supports the amendments to the Pre-Submission Local Plan,

	obligations set out in the NPPF in identifying housing needs that cannot be met in neighbouring local authorities.	and in particular the changes that have been made to Policy 6A of the Local Plan, with the revised wording in part B.
Birmingham City Council (2019 response)	This will ensure that the Wyre Forest District Plan is compliant with the NPPF. The commitment to an early review is therefore welcome particularly if subsequent evidence shows continued unmet need when the Local Plans for both the Black Country and Birmingham are reviewed in the future.	The 'early' review will be where necessary and in accordance with the NPPF, following the formal adoption of the Wyre Forest District Local Plan, (2016-2036). WFDC will continue to have DtC discussions with Birmingham City Council and the Black Country Authorities as they progress with their own Local Plan Reviews.

7) Matters that parties disagree on

Table 3 below shows matters that parties disagree on.

Table 3: Matters that parties disagree on

	Issues	WFDC Response
Birmingham City Council (2019 response)	<p><u>Policy AM6A – Development Needs 2016-2036</u></p> <p>Although Wyre Forest District is not part of the Birmingham and Black Country Housing Market Area, there are some functional relationships with the West Midlands conurbation in terms of migration and commuting patterns (as the document itself states in paragraph AM6.20). The plan therefore needs to explicitly acknowledge that any additional housing growth proposed over and above Local Housing Need (LHN), (once all other factors have been taken into account), can be attributed to meeting established unmet need within neighbouring authorities particularly in the conurbation. This includes Birmingham which has established an unmet housing need of 37,900 through the adoption of the Birmingham Development Plan in 2017.</p>	<p>Wyre Forest District does not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Birmingham City Council currently has an established housing shortfall, some of which has already been met within the GBBCHMA. However, the Black Country Authorities, alongside other local authorities within the GBBCHMA, have yet to provide sufficient evidence that any remaining shortfall cannot be accommodated within their own Housing Market Area, and to</p>

		<p>justify why they need WFDC to accommodate some of their shortfall. WFDC is a Green Belt local authority and therefore exceptional circumstances are required to release land from the green belt.</p> <p>Flexibility has been built into Policy 6A(B). WFDC has also held a number of DtC meetings with Birmingham City Council and has agreed to prepare this Statement of Common Ground with them.</p>
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8) Other Strategic Matters

As WFDC is a green belt local authority, the question of whether neighbouring and nearby local authorities can help to meet the housing need for Wyre Forest in the emerging and future local plans needs to be considered. As Birmingham City Council has a housing shortfall, they will not be in a position to help Wyre Forest District with its housing need.

The emerging WFDC Local Plan is intending to accommodate all of its housing and employment need within its own district area; however this will involve some green belt release which will need to be considered at examination stage by the Planning Inspector.

9) Governance Arrangements

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

Local Authority	Method of Approval
Wyre Forest District Council	SofCG to be agreed by Council Members
Birmingham City Council	Delegated approval by the Interim Director for Inclusive Growth

10) Timetable for agreement

The table below sets out the timetable arrangement for the Statement of Common Ground to be agreed.

Local Authority	Timetable for approval
Wyre Forest District Council	<ul style="list-style-type: none"> - Overview & Scrutiny – 6th February 2020 - Cabinet Meeting – 11th February 2020 - Extraordinary Council Meeting – 20th February 2020

Birmingham City Council	- Delegated approval by the Interim Director for Inclusive Growth
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11) Conclusions

The parties agree that:

- i) WFDC has fulfilled its Duty to Cooperate with Birmingham City Council.
- ii) The SofCG accurately sets out the points of agreement (6) and disagreement (7) between WFDC and Birmingham City Council.
- iii) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.

12) Signatories

This Statement of Common Ground has been agreed and signed by the following:-

<u>Birmingham City Council</u>	<u>Wyre Forest District Council</u>
Name: <u>IAN MACLEOD</u>	Name: <u>Mike Parker</u>
Position: <u>Interim Director</u>	Position: <u>Corporate Director: Economic Prosperity & Place</u>
Date agreed: <u>5/2/2020</u>	Date agreed: <u>17th March 2020</u>
Signature: <u>[Redacted]</u>	Signature: <u>[Redacted]</u>

13) Appendices

- Appendix 1 – Duty to Cooperate Meeting Minutes between WFDC and Birmingham City Council
- Appendix 2 – Birmingham City Council response to the WFDC Preferred Options consultation (June – August 2017)
- Appendix 3 – Birmingham City Council response to the WFDC Pre-Submission Consultation (Sept / Oct 2019)

Present:

Martin Dando (Dudley)		Ian Culley (Wolverhampton)
Kelly Harris (South Staffs)		Uyen-Phan Han (BCC)
Andy Donnelly (WM Metropolitan Authorities)		Mike Parker (WFDC)
Helen Smith (WFDC)		Kate Bailey (WFDC)
		Actions
1.	<p>Local Plan Timetables</p> <p>HS ran through the LP timetable for WFDC. Full Council in November and EiP in 2019 and adoption July 2019.</p> <p>Black Country – Issues and Options (Summer 2017). Preferred Options due out at end of this year. Draft plan summer / autumn 2019. Unmet need of 22k (still subject to testing) until 2036.</p> <p>South Staffs – site allocations examination end 2017 and now out to consultation on modifications and hope to have the plan found sound. Want to adopt by August 2018 and also started work on LP review. Have started drafting Issues & Options and aim to finish this by Summer 2018. New Local Plan aiming to be submitted by 2021.</p> <p>Birmingham – adopted development plan Jan 2017. The Plan is providing 51,000. Housing shortfall to be met by other LPAs in the housing market – 38k approx, against an OAHN of 89,000.</p>	
2	<p>Green Belt Review</p> <p>MD explained that the GB review hasn't been commissioned yet. Wanted to tie it in to the GL Hearn Housing Study so was put on hold.</p> <p>Now also waiting for Issues & Options consultation responses to be published before GB review can be commissioned – will publish without a response from the Council in March 2018. Approximately 1800 consultation responses were received.</p> <p>Combined Authority (CA) are looking at developing an overarching Investment and Spatial Delivery Framework which will not have any statutory planning making powers but will support delivery of existing plans. Therefore not involved in the GL Hearn study (HMS).</p> <p>CA – officers discussed the constituent and non-constituent members and mismatch in the geographies with the HMA. Spatial Investment and Delivery Framework – enables Mayor to have a discussion about priorities for the CA. Discussed timings around the household projections / standardised methodology being published and how this links to the pre-submission consultation timelines in context of WFDC timetable.</p>	

Appendix 1

3	Strategic Growth Locations Study (GL Hearn & Wood plc) Leaders meeting 20th February 2018 to consider the study and should be available publically after that.	
4	Duty to co-operate meeting on 14th February 2018 (Black Country) The Black Country LAs will outline the main consultation responses and timetable and discuss any DTC issues that are likely to arise. Further meetings will follow.	
5	Ongoing engagement with DTC partners Discussed the previous comments given at the DTC. WFDC figures aren't over-provided but meet the range identified by Amion (199 – 332) and we then selected 300 to meet the economic growth aspirations at the time. The DCLG standardised methodology was 246 so waiting on this to be finalised and 2016 population data to be available to then update to OAHN. BCC would be keen if we agreed to a MofU to take some of their numbers on the grounds that we are close to their HMA. The final WFDC OAHN number and the site technical evaluation will highlight whether there is over-provision or not and therefore what the Black Country might say at DTC. The GL Hearn study will then inform us as to whether there is a shortfall or not and as BC work continues will know whether they can meet that shortfall or not by their own GB. Unlikely that the Planning Inspector will have clarity on the BC position when they conduct the WFDC EiP in early 2019. Discussed the role of Solihull in meeting the needs of the conurbation. North Warwickshire is planning for in excess of OAHN and demographic need, with the surplus contributing to wider HMA shortfall. MP advised that it was unlikely that WFDC would be in this position. Issue raised that if a HMA planning for economic led migration above that reflected in trend based projections, then logically it needed to come from somewhere else, otherwise there was a risk of double counting e.g. Telford. Discussed the WFDC Housing Market Area and where the inward migration to the district was coming from.	WFDC will arrange a meeting again April / May 2018 to hold further DTC.

Appendix 1

Duty to Co-operate Meeting

18th May 2018

Present:

Martin Dando (Dudley)	Ian Culley (Wolverhampton)
Uyen-Phan Han (BCC)	Mike Parker (WFDC)
Helen Smith (WFDC)	
Apologies:	
Kate Bailey (WFDC)	Kelly Harris (South Staffs)
Andy Donnelly (WM Metropolitan Authorities)	
	Actions
1.	<p>Local Plan Timetables</p> <p>HS ran through the LP timetable for WFDC. The LP timetable is being revised and will go to Cabinet for approval on 12th June 2018. The pre-submission consultation will be held later this year, the EIP in 2019 and adoption in 2020.</p> <p>Black Country – Issues and Options (Summer 2017). Preferred Options was due out at end of this year, but the timetable is being revised due to delays with dealing with the consultation responses and the Green Belt review.</p> <p>South Staffs – Aiming to publish Issues & Options in September/October 2018.</p> <p>Birmingham – adopted development plan Jan 2017. The Plan is providing 51,000. Housing shortfall to be met by other LPAs in the housing market – 38k approx, against an OAHN of 89,000.</p>
2	<p>Black Country Green Belt Review</p> <p>The Green Belt review has been delayed. Walsall will be finding out who their lead political party is next Wednesday; is it hoped that the Green Belt review work will start shortly after this. Waiting for the politicians to give the green light.</p> <p>The WMCA Investment Plan was discussed. Wyre Forest DC has been approached in the sense that we are a LEP partner. WFDC have provided them with a pipeline of sites. WFDC have engaged as a LEP partner, not as a combined authority partner.</p> <p>Discussed timings around the revised NPPF / standardised methodology being published and how this links to the pre-submission consultation timelines in context of WFDC timetable.</p>
3	<p>Strategic Growth Locations Study (GL Hearn)</p> <p>The GL Hearn Strategic Growth Study was published in February 2018. LAs agreed to publish it on their websites. There is nothing in the study on Wyre Forest. It's not policy, not set in stone. It will be up to LAs to undertake a Green Belt review and plan making.</p> <p>Within the study there are options for urban extensions, rounding</p>

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	<p>off of green belt, new settlements and broad locations for this. The conclusion was that the study is a starting point; it is for LAs to take forward in their Local Plans and test out. By 2031 the needs are capable of being met by HMA. It will require some Green Belt development and rounding off of Green Belt. There are some significant large scale proposals to 2031. 2031 onwards the scale of the challenge is more significant. To meet the shortfall to 2036, would need much larger urban extensions. Increased densities. South of Dudley was a proposal and also in Bromsgrove District. It will be up to LAs to visit this in their local plan reviews. Some LAs have distanced themselves from the study. The status: a piece of evidence. It has not been approved as such, but the LAs cannot ignore it. It needs to be tested.</p> <p>The assumptions on densities were quite brave. LAs will need to consider how they will introduce policies of increased densities.</p> <p>North Warwickshire – going to examination in July 2018. Solihull will be later this year.</p>	
4	<p>Duty to co-operate meeting on 14th February 2018 (Black Country)</p> <p>The Black Country LAs presented the findings of the Issues & Options consultation responses and discussed DTC issues with those that attended the meeting. The meeting consisted of representatives from LAs, Historic England, Natural England, NHS etc. BC will undertake these types of sessions again when they reach the next stage of the Plan. They will also have focus group sessions as and when necessary.</p>	
5	<p>Revised NPPF and Statement of Common Ground</p> <p>The revised NPPF does not make reference to HMAs; it refers to neighbouring geographies instead.</p> <p>Possible topics for Statement of Common Ground could include:-</p> <ul style="list-style-type: none"> - GL Hearn Study - FEMA – Black Country, Wyre Forest connectivity. <p>LEPS – they are a Duty to Cooperate body. Would be involved in the preparation of a Statement of Common Ground. Would have to be engaged, but can't formally sign it.</p> <p>Think about whom do you need, who is important to the delivery of your plan?</p>	
6	<p>Ongoing engagement with DTC partners</p> <p>It was agreed that the next meeting should be in September 2018, preferably late September.</p>	<p>WFDC will arrange a meeting in September 2018 to hold further DTC.</p>

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Duty to Co-operate Meeting

18th July 2019

Present:

Vicki Popplewell (Dudley)	Martin Dando (BCC)
Rachel Blanchard (Dudley)	Kate Bailey (WFDC)
Helen Smith (WFDC)	
Apologies:	
Ian Culley (Wolverhampton)	Uyen-Phan Han (BCC)
Andy Donnelly (WM Metropolitan Authorities)	Kelly Harris (South Staffs)
	Actions
1.	<p>Introductions</p> <p>Rachel Blanchard from Dudley Council was welcomed to the group. Martin Dando was also welcomed to the group in his new role at Birmingham City Council.</p>
2.	<p>Local Plan review progress and timetables</p> <p>HS ran through the LP timetable for WFDC. The pre-submission consultation was held last year in November/December 2018. The team has since been working through the consultation responses received and checking for any soundness issues for the plan. Due to some technical issues identified in the transport evidence base, the Pre-Submission consultation is being re-opened from 2nd September 2019 to 14th October 2019 (6 weeks). The EiP is expected to commence in Spring 2020 and adoption in late 2020, based on the current LDS timetable which was approved by Cabinet in June 2019.</p> <p>Black Country – Issues and Options (Summer 2017). The draft Black Country Plan to be published for consultation in Autumn 2020. The Publication stage will be published in 2021 and Submission in early 2022 for EiP. It is hoped that adoption would be in Spring 2023. This revised timescale has been agreed by ABCA, but is still subject to Cabinet approval for each LA. The current housing shortfall for the Black Country LAs is 26,000 after 2031. The Plan period will be until 2038 to allow a 15 year timescale after adoption.</p> <p>Black Country LAs continue to have encouraging engagement with South Staffs and also Shropshire. Telford is not willing to help with the shortfall at this stage.</p> <p>Birmingham City Council adopted their Plan in January 2017. The adopted Plan anticipates a review after 3 years of adoption, i.e. in January 2020. BCC are currently undertaking work to establish if a review of the Plan will be necessary. BCC intends to publish a paper later this year to show their position on this. The shortfall for housing is 38,000. Some of this has been dissipated because of what other plans have produced in their areas. The Birmingham SHLAA has also identified further sites. Changes to the Government's standard methodology for calculating housing need has also changed the housing need for Birmingham. Some neighbouring LA's have offered to take some of Birmingham's shortfall, which has helped the situation. BCC are therefore not expecting to have to undertake a</p>

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	<p>complete review of their Plan in January 2020; it is more likely to be a partial review, but this will be confirmed in the paper that is published later this year.</p> <p>BCC are currently delivering on the Plan very well. They are meeting their expected targets. It is mainly private led housing being delivered, not much affordable housing. This is because there are a lot of viability issues.</p> <p>Shortfall – Solihull is looking to help out by offering approx. 2,000. Bromsgrove, Lichfield, South Staffs and Cannock are also looking to help with the shortfall for Birmingham.</p>	
3.	<p>Update on Black Country Green Belt Review</p> <p>The Green Belt assessment for the Black Country LAs is still being finalised. A call for sites is planned to take place in Autumn 2019.</p>	
4.	<p>Amendments to WFDC Pre-Submission Local Plan</p> <p>HS presented to the group the amendments to the WFDC Local Plan that were relevant to the DtC discussions. These amendments to the Local Plan were agreed by Cabinet in July 2019 and will be formally consulted on as part of the Pre-Submission consultation in September/October 2019.</p>	
5.	<p>Statement of Common Ground</p> <p>We discussed the need for a Statement of Common Ground and how this could be used to iron out any issues, following the re-opening of the Pre-Submission consultation.</p> <p>It was agreed that the SofCGs should be prepared ready for Submission Stage of the Wyre Forest Local Plan so that it is available for the examination.</p>	
6.	<p>Ongoing engagement with DtC partners</p> <p>It was agreed that the next meeting should be in September/October 2019 to discuss the drafting of the Statement of Common Ground.</p>	WFDC will arrange a meeting in September/October 2019 to hold further DTC.
7.	<p>AOB</p> <p>The Black Country LAs have been undertaking some migration analysis. It was agreed that this information could be shared with WFDC.</p>	Migration analysis to be sent by Vicki Popplewell to WFDC when this information is available.

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Duty to Co-operate Meeting

3rd October 2019

Present:

Vicki Popplewell (Dudley)	Martin Dando (BCC)
Ian Culley (Wolverhampton)	Andy Donnelly (WM Metropolitan Authorities)
Helen Smith (WFDC)	Kate Bailey (WFDC)
Apologies:	
Uyen-Phan Han (BCC)	
	Actions
1.	<p>Introductions</p> <p>Andy Donnelly was also welcomed to the group.</p>
2.	<p>Local Plan review progress and timetables</p> <p>HS ran through the LP timetable for WFDC. The pre-submission consultation is currently open and closing on 14th October 2019. The EiP is expected to commence in Spring 2020 and adoption in late 2020, based on the current LDS timetable which was approved by Cabinet in June 2019.</p> <p>Black Country – The draft Black Country Plan to be published for consultation in Autumn 2020. The Publication stage will be published in 2021 and Submission in early 2022 for EiP. It is hoped that adoption would be in Spring 2023.</p> <p>The Black Country LAs are intending to publish a suite of evidence base documents in November 2019, which will include a Green Belt Study, an Urban Capacity Study, and ecology reports. <i>[Since the DtC meeting, the BCA has decided to postpone publishing their evidence base documents due to the General Election being held on 12th December 2019].</i></p> <p>In terms of the Black Country housing shortfall, they still need to find land for around 10,000 homes. They are currently working on their SHLAA's. They have tried increasing densities, but still need help from neighbouring LA's to accommodate the 10,000 homes shortfall. South Staffs have made an offer of 4,000 homes and are due to publish their Preferred Options soon. Shropshire Council is testing out the possibility of a 3,000 contribution. Shropshire has a strong relationship with Wolverhampton by rail and road and has a growing elderly population. Lichfield and Cannock could be helping in excess of 7,500. Telford Council is looking at reviewing their Local Plan and DtC discussions will be taking place.</p> <p>Birmingham City Council adopted their Plan in January 2017. There is commitment in the Birmingham Plan to monitor the situation in 3 years of adoption. The City Council has been writing to all the local authorities in the HMA and is preparing a Position Statement paper that will be presented to its Members by end of year and published. This will show a) what the shortfall is, b) will try to see where the shortfall can be met, c) potential suppliers, and d) there will be a plan review every 5 years.</p>

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	<p>Shortfall – Solihull is looking to help out by offering approx. 2,000. Bromsgrove, Lichfield, South Staffs and Cannock are also looking to help with the shortfall for Birmingham. Bromsgrove's adopted Plan has a commitment written into policy to helping with the shortfall through their local plan review.</p>	
3.	<p>Update on Black Country Green Belt Review</p> <p>The Green Belt Study has assessed the NPPF GB purposes; it also considers harm and landscape sensitivity. It looks at the quality of the Black Country Green Belt as there are areas of less significance that could be released. This study will help to crystallise the gap in terms of employment need and land supply. However unfortunately, the Green Belt Study won't tell us how much land can be released. More clarity is therefore needed.</p>	
4.	<p>Amendments to WFDC Pre-Submission Local Plan (currently being consulted on as part of Reg 19 consultation)</p> <p>The Black Country LA's and Birmingham City Council are broadly supportive of the changes that have been made to the Wyre Forest District Local Plan in the amendments document. In particular, they were supportive of the Blakedown railway station park and ride site.</p> <p>Both will be working up a final consultation response to be sent to WFDC before close of consultation on 14th October 2019.</p>	
5.	<p>Statement of Common Ground</p> <p>It was agreed that the SofCGs should be prepared ready for Submission Stage of the Wyre Forest Local Plan so that it is available for the examination.</p>	<p>HS to send draft SoCG for comments.</p>
6.	<p>Ongoing engagement with DtC partners</p> <p>It was agreed that the next meeting should be in December 2019 to discuss the Statement of Common Ground.</p>	<p>WFDC will arrange a meeting in December 2019 to hold further DtC.</p>
7.	<p>AOB</p> <p>The Black Country LAs have been undertaking some migration analysis. It was agreed that this information could be shared with WFDC.</p>	<p>Migration analysis to be sent by Vicki Popplewell to WFDC when this information is available.</p>

Appendix 2

Sent: 14 August 2017 16:46
To: LPR Consultation
Cc: Ian MacLeod
Subject: Wyre Forest Preferred Options Consultation Response
Attachments: Wyre Forest Preferred Options Consultation response.docx

Categories: Blue Category

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/ Madam,

Please find attached comments in response to the consultation on the above.

Regards

Uyen

Uyen-Phan Han | Planning Policy Manager | Planning Strategy | Planning and Regeneration | Birmingham City Council
Click uyen-phan.han@birmingham.gov.uk | Call 0121 303 2765 | Visit Planning and Regeneration | 1 Lancaster Circus Queensway | Birmingham B4 7DJ

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Planning Policy
Wyre Forest District Council,
Wyre Forest House,
Finepoint Way,
Kidderminster,
DY11 7WF

14 August 2017

Dear Sir/ Madam,

Wyre Forest Local Plan Preferred Option 2014

Thank you for the opportunity to comment on the above document.

As a member of the GBSLEP, Wyre Forest District Council (WFDC) participated in the initial PBA Strategic Housing Needs Study work (SHNS). Stage 2 of the SHNS was published in November 2014 and confirmed that whilst WFDC did not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), it had close links with it. Based on the earlier housing market areas work undertaken for the National Housing and Planning Advisory Unit and published by DCLG in 2010, WFDC was a best fit with the Worcester HMA along with the three South Worcestershire Authorities (Worcester, Malvern Hills and Wychavon), but as these authorities have an adopted plan, it follows that for the purpose of this round of local plan making, WFDC is a free-standing HMA.

The Preferred Options document summarises the responses to the Issues and Options consultation noting support for additional in-migration, particularly of working age people, due to the ageing population in WFDC. The Amion / Edge Analytics 2017 Objective Assessment of Need report verifies the ageing population and also identifies internal migration as being the principal source of population growth. Figure 2.3 and table 2.2 in this report show that the principal source of this is conurbation authorities within the GBBC MA.

In considering economic factors, the Amion / Edge Analytics Report suggests an OAN of 300 dwellings per annum, compared to a demographically driven figure derived from the 2014 household projections of 199 dwellings per annum. The situation in the South Worcestershire Authorities mirrors that of WFDC in that they too are seeking economic led growth, which requires more people than demographic projections suggest and is reflected in the adopted plan. It follows, therefore, that the same must apply in WFDC.

It is now formally acknowledged in the adopted Birmingham Development Plan that there is a shortfall of 37,900 dwellings in the GBBCHMA arising from the city alone and evidence emerging from the Black Country Core Strategy may lead to the overall HMA shortfall increasing further. In the light of these growth pressures in the GBBCHMA and the established migration patterns with WFDC, it is logical to

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conclude that increased supply in WFDC is likely to be met by additional migration from the GBBCHMA; this is reflected in 8.12 of the Amion / Edge Analytics report. The recently published proposed modifications into the Telford and Wrekin Local Plan are relevant in this context in that the Inspector has acknowledged interactions between HMAs, PM 1 states that:

Given this relationship, and based on current evidence available at this time, the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBC HMA

As a consequence, we would welcome the opportunity to discuss this matter with you further with a view to signing a Duty to Cooperate statement / Memorandum of Understanding between the relevant local authorities.

Yours faithfully

Uyen-Phan Han

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14th October 2019

Dear Helen,

Wyre Forest District Local Plan Review – Amendments to the Pre-Submission Publication Document

Thank you for consulting Birmingham City Council on Wyre Forest District Local Plan Review – Amendments to the Pre-Submission Publication Document.

Birmingham City Council generally welcomes the contents of the consultation document in terms of strategic housing issues identified, to which the Council has confined its comments, and the commitment to an early review of the Plan if evidence leads to continued unmet housing need in neighbouring authorities. We also appreciate the opportunity for continued engagement and working with Wyre Forest District Council through the Duty to Co-operate process.

Policy AM6A - Development Needs 2016-2036.

Birmingham City Council supports the approach in paragraph B and welcomes the amendments to this policy to recognise the obligations set out in the NPPF in identifying housing needs that cannot be met in neighbouring local authorities.

Although Wyre Forest District is not part of the of the Birmingham and Black Country Housing Market Area, there are some functional relationships with the West Midlands conurbation in terms of migration and commuting patterns (as the document itself states in paragraph AM6.20). The plan therefore needs to explicitly acknowledge that any additional housing growth proposed over and above Local Housing Need (LHN), (once all other factors have been taken into account), can be attributed to meeting established unmet need within neighbouring authorities particularly in the conurbation. This includes Birmingham which has established an unmet housing need of 37,900 through the adoption of the Birmingham Development Plan in 2017.

This will ensure that the Wyre Forest District Plan is compliant with the NPPF. The commitment to an early review is therefore welcome particularly if subsequent evidence shows continued unmet need when the Local Plans for both the Black Country and Birmingham are reviewed in the future.

Statement of Common Ground

The strategic housing issues outlined above will be the main area of focus for any Statement of Common Ground (SoCG) with Wyre Forest. As previously discussed, we would support a joint SoCG with the Black Country, having similar strategic housing issues with Wyre Forest and forming part of the same Housing Market Area.

I trust that these comments are useful and constructive.

Yours faithfully



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