

**Greater Birmingham Black Country Housing Market Area
(GBBCHMA) HMA**

Officer Agreed Version

Statement of Common Ground Regarding Housing Shortfall

Position at 21st March 2025

Contents

1. Purpose and list of Parties involved in this Statement of Common Ground	3
Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)	4
2. Signatories to this Statement of Common Ground:	5
3. Strategic Geography.....	5
4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042	7
Birmingham Local Plan.....	8
Bromsgrove Local Plan.....	8
Cannock Chase Local Plan	8
Dudley Local Plan	8
Lichfield Local Plan	9
North Warwickshire Local Plan	9
Redditch Local Plan	9
Sandwell Local Plan.....	9
Shropshire Local Plan	10
Solihull Local Plan.....	10
South Staffordshire Local Plan	11
South Warwickshire Joint Local Plan	11
Tamworth Local Plan.....	11
Telford & Wrekin Local Plan	12
Walsall Local Plan.....	12
Wolverhampton Local Plan.....	12
Wyre Forest Local Plan.....	12
Local Plan Reviews shortfalls and contributions.....	13
Table 1 Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage	13
5. Strategic Matters - meeting housing need and agreed approach	14
Table 2 Percentage Apportionment of housing contributions from each local plan contribution based upon net in- flow	16
6. Further work of the GBBCHMA.....	17
7. Areas of agreement	17
8. Signatories to the Statement of Common Ground	17
Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions.....	21

1. Purpose and list of Parties involved in this Statement of Common Ground

1.1 This statement of common ground (SOCG) has been prepared to facilitate and record cross boundary engagement between local authorities in addressing the emerging housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It records co-operation and progress to date in addressing this strategic issue, demonstrating that the participating authorities have engaged constructively, actively and on an ongoing basis under the Duty to Cooperate.

1.2 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Development Needs Group comprises of the local planning authorities set out below, as shown on Figure 1¹. The Black Country consists of the Dudley, Sandwell, Walsall and Wolverhampton local planning authorities. Officers from the authorities meet regularly on an informal basis through the Development Needs Group. Any formal agreements, including the signing of this SoCG, are the responsibility of the governance arrangements in each authority.

1.3 Local planning authorities within the GBBCHMA

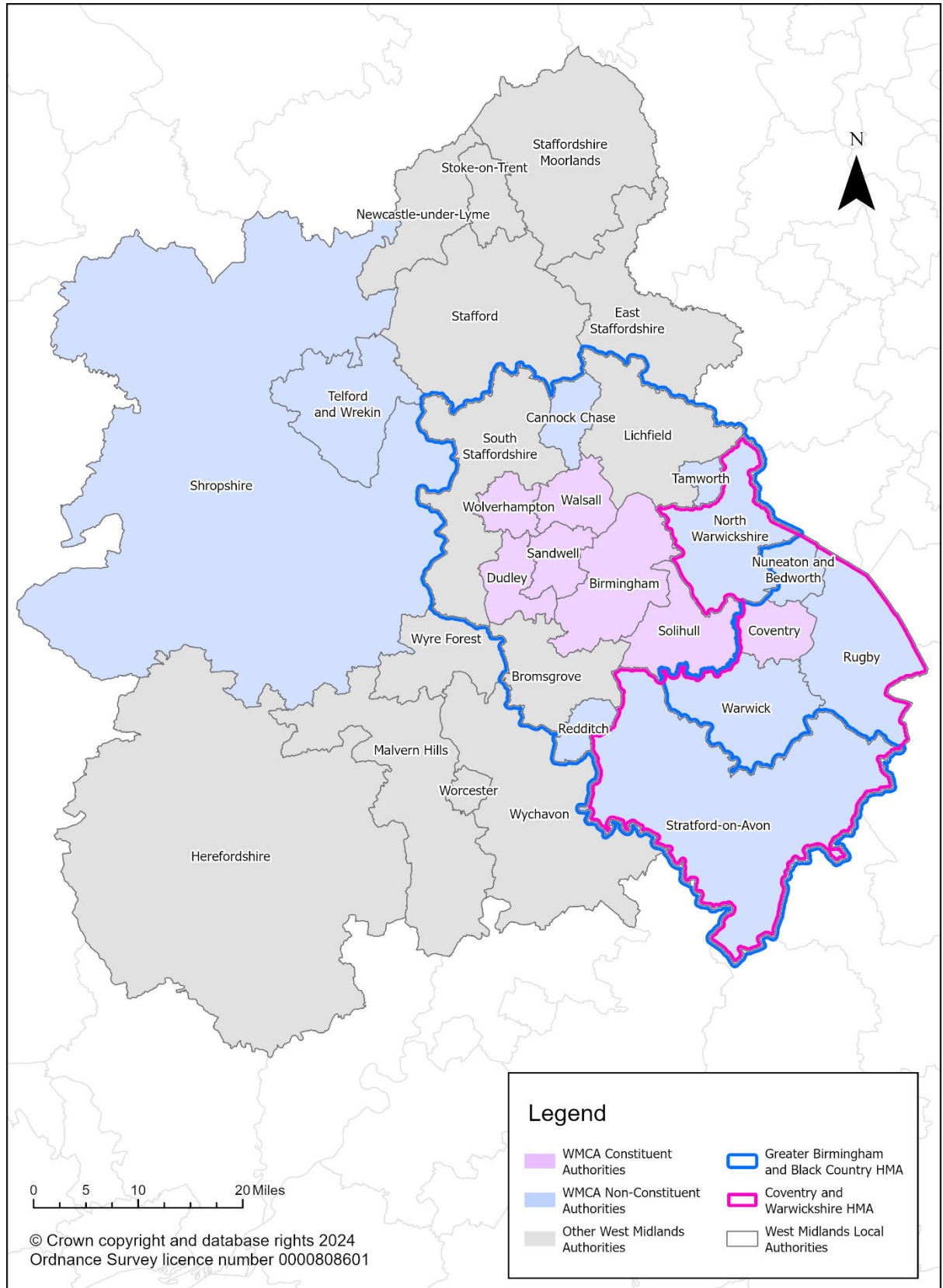
- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council

1.4 Other related local planning authorities outside of the GBBCHMA

- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

¹ Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA”

Figure 1 Greater Birmingham and Black Country Housing Market Area (GBBCHMA)



2. Signatories to this Statement of Common Ground:

- Birmingham City Council
- Bromsgrove District Council
- Cannock Chase District Council
- Dudley Metropolitan Borough Council
- Lichfield District Council
- North Warwickshire Borough Council
- Redditch Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council
- Shropshire Council
- Telford and Wrekin Council
- Wyre Forest District Council

3. Strategic Geography

3.1 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) comprises 14 local authorities: Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford-on-Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council.

3.2 This geography was defined through the published study commissioned from Peter Brett Associates (now Stantec) in accordance with guidance at the time based on analysis of migration flows and commuting patterns and was subsequently endorsed by all authorities².

3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography

² Greater Birmingham and Black Country HMA Strategic Growth Study 2018 https://blackcountryplan.dudley.gov.uk/media/11537/greater-birmingham-hma_strategic-growth-study_lowres.pdf and Greater Birmingham and Black Country HMA Strategic Growth Study 2018 Appendices https://blackcountryplan.dudley.gov.uk/media/11538/greater-birmingham-hma_strategic-growth-study_appendices_lowres.pdf

is still valid. A Housing and Economic Development Needs Assessment (HEDNA) 2022³ report which has been subject to engagement with neighbouring authorities through the GBBCHMA group and through a recent Regulation 18 local plan consultation with no objections raised, confirms that this is still a reliable geography using more recent data where available. Whilst, the HEDNA has yet to be tested through an examination in public it also confirms that other authorities beyond the GBBCHMA have close functional relationships with it based on commuting and migration flows, as listed below:

- Shropshire
- Telford & Wrekin
- Wyre Forest
- Worcester City
- Coventry City

- 3.4 Based on the findings of this report, Shropshire, Telford & Wrekin and Wyre Forest Councils were invited to be signatories to this statement of common ground, recognising the close functional relationships these areas have with the GBBCHMA (or parts of it) and authorities forecast to generate housing shortfalls within it. Worcester City Council and Coventry City Council were not invited to be signatories, because these are constrained urban areas that have historically relied on other neighbouring authorities to meet part of their housing needs over separate functional geographies and are therefore unlikely to be able to contribute towards the unmet housing needs of the GBBCHMA.
- 3.5 At this time, expansion of the GBBCHMA is not advocated but it is acknowledged that there are potentially cross boundary matters, particularly in relation to migration patterns, which should be addressed through the Duty to Cooperate discussions.
- 3.6 The strategic geography and scope of this statement of common ground reflects current emerging evidence regarding the functional relationships between the GBBCHMA and surrounding areas. Where relevant, this scope will be updated to reflect any other evidence showing functional relationships beyond the GBBCHMA as and when such evidence becomes available.
- 3.7 It should be noted that whilst both North Warwickshire and Stratford-on-Avon Councils fall within the Coventry and Warwickshire HMA as well as the Greater Birmingham and Black Country HMA, the 2022 Coventry and Warwickshire HEDNA does state: “While at a strategic level these overlaps are based on the entire local authority in reality, they will be mostly confined to those areas adjoining the Birmingham HMA.
- 3.8 The adopted Birmingham Development Plan (2017) identified a shortfall in Birmingham’s housing supply of 37,900 homes which could not be met in the plan area. Policy TP48 of the adopted BDP sets out a mechanism for how this will be dealt with. A

³ https://www.birmingham.gov.uk/downloads/download/5184/evidence_base_blp_-_homes_and_neighbourhoods

monitoring framework was established and progress towards meeting this shortfall across the wider GBBCHMA has been reflected in a series of position statements for the period 2011-31. The most recent of these Position Statements was published in April 2023 with a base date of 2021/22. This suggests that the shortfall to 2031 is now 2,053 homes. This is mainly a result of the City identifying more capacity than was anticipated when the plan was examined (additional capacity of 18,703 homes has been identified) as well as additional capacity through other local plans and agreed contributions to Birmingham's unmet needs through both the Solihull Local Plan (contribution of 2,104 homes to 2031, although the local plan has subsequently been withdrawn) and the adopted North Warwickshire Local Plan (contribution of 3,790 homes to 2033) reviews.

- 3.9 Following the adoption of the Birmingham Development Plan (2017), a review commenced of the Black Country Core Strategy. The four Black Country Authorities consulted on a Regulation 18 Plan (draft Black Country Plan) in summer 2021. At the time, the Regulation 18 Plan estimated a housing shortfall of 28,239 homes to 2039 based upon the standard method. Although the Black Country Authorities ceased work on the Black Country Plan in October 2022, in favour of separate plans for Dudley, Sandwell, Walsall and Wolverhampton, a housing shortfall has recently been evidenced in the Regulation 18 and Regulation 19 Plans for Dudley, Sandwell and Wolverhampton.
- 3.10 The purpose of this statement of common ground is to demonstrate the status of Local Plans across the strategic geography set out in section 3 and having regards to the current standard methodology (NPPF, 2023) the degree to which those Local Plans either have an evidenced forecast housing shortfall, or those Local Plans where housing need is being accommodated solely in the plan making area. A number of local plans have planned for a level of growth designed to meet not only their own local housing needs, but also shortfalls arising in other areas. This document sets out the approach by which those contributions are apportioned to the shortfall area, to provide certainty for local plan preparation, including reflecting the agreements reached to date between the local authorities who sit within the GBBCHMA.
- 3.11 It is recognised that following the publication of a replacement NPPF expected in December 2024, that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future SoCG and/or plans.

4. Current Status of Local Plan Reviews and the newly emerging shortfall to 2042

- 4.1 The NPPF states that planning policies should identify land for homes where possible for 15 years from the intended date of adoption. Local plans currently in preparation which are expected to be adopted by 2027 and therefore need to look forward to 2042.
- 4.2 Following the adoption of the Birmingham Development Plan in 2017, a review of the Plan commenced in 2022. Alongside this, several other local authorities (as set out below) commenced a review of their local plans taking the new Plan period for most

authorities beyond 2031 to 2041 or in some cases to 2042 or 2043. In respect of Stratford on Avon District Council, a joint local plan is being prepared with Warwick District Council and this plan has a proposed end date of 2050.

- 4.3 An update on the status of local plans for each local authority within the HMA, including details of those local authorities which are carrying out a local plan review, is set out below. In addition, Table 1 provides a summary position of each local plan review which has reached either the Regulation 18 or Regulation 19 stage and where a housing contribution towards meeting unmet needs or a housing shortfall has been evidenced.

Birmingham Local Plan

- 4.4 The current Plan was adopted in 2017. Work commenced on a full update of the Birmingham Development Plan, the Birmingham Local Plan, and its evidence in 2022. An Issues and Options consultation was undertaken on the new Plan, referred to as the Birmingham Local Plan, in Autumn 2022. Following this a further consultation on the Regulation 18 Preferred Options Plan took place in July – August 2024.

- 4.5 The Draft Plan's Housing Need – the projected housing requirement for Birmingham up to 2042 is approximately 150,000 dwellings. The Preferred Options (2024) document identifies an overall land supply sufficient for approximately 103,000 dwellings leaving a shortfall or unmet need of approximately 46,000 dwellings. As of November 2024, when this statement of common ground was prepared, Birmingham had an identified shortfall over the period 2024 – 2042 of 46,000 homes. This shortfall is based upon the NPPF 2023.

Bromsgrove Local Plan

- 4.6 The current Plan was adopted in 2017. Bromsgrove intends to issue a timetable for their Local Plan Review once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

- 4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district's own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.

- 4.8 The Council submitted its Publication Plan for Examination on 29th November 2024. An agreed approach to how the 500-home contribution will be apportioned amongst the GBBCHMA authorities which can currently demonstrate a shortfall is set out in Section 5 of this statement of common ground.

Dudley Local Plan

- 4.9 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Tier Two Plan (Dudley

Borough Development Strategy) adopted in 2017. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.

- 4.10 Dudley MBC published its Regulation 19 Dudley Local Plan for consultation in October – November 2024. The new Local Plan period runs to 2041 and identifies a housing need of 11,169. The Plan makes provision for 10,470 homes to 2041 with an expected shortfall of 699 homes.

Lichfield Local Plan

- 4.11 Lichfield's current Plan was adopted in 2015, with the second part of the plan adopted in 2019. The Council previously progressed a review of its Regulation 19 local plan submission for examination in 2022. Following the submission of its Regulation 19 Plan, Lichfield District Council paused their Plan process. At a meeting of its Full Council on 17 October 2023, Lichfield District Council made the decision to withdraw its proposed local plan to 2040.

- 4.12 Lichfield Council re-commenced work on its new Local Plan in 2024. The new local plan period will run to 2043. A consultation on its Issues and Options was published in October 2024 for a 6-week consultation to December 2024.

North Warwickshire Local Plan

- 4.13 The current Plan was adopted in 2021 with a lifespan to 2033. North Warwickshire sits within the GBBCHMA and the Coventry & Warwickshire HMA. The adopted Plan made a contribution of 3,790 homes towards Birmingham's unmet housing needs, 500 towards Tamworth's unmet housing needs and 540 homes to Coventry's housing shortfall.

Redditch Local Plan

- 4.14 The current Plan was adopted in 2017. Work on the Redditch Local Plan Review has commenced in terms of evidence base gathering. A new timetable for the Plan preparation will be published once the Council has considered the implications of the proposed planning reforms. The new Plan will be prepared under the new planning system.

Sandwell Local Plan

- 4.15 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the publication of its Site Allocations document adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.
- 4.16 Sandwell MBC recently consulted (September-November 2024) on its Sandwell Local Plan Regulation 19. The Local Plan identifies a housing requirement of 26,350 dwellings up to 2041, with an overall supply figure of around 10,434 dwellings, leaving a shortfall

of 15,916 dwellings (this represents a reduction in the shortfall of 18,606 dwellings set out at Regulation 18).

Shropshire Local Plan

- 4.17 The current Core Strategy was adopted in 2011, and the Site Allocations and Development Management Plan was adopted in 2015. The local plan review (2016-2038) commenced in 2017, and the Council submitted its local plan for examination in September 2021. This made a contribution of 1,500 homes towards meeting the needs specifically of the Black Country authorities as established through the evidence supporting the Black Country Plan review. At the time of writing this statement of common ground the timetable for the remaining stages of the Examination is yet to be confirmed.
- 4.18 The Shropshire Council administrative area is located outside the GBBCHMA and is acknowledged as a separate housing market area. Shropshire's approach to assisting with the unmet needs of the HMA as part of the current Local Plan Review is largely based on migratory trends and has continued to engage with the Black Country Authorities. An agreement under a separate statement of common ground with the Black Country Authorities has been reached to support its approach towards unmet needs. This was updated in October 2024 to inform public hearing sessions, which reconfirmed a proposed contribution of 1,500 homes towards the Black Country. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground. Subject to its ongoing Examination, should Shropshire's Local Plan not proceed to adoption, the agreed position will need to be reviewed. Any consideration of further contributions from Shropshire as part of future Local Plan Reviews will need to reflect updates to Shropshire's own housing need and its ability to accommodate these needs within its administrative boundary.

Solihull Local Plan

- 4.19 The current Plan was adopted in 2013. The Council commenced work on its Local Plan review in 2015 and submitted the Plan for examination in May 2021. This Plan included a contribution of 2,100 homes towards the shortfall arising in Birmingham only to respond to the shortfall identified in the 2017 Birmingham Development Plan. This was on the basis that the Birmingham Development Plan (2017) was the only plan that had been adopted (and tested through examination) that generated a shortfall to be accommodated elsewhere. This position was used to support the exceptional circumstances needed to release land from the Green Belt to accommodate Solihull's own needs, and those arising from elsewhere in the HMA. The examination for the Solihull Plan commenced in 2021, but in October 2024 the Solihull Plan was withdrawn from examination. Although the plan was withdrawn, the Inspectors carrying out the examination had confirmed that the duty-to-cooperate had been complied with. A revised Local Development Scheme is being pursued that would see an accelerated process for drawing up a new plan, including publication of a Regulation 18 Preferred Option Plan in autumn 2025 and a Regulation 19 Draft Submission Plan in summer 2026.

South Staffordshire Local Plan

- 4.20 The current Core Strategy was adopted in 2012, and the Site Allocation Document adopted in 2018. The Council are progressing the preparation of a new Local Plan which will cover the period to 2041. Work on the new Local Plan commenced in 2018 and the Council reconsulted on its Regulation 19 Publication Plan in April – May 2024. This follows on from the consultation on the previous Regulation 19 iteration of the South Staffordshire Local Plan in 2022. The updated Regulation 19 Plan reduces the contribution to the wider GBBCHMA from that set out in the 2022 Regulation 19 Plan. This reflects the December 2023 changes to the National Planning Policy Framework and that the evidence (GBBCHMA Strategic Growth Study 2018) on which the previous contribution was based requires updating.
- 4.21 The Plan includes provision for just over 4,700 homes between 2023 and 2041 which is made up of the district's local housing need and a contribution towards the wider GBBCHMA housing market area shortfalls of 640 homes.
- 4.22 South Staffordshire are seeking to submit their Publication Plan for Examination in late 2024. An agreed approach to how the contribution will be apportioned amongst the GBBC HMA local authorities is set out in Section 5 of this statement of common ground.

South Warwickshire Joint Local Plan

- 4.23 Stratford-on-Avon District and Warwick District Councils (hereafter referred to as the South Warwickshire authorities) commenced work on their joint South Warwickshire Local Plan (SWLP) in 2021 and consulted on the Issues and Options in January – March 2023. The Issues and Options document sought views on the most appropriate spatial growth option for accommodating future growth needs, including unmet housing needs arising within GBBCHMAs and the Coventry & Warwickshire HMA. Consultation on the Preferred Options (Regulation 18) is planned for January – March 2025.

Tamworth Local Plan

- 4.24 The current Tamworth Borough Local Plan was adopted in 2016. This plan set an objectively assessed housing need to 2031 of 6,250 dwellings with 4,425 to be delivered within Tamworth. The remaining 1,825 unmet need is being delivered by the neighbouring authorities of Lichfield District Council and North Warwickshire Borough Council and is the subject of a memorandum of understanding and statement of common ground between the three councils.
- 4.25 A review of the adopted plan was undertaken in 2020, the conclusion of which was that changes in national policy and council priorities would warrant the production of a new local plan for Tamworth for the period 2022 – 2043. An issues and options consultation was undertaken in October – November 2022 which identified a minimum housing need figure (calculated using the standard method at the time) of 2,961 dwellings. Whilst the issues and options document did not identify its housing land supply for the plan period, it did however state that given the physical constraints of the Borough, the options for accommodating the identified housing need are likely to be limited. At the time of writing this statement of common ground, work on the new local plan is ongoing.

Telford & Wrekin Local Plan

- 4.26 Current Local Plan was adopted in 2018. Telford & Wrekin Council consulted on its Regulation 18 Draft Telford & Wrekin Local Plan (TWLP) in November 2023 -January 2024. The Draft Plan set out range of development allocations and planning policies to guide decisions on development proposals and planning applications for the period up to 2040.
- 4.27 TWLP proposed provision for 20,100 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. The TWLP states that the housing need for Telford and Wrekin is 930 dwellings per annum. A contribution of 1,600 dwellings over the plan period was proposed towards part of the Black Country’s unmet housing need. Representations submitted to the Regulation 18 consultation, have requested that the Council seeks to clarify how the contribution towards the Black Country Authorities unmet needs has been qualified prior to the contribution being accepted as being appropriate. An agreed approach to how the contribution will be apportioned amongst the four Black Country Authorities is set out in Section 5 of this statement of common ground.

Walsall Local Plan

- 4.28 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011, followed by the adoption of its Site Allocation Document and Walsall Town Centre Area Action Plan in 2019. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan. It should be noted that whilst Walsall has not progressed with the preparation of Plan review, a shortfall of 3,414 homes was evidenced at the Regulation 18 stage of the Black County Plan.

Wolverhampton Local Plan

- 4.29 The current joint Core Strategy (Black Country Core Strategy) with the Black Country Councils was adopted in 2011. Work commenced on a review of the Black Country Plan in 2017. In October 2022, following a statement by the Leaders of the Black Country Authorities, work ceased on the preparation of the Black Country Plan.
- 4.30 The City of Wolverhampton Council published its Regulation 18 Local Plan Issues and Preferred Options for consultation in February 2024. This identified a local housing need for 21,720 homes over the period 2022-42, including a 35% cities and urban centres uplift. The WLP Regulation 18 made provision for 10,307 homes leaving a shortfall of 11,413 homes. The Regulation 19 version of the WLP was published for consultation in late November 2024 and confirms that local housing need for 2024-42 is 19,728 homes, housing supply is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes.

Wyre Forest Local Plan

- 4.31 The current Wyre Forest District Local Plan was adopted in April 2022. The Plan states that due consideration will be given, through a future early review of the Wyre Forest

District Council Local Plan where necessary and in accordance with the NPPF, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area.

Local Plan Reviews shortfalls and contributions

- 4.32 Table 1 below provides a summary of the emerging shortfall for the plan period 2023 – 2042. This indicates that currently there are shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. This shortfall, as evidenced in the Regulation 18 and Regulation 19 Local Plans, totals approximately 76,427 homes.
- 4.33 Alongside this a number of contributions (4,290 homes) have been offered towards the shortfall. This included contributions from South Staffordshire, Cannock Chase, Shropshire and Telford & Wrekin. These contributions are made specifically towards the Black Country's needs (e.g. from Shropshire and Telford & Wrekin Councils) or GBBCHMA's unmet needs (e.g. from South Staffordshire and Cannock Chase Councils). In the case of North Warwickshire, the contribution is towards meeting the unmet needs of the adopted Birmingham Development Plan 2017 and has not been accounted for in the (4,290 homes) contribution figures.

Table 1 Local Plan Reviews – Shortfalls and Contributions at Regulation 18 and 19 Stage

Local Plan	Status	Total contribution to GBBCHMA unmet needs (up to and beyond 2031)	Plan period
Contributing Authorities			
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014-2033
Potential Contributing Authorities			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
Cannock Chase	Regulation 22 - Submission 29 th November 2024	+500 Contribution specifically for Birmingham & Black Country unmet needs	2018 – 2040
Shropshire	Examination July 2022. Ongoing at the time of this SoCG	+1,500 Contribution specifically for Black Country unmet needs	2016 - 2038
Telford & Wrekin	Regulation 18 Plan – November 2023	+1,650 Contribution specifically for Black Country unmet needs	2020-2040

Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2024-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2024-2041
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,414 Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

5. Strategic Matters - meeting housing need and agreed approach

5.1 Cross boundary unmet housing needs are acknowledged as a strategic matter and the GBBCHMA geography is agreed as an appropriate geographical area within which to consider how to address housing needs were possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (the end year for some plans is earlier) as demonstrated in Table 1 above. It is noted that at present such shortfalls have not been subject of examination. This shortfall could change as more local plan reviews progress.

5.2 Engagement to date (November 2024) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. From this engagement, contributions towards meeting the unmet needs of the emerging plans for the Black Country authorities and/or for Birmingham's Plan review have been made as shown in Table 1. This statement of common ground will set out an agreed position of how the contributions will be apportioned to those GBBCHMA local authorities who have a demonstrated shortfall.

5.3 This statement of common ground sets out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire, and Telford & Wrekin) and the receiving authorities (Black Country Authorities and Birmingham) on how the contributions will be apportioned amongst the relevant authorities.

- 5.4 The agreed approach for apportioning the shortfalls amongst each of the relevant authorities is based on net migration flows between the exporting local authority and each of the receiving authorities e.g. the Black Country authorities and Birmingham. This method involves the apportionment being based on the quantum of net migration as a proportion of net migration between the exporting authority and all Black Country local authorities (where the contribution is made specifically to the Black County authorities) or to Birmingham and the Black Country Authorities where the contribution has been made to the wider GBBCHMA. The agreed dataset to base this approach on is migration data available from ONS⁴, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency as set out in Appendix One. Any update of this dataset will be considered through the next update/refresh of this SoCG.
- 5.5 As shown in Appendix One, the data is published over an extended period covering 2001-19 in the form of net flows – the difference between outflows and inflows. Using this approach, and subject to a shortfall from the relevant authority being evidenced in the first place, each of the local authorities will receive a proportion (share) of the contributions which are proportionate to their share of the net outflow. Table 2 below summarises the approach and the contributions made to each local authority where a shortfall has firstly been evidenced by the individual authority.
- 5.6 It is acknowledged that this approach has been used to apportion an already agreed contribution and the same methodology is not necessarily appropriate for establishing the scale of a contribution or future apportionment.
- 5.7 Where it is evidenced that a local authority in receipt of the contribution no longer requires the contribution (share) or has met its shortfall, then the surplus contribution will be apportioned to the remaining local authorities, where relevant.
- 5.8 This statement of common ground confirms agreement to this approach and the ‘share’ of the overall contributions being made where it is evidenced that a shortfall exists as set out in Table 1 above.

⁴ [Internal migration in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Table 2 Percentage Apportionment of housing contributions from each local plan contribution based upon net in-flow

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
Shropshire	1500	0%	0	29%	431	17%	257	15%	219	40%	593
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	1600	0%	0	15%	242	18%	289	23%	367	44%	703
Total	4240	-	116	-	842	-	680	-	1011	-	1593

6. Further work of the GBBCHMA

6.1 The GBBCHMA is committed to working together and with all neighbouring Local Plan areas to progress a programme of evidence base work to inform the work of the HMA and further updates of this statement of common ground.

6.2 The existing evidence base is in need of review to allow for a clear and up-to-date picture on unmet housing needs across the HMA beyond 2031. As such, at the time of writing this statement of common ground, the GBBCHMA is seeking to commission an update of the 2018 Housing Market Area Growth Study to re-evaluate the housing shortfall in light of more recent evidence and policy and to develop scenarios designed to address this shortfall. It is anticipated that this Study will commence in early 2025. This Statement of Common Ground will be revisited and refreshed when the updated Growth Study is published and has been agreed.⁵

7. Areas of agreement

7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 2 of this statement.

7.2 The GBBCHMA has agreed to progress a programme of evidence base work (including an update of the 2018 Housing Growth Study to be commissioned in 2025) to inform the work of the HMA and further updates/refresh of this statement of common ground.








7.3 This SoCG will be reviewed and updated subject to any other local authority demonstrating an unmet need or where a new contribution is made to the wider HMA needs or where a withdrawal of an existing contribution to the wider HMAs need is made.

8. Signatories to the Statement of Common Ground

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken by the GBBCHMA. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

⁵ Note: North Warwickshire Borough Council are not a funding partner in the updated Growth Study as the Council is currently focussed on delivery of their current contributions to BCC needs through their adopted Plan.

<p><u>Birmingham City Council</u></p> <p>Name: [REDACTED] [REDACTED]</p> <p>Position: Strategic Director, Place, Prosperity & Sustainability</p> <p>Date 10/02/25</p>	<p><u>Bromsgrove District Council</u></p> <p>Name:</p> <p>Position:</p> <p>Date</p>
<p><u>Cannock Chase District Council</u></p> <p>Name: [REDACTED] [REDACTED]</p> <p>Position: Head of Economic Development & Planning</p> <p>Date: 06 March 2025</p>	<p><u>Dudley Metropolitan Borough Council</u></p> <p>Name: [REDACTED] [REDACTED]</p> <p>Position: Director of Regeneration and Enterprise</p> <p>Date: 04/03/2025</p>
<p><u>Lichfield District Council</u></p> <p>Name: [REDACTED] [REDACTED]</p> <p>Position: Cabinet Member for Housing & Local Plan</p> <p>Date 22/01/2025</p>	<p><u>North Warwickshire Borough Council</u></p> <p>Name:</p> <p>Position:</p> <p>Date</p>
<p><u>Redditch Borough Council</u></p> <p>Name:</p> <p>Position:</p> <p>Date</p>	<p><u>Sandwell Metropolitan Borough Council</u></p> <p>Name: [REDACTED]</p> <p>Position: Cabinet Member for Regeneration & Infrastructure</p>

	 Date 23/01/2025
<u>Solihull Metropolitan Borough Council</u> Name: Position: Date:	<u>South Staffordshire District Council</u> Name:   Position: Lead Planning Manager Date: 7 th February 2025
<u>Stratford-on-Avon District Council</u> Name: Position: Date:	<u>Tamworth Borough Council</u> Name: Position: Date:
<u>Walsall Metropolitan Borough Council</u> Name:  Position: Executive Director Date: 5 March 2025	<u>City of Wolverhampton Council</u> Name:   Position: Cabinet Member for City Development, Jobs and Skills Date: 12/03/2025
<u>Shropshire Council</u> Name:  Position: Portfolio Holder for Planning and Regulatory Services	<u>Telford and Wrekin Council</u> Name: Position: Date:

Date: 24 February 2025	
<u>Wyre Forest District Council</u> Name: Position: Date:	

Appendix One: Net Migration between Black Country Authorities and Birmingham and the exporting local authorities and apportionment of contributions

	Total Net - Migration 2011- 2019						Percentage (%) Total Net Migration					Net Migration Flows based Distribution					
	Local Plan Contribution	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Total	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton	Birmingham	Dudley	Sandwell	Walsall	Wolverhampton
Cannock Chase	500	1333	-228	-872	-3704	-892	-7029	19%	3%	12%	53%	13%	95	16	62	263	63
Shropshire	1500	0	-2702	-1614	-1374	-3715	-9405	0%	29%	17%	15%	40%	0	431	257	219	593
South Staffordshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
Telford and Wrekin	1600	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	242	289	367	703
Total	4240	1970	-8253	-5424	-10982	-13627	-40256						116	842	680	1011	1593

Source: Migration flows 2011 – 2019 ONS [Internal migration in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/migrationandmobility/articles/internalmigrationinenglandandwales/2011-2019)