



Telford & Wrekin  
Co-operative Council

Protect, care and invest  
to create a better borough

# Telford and Wrekin Local Plan Review

## Submission Document

### Duty to Cooperate Statement – Appendices



2020 - 2040



September 2025



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# Duty to Cooperate Statement Appendices

## **1 Appendix 1 – Statement of Common Ground between Telford & Wrekin Council and Shropshire Council (September 2025)**

# Statement of Common Ground between Telford & Wrekin Council and Shropshire Council

Telford and Wrekin Local Plan  
2020-2040

Position at September 2025



Telford & Wrekin  
COUNCIL

## Statement of Common Ground (SoCG) between Telford & Wrekin Council (TWC) and Shropshire Council

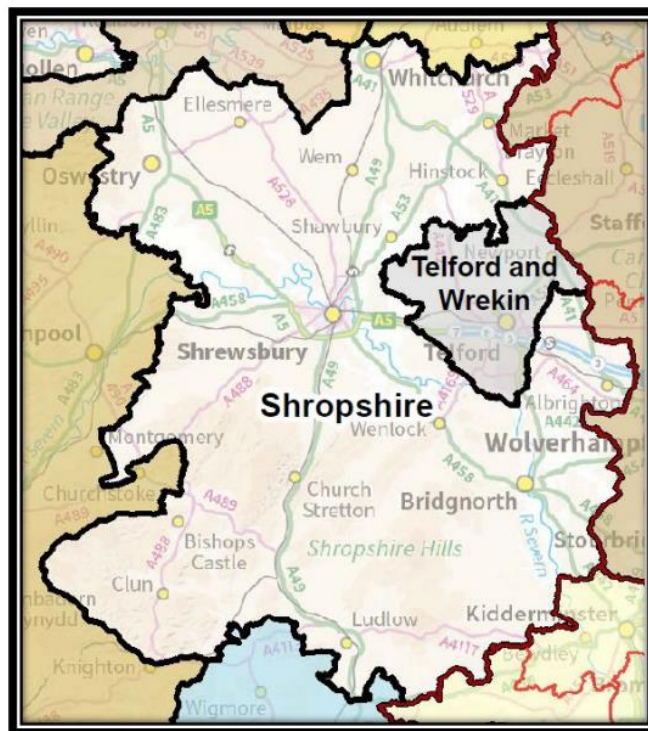
### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Telford & Wrekin Council (TWC) and Shropshire Council (SC), hereafter referred to as “the parties” to inform the submission of the Telford and Wrekin Local Plan review.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the Telford and Wrekin Local Plan review 2020-2040 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of Telford & Wrekin Council and Shropshire Council. The two Local Planning Authorities are located within the County of Shropshire and between them cover the entirety of the County.
4. Figure 1 illustrates the location of Shropshire Council and Telford & Wrekin Council:

**Figure 1: Map of Shropshire Council and Telford & Wrekin Council**



5. As neighbouring Local Planning Authorities, it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.
6. Telford & Wrekin Council commenced a review of its Local Plan in 2020. The Council is now at an advanced stage of this review having recently completed its Regulation 19 Consultation.
7. Shropshire Council is intending to formally commence a review of its Local Plan in early 2026, following withdrawal of the previous review earlier this year.
8. As such, given the respective timescales for the preparation of Local Plan Reviews, this SoCG focuses on those issues relevant to the Telford and Wrekin Local Plan Review. A separate SoCG will be prepared regarding the issues relevant to the Shropshire Local Plan Review at an appropriate time in its preparation process. However, duty to cooperate discussions will continue to inform both these Local Plan review processes as required.

## Key Strategic Matters

9. The Local Planning Authorities have had positive, constructive and on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The parties had already entered into a Statement of Common Ground to inform the submission of the draft Shropshire Local Plan (2016-2038), which has since been withdrawn. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites.
10. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

11. SC and TWC are within separate housing market areas (HMAs), both self-contained. However, it is acknowledged that the duty to cooperate is not restricted to just Local Planning Authorities within the same HMA. As such both Local Planning Authorities continue to liaise closely in accordance with the duty to cooperate.
12. Although SC and TWC are not within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), they are both members of the Technical Officers Group as a related planning authority. TWC is party to the GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a framework for the apportionment of housing contributions to address emerging housing shortfalls forecast to arise within the GBBCHMA.
13. SC have been constructive in sharing their experience with TWC regarding their experiences at Examination on their draft Local Plan, especially with regard to the



manner in which agreed unmet needs from the Black Country are accommodated into the plan. Having considered Telford and Wrekin's proximity to the Black Country and its compacted size, in comparison to the majority of Shropshire, the Council are not minded to identify specific development sites and will provide a 'top slice' approach instead. SC has no concerns with this approach.

14. No other housing related cross-boundary issues have been identified. Shropshire Council support Telford & Wrekin Council meeting the entirety of their local housing need for their administrative area.

## Employment

15. TWC and SC are within separate functional economic market areas but continue to work together collaboratively to monitor any cross boundary employment issues, including working together collaboratively (and more widely) as part of GBBCHMA Technical Officers Group.
16. SC are supportive of TWC meeting their local employment land need over the plan period and thus no further cross-boundary issues have been identified.

## Other Strategic Matters

### Cross boundary transport

17. TWC and SC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. This includes the shared ambition for the electrification of the Shrewsbury – Telford – Wolverhampton Rail Line. Both TWC and SC support the proposals for the new M6 north junction connection which will improve connectivity with the M54 and connections to the North West in general.
18. No other cross-boundary transport issues have been identified.

### Infrastructure

19. Policy S7 of the Telford and Wrekin Local Plan review addresses developer contributions and infrastructure delivery, applying to all sites.
20. For clarity and recognition that both Councils may from time to time need to deploy developer contributions on a cross boundary basis depending on which side of the boundary the infrastructure is located. TWC have suggested a minor modification to the supporting text for policy S7 stating that: *'Assessments of infrastructure capacity may, on occasion, have cross boundary implications between Telford and Wrekin and neighbouring local planning authorities. This may require, where justified, the deployment of developer contributions on a cross boundary basis'*. This proposed minor modification is supported by SC.

### Highways



21. TWC has proactively engaged with National Highways, including in relation to development proposals and implications for the M54/A5 corridor, as part of the Duty to Cooperate, procurement of the transport model report and through consultation on the various iterations of the Local Plan review process. Shropshire Council supports a proportionate approach to evidence collection, in line with the NPPF and the general view on evidence collection promoted by National Highways in discussions to date.
22. TWC and SC will work together, where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.

#### Education

23. Telford & Wrekin Council have assessed their education needs for those within the borough which has informed the projects set out within the Infrastructure Delivery Plan. As stated by Shropshire Council in their Regulation 19 representation to TWC, it is supported that there is reference that *“cross boundary movement of pupils will be kept under review”*.
24. No strategic cross-boundary infrastructure issues have been identified.

#### Minerals

25. SC and TWC cooperate in the preparation of Local Aggregate Assessments (LAAs) to determine the future demand and supply of aggregates across both Local Authority Areas.
26. Increased rates of housing and employment development have and will continue to heighten demand for construction aggregates within the Shropshire and Telford and Wrekin administrative areas.
27. The 2025 LAA demonstrates that the parties can meet the requirements for sand and gravel and crush rock over the period of the TWC Local Plan and therefore no further allocations are required.
28. There are no strategic cross boundary issues which have been identified for the Telford and Wrekin Local Plan review but this position will remain under review.

#### Waste

29. Shropshire Council (February 2025) consider that there are no strategic issues in relation to cross boundary waste movements and that waste movements can continue as they have been between areas.
30. No strategic cross boundary issues have been identified for the Telford and Wrekin Local Plan review

## Gypsy & Traveller Provision

31. TWC has an identified a 26 pitch need for Gypsy and Traveller households in the borough over the local plan period, including 17 pitches within the first 5 year period following adoption of the plan<sup>1</sup>. TWC carried out two call for sites exercises and had a single submission for Gypsy and Traveller accommodation. This was deemed not to be suitable as it was not supported by a proposal for Gypsy and Traveller accommodation that would demonstrate effective delivery and the size of the site would have provided limited additional provision.
32. Within the Regulation 19 Publication Draft of the Telford & Wrekin Local Plan, two proposed allocations for extensions to existing sites were identified for permanent pitches. The proposed allocation to extend the Lawley Furnaces site had an indicated capacity for 3 pitches and the proposed allocation to extend the Lodge Road site had an indicated capacity for 17 pitches.
33. These two allocations are maintained; however a minor modification is now identified to the proposed allocation to extend the Lodge Road site proposed site allocations to reduce its capacity to at least 13 pitches.
34. TWC has also secured a further 4 pitches towards this need as windfall through the grant of planning permission since the GTAA update was completed.
35. The identified supply is sufficient to meet the identified 5 year need. The remaining shortfall for the latter period of the plan will be met by expansion of existing sites within Council control, windfall sites and if necessary further plan reviews (supported by a call for sites). TWC are confident that the additional pitches required in the later period of the plan can be met within the TWC area via the above actions and at this stage do not consider there to be an unmet need within the Borough.
36. SC continues to welcome the inclusion of two proposed allocations for extensions to existing sites for permanent pitches, notes the additional provision secured through windfall planning permissions and acknowledges that remaining need can be met within the TWC area through mechanisms identified in this SoCG.

## Natural Environment

37. TWC and SC are committed to continued working together in respect of matters relating to the natural environment where these are applicable to the authorities.
38. No cross-boundary issues have been identified.

## Matters of Agreement

39. All above matters are agreed between Shropshire Council and Telford & Wrekin Council.

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<sup>1</sup> Telford and Wrekin Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2023 Update

## Matters of Disagreement

40. There are no matters of disagreement between Telford & Wrekin Council and Shropshire Council.

## Governance Arrangements

41. Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.
42. Updating of this SoCG will be linked to key milestones within the TWC and SC Local Plan Review process.

## Conclusions

43. The parties agree that:
  - i) Telford & Wrekin Council has fulfilled its Duty to Cooperate with Shropshire Council.
  - ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

## Signatories

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

### **Telford and Wrekin Council**

**Name: Gavin Ashford**

**Position: Group Manager – Strategic Planning, Inward Investment & Business Support**

**Signature:**

A handwritten signature in black ink that reads "Gavin Ashford".

**Date: 12/09/2025**

### **Shropshire Council**

**Name: Edward West**

**Position: Planning Policy and Strategy Manager**

**Signature:**

A handwritten signature in blue ink, appearing to be "EW".

**Date: 12/09/2025**

## Duty to Cooperate Statement Appendices

### **2 Appendix 2 – Statement of Common Ground between Telford & Wrekin Council and Stafford Borough Council (September 2025)**

Statement of Common Ground  
between Telford & Wrekin  
Council and Stafford Borough  
Council

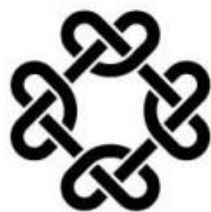
Telford and Wrekin Local Plan  
2020-2040

Position at September 2025



Telford & Wrekin  
Co-operative Council

Protect, care and invest  
to create a better borough



Stafford  
BOROUGH COUNCIL

## Statement of Common Ground (SoCG) between Telford & Wrekin Council (TWC) and Stafford Borough Council

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Telford & Wrekin Council (TWC) and Stafford Borough Council (SBC), hereafter referred to as “the parties” to inform the submission of the Telford and Wrekin Local Plan 2020-2040.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the Telford and Wrekin Local Plan 2020-2040 and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of Telford & Wrekin Council and Stafford Borough Council.

### Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of respective local plans and, where relevant, other related documents.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

### Housing

6. TWC and SBC are within separate housing market areas (HMAs).
7. TWC and SBC share a boundary to the North East of Telford, close to the town of Newport. SBC are content to see that TWC are meeting their own housing needs within the Borough and that development has been proposed with an appropriate spatial distribution.



8. Therefore, no other cross-boundary housing issues have been identified. Due to their close proximity to one another however, both parties will continue to engage with one another regarding housing matters.

## Employment

9. TWC and SBC are within separate functional economic market areas but continue to work together collaboratively to monitor any cross boundary employment issues.

## Cross boundary transport impacts

10. TWC and SBC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities.
11. No other cross-boundary transport issues have been identified.

## Infrastructure

12. TWC and SBC will work together, where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
13. Necessary infrastructure (including school places) will be delivered by the parties. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

14. TWC has an identified a 26 pitch need for Gypsy and Traveller households in the Borough over the local plan period, including 17 pitches within the first 5 year period following adoption of the plan. TWC carried out two call for sites exercises and had a single submission for Gypsy and Traveller Accommodation Assessment (GTAA). This was deemed not to be suitable as it was not supported by a proposal for Gypsy and Traveller accommodation that would demonstrate effective delivery and the size of the site would have provided limited additional provision.
15. TWC have identified a site within their control which will have the potential capacity for at least 13 additional pitches, this will be subject to a windfall application. In addition, the Council has also had a further 4 pitches which have been granted permission since the GTAA update was completed. The remaining shortfall for the latter period of the plan will be met by expansion of existing sites within Council control, windfall sites and further plan reviews (including call for sites). TWC are confident that the additional pitches required in the later period of the plan can be met via the above actions and at this stage do not consider there to be an unmet need within the Borough.
16. TWC will continue to engage with neighbouring Local Planning Authorities (LPA's) on gypsy and traveller accommodation issues as appropriate.

## Natural Environment

17. Due consideration must be given to the development implications in relation to the Habitat Regulations applicable to Aqualate Mere RAMSAR. Although this environmental asset is within Stafford Borough, it is in close proximity to Newport and therefore, continued engagement and sharing evidence-based work to ensure legal obligations are met is necessary.
18. TWC and SBC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
19. No cross-boundary issues have been identified.

## Signatures

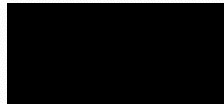
We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between Telford & Wrekin Council and Stafford Borough Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### Telford and Wrekin Council

**Name:** 

**Position:** Group Manager – Strategic Planning, Inward Investment & Business Support

**Signature:**



**Date:** 08/09/2025

### Stafford Borough Council

**Name:** 

**Position:** Cabinet Member - Economic Development & Planning

**Signature:**



**Date:** 12/09/2025

## Duty to Cooperate Statement Appendices

### **3 Appendix 3 – Duty to Cooperate letter from Telford & Wrekin Council to City of Wolverhampton Council (September 2025)**



██████████  
Lead Planning Manager (Regional Strategy)  
City of Wolverhampton Council



Date: 18/08/25

Our ref:

Your ref:

Dear ██████████

**Ref: GBBCHMA Statement of Common Ground – submission of Telford & Wrekin Local Plan**

I am writing to you regarding the submission of the Telford and Wrekin Local Plan and the matter of Duty to Cooperate. The Council will shortly be submitting the Local Plan for examination and, as part of that process, can now confirm its final position regarding housing numbers in order to facilitate an updated Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Statement of Common Ground (SoCG).

The purpose of the GBBCHMA SoCG is to apportion contributions from surrounding Local Planning Authorities (LPAs) against the respective shortfalls of the Black Country LPAs, within the updated SoCG this will include the contribution from Telford & Wrekin Council. In advance of the Statement of Common Ground being updated and approved I would be grateful if you could please confirm the following by return of letter;

- Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address cross boundary development issues.
- Your organisation accepts the positive 153 dwellings per annum contribution towards unmet housing development needs of the four Black Country Local Planning Authorities of Wolverhampton, Sandwell, Dudley and Walsall.
- There are no other cross boundary issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

We will inform you once the Council has formally submitted the Local Plan to the Planning Inspectorate. I would very much welcome receipt of the above information by Tuesday 9 September.

Yours sincerely

██████████

██████████  
**Group Manager - Strategic Planning, Inward Investment & Business Support**



## Duty to Cooperate Statement Appendices

### **4 Appendix 4 – Duty to Cooperate letter from City of Wolverhampton Council to Telford & Wrekin Council (September 2025)**

10<sup>th</sup> September 2025

Strategic Planning Team  
Telford & Wrekin Council

Dear [REDACTED],

### **Telford & Wrekin Local Plan**

I am responding to your letter of 2 September 2025.

The letter asks the Council to confirm three points as set out below:

1. Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address cross boundary development issues.
2. Your organisation accepts the positive 153 dwellings per annum contribution towards unmet housing development needs of the four Black Country Local Planning Authorities of Wolverhampton, Sandwell, Dudley and Walsall.
3. There are no other cross boundary issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

With regards to **point 1**, the Council confirm that Telford & Wrekin Council have engaged constructively and effectively through meetings and written communication to identify and address cross-boundary development issues.

With regards to **point 2**, Our response to the Regulation 19 TWLP consultation acknowledged that the plan sought to meet the most recent (2023) Government-defined local housing need of 7,140 homes (857 per year), but still seeks to deliver 20,200 homes, and were therefore able to make an increased contribution of 153 homes per year to address unmet BCA housing need.

The principle of a housing offer to the BCAs, including Wolverhampton, is positive and welcomed. It is also welcomed that this offer has increased and is now set out in the Plan itself, giving it more weight.

However, supporting technical papers did not clearly explain the overall housing capacity of the district, including potential scenarios that might have increased the supply. A clearer explanation of the methodology used would help to support the Plan at examination.

Substantial BCA and Wolverhampton housing shortfalls will remain following adoption of BCA Local Plans, and other Local Plans across the Greater Birmingham and Black Country Housing Market Area (HMA), which are in progress under the 2023 NPPF. The current housing shortfall position is set out in the Statement of Common Ground (SoCG)



recently agreed between the HMA authorities and a new West Midlands Strategic Growth Study is now underway.

Therefore, if the TWLP housing offer to the BCAs is found to be sound, it is important that the TWLP should commit to an early review, including consideration of the need to accommodate housing shortfalls arising in neighbouring authorities. A logical trigger for this early review would be that all four BCAs have reached Draft Plan consultation stage (including proposed housing allocations) for Local Plans prepared under the 2024 NPPF, and that a cumulative housing shortfall remains. This should be sufficient to demonstrate that all possible development opportunities, together with other exporting opportunities, have been explored for the four BCAs before the new TWLP considers the potential to address the outstanding shortfalls. Detailed work carried out previously on the Black Country Plan strongly indicates that there will still be a significant cumulative housing shortfall at this point. It should be noted that the BCAs new Plans will be prepared to a tight 30 month timetable under the Government's new Local Plan system.

With regards to **point 3**, We confirm that there are no other cross boundary issues between City of Wolverhampton Council and Telford & Wrekin Council.

Yours sincerely,

[Redacted Signature]

Lead Planning Manager (Regional Strategy)

Tel: [Redacted]

Email: [Redacted]

# Duty to Cooperate Statement Appendices

## **5 Appendix 5 - Duty to Cooperate letter from Telford & Wrekin Council to Dudley Metropolitan Borough Council (September 2025)**



██████████  
Planning Policy Manager  
Dudley Council



Date: 18/08/25

Our ref:

Your ref:

Dear ██████████

**Ref: GBBCHMA Statement of Common Ground – submission of Telford & Wrekin Local Plan**

I am writing to you regarding the submission of the Telford and Wrekin Local Plan and the matter of Duty to Cooperate. The Council will shortly be submitting the Local Plan for examination and, as part of that process, can now confirm its final position regarding housing numbers in order to facilitate an updated Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Statement of Common Ground (SoCG).

The purpose of the GBBCHMA SoCG is to apportion contributions from surrounding Local Planning Authorities (LPAs) against the respective shortfalls of the Black Country LPAs, within the updated SoCG this will include the contribution from Telford & Wrekin Council. In advance of the Statement of Common Ground being updated and approved I would be grateful if you could please confirm the following by return of letter;

- Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address cross boundary development issues.
- Your organisation accepts the positive 153 dwellings per annum contribution towards unmet housing development needs of the four Black Country Local Planning Authorities of Wolverhampton, Sandwell, Dudley and Walsall.
- There are no other cross boundary issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

We will inform you once the Council has formally submitted the Local Plan to the Planning Inspectorate. I would very much welcome receipt of the above information by Tuesday 9 September.

Yours sincerely

██████████

██████████  
**Group Manager - Strategic Planning, Inward Investment & Business Support**



## Duty to Cooperate Statement Appendices

### **6 Appendix 6 - Duty to Cooperate letter from Dudley Metropolitan Borough Council to Telford & Wrekin Council (September 2025)**

Our ref:

Service:

Direct Line:

Date:

Telford & Wrekin  
Local Plan

Planning Services

11 September 2025

Gavin Ashford  
Group Manager  
Strategic Planning Team  
Telford & Wrekin Council  
PO Box 457  
Telford  
TF2 2FH

**BY EMAIL**

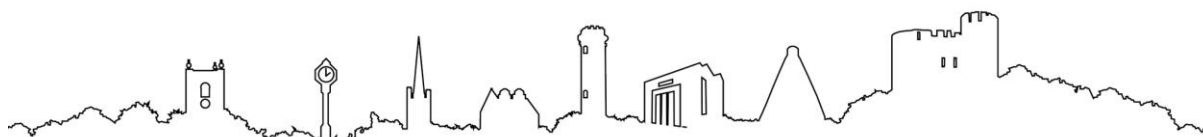
Dear Gavin

**RE: GBBCHMA Statement of Common Ground – submission of Telford & Wrekin Local Plan**

Thank you for your recent letter dated 18<sup>th</sup> August 2025 and which the Council received on 2<sup>nd</sup> September 2025.

In response to your request, I confirm that, in line with Dudley Metropolitan Borough Council's (DMBC) response to the Telford Local Plan Regulation 19 consultation:

- Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with DMBC to identify and address cross boundary development issues.
- DMBC welcomes and accepts the positive proposed contribution of 153 dwellings per year, set out in the Telford Local Plan as submitted, towards the unmet housing development needs of the four Black Country Local Planning Authorities of Dudley, Sandwell, Walsall and Wolverhampton Councils. However, I wish to flag up that DMBC's representation to the Regulation 19




consultation requested that any contribution towards the unmet needs in the Black Country is linked to an early review mechanism given the likely shortfall of land to meet the needs when taking into account other contributions in the current and emerging Local Plans. Our position on this matter remains the same.

- DMBC confirm there are no other cross boundary issues that require a separate SoCG between DMBC and Telford & Wrekin Council as agreed in the Duty to Co-operate meetings between the two authorities and in the letter addressed to DMBC from Telford & Wrekin dated 10<sup>th</sup> April 2025.

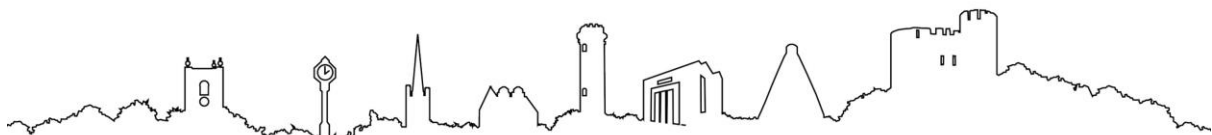
We look forward to ongoing Duty to Co-operate engagement with Telford & Wrekin Council as work on our local plans progress.

If you require any clarification or further discussions on our response, please contact Vicki Popplewell (Planning Policy Manager) via [planning.policy@dudley.gov.uk](mailto:planning.policy@dudley.gov.uk).

Yours sincerely



Nick McGurk  
Group Director - Communities & Growth





# Duty to Cooperate Statement Appendices

## **7 Appendix 7 – Greater Birmingham and Black Country Housing Market Area Statement of Common Ground – Position at November 2024**

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

**Officer Agreed Version**

**Statement of Common Ground Regarding Housing Shortfall  
Position at 29 November 2024**

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## 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 1<sup>1</sup>. 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

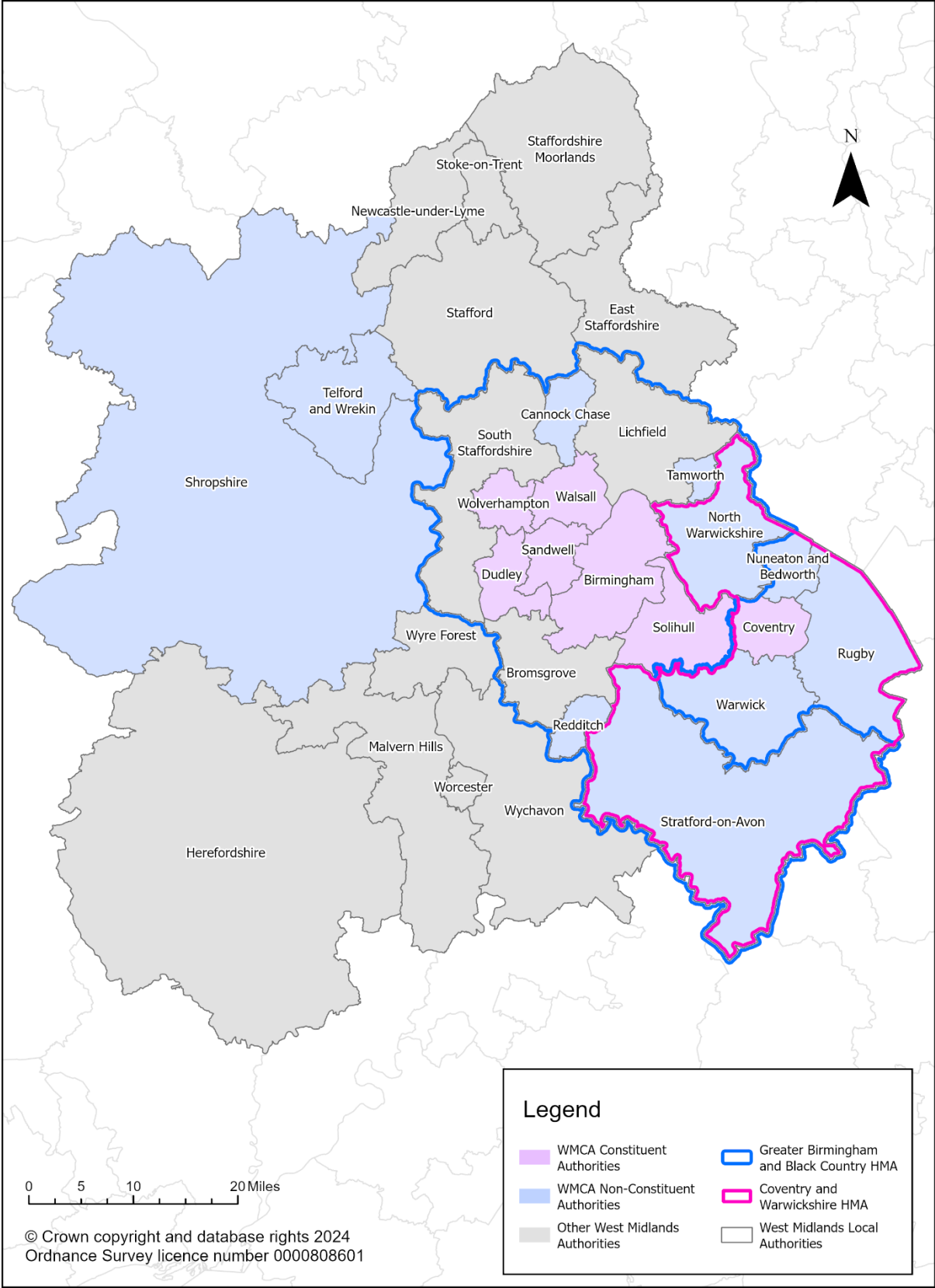
### 1.4 Other related local planning authorities outside of the GBBCHMA

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

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<sup>1</sup> 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 authorities<sup>2</sup>.
- 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

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<sup>2</sup> 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](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](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) 2022<sup>3</sup> 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

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<sup>3</sup> [https://www.birmingham.gov.uk/downloads/download/5184/evidence\\_base\\_blp\\_-\\_homes\\_and\\_neighbourhoods](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 29<sup>th</sup> 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 for 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 GBBCHMA 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 Country 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
<b>Contributing Authorities</b>			
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan 2017	2014-2033
<b>Potential Contributing Authorities</b>			
South Staffordshire	Regulation 19 April 2024	+640 Contribution specifically for Birmingham & Black Country unmet needs	2023-2041
Cannock Chase	Regulation 22 - Submission 29 <sup>th</sup> 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

<b>Authorities with an evidenced unmet need</b>			
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 ONS<sup>4</sup>, 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.

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

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
<b>Cannock Chase</b>	500	19%	95	3%	16	12%	62	53%	263	13%	63
<b>Shropshire</b>	1500	0%	0	29%	431	17%	257	15%	219	40%	593
<b>South Staffordshire</b>	640	3%	21	24%	153	11%	71	25%	161	37%	234
<b>Telford &amp; Wrekin</b>	1600	0%	0	15%	242	18%	289	23%	367	44%	703
<b>Total</b>	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.<sup>5</sup>

## 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.

---

<sup>5</sup> 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.

<u><b>Birmingham City Council</b></u>  Name:  Position:  <b>Date</b>	<u><b>Bromsgrove District Council</b></u>  Name:  Position:  <b>Date</b>
<u><b>Cannock Chase District Council</b></u>  Name:  Position:  Date	<u><b>Dudley Metropolitan Borough Council</b></u>  Name:  Position:  Date
<u><b>Lichfield District Council</b></u>  Name:  Position:  Date	<u><b>North Warwickshire Borough Council</b></u>  Name:  Position:  Date
<u><b>Redditch Borough Council</b></u>  Name:  Position:  Date	<u><b>Sandwell Metropolitan Borough Council</b></u>  Name:  Position:  Date
<u><b>Solihull Metropolitan Borough Council</b></u>  Name:  Position:  Date:	<u><b>South Staffordshire District Council</b></u>  Name:  Position: Date:

<p><b><u>Stratford-on-Avon District Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>	<p><b><u>Tamworth Borough Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>
<p><b><u>Walsall Metropolitan Borough Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>	<p><b><u>City of Wolverhampton Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>
<p><b><u>Shropshire Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>	<p><b><u>Telford and Wrekin Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>
<p><b><u>Wyre Forest District Council</u></b></p> <p>Name:</p> <p>Position:</p> <p>Date:</p>	

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 \(ons.gov.uk\)](#)

## Duty to Cooperate Statement Appendices

### **8 Appendix 8 - Letter from Telford & Wrekin Council to Dudley regarding the GBBCHMA SoCG (April 2025)**



[REDACTED]  
Planning Policy Manager  
Planning - Development Control  
Regeneration & Enterprise  
Dudley Council  
[REDACTED]



Date: 10/04/25

Our ref:

Your ref:

Dear [REDACTED]

**Ref: GBBCHMA Statement of Common Ground**

The Telford and Wrekin Local Plan is now at Regulation 19 stage of the plan making process and as part of that the Council have confirmed the contribution towards the unmet development needs to the Black Country Local Planning Authorities of Wolverhampton, Sandwell, Walsall and Dudley.

On the basis of the contribution contained within the Regulation 19 version of the Local Plan the Council will, in principle, be in a position to sign an updated Statement of Common Ground once this becomes available.

I can also confirm that outside of the request to contribute towards unmet housing needs it is the Council's opinion that, in light of the submission of the Dudley Local Plan, there are no further duty to cooperate matters to be addressed in a unilateral Statement of Common Ground.

Yours sincerely



[REDACTED]

**Strategic Planning Team Leader**



## Duty to Cooperate Statement Appendices

### **9 Appendix 9 - Duty to Cooperate letter from Telford & Wrekin Council to Sandwell Metropolitan Borough Council (September 2025)**



[REDACTED]  
Team Leader Planning Policy  
Sandwell Council



Date: 18/08/25

Our ref:

Your ref:

Dear [REDACTED]

**Ref: GBBCHMA Statement of Common Ground – submission of Telford & Wrekin Local Plan**

I am writing to you regarding the submission of the Telford and Wrekin Local Plan and the matter of Duty to Cooperate. The Council will shortly be submitting the Local Plan for examination and, as part of that process, can now confirm its final position regarding housing numbers in order to facilitate an updated Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Statement of Common Ground (SoCG).

The purpose of the GBBCHMA SoCG is to apportion contributions from surrounding Local Planning Authorities (LPAs) against the respective shortfalls of the Black Country LPAs, within the updated SoCG this will include the contribution from Telford & Wrekin Council. In advance of the Statement of Common Ground being updated and approved I would be grateful if you could please confirm the following by return of letter;

- Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address cross boundary development issues.
- Your organisation accepts the positive 153 dwellings per annum contribution towards unmet housing development needs of the four Black Country Local Planning Authorities of Wolverhampton, Sandwell, Dudley and Walsall.
- There are no other cross boundary issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

We will inform you once the Council has formally submitted the Local Plan to the Planning Inspectorate. I would very much welcome receipt of the above information by Tuesday 9 September.

Yours sincerely

[REDACTED]

[REDACTED]  
**Group Manager - Strategic Planning, Inward Investment & Business Support**



## Duty to Cooperate Statement Appendices

**10 Appendix 10 - Duty to Cooperate letter from Sandwell Metropolitan Borough Council to Telford & Wrekin Council (September 2025)**

By email to

[REDACTED]

My Ref:

Please ask for:

[REDACTED]  
[REDACTED]  
[REDACTED]

Date:09/09/2025

Dear [REDACTED],

**Sandwell MBC response to Telford and Wrekin GBBCHMA Statement of Common Ground submission of Telford and Wrekin Local Plan Letter**

Further to your letter dated 18<sup>th</sup> August 2025 with regards to the GBBCHMA Statement of Common Ground and the submission of the Telford and Wrekin Local Plan.

The letter asks Sandwell Council to confirm three points as set out below:

- 1.Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address cross boundary development issues.
- 2.Your organisation accepts the positive 153 dwellings per annum contribution towards unmet housing development needs of the four Black Country Local Planning Authorities of Wolverhampton, Sandwell, Dudley and Walsall.
- 3.There are no other cross boundary issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

With regards to **point 1**, the Council confirm that Telford & Wrekin Council have engaged constructively and effectively through meetings and written communication to identify and address cross-boundary development issues.

With regards to **point 2**, Our response to the Regulation 19 TWLP consultation acknowledged that the plan sought to meet the most recent (2023) Government-defined local housing need of 7,140 homes (857 per year), but still seeks to deliver 20,200 homes, and were therefore able to make an increased contribution of 153 homes per year to address unmet BCA housing need.

The principle of a housing offer to the BCAs, including Sandwell, is positive and welcomed. It is also welcomed that this offer has increased and is now set out in the Plan itself, giving it more weight.

Directorate of Place

[REDACTED]

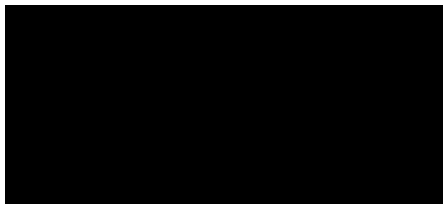
However, supporting technical papers did not clearly explain the overall housing capacity of the district, including potential scenarios that might have increased the supply. A clearer explanation of the methodology used would help to support the Plan at examination.

Substantial BCA and Sandwell housing shortfalls will remain following adoption of BCA Local Plans, and other Local Plans across the Greater Birmingham and Black Country Housing Market Area (HMA), which are in progress under the 2023 NPPF. The current housing shortfall position is set out in the Statement of Common Ground (SoCG) recently agreed between the HMA authorities and a new West Midlands Strategic Growth Study is now underway.

Therefore, if the TWLP housing offer to the BCAs is found to be sound, it is important that the TWLP should commit to an early review, including consideration of the need to accommodate housing shortfalls arising in neighbouring authorities. A logical trigger for this early review would be that all four BCAs have reached Draft Plan consultation stage (including proposed housing allocations) for Local Plans prepared under the 2024 NPPF, and that a cumulative housing shortfall remains. This should be sufficient to demonstrate that all possible development opportunities, together with other exporting opportunities, have been explored for the four BCAs before the new TWLP considers the potential to address the outstanding shortfalls. Detailed work carried out previously on the Black Country Plan strongly indicates that there will still be a significant cumulative housing shortfall at this point. It should be noted that the BCAs new Plans will be prepared to a tight 30 month timetable under the Government's new Local Plan system.

With regards to **point 3**, We confirm that there are no other cross boundary issues between Sandwell Council and Telford & Wrekin Council.

Yours sincerely,



Team Leader Planning Policy

## Duty to Cooperate Statement Appendices

### **11 Appendix 11 - Letter from Telford & Wrekin Council to Sandwell regarding the GBBCHMA SoCG (April 2025)**



Strategic Planning and Transportation

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

-  DevelopmentPlans@telford.gov.uk
-  telford.gov.uk /Policy
-  facebook.com /TelfordWrekin
-  twitter.com /TelfordWrekin
-  [Redacted]

Date: 18/06/25

Our ref:

Your ref:

Dear [Redacted],

**Ref: GBBCHMA Statement of Common Ground**

The Telford and Wrekin Local Plan is now at Regulation 19 stage of the plan making process and as part of that the Council have confirmed the contribution towards the unmet development needs to the Black Country Local Planning Authorities of Wolverhampton, Sandwell, Walsall and Dudley.

On the basis of the contribution contained within the Regulation 19 version of the Local Plan the Council will, in principle, be in a position to sign an updated Statement of Common Ground once this becomes available.

I can also confirm that outside of the request to contribute towards unmet housing needs it is the Council's opinion that, in light of the submission of the Sandwell Local Plan, there are no further duty to cooperate matters to be addressed in a unilateral Statement of Common Ground.

Yours sincerely

[Redacted Signature]

[Redacted Name]

**Strategic Planning Team Leader**



## Duty to Cooperate Statement Appendices

### **12 Appendix 12 - Letter from Sandwell Metropolitan Borough Council regarding Gypsy and Traveller Accommodation shortfall (June 2024)**

By email:

From: [REDACTED]

Email: [REDACTED]

Date: 20<sup>th</sup> June 2024

Dear Colleagues

### **Sandwell Local Plan – Duty to Co-operate**

Sandwell Council wrote to Telford and Wrekin Council in 2023 setting out its intention to produce a Local Plan for Sandwell following the demise of the Black Country Plan (BCP). Sandwell Council consulted on its Draft (Regulation 18) Local Plan in November/December 2023 and since then has been working towards the Publication (Reg19) version of the Plan with a view to undertaking consultation into its soundness at the end of 2024 and submitting the Plan to the SoS in early 2025.

The strategic matters, as set out in the previous letter, included meeting unmet housing need, meeting unmet employment need and some transport issues. It is the view of Sandwell Council that these strategic matters continue to be the principal cross boundary issues affecting the preparation of the Sandwell Local Plan (SLP).

The purpose of this letter is to outline the Council's preferred approach to the Duty to Cooperate (DtC) in respect of strategic housing issues, to seek your views on this approach and to request that your Council fully engages with this work. A separate letter will be sent regarding employment issues.

### **Background**

#### **Housing Provision**

Using the Government's standard method, Sandwell needs to identify land for 29,773 homes between 2022 and 2041. However, the supply of suitable residential land based on the most recent evidence stands at 11,167 homes meaning there is an unmet need of 18,606 homes over this period. The SLP provides for just over one third of the Council's housing need on the land that is available in Sandwell. As of June 2024, Sandwell's unmet need contributes to a larger shortfall across the Black Country of approximately 42,000 homes, made up of the following components:

- Dudley – shortfall of 1078 homes 2022-41 as set out in the 2024 Regulation 18 Local Plan consultation <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents>
- Walsall – shortfall of 11,329 homes 2022-41 based on the Walsall SHLAA 2022. However, Walsall's housing shortfall is unclear at the moment given the uncertainty over the deliverability of some sites.  
[https://go.walsall.gov.uk/sites/default/files/2022-09/Strategic Housing Land Availability Assessment 2022.pdf](https://go.walsall.gov.uk/sites/default/files/2022-09/Strategic%20Housing%20Land%20Availability%20Assessment%202022.pdf)
- Wolverhampton – shortfall of 11,400 homes 2022-42 as set out in the February 2024 Regulation 18 Issues and Preferred Options consultation.  
<https://www.wolverhampton.gov.uk/planning/planning-policies/Wolverhampton-local-plan>

#### **Regeneration and Growth**

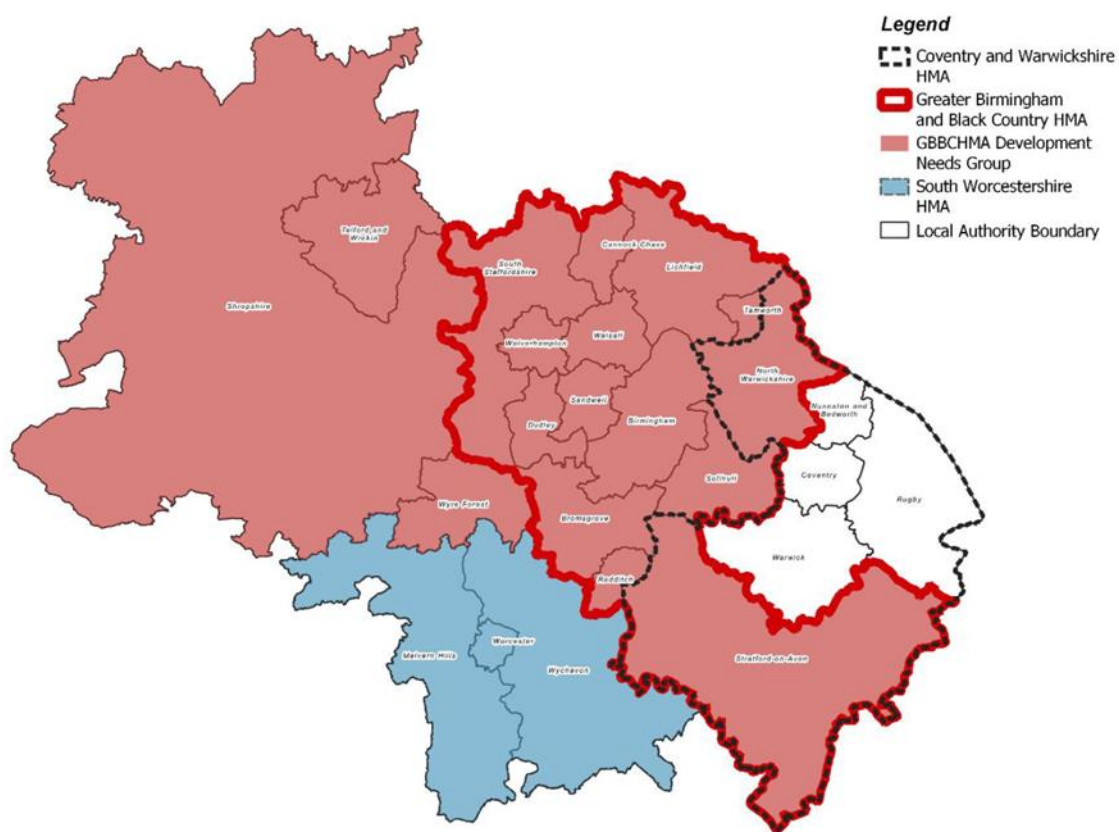
[REDACTED]

[REDACTED]



In addition, the emerging Birmingham Local Plan identifies a significant housing shortfall in the order of 46,000 homes 2022-42 as set out in the 2024 Preferred Options consultation. Together, these emerging Local Plans indicate a housing shortfall of some 88,000 across the Black Country and Birmingham Housing Market Area.

Previous discussions across the Birmingham and Black Country Housing Market Area (B&BCHMA) (as shown on the Map below) and a number of neighbouring Local Plan areas, indicated that contributions to addressing this shortfall have been made from a number of adopted and emerging Local Plans from other local authorities. However, it is anticipated that contributions secured or 'offered' to date will not make significant headway into addressing the shortfall, indicating a very substantial under-delivery of homes compared with identified needs.



Map: Birmingham and Black Country Housing Market Area (B&BCHMA) plus neighbouring Local Plan areas

## Gypsy and Traveller Provision

Sandwell has identified a 14 pitch need for Gypsy and Traveller households over the plan period, including 8 pitches within the first 5-year period.<sup>1</sup> Through the site assessment process for the SLP, Sandwell identified provision for 10 pitches.

<sup>1</sup> Black Country GTAA 2022 <https://www.sandwell.gov.uk/downloads/download/493/sandwell-local-plan-housing-evidence>

The Council explored all potential sites for their suitability for plots and pitches including council land and the potential to expand or new public site provision, it also engaged with site promoters through 'Call for Sites' to explore if they were willing to make part of their site available for a publicly run site, no new sites were identified.

### **Addressing the shortfall**

As Sandwell Council and other Local Plan areas are reliant on contributions from the HMA and wider to meet identified housing needs, this letter is to determine whether Telford and Wrekin Council is able to make any contribution to the wider shortfall, either through current or future local plan reviews. This request is consistent with the December 2023 National Planning Policy Framework (NPPF) which confirms the need for Local Plans to consider how they can accommodate need from neighbouring areas where it is practical to do so whilst achieving sustainable development through the Duty to Cooperate.

Therefore, as part of the DtC, please could you provide the following information:

- confirm the timetable for reviewing your Council's Local Plan, and the term of this Local Plan.
- confirmation of whether your adopted and emerging Local Plan is able to meet local housing needs in full within the administrative area.
- confirm how your adopted / emerging Local Plan is responding to the requirements of the NPPF outlined above and whether your council will be able to contribute to the overall unmet need in the wider HMA area.
- confirm whether this contribution will be for the Black Country, Birmingham, or for the wider HMA.
- confirmation of whether your adopted and emerging Local Plan is able to meet Gypsy and Traveller needs in full within the administrative area.

We anticipate that the responses to these questions will confirm that emerging Local Plan work will fail to address the identified shortfall and that further collaborative work will be needed to identify additional sources of land across the whole of the HMA and almost certainly beyond it. The most recent HMA-wide evidence designed to consider this issue is the 2018 Growth Study which a number of emerging Local Plans consider to be out of date. Sandwell Council is committed to an inclusive and comprehensive review and update of this work as the most effective vehicle to respond to the shortfall and we encourage Telford and Wrekin Council to participate in order to shape its findings and recommendations. We note that the commissioning of this work is progressing through the HMA Development Needs Group.

### **Next Steps**

Moving forward, we intend to use the responses to the questions set out above to prepare a Statement of Common Ground (SoCG) that will set out:

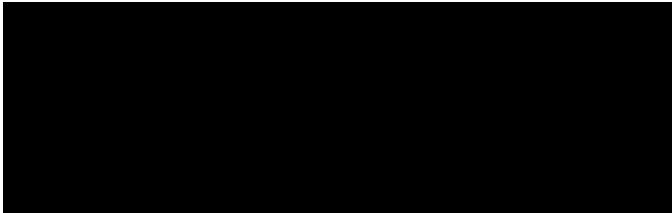
- the housing shortfall arising in individual plan areas across the whole of the HMA and those Local Plan areas which have an evidenced strong functional relationship with it – namely Shropshire, Telford & Wrekin, Stafford and Wyre Forest
- how individually and collectively individual plans are responding to the shortfall,

- confirm the position of individual Local Plan areas to participating in a review and update of the 2018 Growth Study
- agree the method by which current and potential contributions to addressing the shortfall are apportioned to those Local Plan areas with an evidenced shortfall. We suggest that this approach is discussed at forthcoming meetings of the HMA Development Needs Group.

We would be grateful if you could confirm that your Council would be willing to be party to this SoCG.

The Council would be grateful if you could respond to the issues raised in this letter by Friday 5<sup>th</sup> July 2024. This will enable the Council to make progress with DtC issues prior to the Publication of the Sandwell Local Plan later this year.

Yours faithfully



Assistant Director: Spatial Planning and Growth

## Duty to Cooperate Statement Appendices

### **13 Appendix 13 - Duty to Cooperate letter from Telford & Wrekin Council to Walsall Council (September 2025)**



██████████  
Principal Planning Policy Officer  
Walsall Council



Date: 18/08/25

Our ref:

Your ref:

Dear ██████████

**Ref: GBBCHMA Statement of Common Ground – submission of Telford & Wrekin Local Plan**

I am writing to you regarding the submission of the Telford and Wrekin Local Plan and the matter of Duty to Cooperate. The Council will shortly be submitting the Local Plan for examination and, as part of that process, can now confirm its final position regarding housing numbers in order to facilitate an updated Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Statement of Common Ground (SoCG).

The purpose of the GBBCHMA SoCG is to apportion contributions from surrounding Local Planning Authorities (LPAs) against the respective shortfalls of the Black Country LPAs, within the updated SoCG this will include the contribution from Telford & Wrekin Council. In advance of the Statement of Common Ground being updated and approved I would be grateful if you could please confirm the following by return of letter;

- Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address cross boundary development issues.
- Your organisation accepts the positive 153 dwellings per annum contribution towards unmet housing development needs of the four Black Country Local Planning Authorities of Wolverhampton, Sandwell, Dudley and Walsall.
- There are no other cross boundary issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

We will inform you once the Council has formally submitted the Local Plan to the Planning Inspectorate. I would very much welcome receipt of the above information by Tuesday 9 September.

Yours sincerely

██████████

██████████  
**Group Manager - Strategic Planning, Inward Investment & Business Support**





## Duty to Cooperate Statement Appendices

### **14 Appendix 14 – Duty to Cooperate letter from Walsall Council to Telford & Wrekin Council (September 2025)**



# Walsall Council

## Environment, Housing and Growth

Date: 09 September 2025  
Our Ref: DSH/NB/AI/WBLP/dtc  
Telephone: [REDACTED]  
Email: [REDACTED]

[REDACTED]  
Strategic Planning Team Leader  
Housing, Employment & Infrastructure  
Telford & Wrekin Council

Dear [REDACTED],

### Telford & Wrekin Local Plan Review: Duty to Co-operate

Thank you for your email and attachment dated 2 September 2025.

Walsall's formal position in respect of Telford's local plan remains as set out in my letter of 1 May 2025. We would not challenge the view that your council has met the legal requirements under the Duty to Cooperate. We can confirm that the sole cross boundary issue between our town authorities is that of the contribution that Telford can make to the unmet housing needs of the four Black Country authorities.

We note that you recognised in your letter of 10 April 2025 to Dudley, which has been published on the Dudley Local Plan web site ([socg01-letter-from-telford-and-wrekin-council-regarding-gbbchma-statement-of-common-ground.pdf](#)) that an updated statement of common ground should be signed with Dudley. There is currently no bilateral statement between Walsall and Telford but both our authorities are signatories to the GBBCHMA statement of 29 November 2024. This is now somewhat dated as it pre-dates the December 2024 NPPF and the new standard method for calculating local housing need. The latter has substantially increased the need for both our authorities.

We continue to welcome the positive contribution of 153 dwellings per year, set out in the Telford Local Plan as proposed to be submitted, towards the unmet housing development needs of the four Black Country local planning authorities. However,

[REDACTED]  
[REDACTED]  
Tel: [REDACTED]  
[REDACTED]

Walsall in particular is heavily constrained by Green Belt. We expect to publish our draft local plan for consultation by the end of this year which is expected to highlight the challenges we face. NPPF paragraph 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy has, amongst other measures, been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

It may therefore be appropriate for Telford's plan to be linked to an early review mechanism given the likely shortfall of land to meet needs in the areas of neighbouring authorities and taking into account other contributions in current and emerging local plans.

Yours sincerely

A black rectangular box redacting the signature of the Planning Policy Manager.A black rectangular box redacting the name of the Planning Policy Manager.

**Planning Policy Manager**

## Duty to Cooperate Statement Appendices

### **15 Appendix 15 - Statement of Common Ground between Telford & Wrekin Council and South Staffordshire District Council (September 2025)**

# Statement of Common Ground between Telford and Wrekin Council and South Staffordshire District Council

Telford and Wrekin Local Plan  
review 2020-2040

Position at September 2025



**Telford & Wrekin**  
Co-operative Council

**Protect, care and invest  
to create a better borough**



**South Staffordshire Council**

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## Statement of Common Ground (SoCG) between Telford & Wrekin Council (TWC) and South Staffordshire District Council (SSDC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Telford & Wrekin Council (TWC) and South Staffordshire District Council (SSDC), hereafter referred to as “the parties” to inform the submission of the Telford and Wrekin Local Plan review 2020-2040.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the Telford and Wrekin Local Plan review and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing;
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment.

### Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of Telford & Wrekin Council and South Staffordshire District.

### Key Strategic Matters

4. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
5. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

### Housing

6. TWC and SSDC are within separate housing market areas (HMAs). Although TWC are not within the GBBCHMA<sup>1</sup>, they attend the Technical Officers Group in an

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<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan

observation capacity as a neighbouring planning authority. Both TWC and SSDC have been party to the November 2024 GBBCHMA Development Needs Group Statement of Common Ground, which seeks to provide a programme of work to address the housing shortfalls arising from the GBBCHMA. TWC have agreed this in principle by return of a letter but not formally signed.

7. No other housing related cross-boundary issues have been identified.

## Employment

8. SSDC and TWC are within separate functional economic market areas but are among the commissioning authorities for the West Midlands Strategic Employment Sites Study (WMSESS) 2024 that considers the need across the study area for strategic employment sites. SSDC and TWC will continue to work together collaboratively to monitor any cross boundary employment issues, including considering the findings of the WMSESS 2024 through future plan-making.

## Cross boundary transport impacts

9. TWC and SSDC are committed to continue working together in partnership, alongside their respective highways authorities, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. This includes the shared ambition for the electrification of the Shrewsbury – Telford – Wolverhampton Rail Line.
10. SSDC are proposing two strategic housing site allocations, however neither are within close proximity to the Telford and Wrekin administrative area. Likewise, TWC are proposing three strategic allocations but none are within close enough proximity to SSDC to impact the authority in any way.
11. Both SSDC & T&WC support the proposals for the new M6 north junction connection which will improve connectivity with the M54 and connections to the North West in general.
12. No other cross-boundary transport issues have been identified.

## Infrastructure

13. SSDC and T&WC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
14. Necessary infrastructure (including school places) will be delivered by the parties. Therefore, no cross-boundary infrastructure issues have been identified.

## Gypsy & Traveller Provision

15. TWC has an identified a 26 pitch need for Gypsy and Traveller households in the borough over the local plan period, including 17 pitches within the first 5 year period

following adoption of the plan. TWC carried out two call for sites exercises and had a single submission for Gypsy and Traveller accommodation. This was deemed not to be suitable as it was not supported by a proposal for Gypsy and Traveller accommodation that would demonstrate effective delivery and the size of the site would have provided limited additional provision.

16. TWC have identified a site within their control which will have the potential capacity for at least 13 additional pitches, this will be subject to a windfall application. In addition, the council has also had a further 4 pitches which have been granted permission since the GTAA update was completed. The remaining shortfall for the latter period of the plan will be met by expansion of existing sites within Council control, windfall sites and further plan reviews (including call for sites). TWC will be confident that the additional pitches required in the later period of the plan can be met via the above actions and at this stage do not consider there to be an unmet need within the Borough.
17. SSDC through its emerging Local Plan has only been able to identify suitable sites to allocate 37 new pitches, against a potential need of 162 pitches to 2042. TWC are aware of SSDC's unmet need and therefore will not be requesting assistance to help meet the need figure in Telford and Wrekin.
18. SSDC wrote to TWC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. Through this engagement SSDC sought confirmation that TWC would take the same steps as SSDC in exploring options for new pitches (including in the Green Belt); namely plots available within existing sites, options for a new publicly run sites including use of existing publicly owned land, or as part of proposed housing allocations. TWC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. In TWC's view, as the Council have their own existing shortfall in pitches to prioritise, the position with the Telford and Wrekin Local Plan means it is not possible for T&WC to guarantee a contribution towards any unmet need. This position is agreed between both parties, however it will be kept under review.

## Natural Environment

19. SSDC and T&WC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.
20. No cross-boundary issues have been identified.



## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Telford and Wrekin Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### **Telford and Wrekin Council**

**Name:** 

**Position:** Group Manager – Strategic Planning, Inward Investment & Business Support

**Signature:**



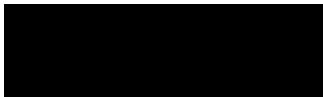
**Date:** 08/09/2025

### **South Staffordshire District Council**

**Name:** 

**Position:** Lead Planning Manager

**Signature:**



**Date:** 09/09/2025

## Duty to Cooperate Statement Appendices

### **16 Appendix 16 – Statement of Common Ground between Telford & Wrekin Council and the Environment Agency**

# Statement of Common Ground between Telford & Wrekin Council and the Environment Agency

Telford and Wrekin Local Plan review  
2020-2040

Position at September 2025



**Telford & Wrekin**  
Co-operative Council

**Protect, care and invest  
to create a better borough**

## **1. Introduction**

This statement of common ground (SOCG) has been prepared by Telford & Wrekin Council and the Environment Agency (EA) in relation to the Telford and Wrekin Local Plan review (2020-2040). It reflects the position between the two parties on a number of strategic matters and shared issues. This SOCG covers the Local Authority area of Telford and Wrekin.

The role of the EA is to secure the protection and enhancement of the environment in England. This includes regulatory powers in areas such as flood risk, water resources and waste. The purpose of the Statement is to document the strategic matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement and, if appropriate, those matters where work is ongoing to resolve differences. The Statement is intended to be 'live' and updated as circumstances change, and agreement occurs on any outstanding issues. Subsequent comments made on the final draft version of this document by EA clarify where issues have been resolved and where they remain unresolved.

The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Telford and Wrekin Local Plan review. A schedule of meetings held to date has been included within the Duty to Cooperate statement.

The Environment Agency were consulted at each stage in the Local Plan making process, including Issues and Options, Draft Local Plan (Regulation 18) and the Publication Version (Regulation 19) of the document.

## **2. Purpose and List of Parties Involved**

The parties involved are Telford & Wrekin Council and the Environment Agency.

This is a statement of common ground between the parties. The statement provides a record of discussions between the parties and how far this has gone towards resolving issues. Meetings will continue on an ongoing basis if relevant and the statement of common ground may be updated accordingly.

## **3. Strategic Matters and Record of Agreement /Areas of Ongoing Discussion**

The approach to the Statement of Common Ground is to follow the structure of the representations made by the Environment Agency at Regulation 19 stage.

In the representation made on the Publication Local Plan (at Regulation 19 stage), the Environment Agency expressed a number of comments in relation to the Local Plan, the following items set out the current position in relation to those elements and where agreement has been secured.

The EA are a member of the Regional Technical Advisory Board for Waste and as such have been party to RTAB responses to the Regulation 19 version of the Local Plan. No significant waste management issues have been raised by the EA.

## **Strategic Flood Risk Assessment (SFRA)**

It has been agreed between both parties that the Level 1 SFRA has been prepared in line with relevant guidance.

The EA recommended within its Regulation 19 response that further assessment be undertaken to compare the flood risk implications of National Flood Risk Assessment 2 data new national flood and coastal erosion risk information - GOV.UK (NaFRA2) with the pre-publication assessment carried out as part of the SFRA work. This would then be submitted as an addendum to the SFRA.

The Council commissioned its consultants JBA Consulting to carry out the required update to the SFRA Level 2 (as referenced above) which was completed and received by the Council on 2 June 2025. The EA received a copy of the Telford and Wrekin Level 2 Strategic Flood Risk Assessment: NaFRA2 Addendum on 7 July 2025. The addendum has been provided to assess the changes within the TWC administrative area following the publication of the NaFRA2 data.

The EA provided a response to the SFRA addendum (QCM-JBAU-XX-XX-RP-EN-0001-S0-P01.01-Level 2 SFRA dated July 2025) on 21<sup>st</sup> August 2025. Following this, the Council forwarded the site screening spreadsheet (QCM-JBA-XX-XX-DA-EN-0001-S2-P01\_NaFRA2\_Site\_Screening\_xlsm) on 27<sup>th</sup> August 2025.

The EA have now reviewed the update and are satisfied with its findings and that there are no further implications for the Local Plan.

## **Water Cycle Study (WCS)**

The EA sought clarification (both Reg 18 & Reg 19 responses) on the deliverability of the planned growth in relation to wastewater capacity and infrastructure. The EA referenced the WCS evidence which highlights that Edgmond and Newport treatment works are likely to exceed their permit limits during the plan period.

With regard to outstanding queries, the Council has sought advice from both JBA and Severn Trent Water (STW) Limited. Responses from both of these parties have been provided to the EA on 27 May 2025 and 25 July 2025.

The EA provided a response to the above on 1<sup>st</sup> September 2025.

The EA acknowledged the correspondence from STW which confirms their intention and duty to meet planned growth. The EA highlighted that while the water company recognise the need for growth in their assets there is limited detail provided on what is planned, where and in what timeframes (factored by cost/BAT). For example, Newport where the WCS (JBA) identifies some potential constraints, but where STW confirm they have a duty to accommodate new development "which will include Technically Available Limits (TAL) and where necessary STW Ltd will look at alternative options such as diverting flows to other WwTW facilities". The EA raise concern that this may impact upon phasing of development.

The EA advised that the Council could seek more certainty on options in relation to what STW have in their programme (what and when) to deal with the identified constraints as part of their Asset Management Plan (AMP) or similar. And that planned growth shouldn't result in deterioration to the water environment in accordance with the Sustainability Appraisal.

The EA acknowledge that STW have confirmed that they will "promote schemes as and when needed to ensure additional capacity is needed to maintain permit compliance and

ensure no environmental impact". The EA advises the Council to consider this within their infrastructure plans.

The EA advise that in light of the response from STW, the Council could seek an update to the WSC to better reflect the above considerations. The Council recognise this advice from the EA and will endeavour to further discuss this with the EA to ensure a process can be agreed between the parties should this be a necessary step.

In addition, the EA confirmed that the separate correspondence regarding Combined Sewer Overflows (CSO's) - JBA 27 May 2025 comments, are satisfactory and have no further comments.

### **Areas of ongoing discussion**

The EA response to the Regulation 19 consultation on the Publication Version of the Local Plan raised a number of points for clarification in policy all of these points have now been addressed in a schedule of modifications for submission of the Plan to the Planning Inspectorate.

The EA have provided further comments on the modifications suggested by the Council, these are attached as Annex A. The Council has addressed these further comments made by the EA and both parties feel that reasonable changes have been suggested for modifications to the plan in advance of submission to the Planning Inspectorate.

### **4. Duty to Cooperate Agreement**

The parties agree that constructive, active and effective engagement has taken place on strategic matters to date and will continue to do. The parties recognise that there are no outstanding issues and that both will continue to work closely and where relevant with other prescribed bodies on any further issues should they arise.

The EA confirm that the Council has met the Duty to Cooperate.

## 5. Signatories and Governance Arrangements

In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the parties on the issues referred to in this SoCG in the form of officer level meetings with escalation to more senior levels where necessary; and
- that this SoCG will be reviewed when required including adding additional issues that may be identified through the Local Plan making process.

### Telford and Wrekin Council

Name: Gavin Ashford

Position: Group Manager – Strategic Planning, Inward Investment & Business Support

Signature:

A handwritten signature in cursive script that reads "Gavin Ashford".

Date: 12/09/2025

### The Environment Agency

Name: Mark Davies

Position: Planning Specialist

Signature: M.Davies

Date: 12/09/2025

## Annex A – suggested modifications in relation to the Environment Agencies Regulation 19 response to the Council

Para No.	Proposed Modification	Actual Modification	Rationale (T&W comment)	EA comment	TWC response/additional modifications
CC4	Policy should be updated in accordance with WCS recommendations "The WCS recommends a phased approach to water efficiency delivery, recommending that the Council adopts a policy requiring a water efficiency target of 100l/p/d in their Local Plan and allow for a reduction in this target to 90l/p/d from 2030."	No change	Justification set out within paragraph 6.30	<p>The justification in 6.31 acknowledges that there is clear local need for tighter water efficiency standards, referencing the water cycle study (2024) as evidence. However, the Policy doesn't reflect the recommendation of the WCS.</p> <p>The WCS recommends a phased approach to water efficiency delivery, recommending <b>that the Council adopts a policy requiring a water efficiency target of 100l/p/d in their Local Plan and allow for a reduction in this target to 90l/p/d from 2030.</b></p> <p>It is unclear why you have chosen to disregard the conclusions of your WCS and our recommendations in relation to water efficiency standards. We consider there to be reasonable justification. There is evidence of a recognised local need, and we consider that the inclusion of such will help deliver sustainable development, provide environmental protection by reducing the burden on water infrastructure, meet climate change</p>	<p>Amend to be made to point 2 of the policy – change 110l/p/d to 100l/p/d</p> <p>Suggested modification to supporting text in 6.30 –</p> <p>...Local Plan policies requiring new dwellings to meet the optional requirement of ±100 litres/person/day. <b>The Council will be supportive of developments aspiring to achieve a reduction in this target to 90 litres/person/day by 2030, in line with recommendations set in the Council's Water Cycle Study (2024).</b></p>



				<p>objectives, and accord with your sustainability appraisal objectives.</p> <p>We appreciate you may have some viability concerns. However, research suggests that implementing tighter water efficiency standards is generally not costly or challenging and is viable for developments. It should be seen as a positive step.</p> <p>In terms of viability we would draw attention to the following <b>'shared standards in water efficiency'</b> document - <a href="#">shared-standards-in-water-efficiency-for-local-plans.pdf</a></p> <p>Whilst much of this document covers Anglia region, West Midlands area is also under serious water stress and has water resource challenges and there are key references that will assist your decision making. For instance, please see page 18 and the <b>'The Future Homes Hub's (FHH) Water Ready report'</b> which was commissioned by Defra to support water efficient homes - <a href="#">Water Ready A report to inform HM Government-s roadmap for water efficient new homes.pdf</a></p> <p>Table 3 and 4 provide some illustration around the costs associated with inclusion of tighter water efficiency standards. Table 3</p>	
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				<p>(page 18) of that report for example suggests that the costs per dwelling associated with 100 litres/person/day or 90 l/p/d (the report includes data for even lower consumption targets) are not cost prohibitive. Table 4 summarises water fittings for reducing water consumption in relation to cost and performance. These factors shouldn't be seen as a barrier or reason for not requiring sustainable water efficiency targets in your local plan.</p> <p>Whilst slightly out of date, Department for Communities and Local Government 'Housing Standards Review Cost Impacts' (September 2014) considered the costs of achieving the water efficiency standards in the Code for Sustainable Homes. Table 26 in Section 3.5.4 demonstrated the cost of complying with each standard in the Code compared with usual costs. Code levels 3 and 4 set a water efficiency target of 105 l/p/d. The report concluded that 105 l/p/d could be achieved for a 3 bed / 4 bed detached house at an additional cost of £9. For 1 bed apartments, 2 bed apartments and a 2 bed terrace, the additional cost was £6.</p>	
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				<p>Other research has indicated potential annual savings on water and energy bills for householders because of such water efficiency measures. The Consumer Council for Water also acknowledges that saving water is not the only driver of water efficiency, it reduces energy bills, water bills of metered customers and carbon emissions.</p> <p>Our recommendation still stands.</p>	
CC4	<p>Add reference in supporting text to Water Stress designation "The plan area is identified as an area under serious water stress (Water stressed areas – 2021 classification (<a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a>). Development has the potential to increase abstraction from groundwater and surface water sources and should not have an adverse impact on WFD."</p>	Footnote to be included in 6.30	Further guidance	Support	No further comment
CC4	<p>The text should signpost developers to WFD management catchment data to aid with this: Severn River Basin District   Catchment Data Explorer.</p>	No change	Covered within supporting text	<p>It is not in the original February supporting text. Please confirm what has been updated.</p> <p>See WCS additional recommendations.</p>	<p>Additional clarification added to 6.32:</p> <p>...impact on water quality and appropriate mitigation is secured.</p> <p><b>An assessment to inform the appropriateness of development within designated Source Protection</b></p>

	<p>Policy wording should be made clearer. It could set out a clear expectation to separate foul and storm drainage, restrict surface water connections etc to reduce pressures on the waste water network, improve water quality and reduce flood risk.</p> <p>Reference to protection of ground water should be added to supporting text with appropriate signposting to our groundwater protection guidance: The Environment Agency's approach to groundwater protection.</p> <p>Policy and supporting text should also highlight the need for appropriate risk assessments to inform the appropriateness of development within designated SPZ's and whether any impact can be appropriately mitigated.</p>				<p><b>Zones (SPZ's) would be required to demonstrate that any impacts can be mitigated.</b></p> <p>Additional supporting text to be added after 6.32:</p> <p><b>New 6.33. Development should demonstrate they separate foul and storm drainage and restrict surface water connections to reduce pressures on the waste water network, improve water quality and reduce flood risk.</b></p> <p><b>New 6.34. Where development has the potential to increase abstraction from ground and surface water sources this should not have an adverse impact on the Water Framework Directive. The Environment Agency provides further technical guidance regarding groundwater protection which should be considered in advance of an application.</b></p> <p><b>Footnotes to add:</b></p> <p><b>Footnote:</b>  <a href="https://www.legislation.gov.uk/ukxi/2017/407/contents">https://www.legislation.gov.uk/ukxi/2017/407/contents</a>.</p> <p><b>Footnote:</b>  <a href="https://www.gov.uk/government/publ">https://www.gov.uk/government/publ</a></p>
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					<a href="#">ications/groundwater-protection-technical-guidance/groundwater-pr...</a>
CC4	Policy should include reference to the drainage hierarchy and requires an assessment of the impacts to the water environment of non-mains drainage. The following wording from Wyre Forest adopted local plan was put forward as a good example of how to cover this: "Development should follow the hierarchy (order of preference for foul drainage connection), as set out in the National Planning Practice Guidance.	No change	Not necessary to repeat national policy	Maintain comment – provides clarity on expectations.	No further comment
EC4	We recommend Policy EC4 sets out a minimum bufferzone to consider/safeguard existing waste facilities (including Installation sites under Environmental Permitting Regulations), or new permitted facilities, from new and conflicting land uses.	3. Where development proposals for any other use come forward, proposals will need to clearly demonstrate that there will be no conflict with the operation of <b>a new or existing</b>	Clarification	More concise wording is suggested below:  Development proposals on, or within 250m of an existing waste management facility (including installation sites under Environmental Permitting Regulations) will be required to;  a. assess the potential impact on the facility and demonstrate that it would not unreasonably restrict the development or operation of the facility b. Provide any necessary mitigation as the "agent of change" to ensure that	Accepted change with some minor changes:  <b>Development proposals on, or within 250m of an existing waste management facility (including installation sites under Environmental Permitting Regulations) will be required to;</b>  <b>a. assess the potential impact on the facility and demonstrate that it would not unreasonably restrict operation of the facility</b> <b>b. Provide any necessary mitigation as the "agent of change" to ensure that the operation of the existing business</b>

		waste site. <b>This will apply to all proposals within or adjacent to a 250m buffer, however in exceptional circumstances evidence of no conflict may be required beyond this buffer zone.</b>		<p>the operation of the existing business would not have a significant adverse effect on the new development.</p> <p>We don't think you need to include 'new'.</p> <p>It is unclear how you would determine 'exceptional circumstances' so maybe remove that.</p>	<b>would not have a significant adverse effect on the new development.</b>
Site 410	We also recommend you risk assess the housing allocation 410 in proximity of Granville Landfill.	No change	Other than the three Sustainable Communities, no guidelines have been set for proposed allocations	<p>We were advising this be considered as part of the allocation process. Ultimately, the above (EC4) would still apply.</p>	<p>No modification</p> <p>Discussions have been ongoing with the site owners regarding their intentions and the developable area of the site suggested by the site owners will be outside of the 250m buffer zone. The modification within EC4 accounts for comment.</p>
EC4	Ensure housing policies include a link to Policy EC4 and highlight the agent of change requirements of the developer to provide appropriate assessment and any mitigation to ensure the safeguarding of existing	No change	Plan should be considered as a whole – change not felt necessary	No further comment.	The Council has received a number of suggestions on where to place this reference to the agent of change. We feel that is best placed in DD2. We have also added extra clarification for waste facilities and utility sites:

	business/facilities in proximity of new development.				After 10.17 (new para) – <b>Where new development is proposed this should be in line with NPPF paragraph 200 and not unduly impact existing uses such as places of worship, pubs, music venues, sports clubs and waste facilities and utilities sites. Where evidence demonstrates that there is a potential conflict between uses, for example the risk of ball strike from an existing sports ground, the applicant will be required to provide suitable mitigation.</b>
ML5	Policy wording could be stronger and would be more effective if it secured appropriate remediation of sites where contamination is present.	<b>2. Development proposals should secure appropriate remediation of sites where contamination is present.</b>	Clarification	<p>The Policy wording could be stronger and would be more effective if it secured appropriate remediation of sites where contamination is present. We acknowledge your additional comment regarding that. But, we previously highlighted the following wording as an example of how to improve the effectiveness of the policy:</p> <p>“Development proposals will not be permitted where the land is contaminated (*As defined under Part IIA of the Environmental Protection Act 1990) and not capable of appropriate remediation without compromising development viability or the delivery</p>	<p>Amends to 14.41 and point 2 within ML5</p> <p>14.41 - The purpose of Policy ML5 is to protect <b>controlled waters</b>, the health and wellbeing of existing and future occupiers and, at the same time, to make effective use of land and buildings consistent with the NPPF.</p> <p>ML5.2. – Add clarification to supporting text 14.48 <b>In some instances further site investigation may be required before planning permission can be granted. Planning permission will only be granted subject to conditions. Site investigations should be prepared by a competent person, assessment and agreed remedial measures agreed before any development takes place. This must demonstrate that the land contamination issues have been fully</b></p>

				<p>of sustainable development. For sites where land contamination is suspected, an adequate site investigation survey will need to be prepared (by a competent person) to demonstrate that land contamination issues have been fully addressed or can be addressed through the development.”</p> <p>The above is considered stronger wording than that proposed.</p>	<p><b>addressed or can be addressed through the development.</b> It is always the developer’s responsibility to ensure the safety of the development and its compliance to best practice safety standards and contaminated land best practices.</p> <p>Change to footnote 27:</p> <p>Remove PPG reference, add the following:  <a href="#">Groundwater protection position statements - GOV.UK</a>  <a href="#">Land contamination risk management (LCRM) - GOV.UK</a></p> <p>This should cover the points below on ML5 also</p>
ML5	Supporting text should be clear that where a site / former land use has the potential to cause contamination of the underlying soils and groundwater then any planning application must be accompanied by a pre-liminary risk assessment up front to demonstrate that the risks to controlled waters are understood and can be appropriately managed.	No change	Covered within supporting text	<p>Our previous comments still stand. We did recommend inclusion of “A Site Investigation may be required”. As some sites may need this upfront with the application. We also previously stated (see emphasis in bold) that “Supporting text 14.48 doesn’t make sense. Preliminary assessment of any risk should be undertaken upfront to provide assurance that the risks are known and can be appropriately managed, giving confidence that the</p>	Covered above (ML5)



				<p>development is viable. <b>In some instances further Site Investigation (SI) may be required before planning permission can be granted. (rather than as the policy suggests left/subject to planning condition)”.</b></p> <p>In addition, Wording of the supporting text is unclear. 14.41 does not reference <b>controlled waters</b>, only health and wellbeing of existing/future occupiers. We recommend text is amended to include controlled waters (including groundwater).</p>	
ML5	Supporting text should signpost developers to our Groundwater Position Statement: Groundwater protection position statements - GOV.UK . The sensitivity of Principal and Secondary Aquifers within the plan area should be recognised.	No change	Covered within supporting text under footnote 27.	Maintain recommendation for additional text. Footnote 27 references the N PPG not the Groundwater Protection Position Statements.	Covered above (ML5)
ML5	Supporting text should signpost developers to the risk management framework: Land contamination risk management (LCRM) - GOV.UK	No change	Covered within supporting text under footnote 27.	Our recommendation would provide a more direct link and awareness.	Covered above (ML5)
WCS – additional recommendations	EA WCS Reg 19 extracts: Odour: The odour screening assessment has identified one site – Land south of Plough Lane, Newport - within 800m of a waste			The EA recommend the inclusion of some advisory text in the policy for that site allocation, and links to Policy EC4 where this is covered in more detail.	<p>New supporting text paragraph</p> <p><b>After 8.29 Sites within 800m of a Waste water Treatment Works (WwtW) may require an odour</b></p>

	<p>water treatment works. An odour impact assessment is recommended at the planning stage. JBA confirm this should be funded by the developer. This fits with the 'agent of change' principle (NPPF para 200). We recommend the inclusion of some advisory text in the policy for that site allocation, and links to Policy EC4 where this is covered in more detail.</p> <p>There are opportunities through the planning system to ease the pressure on the waste water network by separating foul and storm flow in existing combined systems and preventing new surface water connections. Policy CC4 Water re-use, conservation, efficiency and quality – part 3, seeks to address the above. We recommend the policy set a clear expectation for foul and storm flow to be separate and places restrictions on new surface water connections, with further guidance included within the supporting text.</p>			<p>The EA recommend the policy set a clear expectation for foul and storm flow to be separate and places restrictions on new surface water connections, with further guidance included within the supporting text.</p>	<p><b>assessment depending on the proximity and scale of the works to the development</b></p> <p>Covered above (CC4)</p>
SFRA and related policy	<p>EA comments:</p> <p>We recommend cross referencing some elements of the cumulative</p>			<p>The EA recommend cross referencing some elements of the cumulative</p>	<p>Proposed changes to <b>policy CC5:</b></p>

	<p>impact assessment recommendations into the plan policy e.g. CC5.</p> <p>We acknowledge the ‘Cumulative impact assessment’. This was primarily carried out as part of the Level 1 SFRA, considering surface water and other flooding in each catchment. We note 8 sites located in catchments at relative high risk are listed in Table 5-7, 12 of the sites with site summary sheets are in a catchment at relative medium risk. Only 1 site, Site 689 - Land Southern Side of Waters Upton, is in a catchment at low risk. We recommend that the recommendations of section 7 of the Level 1 SFRA, including those strategic flood risk solutions, are implemented. These could be cross referenced and or included in policy CC5 (Flood risk management and sustainable drainage systems) e.g. open up/‘reduce the length of culverted watercourses’, where possible. And some of those recommendations in 7.10 for ‘high risk’ catchments as identified in the SFRA.</p> <p>We have previously mentioned the Strine / Weald Moors area (one</p>			<p>impact assessment recommendations into the plan policy e.g. CC5.</p>	<p>After 1.g., new 1.h.- <b>Opportunities to de-culvert or reduce the length of culverts for water courses have been, where possible, explored, along with measures to contribute to a flood risk reduction.</b></p> <p>After 2., new 3. –</p> <p><b>Surface Water Drainage Strategies and site Flood Risk Assessments are required for developments within areas of high cumulative flood risk as identified in the SFRA.</b></p> <p>Additional supporting text to be added: After 6.35, new 6.36 - <b>The Strategic Flood Risk Assessment (Level 1 and 2) provides a key evidence base document that developers should refer to when bringing forward proposals for new development. The Level 2 SFRA provides details of when site specific flood risk assessments would be required and developers should use this section to understand requirements for FRAs and what conditions/ guidance documents should be followed. Further to this, Site Summary tables are located within Annex A of the document which developers should use to understand</b></p>
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	of/part of the high risk cumulative catchment area) and the potential opportunities for/link up with flood risk reduction and improved water abstraction/water quality.				<p><b>flood risk, access and egress requirements, climate change, SuDS, and FRA requirements for site-specific assessments.</b></p> <p>After 6.31 – <b>There are a range of measures that could be provided through development to ensure the efficient use of, and conservation of, water including; the use of water butts in gardens, permeable surfaces</b></p>
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## Duty to Cooperate Statement Appendices

### **17 Appendix 17 – Duty to Cooperate letter with Telford & Wrekin Council and Historic England (September 2025)**



EMAIL ONLY



Date: 04/09/2025

Our ref: TWLPR-DTC-HE

Your ref: TWLPR-DTC-HE

Dear [REDACTED],

### **Telford and Wrekin Local Plan Review (2020-2040) – Duty to Cooperate – Historic England**

Telford & Wrekin Council are at an advanced stage of its Local Plan review and are in the process of agreeing Statements of Common Ground with all statutory bodies where necessary ahead of submission to the Secretary of State.

The Council have been in discussions with Historic England on an ongoing, constructive and effective basis and are in the process of agreeing a SoCG. In advance of this being finalised in anticipation of submission of the plan, the information below has been agreed between the LPA and officers at Historic England (and signed by both parties below):

- Historic England have been and are currently working with Telford & Wrekin Council, the Local Planning Authority (LPA), ahead of the Local Plan being submitted to the Secretary of State. This letter will be followed by a Statement of Common Ground between Historic England and the LPA.
- The purpose of this letter is to confirm that Historic England do not foresee any significant matters of disagreement at this stage and can confirm that it is Historic England's view that the Council has met the Duty to Cooperate by engaging on an on-going, constructive and effective basis.
- Historic England responded to both Regulation 18 and 19 consultations of the Telford and Wrekin Local Plan review, recommending modifications to policies within the Plan (these have now been agreed in full), as well as the production of Heritage Impact Assessments proportionate at this stage on a small number of sites which may have a detrimental impact upon the setting of adjacent heritage assets.
- The LPA and Historic England have met on an ongoing and constructive basis, namely to discuss the matters raised in Historic England's representations. Thus far the LPA and Historic England have agreed on the Council's suggested modifications to policies within the Local Plan (that address points raised by Historic England) which the Council will put forward to their

Inspector at submission. Historic England are also content that the methodology used produce the HIA's has been in line with Historic England guidance.

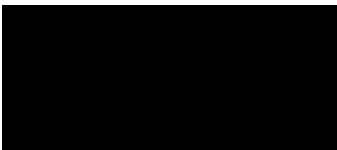
- Historic England are willing to continue discussions with the Council in order to agree a position following the completion of the HIA evidence work requested by Historic England which has been commissioned by the Council. This may result in some further changes to the Local Plan and this is understood by both parties, however it is anticipated that there are no fundamental issues to be resolved regarding the Plan moving forward.

In summary, both parties are pleased to confirm that under the 'Duty to Cooperate' obligations, Historic England have no fundamental issues to raise with the Local Plan.

Kind Regards,



Group Manager - Strategic Planning & Investment



Historic Environment Planning Adviser  
Historic England

## Duty to Cooperate Statement Appendices

### **18 Appendix 18 – Correspondence between Telford & Wrekin Council and Natural England (Position at August 2025)**





[REDACTED]  
Higher Officer - Planning  
West Midlands Team  
[REDACTED]

**BY EMAIL ONLY**

[REDACTED]

 [developmentplans@telford.gov.uk](mailto:developmentplans@telford.gov.uk)

 [telford.gov.uk](http://telford.gov.uk)

 [facebook.com/TelfordWrekin](https://facebook.com/TelfordWrekin)

 [twitter.com/TelfordWrekin](https://twitter.com/TelfordWrekin)

 [REDACTED]

Date: 6<sup>th</sup> August 2025

Our ref: TWLPR-DTC

Your Ref: 506456

Dear [REDACTED],

### **Telford and Wrekin Local Plan review – Duty to Cooperate**

As you will be aware, Telford & Wrekin Council are currently preparing to submit the Local Plan review to the Secretary of State as per the published Local Development Scheme. During the plan making process, the Council has engaged with Natural England at every stage of decision making and liaised with yourselves on sites likely to come forward for development.

Most recently the Council has received a response from Natural England on 5 May 2025 in relation to the Publication Version of the plan (Regulation 19) to which we appreciate you taking the time to engage with us on.

As per your Regulation 19 response, alongside our meeting held on 2 May 2025, we understand that Natural England feel that Telford and Wrekin have met the Duty to Cooperate with regard to the Telford and Wrekin Local Plan review.

We anticipate that this will mean that no Statement of Common Ground will be required between the two parties as the duty has been met and there are no areas of concern from Natural England or the Council. However, we would appreciate a response to this letter to confirm that you are happy with this approach.

Yours sincerely,

[REDACTED]

[REDACTED]

Group Manager - Strategic Planning & Investment



[REDACTED]

---

**From:** [REDACTED] >  
**Sent:** 11 August 2025 16:53  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Duty to Cooperate - TWLP

**CAUTION: This email originated from outside Telford & Wrekin Council's network. Do not click links or open attachments unless you are sure the content is safe.**

Hi [REDACTED]

Thank you for sending through the minutes and responses.

As noted in our response dated the 5 May 2025. Natural England confirms that the Duty to Cooperate has been met with regard those issues within our remit. It is for the LPA and/or the Inspector to decide if a Statement of Common Ground is still required. However, we are satisfied that no outstanding matters remain.

Kind regards

[REDACTED]  
Senior Officer  
Sustainable Development  
West Midlands Team

[REDACTED]  
[REDACTED]  
Direct Dial: [REDACTED]

Follow the West Midlands team on Twitter - [@NE WestMids](#)

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

**Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.**

**These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

---

**From:** [REDACTED] >  
**Sent:** 08 August 2025 11:01

## Duty to Cooperate Statement Appendices

### **19 Appendix 19 – Statement of Common Ground between Telford & Wrekin Council and NHS Shropshire and Telford and Wrekin Integrated Care Board (September 2025)**

# Statement of Common Ground between Telford and Wrekin Council and NHS Shropshire and Telford and Wrekin

Telford and Wrekin Local Plan review  
2020-2040

Position at September 2025



**Telford & Wrekin**  
Co-operative Council

**Protect, care and invest  
to create a better borough**



**Integrated  
Care System**  
Shropshire, Telford and Wrekin



**Shropshire, Telford  
and Wrekin**

## 1. Introduction

This Statement of Common Ground (SoCG) has been prepared by Telford & Wrekin Council ("the council") and the NHS Shropshire, Telford and Wrekin Integrated Care Board ("STW ICB"). The purpose of the SoCG is to document matters agreed with regard to the Telford and Wrekin Local Plan review (2020-2040) to assist the Inspector during the examination of the Local Plan.

STW ICB is responsible for planning and buying a wide range of health and care services for the whole of Shropshire, Telford and Wrekin. These include GP and primary care services, hospital care, community healthcare and mental health services.

The purpose of the Statement is to document the strategic matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and, if appropriate, those matters where work is ongoing to resolve differences. The Statement is intended to be 'live' and updated as circumstances change, and agreement occurs on any outstanding issues. Subsequent comments made on the final draft version of this document by STW ICB clarify where issues have been resolved and where they remain unresolved.

The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Telford and Wrekin Local Plan review. A schedule of meetings held to date has been included within the Duty to Cooperate statement.

In preparing the Telford and Wrekin Local Plan review, the council ran several periods of public engagement on the plan, including; Issues and Options (October 2020 to January 2021), Preferred Options/Draft Plan (Regulation 18) which ran from October 2023 to January 2024, and Publication Stage (Regulation 19) from March to May 2025. The STW ICB submitted representations to both the Issues and Options consultation and the Preferred Options (draft plan) stage. Following the Issues and Options consultation, the council and STW ICB have engaged in quarterly meetings (as of January 2022) to discuss how the proposed residential-led allocations within the plan could impact upon Primary healthcare provision within Telford and Wrekin.



Shropshire and Telford & Wrekin ICB area.

## **2. Purpose and List of Parties Involved**

The parties involved are Telford & Wrekin Council and the STW ICB.

This is a statement of common ground between the parties. The statement provides a record of discussions between the parties and how far this has gone towards resolving issues. Meetings will continue on an ongoing basis if relevant and the statement of common ground may be updated accordingly.

## **3. Strategic Matters and Record of Agreement / Areas of Ongoing Discussion**

### **Infrastructure Delivery**

As the council has progressed with the plan and site allocations have been refined, the council has engaged with the STW ICB to assess and identify the impact of proposed developments on local NHS Primary Care GP provision. STW ICB has been consulted on the content of the Infrastructure Delivery Plan which formed part of the council's evidence base documents for consultation at Publication Stage. As part of this, the STW ICB assessed the likely impact of development on the current Primary healthcare system within Telford and Wrekin with the outcome being a schedule of projects identified as a result of current and future growth. The detail referenced above can be found in the Health and Wellbeing chapter of the IDP document.

STW ICB provided confirmation that there were a number of routes that can be pursued to fund Primary Care GP infrastructure improvements, which could ultimately include, where justified and appropriate, requests for Section 106 contributions.

The parties agree that the IDP provides an appropriate and proportionate assessment of the primary healthcare needs.

Throughout various stages of the plan making process, the ICB have been supportive of policies within the plan, as well as sites suggested for allocation with a view for a schedule of infrastructure requirements to be added to the IDP.

The council has also engaged with, NHS Property Services and contacts who manage Dentist, Optician and Pharmacy Services across Telford and Wrekin. No capacity gap issues were raised by NHS Property Services regarding the Local Plan.

The parties will continue to work jointly to ensure sufficient healthcare infrastructure is provided for through both the development management process, and in any future plan making.

### **Area of ongoing discussion**

Telford & Wrekin Council and STW ICB can confirm that there are currently no further areas of ongoing discussion and all matters have been resolved.

## **4. Duty to Cooperate Agreement**

The parties agree that constructive, active and effective engagement has taken place on strategic matters to date and will continue to do so in the future. The parties recognise that there are currently no outstanding issues and that both will continue to work closely and where relevant with other prescribed bodies on any further issues should they arise.

STW ICB confirm that the Council has met the Duty to Cooperate.

## 5. Signatories and Governance Arrangements

In terms of governance, the authorities agree:

- That in response to any new evidence / changes in circumstances, informal discussions will occur between the parties on the issues referred to in this SoCG in the form of officer level meetings, with escalation to more senior levels where necessary; and
- That this SoCG will be reviewed when required including adding additional issues that may be identified through the Local Plan making process.

### **Telford and Wrekin Council**

Name: 

Position: Group Manager – Strategic Planning, Inward Investment & Business Support

Signature:



Date: 02/09/2025

### **Shropshire and Telford Integrated Care Board**

Name: 

Position: Head of Primary Care and PCN Development

Signature:



Date: 04/09/2025

## Duty to Cooperate Statement Appendices

### **20 Appendix 20 – Duty to Cooperate letter from Telford & Wrekin Council to Sport England (September 2025)**





EMAIL ONLY



Date: 04/09/2025

Our ref: TWLPR-DTC-SE

Your ref: TWLPR-DTC-SE

Dear [REDACTED],

### **Telford and Wrekin Local Plan Review (2020-2040) – Duty to Cooperate – Sport England**

I am writing to you regarding the submission of the Telford and Wrekin Local Plan and the matter of Duty to Cooperate. The Council will shortly be submitting the Local Plan for examination following our most recent consultation which took place earlier this year. As part of this work the Council have been working with statutory bodies, such as Sport England, in order to agree a position on whether the Council have met its 'Duty to Cooperate'.

We are writing to confirm that following your Regulation 19 submission, and subsequent meeting to discuss this, the Council have proposed modifications in line with feedback from Sport England. Modifications which are relevant to the submission that Sport England made at Regulation 19 are enclosed alongside this letter, for agreement.

Particular note should be given to housing allocation HO26 which the Council has taken the decision to remove in the absence of a Ball Strike Risk Assessment. The Council consider that there is sufficient uncertainty around the potential for the site to deliver the stated housing figure of 19 units and at this stage the Council are not able to secure an assessment on the site. Therefore the following modification has been made:

*Housing site HO26 to be removed from the plan as a result of concern raised by Sport England in relation to the need to assess risk of ball strike to inform the level of housing. The Council support the delivery of the site in principle and as such the land has re-allocated as 'white land' on the submission policies map to allow the site to come forward as windfall development.*

The Council welcome the engagement with Sport England and confirmation that there are no fundamental issues to moving towards submission of the Local Plan.

In addition to this, the Council are committed to keeping the Infrastructure Delivery Plan (IDP) as a 'live' document, which is referenced within the IDP. Therefore, as agreed between both parties, the Council will update the IDP in line with the Playing Pitch and Outdoor Recreation Strategy upon adoption which is expected during the autumn of 2025.



I would be grateful if you could please confirm the following by return of letter;

- Telford & Wrekin Council have met the Duty to Cooperate and engaged, constructively, effectively and on an ongoing basis with your organisation to identify and address potential issues.
- Your organisation agrees the modifications suggested by Telford & Wrekin Council which will be submitted to the Inspector.
- There are no other issues that require a separate SoCG between your organisation and Telford & Wrekin Council.

We will inform you once the Council has formally submitted the Local Plan to the Planning Inspectorate. I would very much welcome receipt of the above information by Wednesday 10 September.

Yours sincerely,



[Redacted Name]

Group Manager – Strategic Planning, Inward Investment and Business Support

## Duty to Cooperate Statement Appendices

### **21 Appendix 21 – Duty to Cooperate letter from Sport England to Telford & Wrekin Council**

Telford and Wrekin Council

FAO [REDACTED]

17<sup>th</sup> September 2025

**Telford and Wrekin Local Plan Review (2020-2040) – Duty to Co-Operate – Sport England**

On behalf of Sport England, I can confirm that we are able to agree to contents of the attached letter dated 4<sup>th</sup> September 2025 and the associated proposed minor modifications table. We are pleased to note the various minor mods proposed to address the various points raised.

The only outstanding matter, as referenced in the mods table relates to the point regarding the existing playing field within the Muxton allocation, for which you are making further enquiries with the land owner. I assume you will get back to me separately in due course on this point. Subject to acceptably resolving this point, we agree that all other modifications can be agreed and that at this time it would not seem necessary to prepare a SoCG between us. We are pleased to note the removal of housing site HO26, a sensible step given the uncertainty regarding ball strike risk.

I trust this is sufficient to allow you to move forward with the Plan to submission, but if you need anything further from me, please let me know.

Kind regards,

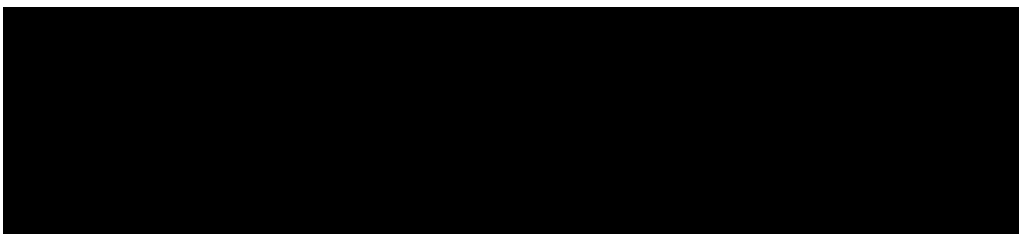
Yours Sincerely,

[REDACTED]

Principal Planning Manager, North Team

E: [REDACTED]

T: [REDACTED]



## Duty to Cooperate Statement Appendices

### **22 Appendix 22 – Statement of Common Ground between Telford & Wrekin Council and National Highways (September 2025)**

# Statement of Common Ground between Telford and Wrekin Council and National Highways

Telford and Wrekin Local Plan review  
2020-2040

Position at September 2025



**Telford & Wrekin**  
Co-operative Council

**Protect, care and invest  
to create a better borough**



## **Telford & Wrekin Council and National Highways**

### **1. Introduction**

This Statement of Common Ground (SoCG) has been prepared by Telford & Wrekin Council ("the Council") and National Highways ("NH"). The purpose of the SoCG is to document matters agreed with regard to the Telford and Wrekin Local Plan review (2020-2040) to assist the Inspector during the examination of the Local Plan.

National Highways is the government company charged with operating, maintaining and improving England's motorways and major A roads. Within the Telford and Wrekin area, National Highways principal interest is safeguarding the operation of and safety of the M54 and the small section of the A5 through the Plan area.

The purpose of the Statement is to document the strategic matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and, if appropriate, those matters where work is ongoing to resolve differences. The Statement is intended to be 'live' and updated as circumstances change, and agreement occurs on any outstanding issues. Subsequent comments made on the final draft version of this document by NH clarify where issues have been resolved and where they remain unresolved.

The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Telford and Wrekin Local Plan review. A schedule of meetings held to date has been included within the Duty to Cooperate statement.

In preparing the Telford and Wrekin Local Plan review, the council ran several periods of public engagement on the plan including; Issues and Options (October 2020 to January 2021), Preferred Options/Draft Plan (Regulation 18) which ran from October 2023 to January 2024, and Publication Stage (Regulation 19) from March to May 2025. National Highways submitted representations to both the draft plan (Regulation 18) consultation and the Publication Version consultation (Regulation 19).



National Highways Strategic Road Network

## **2. Purpose and List of Parties Involved**

The parties involved are Telford & Wrekin Council and NH.

This is a statement of common ground between the parties. The statement provides a record of discussions between the parties and how far this has gone towards resolving issues. Meetings will continue on an ongoing basis if relevant and the statement of common ground may be updated accordingly.

## **3. Strategic Matters and Record of Agreement / Areas of Ongoing Discussion**

### **Infrastructure Delivery**

The Council shared an early version of sites possible for allocation in July 2023, ahead of the draft plan consultation. Acknowledgment of this information being shared was received by the Council, however no feedback at this time was given by National Highways.

Following this, NH provided the council with a response to the draft plan consultation on 8 January 2024. Within the response NH highlighted a number of sites which caused them some concern with regard to the Strategic Road Network (SRN) and advised that Transport Assessments would be required. NH however were generally supportive of the plan at this time and welcomed continued communication on the Local Plan review.

During the draft plan consultation, the Council commissioned a Transport Modelling report to support the Local Plan's evidence base. This worked off the TSTM which National Highways had an involvement with the auditing and believes it is a suitable tool for the strategic assessment of developments. The model has a Base Year of 2019 and has been calibrated and validated in line with TAG guidance. Forecast Year models have been developed for 2024, 2031 and 2039 (which are suitable interim dates relating to the Local Plan Period which runs from 2020-2040), for AM, Inter Peak and PM peak hours. The Transport Modelling then looked to forecast to 2039 by adding in the level of development proposed within the Local Plan review.

Again, NH were consulted on the process undertaken when commissioning the Transport Modelling for the Local Plan and confirmed that they were happy with the method used from sensitivity testing to mitigation testing. In addition, NH were then able to confirm that there was no concern over there being unacceptable impacts on the SRN due to additional development.

In the Regulation 19 response the Council received from NH, it was stated that continued engagement was encouraged which the Council agrees with as well as welcoming individual sites engaging with NH regarding transport assessments etc.

National Highways are in agreement that the Duty has been met by the council and welcomes further communication with the Council into the future and will provide support where required in developing a new TSTM and/or looking into possible funding streams required for highways projects within the Infrastructure Delivery Plan.

### **Area of ongoing discussion**

Telford & Wrekin Council and NH can confirm that there are no further areas of ongoing discussion and all matters have been resolved.



## **1. Duty to Cooperate Agreement**

The parties agree that constructive, active and effective engagement has taken place on strategic matters to date and will continue to do. The parties recognise that there are no outstanding issues and that both will continue to work closely and where relevant with other prescribed bodies on any further issues should they arise.

NH confirm that the Council has met the Duty to Cooperate.

## **2. Signatories and Governance Arrangements**

In terms of governance, the authorities agree:

- That in response to any new evidence / changes in circumstances, informal discussions will occur between the parties on the issues referred to in this SoCG in the form of officer level meetings with escalation to more senior levels where necessary; and
- That this SoCG will be reviewed when required including adding additional issues that may be identified through the Local Plan making process.

### **Telford and Wrekin Council**

Name: 

Position: Group Manager – Strategic Planning, Inward Investment & Business Support

Signature:



Date: 02/09/2025

### **National Highways**

Name: 

Position: Spatial Planner

Signature:



Date: 02/09/25

## Duty to Cooperate Statement Appendices

### **23 Appendix 23 – Duty to Cooperate letter from the Local Highways Authority (Strategic Transport) (September 2025)**



EMAIL ONLY



Date: 4 September 2025

Our ref: TWLPR-DtC

Your ref: TWLPR-DtC

Dear [REDACTED],

**Telford and Wrekin Local Plan Review (2020-2040) – Duty to Cooperate – Local Highways Authority**

I am writing to confirm that the Council acting as the Local Highway Authority (LHA) have no significant issues to raise regarding the Local Plan 2020-2040 ahead of submission to the Secretary of State. This has been confirmed as a result of the joint commissioning of the traffic modelling using the Telford Strategic Transport Model (TSTM), which has helped in identifying locations on the highway network which will require mitigation due to the cumulative impacts of proposed residential, employment and mixed-use development. Going forward it will be vital for the Council to continue to secure developer contributions as new development comes forward. The Council will aim to continue to achieve its successful track record of securing central government funding for major infrastructure projects.

The TSTM has also been reviewed by National Highways in relation to their responsibility of the Strategic Road Network by assessing the possible impacts in the SRN. Throughout the production and development of the Local Plan review (2020-2040) council officers have worked closely with National Highways and have secured their support for the methodology used to assess the impact of development on the highway network. The LHA and Local Planning Authority (LPA) have shared a full set of evidence documents including the results of the TSTM. NH in return have responded to the LPA's consultations both at Regulation 18 and 19 as part of meeting the two organisations 'Duty to Cooperate' obligations and confirmed that the Council have met the Duty.

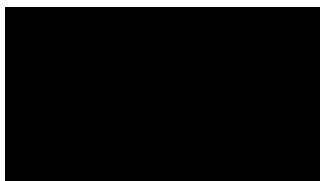
I can also confirm that the LHA support the inclusion of highway schemes within the Infrastructure Delivery Plan and have, to further support the Local Plan review submission, produced a review of the Transport Growth Strategy which sets out the long term plan for delivery of sustainable transport and highway infrastructure in support of the Local Plan review. This is also supported by our adopted Local Cycling and Walking Infrastructure Plan and Bus Service Improvement plan that will underpin sustainable transport choices for new developments.

In addition, the LHA and LPA will work with developers to secure contributions towards identified infrastructure projects using an appropriate framework.



The LHA look forward to working in partnership with colleagues in planning to help deliver the Local Plan. In summary, I am pleased to confirm that under the 'Duty to Cooperate' obligations, the LHA have no fundamental issues to raise with the Local Plan.

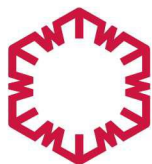
Yours sincerely,



Service Delivery Manager – Strategic Transport & Highway Network Management

## Duty to Cooperate Statement Appendices

### **24 Appendix 24 - Duty to Cooperate letter from the Local Highways Authority (Development Control) (September 2025)**



EMAIL ONLY



[REDACTED]



telford.gov.uk



facebook.com /TelfordWrekin



twitter.com /TelfordWrekin



[REDACTED]

09 September 2025

Our ref: DtC LP 09/25 Your ref: DtC-LHA-DC

Dear [REDACTED],

### **Telford and Wrekin Local Plan Review (2020-2040) – Duty to Cooperate – Highways Development Control**

I am writing to confirm that the Council's Highways Development Control (DC) team have no material issues to raise regarding the Local Plan 2020-2040 ahead of submission to the Secretary of State. This has been confirmed as a result of ongoing, constructive and effective engagement with our colleagues, the Local Planning Authority (LPA) and the Strategic Transport Team. Going forward it will be vital for the Council to continue to secure developer contributions and offsite highway infrastructure works under S.278, as new development comes forward. In addition to this the Council will aim to continue to achieve its successful track record of securing central government funding for major infrastructure projects.

The LPA has engaged with Highways DC on an ongoing basis which has enabled both teams to work together on assessing sites which have come forward for consideration through the 'Call for Sites' process, all the way through to the proposed allocations ahead of submission of the Plan. Highways DC have provided the Local Planning Authority with comments for each site, excluding the Sustainable Urban Extensions, to be considered by the team during site selection.

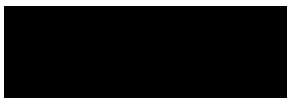
I can also confirm that Highways DC recognise the inclusion of highway schemes within the Infrastructure Delivery Plan, prepared by the Councils Strategic Transport Team, and have, to further support the Local Plan review submission, recognised the review of the Transport Growth Strategy, which sets out the long term plan for delivery of sustainable transport and highway infrastructure in support of the Local Plan review. I am of the understanding also that the infrastructure requirements will be kept under review by the Strategic Transport Team, as part of the continued development of the Telford Strategic Transport Model, where it will be updated periodically with the latest input data available.

In addition, Highways DC have engaged with the Local Highway Authority and LPA to advise on an appropriate framework for securing developer contributions or S.278 obligations towards delivering identified infrastructure projects.



Highways DC look forward to working in partnership with colleagues in planning to help deliver the Local Plan. In summary, I can confirm that under the 'Duty to Cooperate' obligations, I have no fundamental issues to raise with the Local Plan at this time.

Yours sincerely

A large black rectangular redaction box covering the signature of the Highways Development Manager.A small black rectangular redaction box covering the name of the Highways Development Manager.

Highways Development Manager

## Duty to Cooperate Statement Appendices

### **25 Appendix 25 – Duty to Cooperate letter from the Lead Local Flood Authority (LLFA) (September 2025)**





**Telford & Wrekin**  
Co-operative Council

**Protect, care and invest  
to create a better borough**



Date: 10/09/2025

Our ref:

Your Ref:

Dear [REDACTED],

### **Telford and Wrekin Local Plan Review (2020-2040) – Duty to Co-operate – Lead Local Flood Authority**

I am writing to confirm that the Council acting as the Lead Local Flood Authority (LLFA) have no significant issues to raise regarding the Local Plan 2020-2040 ahead of submission to the Secretary of State. We have been in close discussions with the Local Planning Authority (LPA) and their consultants at JBA Consulting in the development of the Strategic Flood Risk Assessment evidence documents. These documents reflect our understanding of flood risk priorities in the Borough and our aspirations for how flood risk is managed in future housing allocations, considering the cumulative impacts of any proposed development.

As identified in the Infrastructure Delivery Plan, the LLFA has also been collaborating with the LPA and Severn Trent Water, as the incumbent sewerage undertaker, around Strategic Infrastructure projects which could be required as additional development comes forward. Notably, the majority of discussions and work have been focused on existing strategic drainage infrastructure to the North of Telford, The Northern Interceptor Channel. This channel will have a key part to play in the next phases of land allocation in the Plan and we will remain engaged with the LPA and other stakeholders, such as the Strine Internal Drainage Board, to ensure that this section of strategic drainage infrastructure is fit for purpose.

The LLFA look forward to working in partnership with colleagues in planning to help deliver the Local Plan as proposals come forward. In summary, I am pleased to confirm that under the 'Duty to Cooperate' obligations, the LLFA have no fundamental issues to raise regarding the Local Plan.

Yours sincerely,

[REDACTED]

[REDACTED]

Service Delivery Manager – Highways, Engineering & Project Delivery



## Duty to Cooperate Statement Appendices

### **26 Appendix 26 – Duty to Cooperate letter from National Grid Electricity Distribution (NGED) (August 2025)**

National Grid Electricity Distribution

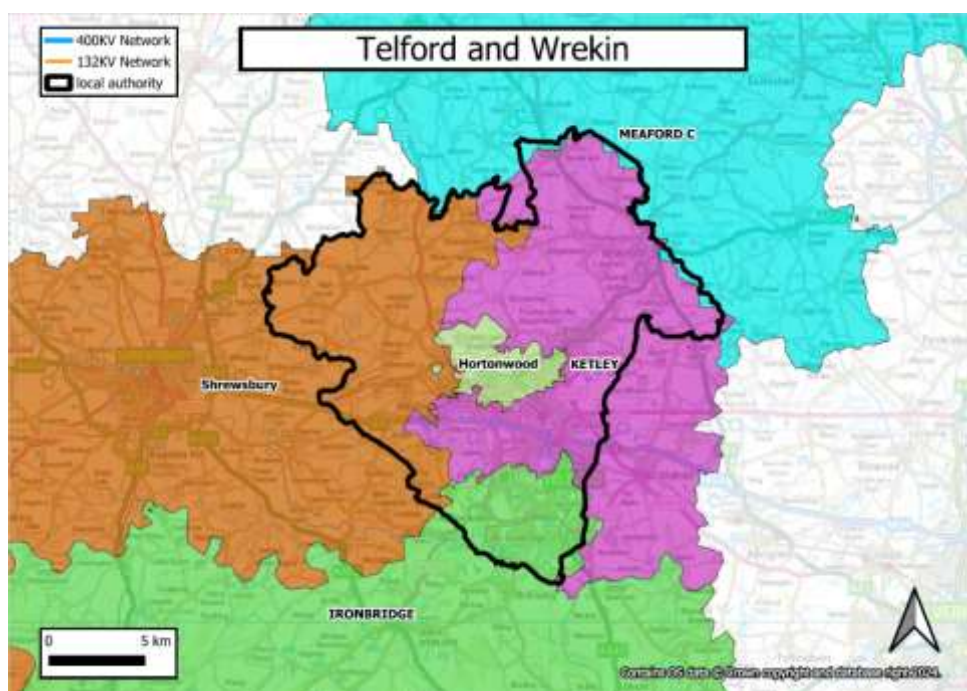
28 August 2025

To whom it may concern

**Re: Letter to confirm Duty to Cooperate has been met by Telford & Wrekin Council**

We are writing to confirm that the Council have cooperated with National Grid Electricity Distribution successfully throughout the course of the Local Plan review preparation.

National Grid Electricity Distribution (NGED) are the electricity distribution network for Telford and Wrekin. The current NGED Business Plan, RIIO ED2, details the delivery plan for the period 2023 – 2028 and during this plan, NGED will be investing £7.5 billion in network development in the West Midlands area. This includes expenditure to maintain, extend and reinforce their network, enabling the connections of millions of low carbon technologies and small scale generation to support local and national decarbonisation.



Electricity supply to Telford &amp; Wrekin

Telford and Wrekin is predominately supplied from the Ironbridge and Shrewsbury Grid Supply Points (GSPs). Ironbridge is a 132 kV Grid Supply Point (GSP) that runs in parallel at 132 kV with Shrewsbury GSP. The group supplies the majority of Bridgnorth, Telford, and parts of Shropshire areas, connecting over 158,000 customers. The network comprises of a couple of 132 kV circuits that connect the two GSPs together including four Bulk Supply Points (BSPs) which in turn supply multiple primary substations and Extra High Voltage (EHV) customers. A very small section (in purple) is supplied by the Cellarhead GSP.

The Government is committed to achieve net zero by 2050. The shift towards electricity to heat our homes and power our cars is critical to achieving this goal and NGED is playing a crucial role in meeting this commitment by increasing capacity to meet the growing demand for electricity.

Our network investment planning process is the strategic approach we are taking to investing the electricity network, ensuring that it can meet future demand in the right place, at the right time while ensuring good value for money for customers.

To ensure NGED can provide the network that Telford and Wrekin need, the Council have engaged with us regularly and on an annual basis include their future housing and employment projects on NGED's Distribution Future Energy Scenarios (DFES) planning exercise. NGED use this information to forecast the future requirements on the electricity network and decide when and where to invest. This ensures that NGED are able to provide sufficient network capacity as the country transitions to net zero.

Once NGED have forecast future demand, this is published as our Network Development Plans which show where and when network reinforcement is needed. The Network Development Plan for Telford and Wrekin includes Telford and Wrekin's growth plans in the adopted and emerging local plans. Our Network Development Plans are refreshed every 2 years and include the most up to date information provided to us by the council.

We are currently starting to work on our RII0-ED3 business plan which will cover 2028 – 2032 and the data used to inform that plan will include information shared by Telford and Wrekin.

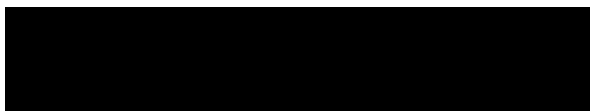
The council meet regularly with NGED to discuss any changes to their plans and submit their data to NGED annually so are assured that the work and investment taking place on the electricity network aligns with their plans. NGED also inputted into the Infrastructure Delivery Plan which we can confirm that we agreed on the relevant contents of the document for electricity provision.

In our response provided to the Council with regard to their Regulation 19 consultation, our constants (Lucy White Planning) highlighted that we would encourage the LPA and developers to engage with NGED early on in the plan making process to ensure that existing infrastructure could be accommodated on site or whether alternative options would need to be assessed. Comments were mainly in connection with SC2 and SC3 due to the presence of overhead power lines on both sites. Early master planning is encouraged which NGED are satisfied that the Council has advised the developers on.

The Council also initiated meetings with our organisation and the three development consortiums leading on the Sustainable Communities sites in the borough. This was welcomed by NGED by way of instigating meaningful and constructive dialogue between parties at the allocation stage in the plan making process.

In summary, we are pleased to confirm that under the 'Duty to Cooperate' obligations, NGED have no fundamental issues to raise with the Local Plan.

Kind regards



Regional Decarbonisation Manager