

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

**Statement of Common Ground Regarding Housing Shortfall
updated to reflect the position at September 2025.**

OFFICER AGREED VERSION

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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 This SoCG updates the first SoCG published in November 2024, which accompanied the examination hearings of the Cannock Chase, South Staffordshire, Sandwell and Dudley local plans. This document reflects the status of local plans as of September 2025, in accordance with guidance that requires SoCGs are kept up to date and to support the forthcoming Telford and Wrekin and Wolverhampton local plan examination hearings.

1.3 The Cannock Chase local plan was prepared under the NPPF (as of September 2023), and the South Staffordshire, Sandwell, Dudley and Wolverhampton plans have been prepared under the December 2024 NPPF Transitional Arrangements, which effectively permitted plans to proceed using the December 2023 NPPF. All other plans are proceeding using the December 2024 NPPF, including the Telford and Wrekin Local Plan, which was submitted for examination in September 2025.

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

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

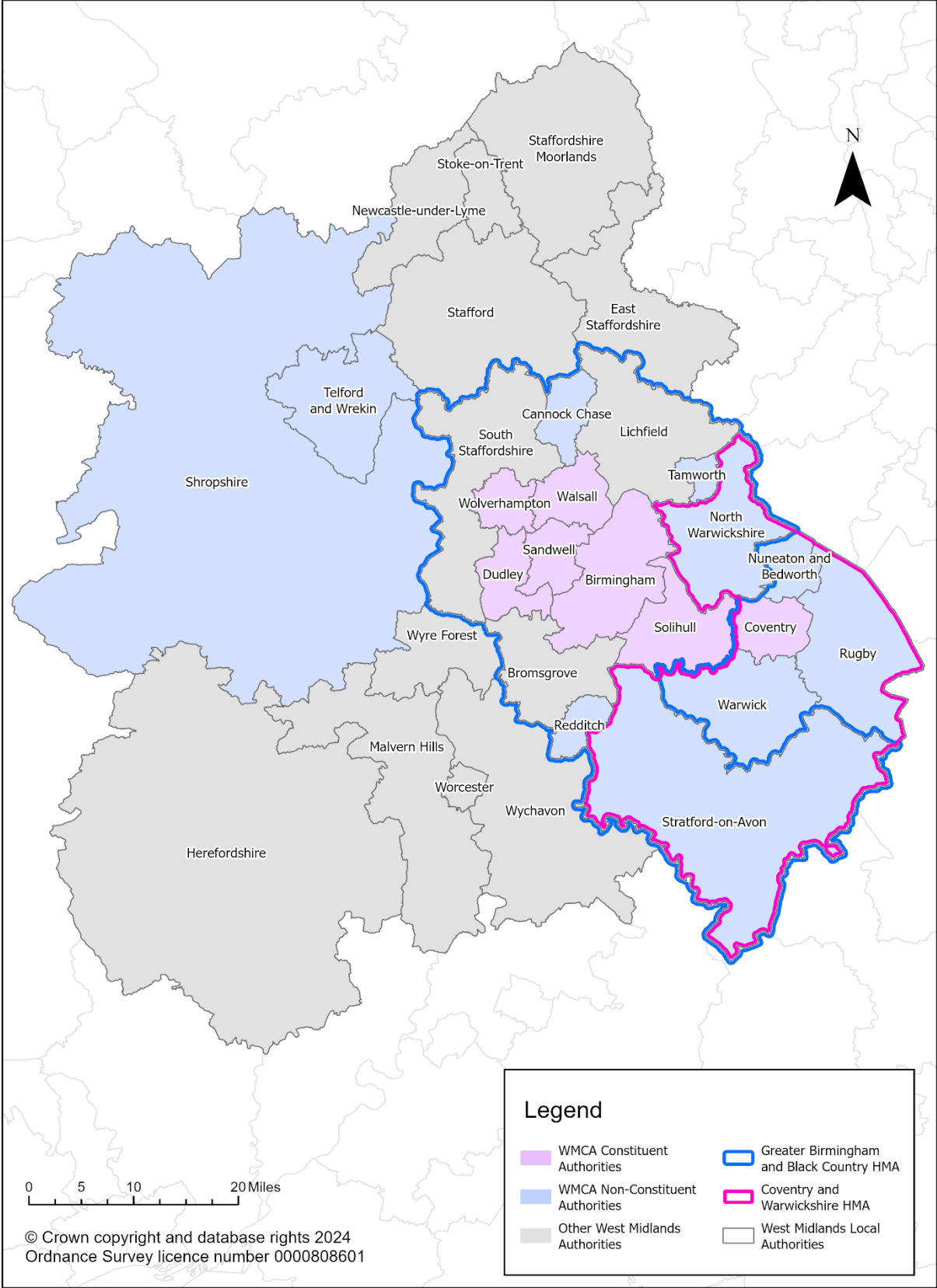
¹ Figure 1 – map showing boundaries of: “Greater Birmingham and Black Country HMA”; “Coventry & Warwickshire HMA”

- Solihull Metropolitan Borough Council
- South Staffordshire District Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council

Other related local planning authorities outside of the GBBCHMA

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

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



2. Signatories to this Statement of Common Ground:

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

3. Strategic Geography

- 3.1 The Greater Birmingham and Black Country Housing Market Area (GBBCHMA) comprises 14 local authorities: Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford-on-Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council.
- 3.2 This geography was defined through the published study commissioned from Peter Brett Associates (now Stantec) in accordance with guidance at the time based on analysis of migration flows and commuting patterns and was subsequently endorsed by all authorities².
- 3.3 As part of the review of the Birmingham Development Plan (BDP), which will be known as the Birmingham Local Plan (BLP), Birmingham City Council tested whether this geography

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

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

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

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

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

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

- 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 SoCG is to demonstrate the status of Local Plans of the signatory authorities with respect to local housing need calculated using the standard method in the version of national planning practice guidance applicable at the time of submission for examination. It sets out the degree to which each Local Plan either has an evidenced forecast housing shortfall, or can accommodate local housing need plus shortfalls arising in other areas. This SoCG sets out the approach by which those contributions are apportioned to the shortfall areas, to provide certainty for local plan preparation, in accordance with agreements reached to date between the GBBCHMA local authorities.
- 3.11 The November 2024 SoCG recognised that publication of a replacement NPPF and planning practice guidance (expected in December 2024) might change the nature and extent of shortfalls and contributions across the HMA and necessitate changes to the SoCG. As of September 2025, however, only the Telford and Wrekin Local Plan had been submitted for examination under the 2024 NPPF. It is only at the Regulation 19 stage that any contributions or shortfalls have certainty, until then they are subject to change. Therefore, it is not appropriate for this iteration of the SoCG to include universal indications of shortfalls and contributions relative to the 2024 NPPF standard method.

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 contribution towards unmet housing 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 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 need 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 of approximately 46,000 dwellings. As of September 2024, Birmingham's latest published shortfall estimate remained 46,000, although it was acknowledged that Birmingham's local housing need figure fell significantly following publication of the 2024 NPPF. The revised Local Development Scheme states that further Regulation 18 consultation will take place in November / December 2025, which will take account of the 2024 NPPF.

Bromsgrove Local Plan

- 4.6 The current Plan was adopted in 2017. A Regulation 18 Draft Development Strategy (June 2025) identified a need for 12,155 homes, it also identified approximately 3,000 commitments (planning permissions and site allocations), whilst identifying potential capacity for a further 9,280 homes. This gives a total estimated capacity for 12,280 homes; this will be refined as the local plan progresses. The new Plan will be prepared under the new planning system.

Cannock Chase Local Plan

- 4.7 The current Plan was adopted in 2014. The Council commenced work on the new Local Plan in 2018 and considered contributions to unmet need on the basis of scenarios set out in the Strategic Growth Study. The Council consulted on its Regulation 19 Plan in February – March 2024. The Plan include provision for 6,308 homes between 2018 – 2040. This scale of development will provide for the district’s own housing need and a contribution towards the GBBCHMA shortfall of 500 homes.
- 4.8 The Council submitted its Publication Plan for Examination on 29th November 2024 and examination hearings were completed in July 2025. 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 and this was submitted for examination in February 2025. Hearings commenced in June 2025 with further Hearings programmed for October 2025. 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 to 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; the position is unchanged since the first SoCG.

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. A revised Local development Scheme was published in February 2025 and anticipated a Regulation 18 Issues and Options Plan during Spring 2025.

Redditch Local Plan

- 4.14 The current Plan was adopted in 2017. A Regulation 18 issues and Options document (May 2025) identified a need for 8,843 homes by 2043. When commitments are accounted for the residual need is 3,900 homes and the document sought views on broad strategic options to address this. 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). The plan was submitted for examination in December 2024 and examination hearings are scheduled to be completed by October 2025.

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. The plan was formally withdrawn in July 2025 following advice from the examining inspectors, consequently the 1,500 home contribution has been withdrawn and removed from table 1 of this updated SoCG. 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 this need within its administrative boundary.

Solihull Local Plan

- 4.18 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. The latest published Local Development Scheme (December 2024) states a plan period 2026 – 2043 and anticipates a Regulation 18 Preferred Options document will be published in Autumn 2025.

South Staffordshire Local Plan

- 4.19 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.
- 4.20 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 shortfalls of 640 homes.
- 4.21 The plan was submitted for examination in December 2024 and hearings commenced in May 2025 and are ongoing. An agreed approach to how the contribution will be apportioned amongst the GBBC HMA local authorities is set out in Section 5 of this SoCG.

South Warwickshire Joint Local Plan

- 4.22 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) took place January – March 2025. This stated that, over a 2025 – 2050 plan period (based on the 2024 standard method), Stratford had a housing need of 28,150 with a shortfall of 13,338 to be accommodated, and a range of potential options were put forward for consideration. At the time of this update a Regulation 19 Publication Plan is expected by December 2025.

Tamworth Local Plan

- 4.23 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.

- 4.24 A review of the adopted plan commenced 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.
- 4.25 An updated Local Development Scheme (2025) states that a Regulation 19 Publication Local Plan will be published during February / March 2026. The housing need set out in the 2022 issues and options consultation was based on the previous standard method. The latest standard method (December 2024) increased Tamworth's housing need from 123 per annum to 445. Given the aforementioned physical constraints, Tamworth's shortfall is likely to increase significantly.

Telford & Wrekin Local Plan

- 4.26 The 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. As part of the Regulation 18 plan Telford & Wrekin Council recognised the need to contribute towards the unmet housing needs of the four Black Country Local Planning Authorities (BCAs). The Regulation 19 Publication Plan was consulted on from March 2025 until 5 May 2025 for comments on matters of soundness.
- 4.27 The Publication Plan housing requirement is 20,200 dwellings over the Plan period of 2020 – 2040, which is equivalent to 1,010 dwellings per annum. This housing requirement is based on local housing need of 857 dwellings per annum, which reflects the standard method figure at the time of publication plus a contribution of 153 dwellings per year (3,060 dwellings over the plan period) towards part of the unmet housing need of the BCAs. An agreed approach to apportioning this contribution between the four BCAs is set out in Section 5 of this SoCG.

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. -an updated Local Development Scheme was published in January 2025 with a Regulation 18 Preferred Options scheduled for autumn 2025. The aborted joint Black

Country Plan identified a shortfall of 3,414 homes in Walsall and this will be reevaluated through the local plan review process. Unlike the other Black Country Authorities Walsall is preparing its plan under the 2024 NPPF without recourse to the transitional arrangements, consequently its housing need will be much higher.

Wolverhampton Local Plan

- 4.29 The current joint Core Strategy (Black Country Core Strategy) covering the BCAs was adopted in 2011. Work commenced on a review, called the Black Country Plan, in 2017. In October 2022, following a statement by the Leaders of the BCAs, work ceased on 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, the housing requirement is 9,330 homes and therefore the shortfall for the period 2024-42 is 10,398 homes. The plan was submitted for examination in March 2025, and the council had responded to the inspector's initial queries as of September 2025.

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 Housing Shortfalls and Contributions

- 4.32 Table 1 below provides a summary of the emerging housing shortfalls and contributions for the period up to 2042, as of September 2025, for each signatory authority. This shows that there are currently shortfalls for Birmingham, Dudley, Sandwell, Walsall and Wolverhampton. These shortfalls, as evidenced in the Regulation 18 and Regulation 19 Local Plans, total approximately 76,427 homes.
- 4.33 Alongside this, -contributions have been offered towards the shortfalls. These contributions (in table 1) are made specifically towards: the 2017 Birmingham Development Plan (North Warwickshire and the emerging Black Country Local Plans' unmet needs and arise from Telford & Wrekin, South Staffordshire and Cannock Chase). The unmet need in the adopted Tamworth Local Plan (2016) has been addressed through further contributions in the adopted Lichfield and North Warwickshire Local Plans (see paragraphs 4.13 and 4.24).

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

Local Plan	Status	Total housing shortfall / contribution to GBBCHMA unmet needs (net homes)	Plan period
Contributing Authorities			
North Warwickshire	Adopted 2021	+3,790 Contribution specifically for Birmingham Development Plan unmet need (2017),	2014-2033
Potential Contributing Authorities			
South Staffordshire	Regulation 22 Submission, December 2024	+640 Contribution specifically for GBBCHMA unmet needs	2023-2041
Cannock Chase	Regulation 22 - Submission November 2024	+500 Contribution specifically for GBBCHMA unmet needs	2018 – 2040
Telford & Wrekin	Regulation 22 Submission September 2025	+3,060 Contribution specifically for Black Country unmet needs	2020-2040
Authorities with an evidenced unmet housing need			
Birmingham *	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 stage	2023 – 2042
Dudley	Regulation 22 Submission, February 2025	Shortfall of - 699 at Regulation 19 Stage	2024-2041
Sandwell	Regulation 22 Submission, December 2024	Shortfall of - 15,916 at Regulation 19 Stage	2024-2041
Walsall *	Regulation 18 Black Country Plan published August 2021	Shortfall of -3,414 at Regulation 18 Stage	2020 - 2039
Wolverhampton	Regulation 22 Submission, March 2025	Shortfall of – 10,398 at Regulation 19 Stage	2024-2042

* This reflects the formal published position of the Walsall and Birmingham local plan reviews as of September 2025. Both the local housing need and housing requirement figures

will change as a consequence of the 2024 NPPF when the next iteration of the local plan is published.

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 where possible. Based on the published evidence to date, there is evidence of a shortfall of 76,427 homes to 2042 (although the end year for some plans is earlier) as demonstrated in Table 1 above. Since the first SoCG was published, plans have progressed through the examination process where shortfalls and contributions have been examined alongside whether Duty to Cooperate requirements have been met. As of September 2025, other than the Shropshire Local Plan, no formal indication has been given by Inspectors that local plans should not proceed.

5.2 Engagement to date (September 2025) has primarily taken place through direct Duty to Cooperate discussions between individual local authorities and the GBBCHMA Development Needs officer group. As a result of this engagement, contributions towards the unmet needs of emerging plans for the Black Country Authorities and Birmingham have been made as shown in Table 1. This SoCG sets out an agreed position on how the contributions will be apportioned to those GBBCHMA local authorities which have a demonstrated shortfall, and it will be updated as plans progress

5.3 This SoCG sets out an agreed approach between the contributing authorities (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 i.e. 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 for this approach is migration data available from ONS⁴, which is based on a combination of administrative data taken from the National Health Service Central Register, the Patient Register Data System and the Higher Education Statistics Agency

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

- 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 SoCG 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.

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

Contributing LA	Local Plan Contribution	Birmingham		Dudley		Sandwell		Walsall		Wolverhampton	
		% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution	% of Net Flow	Potential Contribution
Cannock Chase	500	19%	95	3%	16	12%	62	53%	263	13%	63
South Staffordshire	640	3%	21	24%	153	11%	71	25%	161	37%	234
Telford & Wrekin	3,060	0%	0	15%	462	18%	553	23%	701	44%	1344
Total	4,200		116		631	-	686		1,126	-	1,641

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. A refresh of the 2018 Strategic Growth Study was commissioned in early 2025 and will take account of the 2024 NPPF including the revised 'dwelling stock based' standard method for calculating housing need, at present only the Telford and Wrekin local plan has reached the Regulation 19 stage and uses the new method, all other plans currently under examination are using the previous 'household based' standard method for calculating housing need ⁵

7. Areas of agreement

- 7.1 The areas of agreement to be agreed by signatories of this statement of common ground relate to agreement on the contributions made to the GBBCHMA (including those offers made expressly to the Black Country Authorities) and agreement of the distribution and apportionment of the contributions will be made to the receiving authorities as set out in Section 5 and Table 2 of this statement.
- 7.2 The GBBCHMA commissioned an update to the 2018 Strategic Growth Study in January 2025 to inform future local plan reviews and strategic planning activity.
- 7.3 This SoCG will be reviewed and updated when any of the following take place: the unmet need of any local authority changes; a new contribution is offered towards any unmet needs or such contributions change.

8. Signatories to the Statement of Common Ground

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

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

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

<u>Stratford-on-Avon District Council</u> Name: Position: Date:	<u>Tamworth Borough Council</u> Name: Position: Date:
<u>Walsall Metropolitan Borough Council</u> Name: Position: Date:	<u>City of Wolverhampton Council</u> Name: Position: Date:
<u>Shropshire Council</u> Name: Position: Date:	<u>Telford and Wrekin Council</u> Name: Gavin Ashford Position: Group Manager – Strategic Planning, Inward Investment & Business Support Date:
<u>Wyre Forest District Council</u> Name: Position: Date:	

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

Local Plan	Local Plan Contribution	Total Net - Migration 2011- 2019						Percentage (%) Total Net Migration					Net Migration Flows based Distribu				
		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
North Warwickshire	640	-637	-4689	-2180	-4942	-7177	-19625	3%	24%	11%	25%	37%	21	153	71	161	234
South Staffordshire	3060	0	-634	-758	-962	-1843	-4197	0%	15%	18%	23%	44%	0	462	553	701	1344
Telford and Wrekin	4200	-1970	-5551	-3810	-9608	-9912	-30851						116	631	686	1126	1641

Source: Migration flows 2011 – 2019 ONS [Internal migration in England and Wales - Office for National Statistics \(ons.gov.uk\)](#)