

Prescribed Body / Local Authority	Method of Engagement	Topics Discussed	Impact on the Plan
National Highways; Black Country Transport	Evidence for IDP – DEL /001	<p>Existing highway capacity constraints and the overarching objective of transport stakeholders to encourage and enable a shift to more sustainable transport requires an integrated network management approach to make the most of existing assets to facilitate growth.</p> <p>The availability of active travel provision should also be a key factor informing site selection decisions and when considering infrastructure provision across settlements more widely. The key consideration for the new Local Plan should therefore be to ensure that new development is designed to promote active travel as a genuinely viable alternative to the car, particularly for shorter journeys. This can be achieved through suitable policy in the Local Plan, by securing developer contributions and encouraging consistency in the quality and design of networks to ensure piecemeal delivery can contribute to a coordinated network.</p>	<p>Policy SID1 requires all new developments to be supported by the necessary on and off-site infrastructure and that they will be secured through various means. The introduction to the Transport Chapter identifies the importance of regional and national networks and improving connectivity. Policy STR5 incorporates provision for enhancing and extending networks where possible.</p> <p>Policy SDS5 – Achieving Well-designed Places. Point 7 of this policy asks for transport proposals to be of a high quality design to facilitate permeability and accessibility</p>
	Evidence for IDP – DEL / 002	National Highways has expressed a desire to work collaboratively with the Council to identify improvement measures for Junctions 1 and 2 of the M5, as set out in draft Policy STR1.	<p>No specific transport-related constraints have been identified on the planned levels of growth as the majority of the growth is proposed to be accommodated on smaller scale brownfield sites.</p> <p>For both the local and strategic road network this means drawing upon the modelling outputs and working collaboratively with National Highways and other neighbouring highway authorities to determine the most effective forms of mitigation and testing</p>

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			their likely effectiveness and deliverability.
	Issues and Options Consultation – SUB 010	<ul style="list-style-type: none"> <li>• Raised concerns about the Transport Modelling Report; Require individual and cumulative impact of any large developments in close proximity to the SRN;</li> <li>• Request a Strategic Transport Assessment be produced.</li> </ul>	Advised that modelling evidence will be reviewed prior to the next stage of the plan consultation. Which will address concerns raised.
	Reg 18 Consultation – SUB 011	Welcome engagement in Part 2 of IDP in the future.	Engagement took place with National Highways for Part 2 of IDP.
		Welcome further information following DtC discussions with neighbouring authorities in helping to accommodate unmet needs.	Understand where the need will be met and any impacts identified.
	Reg 19 - Consultation	<p>National Highways will actively work with Sandwell MBC to develop and draft a Statement of Common Ground (SoCG) to deal with any strategic cross boundary issues as the Local Plan progresses.</p> <p>Queried Housing Need figure;</p> <p>Queries around transport modelling;</p>	<p>If needed, will identify approach to cross boundary issues.</p> <p>Advised housing figure calculated using LHN and now for the period 2024-41, not 2023-41 as in the previous draft.</p> <p>Following on from this representation, the Council’s transport modelling consultants produced a further technical note in response to the comments contained which addresses the issues raised. The Council is committed to continued and ongoing engagement with National Highways as proposals progress.</p>

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Transport for West Midlands	Issues and Options	Request acknowledgement of the relationship the Statutory Local Transport Plan has with the emerging local Plan.	The West Midlands Local Transport Plan was not fully adopted. The SLP only refers to plans and strategies that were adopted at the time of publication.
		<ul style="list-style-type: none"> <li>• Could be more supportive accessibility elements captured;</li> <li>• additional narrative could be added in terms of transport role in tackling climate change;</li> <li>• greater consideration could be given to HGVs;</li> <li>• could elaborate on how the West Midlands is playing a leading role at the heart of the UK Connected and Autonomous Vehicle Ecosystem; should look to increase densities in town centre locations and along key transport corridors;</li> <li>• need to work closely with TfWM;s Transport Planning Team in terms of the certainty of development coming forward.</li> </ul>	Will look to address the issues raised in Reg 18 Plan
	Reg 18 Consultation	Like to continue working on both WMLTP5 outcomes and in shaping the transport elements in the Local Plan;	Ongoing work will help to shape the Plan.
		Specific requests for changes to policies, justifications – <ul style="list-style-type: none"> <li>• KRN network needs to be added to transport chapter;</li> <li>• reference DRUEs;</li> <li>• request for policy detailing promotion of coaches;</li> <li>• amend text from ‘fast’ public transport to something more appropriate;</li> <li>• stronger acknowledgement to exploring road space re-allocation for active travel and public transport;</li> <li>• incorporate safeguarding rail infrastructure</li> <li>• would like reference to last mile journeys</li> </ul>	Policy STR2 – Safeguarding the Development of the Key Route Network (KRN)  Para 11.34 of Transport Chapter references DRUEs. DRUEs are also shown on figure 15 of the Plan.  Policy STR5 – Creating Coherent Networks for Cycling and Walking – refers to road space reallocation (point 10).

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			<p>Policy STR1 – Priorities for the Development of the Transport Network (4bi Midlands Rail Hub) sets out how rail infrastructure will be safeguarded and improved. The RJ of this policy explains this in more detail, particularly in paragraphs 11.15 and 11.16</p>
	Reg 19 – Consultation	<p>Minor amendment in Regeneration Areas section;            Minor amendment regarding Core Bus Network Plan;            Minor amendment to STR4</p>	<p>Minor Modifications included;</p>
<p>Black Country Integrated Care Board, Sandwell and Birmingham Teaching Hospitals NHS Trust,</p>	<p>Evidence for IDP DEL /001</p>	<p>Have no concerns in terms of primary healthcare capacity when considering Sandwell’s proposed planned growth. This was subject to the publication of their new Primary Care Estates Strategy. Need to engage in Phase 2 to understand whether any particular infrastructure investment schemes need to be reflected in the IDP. SMBC</p>	<p>Worked closely with ICB to develop Policy SHW2 to ensure existing primary and secondary healthcare infrastructure and services are, under most circumstances, protected.</p> <p>Viability included developer contributions per development to healthcare. Although funding is mostly delivered through mainstream NHS revenue.</p> <p>Proposed growth across the plan period did not raise any concerns for the ICB and the NHS aim not to be an obstacle for growth</p>
	<p>Evidence for IDP DEL / 002</p>	<p>Sandwell is well provided for in terms of primary healthcare infrastructure; GP provision is considered sufficient and well located; MMUH is expected to provide secondary healthcare capacity for Sandwell for at least 50 years.</p>	<p>No impact on plan.</p>

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		Future healthcare infrastructure requirements for Sandwell are linked to the need to ensure that planning policy facilitates development which caters for the needs of an ageing population and provides accessibility to services and facilities that support healthy lifestyles	Policy SHO10 addresses housing for people with specific needs including the ageing population.
	Issues & Options consultation	Local Plan must support the principle of alternative uses for NHS land and property (where demonstrated not needed for viable for current use). Policies should support the delivery of public service improvements.	Policy SHW2 deals with the provision of new healthcare facilities and the protection of existing facilities.
	Reg 18 consultation	Draft Policy SHO4 does not refer to the need for, or delivery of, affordable housing for key workers; Additional text to SHW1	SHMA to assess housing need for the borough; Amend text.
Natural England	Natural England representations on SLP Issues & Options consultation	Recommended the following: <ul style="list-style-type: none"> <li>• Vision to address impacts on and opportunities for the natural environment;</li> <li>• Include strategic policies to protect and enhance valued landscapes;</li> <li>• Include criteria-based policies to ensure the protection and designated biodiversity and geological sites;</li> <li>• Welcome early discussion on HRA;</li> <li>• Expect the plan to address the impacts of air quality on the natural environment.</li> </ul>	Vision amended to take account of comments. Chapter 4 policies (which are not 'strategic') relate to protection and enhancement of valued landscapes.
Natural England	Email from SMBC to NE 13/08/2024	Copy of Reg 19 policies for information and inviting comments if wished – Responded logging email.	Demonstrates ongoing engagement.

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Natural England	Meeting 11/09/2024	Meeting with Lepus HRA expert, NE, Wolverhampton and Dudley to discuss approach to Air Quality work the steering group are undertaking with Sweco. NE going to look at work and advise if there are any significant issues.	Informed the joint working with various LA and NE on evidence base and SoCG to address the issue.
Natural England	Meeting 11/09/2024 25/09/2024 14/10/2024 14/11/2024	Meeting with AQ SAC steering group and NE to discuss findings of Sweco report and whether sites could be scoped out	Joint working with various LA and NE on evidence base and SoCG to address the issue.
Natural England	Natural England representations on SLP Reg 19 – Consultation	Supports the desire to prevent the loss of open and green spaces across the district. We understand that will mean development elsewhere contributing to Sandwell’s needs but believe in the importance of access to green infrastructure and open space	No impact on plan
Historic England	Historic England representations on SLP Issues & Options consultation	Historic England’s made representations to the Issues and Options consultation on the SLP. <ul style="list-style-type: none"> <li>• Requested references to heritage in the vision;</li> <li>• objectives; and a strategic policy (not necessarily standalone) with regards to historic environment</li> <li>• and referencing heritage led regeneration.</li> </ul>	Policy SDS1 paragraph 1(j) relates to historic environment. Policy SDS3 and supporting text refers to heritage assets within Regeneration Areas.
Historic England	Historic England representations to Reg 18 Consultation – see	Requests for text amendments to; SHE1 and SHE2; SCC4/5/6; SDM1; SDS1; SDS2; SDS4; SDS7 SMI2; SNE5; SWB1	Text amended to provide clarity, strengthen and reflect importance of historic environment and assets.

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Historic England	Meeting between SMBC and Historic England 07/02/2024	Meeting between SMBC and HE to discuss requirements for heritage assessments of allocations and to agree to send draft HE policies through prior to Reg 19 publication for their consideration	Discussion informed methodology for SMBC's Heritage Impact Assessment (SAA/005)
Historic England	Email from SMBC to Historic England 17/04/2024	Emailed approach to HIA of site allocations for comment	Discussion informed methodology for SMBC's Heritage Impact Assessment (SAA/005)
Historic England	Email from SMBC to Historic England 22/04/2024	Email to HE with copy of revised HE policies asking for their comments	Comments were received on 16.05.2024 and the policies and supporting text were amended as necessary.
Historic England	Historic England's representations on the SLP Reg 19 – Consultation	Historic England made representations on the Reg.19 version of the SLP. <ul style="list-style-type: none"> <li>• Additional wording for Objective 5;</li> <li>• Requested slight amendment to SDS1;</li> <li>• Requested minor amendment to SDS2;</li> <li>• Requested minor amendment to SDS3;</li> <li>• Requested minor amendment to SDS4 clause 1 (ai);</li> <li>• Requested changes to paragraphs 4.108 and 4.113;</li> <li>• Minor amendment to SHE2 part 3;</li> <li>• Minor amendment to SHE4 part 3</li> </ul>	Minor modifications made SDS4 clause 1 - footnote 49 includes explanation and was included following HE representation at Reg 18

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Environment Agency	Reg 18 – consultation	Raised concerns about the BCP Water Cycle Study; and approach to site assessments and how considered flood risk and whether Sequential Test has been passed or not.	Council commissioned JBA consultants to undertake a review of the SFRA and WCS.
Environment Agency		Recommended wording for Policies SCC4, SHO2 and SWA2.	Amended / re phrased policies.
Environment Agency	Environment Agency's representations to SLP Reg 19 – Consultation	Raised concerns about the Sequential Test and Exception Test; Suggested changes to paragraph 4.16; Minor amendment to SCC5	The Council needed to undertake; Minor amendment made;
	Environment Agency and SMBC email correspondence 16/08/2024; 30/01/2025; 20/02/2025; 14/03/2025	Correspondence regarding the sequential and exception tests and Level 2 SFRA – methodology and discussion on how to address issues. [SA/ED 19 / 20 / 23]	Updated Level 2 SFRA and updated sequential test and exception tests.
Wildlife Trust	Wildlife Trust Representation to Reg 19 consultation	<ul style="list-style-type: none"> <li>• Vision should include reference to greenspaces;</li> <li>• Suggested change to SDS1 re LNRS;</li> <li>• Change to SDS7;</li> <li>• Minor amendment to reference to Local Nature Recovery Strategy</li> <li>• Suggested change to SDS8;</li> </ul>	<p>Minor modification made to update text;</p> <ul style="list-style-type: none"> <li>• Council thought its importance was already recognised in SNE2, SNE1 makes clear reference to the need to protect areas and doesn't need to further emphasise one particular aspect.</li> </ul>



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			<ul style="list-style-type: none"> <li>• Repeats national guidance so does not need to be included.</li> <li>• Minor modification made</li> <li>• Rewording not accepted as it would erode the boundaries between SINCs and SLINCs in terms of their relative importance.</li> </ul>
GBBCHMA Development Needs Group	Monthly meetings to discuss issues	<p>Regular updates on progress of individual Local Authorities Plan Status and discussions of key issues emerging from Plan reviews focusing on housing and employment land shortfalls. This work has informed the HMA position statement and Statement of Common Ground.</p> <p>Meetings have also discussed recommendations from the West Midlands Strategic Employment Sites Study and Regional Aggregates Assessment</p>	SoCG signed agreeing apportionment of contributions to the HMA and to review the 2018 Growth Study. Will help to understand where the Council's shortfall can be accommodated.
Four Black Country Authorities	BCP	Joint working on evidence and drafting and consulting of BCP policies.	Carried forward policies from BCP and updated where appropriate
Four Black Country Authorities	Letter October 2022	Correspondence to all on BCP database to advise that work on the BCP had ceased and the four local authorities would be proceeding by producing their own local plans.	Carried forward policies from BCP and updated where appropriate
Black Country Planning Leads	Meetings – see [XX]	Letter of 31/05/23 sent to BC Planning Leads asking for discussion on apportionment of any offers of housing or employment land between the BCAs;	Understand the local plan status, understand any shortfalls in housing, employment and G&T. Agree an approach to apportioning any contributions to the BC. Establishes what potential contributions are to Sandwell

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		Sept / Oct 2023 Draft letters agreeing to apportionment method received, Draft letters received from BCAs – awaiting sign-off	<p>shortfall and the quantum that can be exported.</p> <p>Sandwell submitted a representation to Dudley Local Plan stating that do not agree with their strategy and could meet their housing need in total if released sites in the Green Belt that were identified as suitable and deliverable in the BCP</p>
Black Country Local Authorities	Waste DtC – Meeting 25/04/2024	Meeting to discuss waste and minerals issues and the reps received on both Dudley and Sandwell's Reg 18 Draft Plans. At the meeting it was concluded that no specific minerals or waste SOCGs will be required	No impact on the plan
Dudley MBC	Dudley's representations to Issues & Options consultation on SLP	<p>Dudley submitted representations to the SLP Issues and Options Consultation.</p> <ul style="list-style-type: none"> <li>• Agree to approach of using, adapting and apportioning the evidence base and draft policies of the BCP.</li> <li>• Should include objective around the need to engage with neighbouring authorities under DtC;</li> <li>• Promote use of and access to sustainable modes of transport including cross-boundary cycle route, footpaths and metro system;</li> <li>• Development should be prioritised around sustainable locations;</li> <li>• Regard should be had to meeting a strategic need for Gypsy &amp; Traveller and travelling showpeople;</li> </ul>	Points raised were addressed in the Draft Plan

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		<ul style="list-style-type: none"> <li>• Regard should be given to placing an emphasis on improving and reconnecting strategic green and blue infrastructure.</li> </ul>	
Dudley MBC	Dudley representations to Reg 18 consultation on SLP	<p>Certain allocations should take account of cross boundary considerations;</p> <p>Table 10 needs to be updated;</p> <p>With regards to redevelopment of Owen Street, specific proposals should be at a scale appropriate to the district centre;</p> <p>Policy SNE2 - The draft Dudley Local Plan identifies the Saltwells Local Nature Reserve as a potential Biodiversity Net Gain Receptor Site, which borders onto Mousesweet Brook Local Nature Reserve/SINC within Sandwell borough. This site is not identified within the SLP as a Biodiversity Net Gain site. There may be an opportunity for cross boundary working in relation to this area if the site was identified within the SLP</p>	<p>Sandwell will continue to work through DtC to discuss potential impacts and issues with neighbouring authorities, including where the implications of cross-boundary infrastructure arise.</p> <p>Table 10 of the SLP to be updated to clarify that proposals of more than 280sqm require impact tests for Edge of Centre, Out of Centre for T2 Centres p225</p> <p>The proposed redevelopment of Owen Street is primarily residential, with no new retail floor space currently envisaged.</p> <p>While sites beyond the boundary of the local plan area cannot be specifically included in the SLP and policies map, SMBC would welcome the opportunity to undertake cross-boundary working on ecological matters with Dudley MBC and other LA partners and will look to amend the introductory wording of the policy to reflect this.</p>

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Dudley MBC	SMBC response to Reg.18 Draft Dudley Local Plan	<p>SMBC’s Cabinet endorsed representations to the Reg.18 consultation on Dudley’s Draft Local Plan on 17 January 2024 (item 14/24). The representations stated that <i>“Dudley should take account of the amount of housing to be planned for not just within its own borough, but also the Black Country and wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This includes the housing shortfall of 18,606 arising in Sandwell until 2041, identified in the draft Sandwell Local Plan. Considered collectively the housing shortfalls in the GBBCHMA are significant and warrant a review of the Green Belt.”</i></p> <p>It went on to state that <i>“If the Green Belt sites identified for housing in the [Black Country Plan] were brought forward, this would meet their shortfall and have a surplus of 39 homes. This would therefore negate the need to export the shortfall of 1,078 homes to other authorities who are themselves struggling to meet their own needs.”</i></p> <p>The representations recognised that Dudley’s viability evidence indicated that higher provisions of affordable housing are viable in Dudley than in Sandwell, so allocating additional land in Dudley for residential development could contribute greater amounts of affordable housing to the MHA.</p> <p>The representations recognised that local concerns resulted in Dudley being unwilling to consider the use of Green Belt to help meet the need for housing</p>	No direct impact on SLP but demonstrates ongoing engagement at a political level to seek to reduce the unmet housing needs arising from the HMA overall, and to identify a small but realistic contribution towards Sandwell’s unmet housing needs.
Dudley MBC	Meeting, 09.05.2024	<ol style="list-style-type: none"> <li>1. Sandwell Local Plan (SLP) timetable /consultation/Reps</li> <li>2. Sandwell Local Plan Update</li> <li>3. Dudley reps to Sandwell Local Plan /cross boundary matters</li> <li>4. DtC correspondence /matters arising/SoCG</li> <li>5. Evidence base</li> <li>6. Next Steps</li> </ol>	Went through fifteen reps raised by Dudley and explained what had been done to address the comments and questions raised for each one. Dudley

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		7. AOB	<p>colleagues seemed generally content with responses.</p> <p>Agreed to undertake further DtC work when the need arises, including for infrastructure, housing sites, employment land and mixed-use allocations. Discussed issues around the potential Lion Farm allocation, and a need for Sandwell to identify adjacent replacement sports pitch provision – Dudley confirmed that they had a shortfall of provision and would be unable to assist in this.</p> <p>Discussed potential shared SoCGs – these are being looked at in more detail through Planning Leads and Vicki indicated that work may start on them next week.</p> <p>Shared topics include BC apportionment SoCG, HMA SoCG, FEMA SoCG, and transport.</p> <p>Agreed to continue dialogue and start work on SoCGs.</p>
Dudley MBC	Dudley's representations to Reg 19 – Consultation on SLP	Requested additional wording to paragraphs 3.12 and 3.17 to provide clarity	Wording included as Minor Modification

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Dudley MBC	SMBC representations to Reg 19 consultation on Dudley Local Plan	<p>SMBC submitted representations to the Reg.19 consultation on Dudley's Local Plan which took place in October and November 2024.</p> <ul style="list-style-type: none"> <li>• Dudley should look to accommodate as much housing as possible within its own administrative boundary through maximising densities and considering focussed Green Belt release.</li> <li>• Policy DLP1 is unsound as the plan does not clearly set out why the Green Belt hasn't been reviewed to meet housing needs, especially as the inclusion of sites previously proposed for allocation in the draft Black Country Plan would enable the council to meet its housing needs in full</li> <li>• Suggested additional wording that would require Dudley MBC to regularly monitor housing land supply position during the plan period and keep under review any opportunities for additional supply within the borough</li> <li>• Policies relating to employment land are sound and Sandwell supports continued joint working between authorities in the Black Country Functional Economic Market Area (FEMA)</li> <li>• Policies relating to Gypsy and Traveller pitch position are sound. Sandwell is unable to contribute towards any of Dudley's unmet needs and has identified its own shortfall in provision for Gypsy, Traveller and Travelling Showpeople pitches</li> </ul>	No direct impact on SLP but demonstrates ongoing engagement in relation to strategic issues including unmet housing, G&T and employment need arising in both Sandwell and Dudley.
Walsall Council	Issues and Options	<ul style="list-style-type: none"> <li>• Current evidence that needs from G&amp;T communities requiring accommodation in Sandwell is very low;</li> <li>• Additional restrictions on HMO's should seek to ensure that they do not result in potential occupiers being displaced to neighbouring local authority areas;</li> </ul>	Looked at points raised in drafting Draft Plan

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		<ul style="list-style-type: none"> <li>• Support the use of land to accommodate new green/blue infrastructure except where it is strictly necessary to support and mitigate impact of development i.e. SuDs;</li> <li>• Facilities that process waste from outside Sandwell should be protected against development on nearby land that might act as a constraint;</li> <li>• Need to include reference to Areas of High Historic Landscape and Areas of High Historic Townscape within the policy or identified on Policies map.</li> </ul>	
Walsall	Meeting between SMBC and Walsall 09/05/2024	<p>Walsall advised that they have paused plan preparation while awaiting changes to the plan-making system.</p> <p>It was acknowledged that Walsall's representations to the Reg.18 SLP consultation recognises the shortfall in housing and employment land supply arising from the SLP and that it would be necessary to export the unmet need to neighbouring authorities.</p>	No direct impact, however it demonstrates ongoing DtC engagement and active approach to seek contributions towards unmet development needs.
Wolverhampton City Council	Issues & Options	Recommend the Council engage with the work of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) officer group and the programme of work contained within the Statement of Common Ground as circulated by South Staffordshire Council in 2022	Have signed a SoCG and the officer group has commissioned a review of the 2018 Growth Study. The study will seek options for addressing the shortfall in the HMA and how Sandwell's shortfall can be accommodated.
Wolverhampton City Council	Reg 18	Wolverhampton not able to help with Council housing and employment shortfall and should continue to engage with the GBBCHMA officer group.	Have signed a SoCG and the officer group has commissioned a review of the 2018 Growth Study. The study will seek options for addressing the shortfall in the HMA and how Sandwell's shortfall can be accommodated.

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Wolverhampton City Council	Meeting 03/06/2024	Discussion on progress and expected timescales for preparation of Sandwell Local Plan and Wolverhampton Local Plan. Previous representations to Local Plan consultations were discussed. Strategic issues relating to unmet housing need, employment land need, and Gypsy and Traveller plot needs arising from both Sandwell and Wolverhampton were discussed. Neither authority can accommodate unmet development needs arising from elsewhere. West Midlands Resource Technical Advisory Body has submitted representations relating to strategic waste management	No impact on the plan, however demonstrates ongoing DtC engagement to seek to address strategic issues.
Birmingham City Council		It is essential for close working to continue between the two authorities and across the Greater Birmingham and Black Country HMA to try and address the shortfalls as much as possible across the wider HMA area.	Have signed a SoCG and the officer group has commissioned a review of the 2018 Growth Study. The study will seek options for addressing the shortfall in the HMA and how Sandwell's shortfall can be accommodated.
Birmingham City Council	Meeting with BCC 20/06/2024	Discuss local plan position and agree cross boundary issues	No direct on impact on the SLP however demonstrates ongoing engagement.
Birmingham City Council	Letter from SMBC to Birmingham 17/08/2023	Letter sent requesting discussion on issues – no response yet	To understand status of local plan preparation and whether they can meet their needs.
Birmingham City Council	SMBC representations on Birmingham Local Plan Preferred	SMBC submitted representations to Birmingham's Local Plan Preferred Options Consultation <ul style="list-style-type: none"> <li>• The strong relationship between Birmingham and Sandwell borough was acknowledged</li> </ul>	No direct impact on the SLP, however demonstrates ongoing engagement with neighbouring authority to seek to reduce the unmet housing need arising from the



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	Options Consultation 27/08/2024	<ul style="list-style-type: none"> <li>It was explained that the Sandwell Reg.19 Publication Local Plan was expected to identify an unmet need for around 16,000 homes arising from Sandwell. It was also expecting to identify an unmet need for around 186ha employment land although this is expected to be capable of being accommodated in full by other authorities within the Black Country and South Staffordshire FEMAs.</li> <li>The measures that Birmingham has taken to significantly reduce its own housing shortfall were welcomed. However, Sandwell is unable to meet its own housing need and cannot contribute to meeting any of Birmingham's remaining unmet need.</li> <li>Birmingham's emerging approach of not releasing further Green Belt land was acknowledged. Nevertheless, it was advised that Birmingham should ensure it takes all possible steps to accommodate its own housing need and consider accommodating the unmet need of other authorities including Sandwell.</li> </ul>	HMA, and to seek contributions towards Sandwell's unmet housing need.
Birmingham City Council	BCC representations on SLP Reg 19 – Consultation	Support wording in paragraph 3.19 regarding supporting neighbours in bringing forward land for employment and housing.	No impact on the plan
Bromsgrove District Council	Reg 18	Will continue to engage under the DtC	No direct impact on the plan but demonstrates ongoing engagement
Bromsgrove District Council	Letter from SMBC to Bromsgrove 7/08/2023	Letter sent requesting discussion on strategic issues including meeting unmet housing need, meeting unmet employment needs and some transport issues.	To understand status of local plan preparation and whether they can meet their needs.

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Bromsgrove District Council	Letter 20/06/2024	Letter sent regarding clarification on status of local plan and to assess any likely contributions to address housing and employment shortfall.	
Bromsgrove District Council	Letter 01/08/2024	Letter received from Bromsgrove and Redditch Councils	Responded that timetable under review. No direct impact on the plan but demonstrates ongoing engagement.
Cannock Chase District Council	Letter from SMBC to Cannock Chase 17/08/2023	Letter sent requesting discussion on issues – no response yet	To understand status of local plan preparation and whether they can meet their needs.
Cannock Chase District Council	SMBC representations on Reg.19 Cannock Chase Local Plan	SMBC submitted representations to the Reg.19 Cannock Chase Local Plan. <ul style="list-style-type: none"> <li>Contribution of 500 dwellings towards the unmet housing needs of the wider housing market area is supported. However, Strategic Objective 3 is unsound as it refers to meeting unmet needs of 'adopted plans' and does not take account of emerging Local Plans that have reached an advanced stage. It also does not apportion the contribution figure.</li> <li>The plan refers to housing shortfalls from each of the Black Country authorities being unknown. This is incorrect as Dudley and Sandwell have recently consulted on Reg.18 draft plans which set out up-to-date positions on housing shortfalls.</li> </ul>	No direct impact on the plan. However, it demonstrates ongoing engagement with authorities in the HMA to seek to agree contributions towards unmet housing need arising from Sandwell.
Cannock Chase District Council	Letter from SMBC to Cannock Chase 20/06/2024	Letter sent regarding clarification on status of local plan and to assess any likely contributions to address housing and employment shortfall.	
Cannock Chase District Council	Letter from Cannock Chase to	Letter received from Cannock Chase DC	Responded confirming contribution to the HMA. Impacts on the plan by contributing to the shortfall.

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	SMBC 20/08/2024		
Coventry City Council	Letter from SMBC to Coventry 17/08/2023	Letter sent requesting discussion on strategic issues including meeting unmet housing need, meeting unmet employment needs and some transport issues.	
Lichfield District Council	01/09/2022	Draft SoCG produced but not yet signed Appendix 7	
Lichfield District Council	Letter from SMBC to Lichfield 08/08/2023	Letter sent to Lichfield requesting discussion on issues.	
Lichfield District Council	Meeting between Black Country Authorities and Lichfield 08/11/2023	Meeting arranged between Black Country and Lichfield to seek clarification on housing and employment contributions	Advised recommending withdrawal of plan, Impact on plan as contribution to BCA will be lost.
Lichfield District Council	Lichfield's representations on SLP Reg 19 - Consultation	Need to fully justify and evidence that there are no exceptional circumstances that exist that could justify potential Green Belt release; Note that at an early stage in plan making to ascertain if can assist with SMBC G&T shortfall but previous plans were not able to meet their own needs.	SMBC is satisfied that sufficient consideration has been given to the use or otherwise of green belt for additional housing and a recent appeal decision backs this stance.
South Staffordshire District Council	South Staffordshire representations to SLP I&O	SS have made an offer to contribute 4000 dwellings to the GBBCHMA and will work with the group in order to apportion the contribution;	Once agreed and apportioned there may be a contribution to the plan shortfall.

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		Have identified a shortfall of G&T Pitches, request that SMBC explore options to identify and capacity to help with the shortfall.	
South Staffordshire District Council	Meeting 31/10/2022	SoCG with other BCA and BC; whether apportionment is possible.	Explain Sandwell shortfall, understand if able to contribute to the housing, employment land and G&T shortfall. SS investigate whether able to help meet GBBCHMA shortfall.  Provide a steer for DtC conversations
South Staffordshire District Council	SMBC representations to South Staffordshire Reg.19 consultation 15/12/2022	Representations made by SMBC to the first Reg.19 consultation on the South Staffordshire Local Plan. <ul style="list-style-type: none"> <li>• Contribution of 4,000 dwellings to the GBBCHMA is supported but would prefer to be apportioned on travel to work information rather than being apportioned by HMA</li> <li>• Black Country Urban Capacity Review Update 2020 identifies a shortfall of 38,595 arising from the Black Country. Although the Black Country Plan is no longer being taken forward there is still a large housing shortfall across the region. Sandwell has a 19,363-home shortfall.</li> <li>• The contribution of 36ha (general) and 67ha (West Midlands Interchange) employment land contribution to the Black Country is supported.</li> </ul>	No direct impact on the SLP. However, demonstrates ongoing engagement to seek to maximise contributions from South Staffordshire to Sandwell's unmet housing and employment land needs.
South Staffordshire District Council	Letter from SMBC to South Staffs 07/05/2023	Letter sent to S.Staffs requesting discussion on strategic issues including <ul style="list-style-type: none"> <li>• Housing (including housing needs across the GBBCHMA);</li> <li>• Employment land;</li> <li>• Transport and infrastructure matters;</li> <li>• Gypsy and traveller accommodation; and</li> </ul>	No direct impact on SLP, however demonstrates ongoing DtC on strategic issues

Prescribed Body / Local Authority	Method of Engagement	Topics Discussed	Impact on the Plan
		<ul style="list-style-type: none"> <li>Natural environment</li> </ul>	
South Staffordshire District Council	Letter from South Staffs to SMBC 14/08/2023	<p>Letter sent from South Staffordshire to SMBC.</p> <ul style="list-style-type: none"> <li>It confirmed that South Staffordshire has paused work on its Local Plan. It cannot confirm the next local plan consultation's approach to housing land employment land, or any contribution to the wider housing market area.</li> <li>Formal Duty to Cooperate correspondence would be prepared in the early Autumn</li> <li>It was advised that SMBC consider in its local plan review: <ul style="list-style-type: none"> <li>Maximising supply in Sandwell before seeking contributions</li> <li>Incorporating the recommendations of the West Midlands Combined Authority brownfield land review</li> <li>Fully consider the same options for accommodating Gypsy and Traveller needs as South Staffordshire before concluding that it can't meet its own needs.</li> <li>Sandwell and South Staffordshire are in different FEMAs and this should be recognised when distributing the oversupply of employment land in South Staffordshire</li> <li>The need to explore contributions towards Black Country employment shortfalls with other authorities with a strong or moderate economic relationship to the Black Country</li> </ul> </li> </ul>	<p>Letter demonstrates ongoing DtC between authorities and Sandwell's consistent approach to seek contributions towards its unmet development needs.</p> <p>Advice has re-iterated Sandwell's commitment throughout the preparation of the SLP to maximise supply in Sandwell, optimise the use of land in the borough, seek to meet Gypsy and Traveller needs as far as possible, and agree sufficient contributions to meet unmet employment land needs arising from the Black Country.</p>
South Staffordshire District Council	South Staffordshire representations	<p>Suggested change to SDS1 so not in conflict with SEC4.</p> <p>Query over whether SMBC can assist with SS G&amp;T shortfall</p>	Council do not think that there is a conflict and Policy SDS1 is sufficiently flexible;

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	to SLP Reg 19- Consultation		G&T Topic Paper sets out how not able to help with shortfall.
Shropshire Council	Reg 18	Objects as it is necessary to consider further whether exceptional circumstances exist to justify changes to Green Belt boundary; Request additional text to Spatial Strategy to address matters in relation to Green Belt; Should set out how the proposed contribution from Shropshire will be apportioned between the 4 BCA;	SMBC is satisfied that sufficient consideration has been given to the use or otherwise of green belt for additional housing.  Agreed. SoCG between the GBBCHMA and various local authorities has since agreed approach to apportionment and is set out in SoCG [SA/ED37]
Shropshire Council	Meeting 01/09/2022	Draft SoCG produced but not yet signed	Explain Sandwell shortfall, establish whether SC could help meet the BC shortfall. Establish the quantum of housing and employment land needs can contribute. Helps to demonstrate that some of the Sandwell shortfall can be met by exporting.
Shropshire Council	Letter from SMBC to Shopshire 08/08/2023	Letter sent to Shropshire requesting discussion on issues	
Shropshire Council	Meeting between SMBC and Shropshire 09/11/2023	Meeting arranged between Black Country and Shropshire to seek clarification on housing and employment contributions	Updated on EiP – no direct impact on the plan but will provide potential contribution to shortfall.

Prescribed Body / Local Authority	Method of Engagement	Topics Discussed	Impact on the Plan
Shropshire Council	Letter from Shropshire Council to SMBC 28/04/2025	<p>Letter sent from Shropshire Council to SMBC explaining that the council intend to withdraw the Shropshire Local Plan from examination. Following withdrawal, the council see no way by which Shopshire can currently accommodate any contributions to unmet needs forecast to arise in the Black Country.</p> <p>Reference is made to the increase in housing need in Shropshire due to the new standard method and updates to the NPPF which relate to Green Belt.</p>	Shopshire's contribution towards meeting unmet housing needs in the Black Country falls away. Note, the letter was sent by Shopshire following the submission of the Sandwell Local Plan to government.
Solihull MBC	Letter from SMBC to Solihull 17/08/2023	Letter sent requesting discussion on issues – no response yet	
Solihull MBC	Letter from SMBC to Solihull 20/06/2024	<p>Letter sent regarding clarification on status of local plan and to assess any likely contributions to address housing and employment shortfall.</p> <p>No response received</p>	
Solihull MBC	25/07/2021	BCA agreed statement regarding the provision of Solihull's contribution to assist with their examination.	No direct impact on the plan but demonstrates ongoing engagement and assists Solihull with taking forward their plan.
Stratford upon Avon District Council	Stratford representations to SLP Reg 18 consultation	It is acknowledged that the Green Belt in Sandwell protects a relatively limited area of valuable open space within a heavily urbanised area. As such, it is agreed that it would not be appropriate to seek to release Green Belt land for development in Sandwell.	

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Stratford upon Avon District Council	Letter sent from SMBC to Stratford 17/08/2023	Letter sent requesting discussion on issues – no response yet	To understand status of local plan preparation and whether they can meet their needs.
Stratford upon Avon District Council	Letter sent from SMBC to Stratford 20/06/2024	Letter sent regarding clarification on status of local plan and to assess any likely contributions to address housing and employment shortfall.	
Letter sent from SMBC to Stratford	Letter sent from Stratford to SMBC 23/08/2024	Letter received from Stratford Upon Avon explaining that Stratford District Council and Warwick District Council are working together on a South Warwickshire Local Plan. Due to early stage of plan preparation Stratford Upon Avon is unable to say whether the South Warwickshire Local Plan will be able to contribute to any unmet needs arising from the Birmingham and Black Country HMA or the Coventry and Warwickshire HMA. Similarly, it is unable to say whether the South Warwickshire Local Plan will be able to meet Gypsy and Traveller needs in full.	No impact on plan as no contribution offered to meet unmet needs arising from Sandwell Local Plan.
Tamworth Borough Council	Letter from SMBC to Tamworth 17/08/2023	Letter sent requesting discussion on issues – no response yet	
Telford and Wrekin Council	Meetings between SMBC and Telford 19/04/2023; 23/05/2023;	General update of where we are with local plans. No discussion re meeting need. Sandwell to send formal letter requesting this be considered on 08/08/23.	Explain the shortfall arising in Sandwell and the BC, establish whether Telford could help meet the BC housing shortfall; established no Strategic Employment matters.



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	04/07/2023; 08/08/2023		
Telford and Wrekin Council	Meeting between Black Country Authorities and Telford 07/11/2023	Meeting arranged between Black Country and Telford and Wrekin to seek clarification on housing and employment contributions	
Telford and Wrekin Council	Letter 20/06/2024	Letter sent regarding clarification on status of local plan and to assess any likely contributions to address housing and employment shortfall.  No response received	
Telford and Wrekin Council	Meeting between Black Country Authorities and Telford 15/04/2025	Meeting to discuss Telford Reg 19 plan and proposed contributions to BCA.	Will help to meet the housing shortfall in the Black Country and Sandwell.