

South Staffordshire Local Plan Review Examination

Hearing Statement for Matter 2: Duty to Cooperate

Representor: Miller Homes

Representor Reference: AGT24-030-03

Date: 11 April 2025 | Pegasus Ref: P17_2919_R008_PL_MAN_RD

Author: RD



Document Management

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	07/04/2025	RD	GL	-

1. Introduction

- 1.1. Pegasus Group is instructed by Miller Homes to respond to the South Staffordshire Local Plan Examination: Matters, Issues and Questions produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan Review 2023–2041 (the Local Plan).
- 1.2. Miller Homes are promoting 23ha of Green Belt land for development, located to the south of Holly Lane, Great Wyrley. The land comprises agricultural fields set across two parcels, that lie either side of the railway line (**Figure 1.1**).
- 1.3. Great Wyrley is a highly sustainable Tier 1 settlement which is a suitable location for Green Belt release and housing growth. The land is appropriately 1.2km (15-minute walk) from Landywood railway station which offers regular services to Walsall and Birmingham, which are authority areas which have significant unmet housing needs.
- 1.4. The entire landholding is available, suitable, and deliverable / developable and would form a logical and sensitive extension to the Tier 1 settlement. The north-eastern part of the landholding is allocated for development in the Local Plan and is referred to as Site 536a Land off Holly Lane. The remainder of the landholding is also suitable for allocation.

Figure 1.1: Miller Homes Landholding



- 1.5. This Hearing Statement relates to **Matter 2: Duty to Cooperate** and the following question:
 - Question 8: Are the co-operation activities and outcomes sufficiently evidenced? Have all relevant signed and dated Statements of Common Ground been provided, consistent with the requirements of the National Planning Policy Framework and the associated Planning Practice Guidance? If not, why?



- 1.6. As this Local Plan has been brought forward under the December 2023 version of the NPPF, references throughout this Hearing Statement are to that version of the NPPF unless expressly indicated otherwise.

2. Matter 2: Duty to Cooperate

Issue 1: Whether the Council has complied with the Duty to Cooperate in the preparation of the Plan.

Question 8: Are the co-operation activities and outcomes sufficiently evidenced? Have all relevant signed and dated Statements of Common Ground been provided, consistent with the requirements of the National Planning Policy Framework and the associated Planning Practice Guidance? If not, why?

- 2.1. Given the scale and complexity of the housing shortfalls arising in the Greater Birmingham and Black Country House Market Area (GBBCHMA), the Council consider that the Development Needs Group Statement of Common Ground is the appropriate vehicle by which to consider the issue holistically. The Development Needs Group Statement of Common Ground is dated 29 November 2024 but is unsigned by all parties¹.
- 2.2. This approach to dealing with the shortfall has been agreed with thirteen of the fourteen authorities within the GBBCHMA through signed Statements of Common Ground². However, at the time of writing there is no Statement of Common Ground between South Staffordshire and North Warwickshire, whom through adoption of their own Local Plan in 2021 made a 3,790-home contribution towards the unmet housing needs. Furthermore, North Warwickshire notably state in their Regulation 19 representations that the Local Plan does not adequately address unmet need in relation to the housing shortfall and that the major reduction in the housing proposed to address unmet needs will increase pressure on other adjoining authorities³.
- 2.3. On this basis it can only be concluded that not all relevant signed and dated Statement of Common Ground have been provided, inconsistent with the requirements of the NPPF and the associated Planning Practice Guidance.
- 2.4. In addition, the Development Needs Group Statement of Common Ground refers to a 1,500-home contribution from Shropshire and says that should their Local Plan not proceed to adoption, the agreed position will need to be reviewed⁴. On 13 March 2025, Shropshire confirmed their intention to withdraw their Local Plan from examination. As such, the agreed position needs to be reviewed.

¹ SST/ED11

² DC7, DC8, DC9, DC10, DC11, DC13, DC14, DC15, DC16, DC18, DC19, SST/ED14, SST/ED15

³ CD5

⁴ SST/ED11, para 4.18

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Manchester

Queens House, Queen Street,
Manchester, M2 5HT

T 0161 3933399

E Manchester@pegasusgroup.co.uk

Offices throughout the UK.

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



[Pegasus_Group](#)



[pegasusgroup](#)



[Pegasus_Group](#)

PEGASUSGROUP.CO.UK