



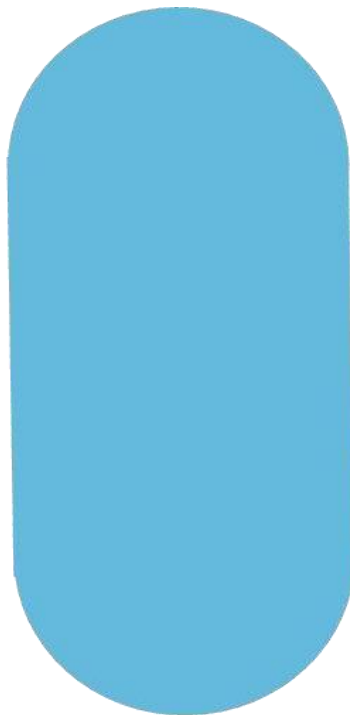
 Part of Shakespeare Martineau

Statement in Respect of the South Staffordshire Local Plan Examination

Matter 2 – Duty to Co-Operate

On Behalf of Catesby Estates

April 2025



1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of Catesby Estates with respect to Matter 2 - Duty to Co-Operate.

2. MATTER 2 – DUTY TO CO-OPERATE

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

Q4: Who has the Council engaged with in terms of overall housing provision and what form has this taken?

- 2.1 The Council have engaged with a number of neighbouring and proximal Local Authorities including those within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which includes South Staffordshire, and wider Functional Economic Market Areas (FEMAs). This is evidenced through the Duty to Cooperate Topic Paper Addendum December 2024 (DC1) and associated Statements of Common Ground (DC7-DC20).
- 2.2 However, Catesby Estates contend that the level of housing contribution being made to the GBBCHMA, at just 640 dwellings in the Plan period to 2041, is inadequate.
- 2.3 During the course of the preparation of the Local Plan, the proposed contribution towards the housing needs of the GBBCHMA has been significantly reduced from 4,000 dwellings in the 2022 Publication version to just 640 dwellings. The justification in approach to contributions to be made to the GBBCHMA appears to be wholly influenced by the ‘capacity-led’ approach to the Spatial Strategy which simply seeks to focus growth to non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport, rather than through due consideration of the level of unmet needs and how these could be reasonably accommodated in South Staffordshire.
- 2.4 Table 1 in the Duty to Cooperate Topic Paper Addendum December 2024 (DC1) provides stark evidence of the significance of the level of
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unmet needs arising from the GBBCHMA. It identifies an emerging shortfall of 75,427 dwellings in unmet needs arising from Birmingham, Dudley, Sandwell, Walsall and Wolverhampton, with just 8,080 dwellings in established and confirmed contributions. This includes the proposed 640 dwellings contribution from South Staffordshire, and represents a shortfall of some 67,347 dwellings.

- 2.5 Catesby Estates contend that the Local Plan's approach to the Duty to Cooperate and contribution to unmet needs arising from the GBBCHMA fails to satisfy the National Planning Policy Framework (NPPF, December 2023) Paragraph 35 a) positively prepared test of soundness. To remedy this, the Local Plan should make provision for at least 4,000 dwellings to assist with GBBCHMA unmet needs, in line with the level proposed in the 2022 Publication version of the Local Plan.

Reiss Sadler
Marrons
10th April 2025

Word Count: 370

