

South Staffordshire Local Plan examination – matter 2 (duty to cooperate)

Bellway Homes Limited (sites at Orton Lane and Strathmore Crescent, Wombourne)

April 2025

Introduction

1. This statement is submitted on behalf of Bellway Strategic Land ('Bellway') in response to the Inspector's matters, issues and questions to the South Staffordshire Local Plan.
2. Bellway is promoting two sites at Wombourne for residential development, land off Orton Lane (site ref: 416) and land west of Strathmore Crescent (site ref: 708). Details regarding both sites can be found in Bellway's representations to the reg 19 publication plan.
3. Land off Orton Lane is identified as safeguarded land in the adopted Site Allocations Document (September 201) and is currently subject to a full planning application (ref: 24/00241/FULM). This application is well advanced and is expected to be presented to Planning Committee with a recommendation for approval on 20 May 2025.
4. We have responded to the questions most relevant to Bellway's interests at Wombourne.

Questions

Q1: have all the genuinely strategic matters requiring cross boundary co-operation been identified?

5. The key strategic matters requiring cross boundary co-operation are housing, employment needs, Green Belt and highways.
6. In respect to strategic cross boundary housing matters, whilst the plan is being submitted under the transitional arrangements in the NPPF 2024 (paras 234 and 235), the combined NPPF 2024 local housing need ('LHN') is relevant given after five years from adoption (or sooner subject to the speed of any review, which we discuss in response to Matter 4 Q3) this will become the starting point for South Staffordshire's housing needs.
7. NPPF 2024 has increased the combined Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') LHN by over 1,000 dwellings per annum ('dpa'), from 14,377dpa to 15,861dpa. This would equal an additional 26,712 homes for the GBBCHMA to deliver over South Staffordshire's proposed plan period (i.e. 2023-2041). It is presumed this would be additional unmet need.
8. With all existing signed Statements of Common Ground ('SoCG') relevant to strategic cross boundary housing matters pre-dating the publication of NPPF 2024, it is unclear whether an updated position on unmet need should be agreed between the 14 HMAs.

9. Equally, one of the key SoCGs in respect to cross boundary housing matters, the GBBCHMA SoCG regarding housing shortfall (November 2024) (SST/ED11) is 'agreed by officers only'. For the statement to have full weight it should be signed by the necessary signatories.

10. The above points require resolution to determine if the duty to cooperate has been satisfied.

Q2: have the neighbouring authorities and prescribed bodies the Council is under a legal duty to co-operate with been correctly identified?

11. No comment.

Q3: has any neighbouring authority or prescribed body indicated that the duty to co-operate has not been complied with in relation to any strategic matter? If so, what was the Council's response?

12. As per our response to Q1, to be clear on the position of the relevant neighbouring authorities in terms of whether South Staffordshire has complied with the duty to cooperate:

- Firstly, with all existing signed Statements of Common Ground ('SoCG') relevant to strategic cross boundary housing matters pre-dating the publication of NPPF 2024, it is unclear whether an updated position on unmet need should be agreed between the 14 HMAs.
- Secondly, the GBBCHMA SoCG regarding housing shortfall (November 2024) (SST/ED11) is 'agreed by officers only'. For the statement to have full weight it should be signed by the necessary signatories.

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

13. Clarity is needed on the points raised in response to Q1 and Q3 in order to answer this.

Q5: In terms of migration, community, travel to work and housing markets: a.) what are the inter-relationships with neighbouring authority areas? b.) how have these been taken into account in preparing the Local Plan?

14. This data is set out in the GBBCHMA Strategic Growth Study (2018). The GBBCHMA SoCG (SST/ED11) considers it insofar as how any proposed contribution should be apportioned (table 2). There is however no evidence or position from the Council or wider GBBCHMA as to how this data should inform apportioning the total GBBCHMA unmet need.

Q8: 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?

15. No comment.