

Peveril Securities Limited

Matter 2: Hearing Statement

Respondent Reference Numbers:

AGT24-048-01-01, AGT24-048-01-02 and AGT24-048-01-03

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PLANNING

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1.0 Introduction

CarneySweeney are acting on behalf of Peveril Securities Limited in making representations to the emerging South Staffordshire Local Plan (SSLP), with representations having been made to the previous Regulation 19 consultation stage in relation to two sites within Peveril Securities Limited's ownership: land north-west of Featherstone and land south of Hilton Cross Strategic Employment Site.

Our previous representations are not repeated here but should be read in conjunction with this Hearing Statement to the Inspectors' Matters, Issues and Questions for Matter 2.

As requested, we have provided separate Hearing Statements for the following Matters:

- Matter 2 – Duty to Co-operate
- Matter 4: Development Needs and Requirement
- Matter 12: Building a Strong Local Economy
- Matter 14: Protecting and Enhancing the Natural Environment

This document covers Matter 2 – Duty to Co-operate with responses provided in respect of housing and employment development.



2.0 Matter 2 – Duty to Co-operate

Respondent Reference Numbers: AGT24-048-01-01, AGT24-048-01-02 and AGT24-048-01-03

Issue 1

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

Questions:

1. Have all the genuinely strategic matters requiring cross boundary co-operation been identified?

Whilst housing has correctly been identified as a strategic matter requiring cross-boundary co-operation, we do not consider that this matter has been properly addressed. In particular, the need for South Staffordshire to provide a greater contribution to addressing the identified housing shortfall in the Greater Birmingham Black Country Housing Market Area (GBBCHMA). This is covered in greater detail in our answers to questions 4, 5 and 8 below.

It is also noted that the Council are due to provide a response through the submission of their Hearing Statement, following a review of which, we may wish to make comments during the Hearing Session.

2. Have the neighbouring authorities and prescribed bodies the Council is under a legal duty to co-operate with been correctly identified?

This is a question for the Council to respond to and depending on their response, we may wish to make comments during the Hearing Session.

3. Has any neighbouring authority or prescribed body indicated that the duty to cooperate has not been complied with in relation to any strategic matter? If so, what was the Council's response?

This is a question for the Council to respond to and depending on their response, we may wish to make comments during the Hearing Session.

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

A key consideration of the overall housing provision to be planned for in the SSLP should be seeking to address unmet housing need arising from the wider housing market area in which a local authority is located. We note that the examination documents include the 'Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA Officer Agreed Version Statement of Common Ground Regarding



Housing Shortfall Position at 29 November 2024' (Examination Document Ref. SST/ED11), which was published after the SSLP was submitted for Examination. The document is a Statement of Common Ground (SoCG) in respect of the apportionment of 640 dwellings in the SSLP to local authorities in the GBBCHMA. It does not provide evidence of co-operation between South Staffordshire Council and other local authorities regarding the number of new dwellings to be included in the SSLP to meet the housing shortfall in the GBBCHMA.

In total, the evidenced unmet need identified in Table 1 of the SoCG is 76,427 dwellings. The figure of 640 dwellings represents only 0.8% of this shortfall. The figure of 640 dwellings to contribute towards the unmet needs of the GBBCHMA is a considerable fall from 4,000 dwellings which formed part of the previous 2022 Regulation 19 Pre-submission Local Plan. The figure of 4,000 dwellings was proposed when the unmet needs of the GBBCHMA were lower – *"around 28,000 dwellings up to 2031, rising to nearly 61,000 dwellings by 2036"* (Regulation 19 South Staffordshire Local Plan, 2022, para. 5.11). In recent months the UK Government has announced plans to build 1.5 million additional homes over the next 5 years and published a revised standard housing method, which results in an extra 3,106 dwellings across the 17 signatories to the SoCG. The reduction in South Staffordshire's contribution to the GBBCHMA goes against a clear and obvious need for more housing.

It is noted that the Council are due to provide a response through submission of their Hearing Statement, following a review of which, we may wish to make comments during the Hearing Session.

5. *In terms of migration, commuting, 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?*

The evidence base relies on past-trends when considering the inter-relationships with neighbouring authority areas. This approach does not reflect potential changes in migration associated with large-scale employment development coming forward within the M54 corridor and the significant shortfalls in housing provision in the GBBCHMA, including neighbouring Wolverhampton.

The locations of proposed housing allocations in the SSLP do not reflect the concentration of employment allocations in the M54 corridor, on the northern side of the motorway. Large-scale employment development in the M54 corridor have the clear potential to alter migration patterns from neighbouring local authorities and increase demand for housing in this part of the district. The absence of housing allocations in this part of the district does not support the emphasis on sustainable development in the NPPF. The provision of housing close to people's place of work can support commuting by non-car modes



of transport and reduce pressure on road infrastructure.

In addition, the significant shortfall in housing provision in Wolverhampton and the knock-on effects in terms of demand for housing in South Staffordshire have not been addressed in the evidence base. The Wolverhampton Local Plan will only meet 47.3% of its housing requirements, leaving a shortfall of 10,398 dwellings, and the SoCG shows the SSLP submitted for Examination will only meet 2.3% (or 234 dwellings) of this shortfall.

More housing sites should be allocated in and around the M54 corridor to meet an anticipated increase in the demand for housing generated by both the employment development coming forward in the M54 corridor and the significant shortfalls in housing provision in the Wolverhampton Local Plan.

6. Who has the Council engaged with in terms of overall employment land provision and what form has this taken?

This is a question for the Council to respond to and depending on their response, we may wish to make comments during the Hearing Session.

7. In terms of migration, commuting and travel to work areas:

a. What are the inter-relationships with neighbouring authority areas?

b. How have these been taken into account in preparing the Local Plan?

This is a question for the Council to respond to and depending on their response, we may wish to make comments during the Hearing Session.

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?

As per our response to question 4, the SoCG relates to the apportionment of 640 dwellings to local authorities within the GBBCHMA. It does not demonstrate that the duty to co-operate has been met in terms of the number of dwellings to be delivered in the SSLP to meet part of the housing shortfall in the GBBCHMA.

Further, it is noted that the SoCG was completed after the 2024 Regulation 19 consultation, which raises questions as to how much consideration has been given during the Plan's preparation to the quantum and location of new housing being delivered through the SSLP to address the shortfalls in the GBBCHMA.

