

Matter 2: Duty to Cooperate – Opening Statement

The Council consider that all strategic matters requiring cross boundary co-operation have been identified through the Duty to Cooperate process. The council has engaged constructively, actively and on an ongoing basis in relation to these matters with the relevant authorities and prescribed bodies. Full details of this engagement can be found in the Council's Duty to Cooperate Topic Paper April 2024 [DC2] and December 2024 addendum [DC1]. Local Authority specific SoCG have now been signed with all neighbouring authorities and authorities within the HMA [DC7 – 20 & SST/ED3, SST/ED13, SST/ED14, SST/ED23].

No neighbouring authorities or prescribed bodies have indicated that the duty to co-operate has not been complied with.

Turning to specific Duty to Cooperate matters:

In relation to housing, council has engaged constructively, actively and on an ongoing basis with the other authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and other neighbouring authorities throughout the plan making process.

This is reflected in joint Statements of Common Ground (SoCG) [SST/ED21] which is now signed by all authorities within the HMA and a number of others outside.

In relation to this SoCG just to clarify a point which was raised on this morning, table two in the SOCG deals with the apportionment of the contributions to the unmet needs of the HMA (in the case of South Staffordshire is 640). Not how the contribution was derived or arrived at.

The Council has also actively engaged through the HMA Strategic Growth Study 2018 [EB28] and subsequent updated position statements [EB29-31]. An update the Strategic Growth Study is currently underway. The Council has invested considerable resources both financially and in officer time towards working with the HMA authorities in understanding the shortfalls and agreeing common ground.

In relation to Gypsy, Traveller and Travelling Showperson provision, the council has engaged with neighbouring authorities and authorities within the HMA on an ongoing basis including requesting assistance in meeting the unmet need in South Staffordshire on several occasions. This is set out within the Duty to Cooperate Topic Paper April 2024 [DC2] and December 2024 addendum [DC1], Gypsy and Traveller Topic Paper 2024 [EB33] and SoCG with individual authorities previously mentioned.

Turning to employment matters, South Staffordshire Council has engaged constructively, actively and on an ongoing basis with the other authorities within the South Staffordshire FEMA and wider area throughout the plan making process. Specifically, the Council has produced a SoCG [DC5] which has been signed by all authorities within the South Staffordshire FEMA as well as Sandwell because of the linkages between the four Black Country authorities. The council has also actively engaged with other local authorities to commission the West Midlands Strategic Employment Sites Study 2021 [EB47] and August 2024 update [EB92]. The Council is also party to an officer agreed SoCG for the Black Country FEMA [SST/ED12].

In relation to air quality on European designated wildlife sites, partnership work was carried out across the region in with other local authorities. This was led by South Staffordshire and confirmed that in combination, the Local Plan and other relevant plans polices and projects, will not have adverse effects on site integrity due to increased air pollution from traffic

associated with local plans. Natural England were a partner in this project and support the findings, which is reflected in the SoCG [SST/ED4] on this matter.

In relation to highways, ongoing engagement has taken place between National Highways, Staffordshire County Council, City of Wolverhampton Council and South Staffordshire District Council, with this recorded in a signed SoCG [SST/ED5]. The Council has also now received a letter of support from National Highways [SST/ED22] following additional work set out in a technical note [SST/ED22A].

Overall, the Council considers that the Submission Plan meets the legal requirements of the Duty to Cooperate.