



**North Warwickshire
Borough Council**

The Planning Inspectors : South Staffordshire Local
Plan Review : Examination in Public.

c/o

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This matter is being dealt with by
: Mike Dittman

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Your ref : |

Our ref : |

Date : 01/09/2025

Dear Programme Office,

Re: South Staffordshire Local Plan Examination - Consultation on Duty to Co-operate Documents

In response to the current 'Consultation on Duty to Co-operate Documents' for the Staffordshire Local Plan Examination email dated 31/07/2025 and with regards to Matter 2 – Action 2.1 I can confirm that the summary comments in the Supplementary Note to the South Staffordshire Local Plan Examination 2025, specifically paragraphs 1.34, 1.46 and 1.52, and the timeline indicated in *Table 1: Housing Duty to Co-Operate Timeline* (and relevant Appendices Part 1 and Part 2) are correct and fully support the engagement and approach taken by South Staffordshire to the Duty to Co-operate.

To help clarify, unfortunately in the completion of the response form to South Staffordshire, the Duty to Co-operate response box was ticked. This should have been indicated as simply a concern over the reduction in the GBBCHMA (Greater Birmingham and Black Country Housing Market Area) unmet housing numbers in the South Staffordshire Publication Plan April 2024 from that proposed earlier from earlier and not as a failure of South Staffordshire District to address the Duty to Cooperate requirements.

The Borough Council originally indicated support for South Staffordshire Local Plan and their approach to addressing unmet need, noted in the LDF Sub-Committee Board Reports, 6 September 2021 and 28th November 2022, dealing with the Borough Council response. This support was provided in light of the significant and similar level of housing South Staffordshire proposed to address the Birmingham unmet need to that included in the Adopted North Warwickshire Local Plan 2021. A signed letter of support was sent to South Staffordshire District on the 9th September 2021.

Subsequently, the second Publication Plan (Regulation 19) in April 2024 significantly reduced the South Staffordshire figures proposed to address the Birmingham unmet need. Following a further Report to the 21st May 2024 Planning & Development Board and LDF Sub-Committee, the Borough Council sought to raise concerns over both the limited housing numbers proposed to address the unmet need and also the potential

implications of lower delivery for future unmet needs arising. Nevertheless, the implications of the changes to National Planning Policy Framework in 2023, whereby paragraph 145 made clear there is “no requirement for Green Belt boundaries to be reviewed or changed”, were recognised.

Furthermore, in light of the Publication Plan significantly addressing the strategic employment need in the West Midlands (a key concern and priority for North Warwickshire) and the increased housing delivery over recent years within Birmingham, where the pressure on addressing the Birmingham unmet housing need had reduced, it was still considered that the Publication Plan was sound and the District Council had addressed the Duty to Co-operate. The major contribution towards strategic employment needs was considered of particularly significant benefit both to North Warwickshire and the surrounding sub-region, generating major support for the South Staffordshire Local Plan. Nevertheless, Members still felt that the Publication Plan was not sufficiently positive towards assisting the unmet housing needs of the GBBCHMA and wished to express those concerns. The attached 21st May 2024 Board Report and minutes indicates the latter concerns.

It should be noted that the Borough Council have also raised concerns at Local plan consultations with all Local Authorities within the GBBCHMA that it considers are not dealing with the Birmingham unmet need in a similar positive way to that which North Warwickshire undertook, as evidenced by the individual memorandum of Understanding signed between North Warwickshire and Birmingham City Planning authority to accommodate 10% of their unmet need. (See attached MOU copy). But this has not generated objection to the Duty to Cooperate in those circumstances. Simply concerns over the lack of housing levels proposed to address unmet needs. It should be stressed that the Duty to Cooperate is not a Duty to Agree, rather the local authority must demonstrate it has made every effort to engage constructively on strategic matters, to which North Warwickshire believe South Staffordshire have engaged every effort.

So, in summary, in light of the changes to the NPPF in 2023 whereby Green Belt release was permitted by national policy, the increased delivery of housing within Birmingham that had also been delivered up to that point, the proposals to continue to address some of the Birmingham unmet need (notwithstanding concerns over the scale proposed) in the South Staffordshire Publication plan, and the significant and positive proposals to address strategic employment needs (a key priority and concern of North Warwickshire) it was considered the South Staffordshire Plan was both sound and addressed the Duty to Cooperate. North Warwickshire Borough were accepting of this situation which subsequently led to the GBBCHMA Statement of Common Ground being signed. In addition, the Borough Council therefore believe the issue raised in relation to Request 4 (consequences of reduced contribution) has also been answered.

I hope the above information is helpful and if you require any further information or clarification of the above please do not hesitate to contact me at this office.

Yours Sincerely,

Mike Dittman
Senior planning policy officer
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North Warwickshire Borough Council
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