



# MATTER STATEMENT

in respect of  
Matter 1 – Legal Requirements, Duty to Cooperate and  
the public sector equality duty

on behalf of  
Seven Homes Ltd – Representor ID: 1192551

26 November 2020  
Client Reference: RCA716b

# QMS

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## 1. INTRODUCTION

- 1.1. This Matter Statement has been prepared in response to the Inspector's Matters Issues and Questions in relation to the legal requirements, duty to cooperate and the public sector equality duty. This Statement has been prepared on behalf of Seven Homes by RCA Regeneration Ltd.
- 1.2. I can confirm that RCA Regeneration Ltd would wish to speak at the Hearing sessions in connection with Matter 1 on behalf of their client Seven Homes.
- 1.3. The following section sets out our responses to the Inspector's questions.

## 2. MATTER 1 – LEGAL REQUIREMENTS, DUTY TO COOPERATE AND THE PUBLIC SECTOR EQUALITY DUTY

2.1. This section aims to respond to the Inspectors questions in regard to the above Matter.

**Q1.2 Is the sustainability appraisal adequate? Does it indicate that the Plan sets out an appropriate strategy for the District over the Plan period, taking account of the reasonable alternatives?**

2.2. We consider that the sustainability appraisal (SA) (and in particular the latest document entitled 'Wyre Forest District Local Plan Sustainability Appraisal Consideration of Alternatives: Update' (ED5) ) clearly sets out that the Council has not properly considered the change in circumstances we now face, as a result of the COVID pandemic and ensuing economic recession.

2.3. Indeed, the evidence previously posited by WFDC to underpin the submission plan suggests that the authority should not take any unmet need from the Black Country and Birmingham conurbations, leading to objections to the Plan from neighbouring authorities. This is despite the fact that in the consideration of alternatives, at paragraph 7, it clearly states that *'an increase in net internal migration over the past 20 years, dominated by young retirees, with the number of additional households thus being much higher than would be expected from the population increase. The Wyre Forest Local Plan uses the 2016 projections as its basis because they are felt to more accurately reflect the situation in the district than the 2014-based predictions. If the 2018 projections were used, even more homes would be needed.'* This suggests that the growth attributed to net migration in the District has been under-estimated and that unmet need from neighbouring authorities, therefore should form an element of the Wyre Forest housing target, increasing it in line with the 2018-based projections, for the plan period after all.

2.4. We do not consider that the plan has taken sufficient account of the reasonable alternatives, particularly given the economic effects of the COVID pandemic we are now facing as a nation. Furthermore, we also consider that the wider social changes including an increase in online shopping, homeworking and changes to the economic landscape have not been adequately reflected in the Local Plan as it is currently written. These are increasingly challenging times we are facing, and we need to ensure that the Plan currently under examination (not in light of any proposed MM's) is robust and takes into the current pandemic sweeping the nation.

**Q1.4 Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on the strategic matters that are relevant to the Plan's preparation, as required by the duty to cooperate?**

2.5. We would point out that the serious and as yet unresolved objections from neighbouring authorities, particularly those with, as yet, unmet housing need, where they will need to distribute housing growth outside their administrative boundaries have not been considered appropriately or adequately. We consider that the Statements of Common Ground received from neighbouring authorities do not adequately address the areas where dispute currently lies between them in terms of assistance with meeting unmet housing needs and the housing market area within which Wyre Forest sits. The strategic matters which are relevant to the Plan's preparation, including multiple infrastructure projects has been underplayed by the Council and we consider that the Council have failed in their duty to cooperate in this regard.