



Cannock Chase Local Plan (2018-2040)

Duty to Co-operate Statement of Compliance

December 2023



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Executive Summary

The Localism Act (2011) introduced a legal duty to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. This document sets out how Cannock Chase District Council engaged with local authorities, the County Council and prescribed bodies to develop the Regulation 19.¹ Cannock Chase Local Plan.

The first section sets out the legislative background and policy context for the duty, listing the prescribed bodies and explaining the framework for how the Local Plan must be prepared.

The local context is set out; providing an overview of the partnerships in place, the geography, physical and policy boundaries and the factors which inform cross boundary consideration.

The main document is split into a set of cross boundary matters:

- Meeting Housing Needs
- Meeting the needs of Gypsies, Travellers and Travelling Showpeople
- Meeting Economic Needs
- Protecting the Green Belt
- Planning for Infrastructure
- Enhancing Cannock Chase Area of Outstanding Natural Beauty (AONB) and protecting Special Areas of Conservation (SAC)
- Conserving and Enhancing Heritage Assets
- Mitigating the Impacts of Climate Change
- Strategic Cross Boundary Site Allocations

Each matter is described in terms of identifying the main parties involved in cooperation, how the matter has been addressed, what was the outcome in terms of areas of common ground or any areas of uncommon ground and matters arising. Appendices are provided to evidence some of the documents referred to in the text but this is not exhaustive. Further evidence can be made available on request.

The document concludes by asserting that the legal process of the duty has been followed in producing the Cannock Chase Local Plan. Cooperative working will continue leading up to submission of the Local Plan to the Planning Inspectorate and upon implementation of the plan, subject to successful Examination in Public and adoption of the plan by Cannock Chase District Council.

¹ Regulation 19. Publication of a local plan - The Town and Country Planning (Local Planning) (England) Regulations 2012

1. Introduction

- 1.1. Cannock Chase District Council has prepared a new Local Plan which sets out local planning policies and site allocations to meet the development needs of the district over the period 2018-2040. This statement accompanies the Local Plan and sets out how it has been produced in compliance with the nationally set Duty to Cooperate.
- 1.2. The duty places an obligation on local authorities to cooperate with each other, and other statutory bodies, when preparing policies which address strategic cross boundary issues, such as meeting housing and economic needs. It is not a 'duty to agree' but it should be demonstrated how effective and on-going joint working was undertaken throughout the production of the Local Plan with clear outcomes. These introductory sections explain what the duty is, who is involved, and the strategic context of Cannock Chase.

National Policy and Legislation

- 1.3. The duty to cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 1.4. Strategic matters are defined in the 2004 Act as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
(b) sustainable development or use of land in a two-tier area if the development or use—
 - (i) is a county matter, or
 - (ii) has or would have a significant impact on a county matter.
- 1.5. The Act states that engagement includes considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches to the undertaking of activities and in the case of a local planning authority, considering whether to agree to prepare joint local development documents.
- 1.6. Legislation in the Act has been referred to and further explained in national guidance within the National Planning Policy Framework (NPPF). Paragraphs 20-23 of the NPPF provide guidance on strategic planning matters, (although these are not exhaustive).

1.7. *“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision 13 for:*

(a) housing (including affordable housing), employment, retail, leisure and other commercial development;

(b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

(c) community facilities (such as health, education and cultural infrastructure); and

(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

NPPF (Sept 2023)

1.8. National Policy also sets out the expectation for local authorities to demonstrate effective joint working by the production of one or more statements of common ground. These statements are separate to this overarching statement of compliance but they also document the cross-boundary matters being addressed and progress in cooperating to address these between specific authorities or prescribed bodies.

Who is involved?

1.9. The duty as set out in Section 33a of the Planning and Compulsory Purchase Act (2004) applies to local authorities, County Councils who are not local planning authorities and prescribed bodies.

1.10. The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the list of prescribed bodies:

- the Environment Agency;
- Historic England;
- Natural England;
- The Mayor of London;
- The Civil Aviation Authority;
- Homes England;
- Integrated Care Board;
- NHS Commissioning Board;
- The Office of Rail and Road;
- Transport for London;
- Each integrated Transport Authority;

- Each Highway Authority;
- The Marine Management Organisation.

1.11. Bodies that local authorities must also have regard to include Local Enterprise Partnerships and Local Nature Partnerships.

2. Cannock Chase Strategic context

2.1. The Plan area covers the administrative local authority boundary for Cannock Chase. Cannock Chase is located in the County of Staffordshire in the West Midlands, and is situated to the north east of the City of Birmingham and directly adjacent to Walsall which together with Sandwell, Dudley and Wolverhampton form the Black Country Authorities. Cannock Chase is adjacent to the local authorities of South Staffordshire to the west, Stafford to the north and Lichfield to the East.

2.2. The local authorities which directly neighbour the authority boundary for Cannock Chase are set out below:

- Stafford Borough Council
- South Staffordshire District Council
- Walsall District Council
- Lichfield District Council

2.3. Cannock Chase is also one of the smallest authorities in the County of Staffordshire making it quite constrained in terms of potential for growth and expansion. The 2021 census registered a population of 100,500 residents with most of the population contained in the urbanised settlements of Cannock/Hednesford/Heath Hayes and Rugeley/Brereton and Norton Canes.

2.4. Cannock Chase is part of the Greater Birmingham and Black Country housing market area (figure 1). The functional HMA around Birmingham extends to include the Black Country and parts of Worcestershire, Warwickshire and Staffordshire. It comprises local authorities within the Greater Birmingham and Solihull area and Black Country area together with South Staffordshire; as well as North Warwickshire and Stratford-on-Avon Districts which fall within an area of overlap between the Birmingham and Coventry/Warwickshire HMA. Therefore Cannock Chase has strong links to the wider city conurbation and not just to adjacent neighbouring authorities in terms of people locating in the area living and working across local authority boundaries.

2.5. Cannock Chase is also not a self-contained functional economic market area (FEMA). The Economic Development Needs Assessment (2019) shows the

boundary of the FEMA encompasses parts of all immediately adjacent neighbouring authorities (figure 2). Around 75% of Cannock Chase residents in employment travel to work within this zone on a daily basis. As such, consideration for addressing the housing needs of both greater Birmingham and the Black Country as well as consideration of employment needs across the FEMA is a key aspect of cooperation between local authorities.

Figure 1 Map showing Greater Birmingham Strategic Market Area, source: Peter Brett Associates (2014) Joint Strategic Housing Needs Study Phase 2 Report

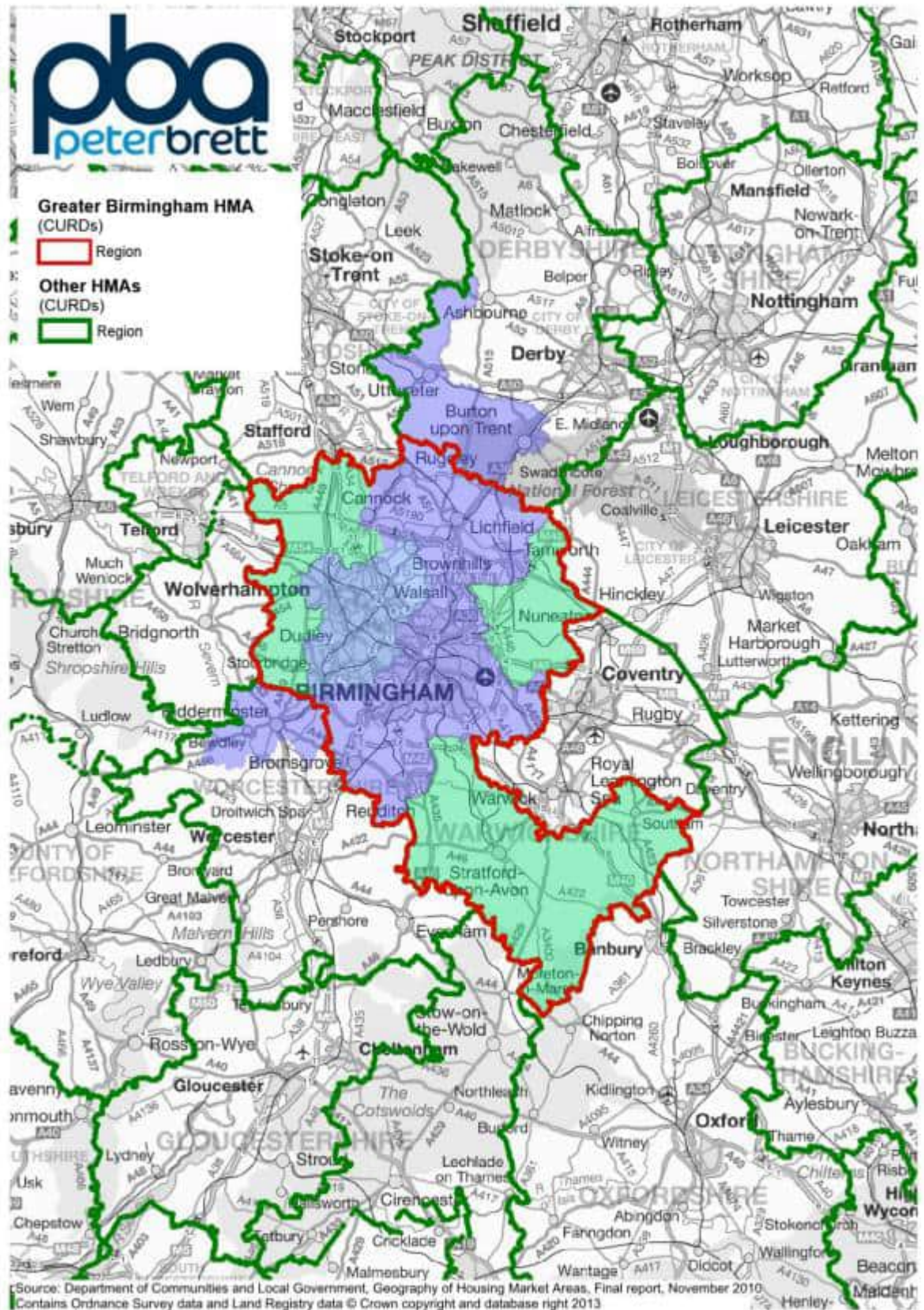
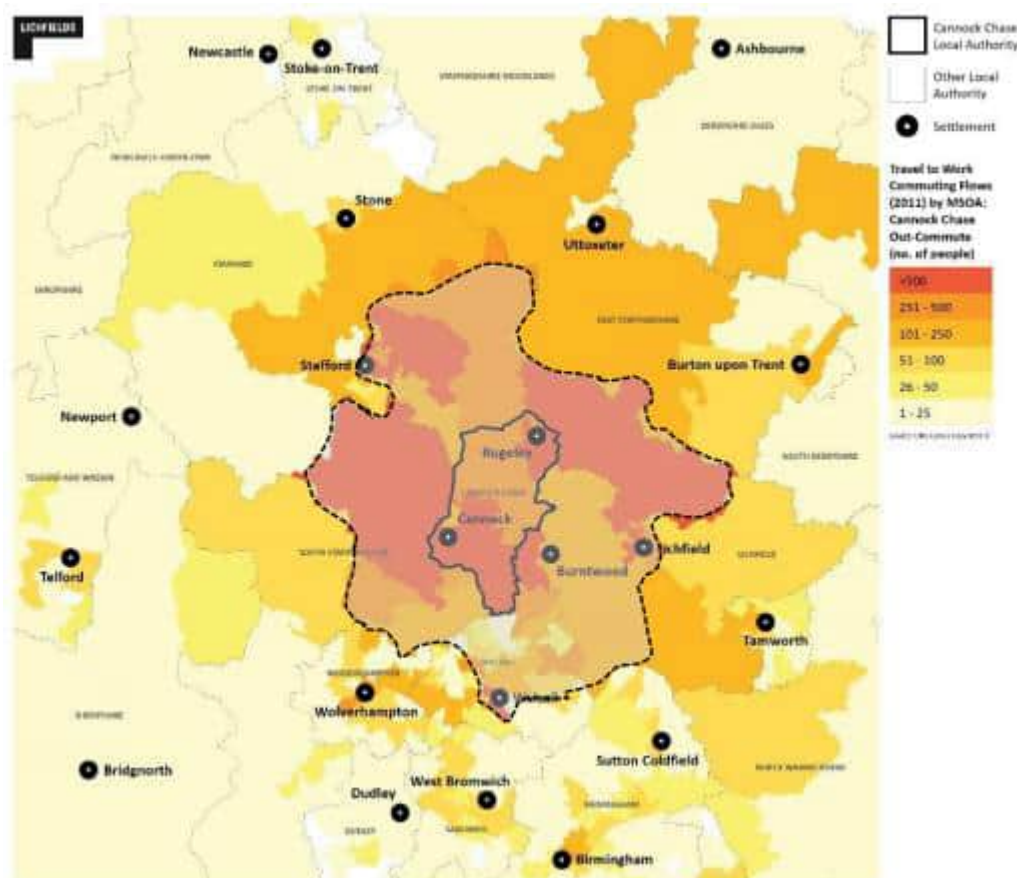


Figure 2 Cannock Chase Functional Economic Market Area (FEMA): Economic Development Needs Assessment, Lichfields



Source: ONS (2011) / Lichfields analysis

2.6. The need for accommodation for Gypsies, Travellers and Travelling Showpeople has been calculated for the local authority area and equates to 25 permanent pitches and 10 plots for travelling showpeople. The Council has discussed with neighbouring authorities the potential to accommodate unmet need for Gypsy and Traveller sites throughout production of the plan, however no additional capacity has been identified in neighbouring authority areas.

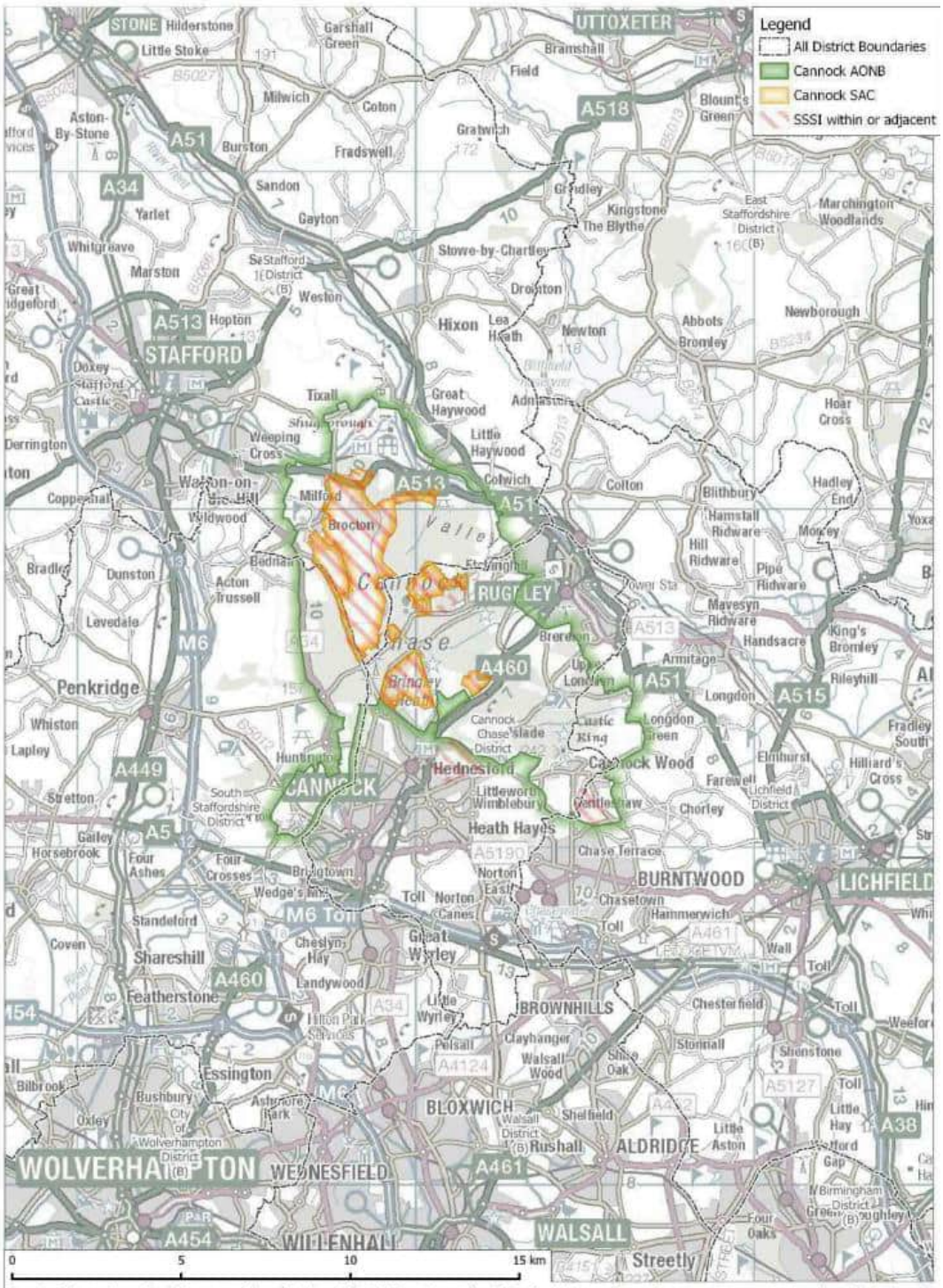
2.7. Cannock Chase District Council is both a member of the Stoke-on-Trent and Staffordshire Local Economic Partnership (LEP) and the Greater Birmingham and Solihull LEP. In addition, it is a non-constituent member of the West Midlands Combined Authority (WMCA) which has devolved powers to implement funds and policy in relation to transport and housing.

2.8. Cannock Chase has a very distinctive environment containing large parts of the Cannock Chase Area of Outstanding Natural Beauty (AONB) and Green Belt (which forms a 'policy' belt to prevent urban sprawl) accounting for 60% of the authority's total land area. The West Midlands Green Belt covers over 1500 square kilometres, surrounding the Black Country, Coventry, Birmingham and Solihull, with its edge lying between 10 and 25 kilometres

from the built-up area of the conurbation. The Green Belt was approved by the Secretary of State in 1975 and has been confirmed in adopted Local Plans.

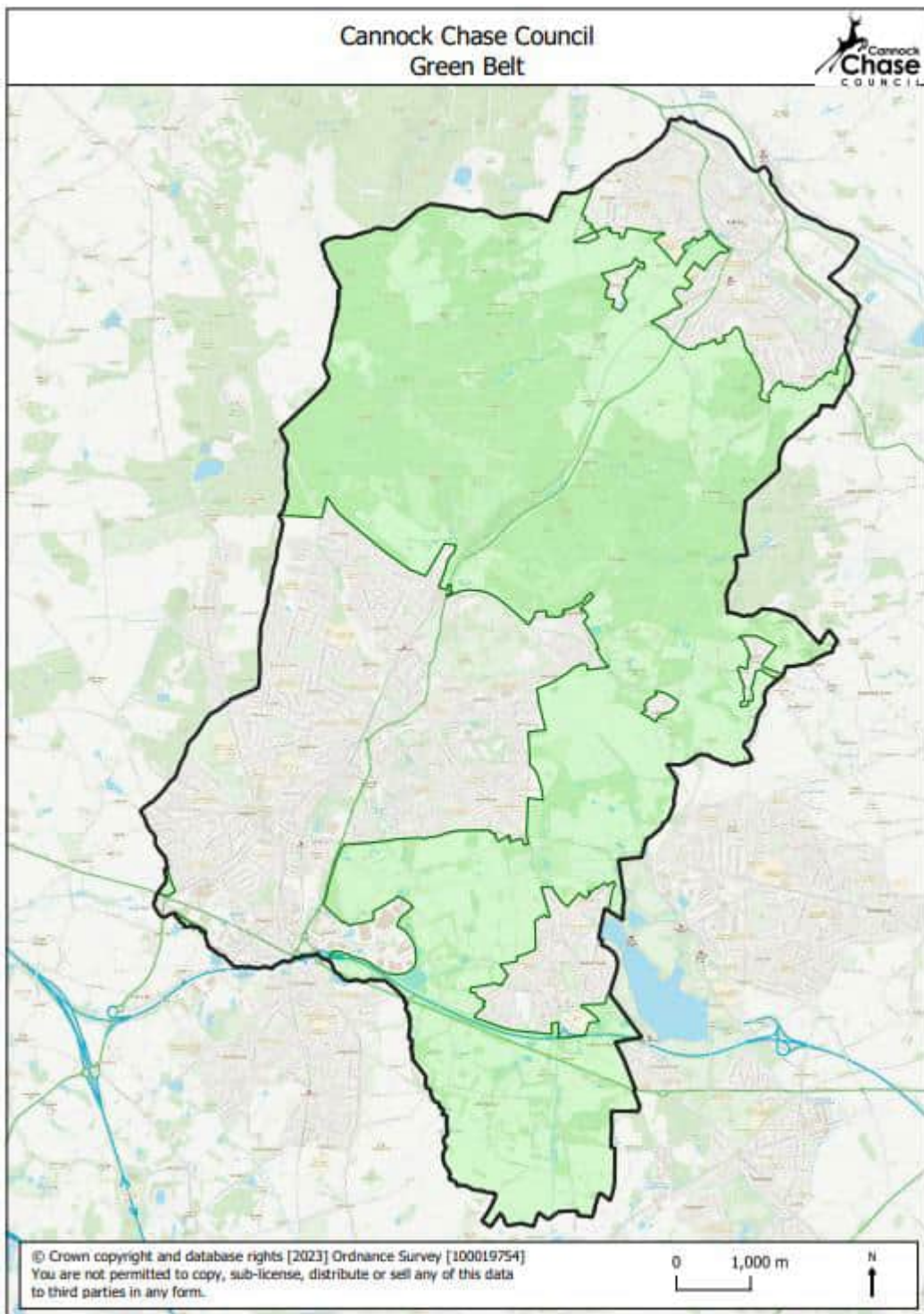
2.9. There are a number of international, national and local environmental designations applying to Cannock Chase National Landscape (formerly AONB); the total 6,900 hectare area of the National Landscape spans beyond the authority boundary with 64% of the National Landscape owned and managed by 7 public bodies and charities. The National Landscape includes Cannock Chase Forest, its 2,700 hectares managed by Forestry England. As such, the management of this special area for its ecological, recreational, and productive value is a key aspect of cross boundary partnership and co-operation work for Cannock Chase District Council. This includes addressing and mitigating any potential negative impacts arising from planned growth set in Local Plans.

Figure 3 Cannock Chase AONB, surrounding local authorities and designated areas, source: Footprint Ecology (2019) Cannock Chase Visitor Survey 2019. Note this map was produced before the change of name from AONB to National Landscape



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Figure 4 Cannock Chase Green Belt



- 2.10. The District is located at a strategic road/rail transport crossroads between the North West and South East via the M6T/M6 and West Coast Main Line railway and East-West A5/M54 corridor, and the West Midlands and wider Staffordshire. Road and rail improvement projects are in the pipeline and there are aspirations to improve the recreational opportunities for the historical canal network linking with neighbouring authorities. There has also been marked improvements to air quality with the Council removing two of the three Air Quality Management Areas (AQMA's) at A5 Watling Street in Bridgtown (AQMA 1) and A5190 Cannock Road, Heath Hayes (Five Ways Island) (AQMA 3). There are issues to address with congestion and declining bus services. The strongest commuter flows from Cannock Chase are to Lichfield, Walsall, Stafford, South Staffordshire and Birmingham. The planned growth of Cannock Chase, the Black Country and greater Birmingham will add pressure to the transportation network, therefore this remains a key cross boundary strategic issue to address.
- 2.11. In terms of physical infrastructure, utilities providers generally cover areas wider than local authority boundaries. Water is supplied by South Staffordshire Water which spans an area as far north as Uttoxeter and encompasses Lichfield, Walsall and areas west of Birmingham. Severn Trent manage waste water over a wide central area from the Bristol Channel to the Humber, and from the West to the East Midlands. National Grid cover the East and West Midlands as well as South Wales and the South West. Whilst utilities providers aren't defined as prescribed bodies under the duty, consultation with these providers is necessary to ensure any significant infrastructure requirements are identified and fed into their business plans which usually span periods of 5 years or more.
- 2.12. Social infrastructure comprises health, education, and community facilities. The Primary Care Network (PCN) clusters G.P's with community services and social care. The district is covered by Cannock North which includes the areas of Cannock, Chads Moor and Hednesford. There is also Cannock Villages PCN and Rugeley and Haywood PCN. In this respect the district is fairly self-contained as the PCN's are the key consultee in relation to health, however, dependent where growth is planned there may be cross boundary implications for health services. Chase Better Health is a partnership approach between Cannock Chase District Council, Staffordshire County Council and Cannock Chase Clinical Commissioning Group which seeks to shape and build Cannock Chase's healthy future, by supporting the improvement of health and wellbeing outcomes for residents of the District.
- 2.13. Staffordshire County Council are responsible for delivering education and have a central point of contact that liaises with authorities as Local Plans develop helping to identify any potential cross boundary implications for education provision. In terms of other social and community infrastructure impacts are likely to be localised and dependent on the location and scale

and growth this requires consideration of the impact on facilities and what improvements, or new infrastructure may be provided. The Playing Pitch Strategy and Open Space Assessment inform consideration of what leisure facilities may be affected or improvements required.

- 2.14. The Council is committed to ensuring the authority is carbon neutral and has worked with Staffordshire authorities to produce evidence which specifically examines climate change adaptation and mitigation across the county and will be used to inform all Local Plans.

3. Strategic Cross Boundary Matters

- 3.1. The following sections set out the strategic cross boundary matters which have been the subject of cooperation. Each matter is described, along with the partners involved in discussions, the progress in addressing the matters and the outcomes achieved.

4. Meeting Housing Needs

The key strategic housing matters relevant to the Cannock Chase Local Plan are:

- The identification of the housing market area for Cannock Chase;
- The number and type of new homes required;
- The ability to meet the housing needs of Cannock Chase
- Then ability to contribute to meeting the housing need of the wider housing market area.

The key partners involved in discussions are:

- 4.2. the members of the strategic housing market area (Greater Birmingham and the Black Country combined), in addition to authorities with a functional relationship:

- Greater Birmingham and Black Country Housing Market Area: Cannock Chase; Lichfield; South Staffordshire; Tamworth; North Warwickshire; Stratford-on-Avon; Bromsgrove; Redditch; Birmingham; Solihull; Dudley, Sandwell, Walsall and Wolverhampton
- Stafford District Council
- Shropshire Council

Summary of how the matter has been addressed

4.3. How has the matter been discussed

- The Greater Birmingham and Black Country Housing Market Area Development Needs Group provides a framework for coordination between local authorities to ensure that unmet housing needs within the GBBCHMA can be satisfactorily addressed (where possible). The group meet at least quarterly. Notes of all meetings are recorded. Dates of meetings held whilst the Local Plan was in production are as follows:
 - 2018 - 16th April, 12th July, 30th August, 11th October, 6th December
 - 2019 - 4th February, 11th April, 5th June, 5th November
 - 2020 - 12th February, 2nd June, 3rd December
 - 2021 - 14th June, 9th October, 30th November
 - 2022 - 18th January, 15th March, 19th April, 17th May, 21st June, 19th July, 16th August, 20th September, 1st November, 12th December
 - 2023 - 24th January, 21st February, 21st March, 16th May, 18th April, 26th September, 21st November

4.4. With the involvement of 14 Councils in the original Strategic Growth Study, positions on Local Plan progress and housing targets including contributions to wider unmet need was a complex matter and positions changed over time. The key mechanism to record the position on housing for all the authorities was the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statements. These extracted the most relevant information regarding housing need and supply from the Strategic Growth Study and updates the land supply position from set time periods for each statement. It also set out progress and timetables for plan reviews including likely increases in capacity. The purpose of the statements was to provide a starting point from which future Statements of Common Ground could develop.

4.5. Defining the HMA

4.6. Prior to the start of the new Cannock Chase Local Plan, CCDC engaged with the Stage 2 (2014) and Stage 3 (2015) Strategic Housing Needs Study produced by the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Local Authorities. This evidence defines the Greater Birmingham Housing Market Area (GBHMA) which Cannock Chase is part of as well as the neighbouring HMA's including the Black Country (BCHMA). The boundary of the HMA has recently been reviewed and confirmed through the Birmingham Housing and Economic Development Needs Assessment 2022 which has not proposed any change.

4.7. The assumption was also tested at Issues and Options consultation. The question asked was: 'We think that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country Housing Market Area. Do you agree? If not, what evidence is there for any alternative approach?'. Responses were analysed and no counter evidence proved an alternative boundary was more robust.

4.8. Establishing housing need

- 4.9. Cannock Chase have used the standard methodology which was introduced through the original 2018 National Planning Policy Framework to determine the number of homes required in the district. The NPPF has been subject to updates but the standard methodology for calculating housing need has remained unchanged throughout the production of the plan.
- 4.10. ORS were commissioned to develop the Local Housing Needs Assessment (published in 2019) which establishes a profile of housing need across the district considering the type, size, affordability and other housing need which has formed evidence for the Local Plan.
- 4.11. The housing target and evidence of housing need for Cannock Chase are accepted as a baseline by other local authorities. The standard method target formed a starting point in any joint evidence or discussions.

4.12. Establishing unmet housing need

- 4.13. In 2017 the Birmingham Development Plan (BDP) established an unmet need of 37,900 dwellings arising from Birmingham by 2031.
- 4.14. In 2017 the Black Country Draft Plan established an unmet need of 21,670 dwellings
- 4.15. The members of the GBBCHMA (includes CCDC) agreed to commission a strategy to identify and understand the scale of unmet need and assess options to address the unmet needs of both HMA areas over the period to 2031 and beyond to 2036.
- 4.16. In 2018 the Housing Growth Strategy was published. In the same year (March 2018) the government published the 'Outline of Housing Package' which set out an agreed commitment with the West Midlands Combined Authority (WMCA) to increase housing delivery of 215,000 homes by 2030/31 which equated to an increase of nearly 16,000 dwellings per year from an average of 12,000 over the previous 3 years. WMCA were awarded £350 million in funding for the region but did not have the power to apportion housing targets to those local authorities within the WMCA geography.

4.17. Apportioning the housing target and addressing housing need

- 4.18. The Strategic Growth Study informed the options presented for housing growth in the Issues and Options version of the Local Plan. Options were developed based on the proportionate dispersal methodology to deliver above the local housing need target to contribute to the unmet needs of the wider area which equated to 500, 1,500 and 2,500 dwellings above local need.
- 4.19. This intention to present options which would help address unmet need was communicated to officer members of the GBBCHMA at the quarterly meeting held 4/2/19 as it was to appear in the Issues and Options consultation document for the Cannock Chase Local Plan. The consultation

on the Local Plan in summer 2019 provided the opportunity for CCDC to engage with the members of the HMA to establish which options were supported.

- 4.20. The Association for Black Country local authorities (ABCA) - supported 2,500 dwellings above local housing need but caveated this with an acceptance of the policy constraints restricting land supply in CCDC and said the option would need testing to see whether there are sufficient sites.
- 4.21. Birmingham City supported the presentation of options above local housing need. Lichfield supported the presentation of options above local housing need and supported using the proportionate dispersal approach as a basis for targets. South Staffordshire supported the proportionate dispersal approach and the lower target of 500 dwellings above local housing need to align with their approach to addressing unmet need.
- 4.22. Following Issues and Options stage, a report was taken to Cabinet in October 2019 to summarise the response to the consultation. It reported that options for growth were to be analysed in more detail to consider deliverability, infrastructure capacity and the economic, social and environmental sustainability implications of each proposal.
- 4.23. A number of evidence base documents were produced or updated to assess the land supply position in Cannock Chase including the Strategic Housing Land Availability Assessment and the Development Capacity Study. It became evident, at that stage, that insufficient land in Cannock Chase was available to meet the local housing need housing target without Green Belt release. However, during this time it became apparent that a number of neighbouring authorities were similarly struggling to identify land to meet their own housing need. Through meetings and written correspondence, CCDC were informed separately by Lichfield District Council and South Staffordshire District Council that they were not able to meet their local housing need and contribute to the unmet needs of the GBBCHMA on sites outside of the Green Belt. Both authorities made formal requests to CCDC to help meet their housing need on sites outside the Green Belt.
- 4.24. In December 2021, CCDC wrote to all local authorities in the GBBCHMA and authorities with a functional relationship outside the HMA as well as immediate neighbouring authorities to establish whether any were able to accommodate the unmet housing need of Cannock Chase. At the time this was stated as 1500 dwellings over the period to 2038. This figure included a 500 dwelling contribution to the unmet needs of neighbouring authorities.
- 4.25. Responses were received from Lichfield District Council, Stafford Borough Council, Coventry City Council, Birmingham City Council and ABCA all stating that these authorities were unable to accommodate any of the housing shortfall for Cannock Chase and no further discussions were sought beyond the existing regular duty to cooperate meetings at that time.
- 4.26. South Staffordshire District Council sought further discussion, wanting to ascertain whether CCDC would be declaring its need as unmet through the plan process, or seeking to build an exceptional circumstances case to

release Green Belt land to meet housing need within the District. At the time South Staffordshire's emerging Local Plan was proposing to release Green Belt land to assist with addressing the unmet need of the Black Country and therefore were not considered to be in a position to address any unmet need from CCDC.

4.27. The regular meetings of the GBBCHMA Development Needs Group throughout the production of the plan enabled discussion and understanding of the position of each authority in terms of meeting housing targets and contribution to unmet need. The GBBCHMA Housing Need and Housing Land Supply Position Statements formalised local authorities' position on housing need and supply at set points in time:

- GBBCHMA Housing Need and Housing Land Supply Position Statement no. 1 (February 2018)
- GBBCHMA Housing Need and Housing Land Supply Position Statement no. 2 (Sept 2018)
- GBBCHMA Housing Need and Housing Land Supply Position Statements no. 3 September 2020 (updated December 2021)
- Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum, (April 2023)

4.28. There remains a shortfall of 2,053 homes in the GBBCHMA between 2011 and 2031 based on April 2023 information, although it is recognised that the Greater Birmingham housing need figure from the 2017 Local Plan is now out of date. Based on Regulation 18 Issues and Options consultation for the Birmingham Development Plan held between 24 October 2022 to 5 December 2022, the evidence suggests a significant shortfall (78,415 dwellings) between Birmingham's housing need and housing supply up to 2042. This number could change as the plan develops and does not form part of an adopted strategy.

4.29. The Draft GBBCHMA Development Needs Group Statement of Common Ground SoCG, August 2022 summarised the position on unmet needs taken by each local authority within the HMA and those with a functional relationship with it at a point in time (Figure 5). It was signed by 8 of the 14 authorities in the GBBCHMA including Cannock Chase as well as 1 of the 3 bordering authorities (Wyre Forest District Council) and is the closest to a collective position that has been achieved during the plan preparation process.

Latest position

4.30. Proposed reforms to the NPPF and plan making released in December 2022 resulted in delays to plan making for many authorities as Councils sought to interpret what this may mean for strategies in development.

4.31. Members of the GBBCHMA were preparing to commission a new Strategic Growth Study to update the 2018 study based on new information. However, the commissioning has been uncertain since the Government announced the consultation on the NPPF, which indicated Green Belt would

not require review through Local Plans. The subsequent introduction of the new NPPF on Dec 19th 2023 could limit the scope of joint evidence on growth in future and it is not yet clear what implications this will have. This also prevented any further signatories being achieved for the Aug 2022 SoCG.

- 4.32. In line with paragraph 230 of the NPPF revised in Dec 2023, the Cannock Chase Local Plan will be examined under the previous iteration of the NPPF. All work to date has been based on the understanding that under the Duty to Cooperate, meeting the development needs of the HMA (including the adopted unmet need of Greater Birmingham) is a collective responsibility. The strategy for the Local Plan references the joint evidence in the form of Strategic Growth Study (2018) and SoCG (2022), and has been informed by proactive and continued joint working as part of the GBBCHMA Development Needs Group.
- 4.33. Lichfield District Council withdrew their Local plan from Examination on 17th October 2023. The only authority in the HMA at Regulation 19 stage now is Solihull which submitted their Local Plan on 13 May 2021 for independent examination. The Examination has been paused pending the release of the revised NPPF. As such, it may be difficult to establish further SoCG's with HMA members to support the Cannock Chase Local Plan in relation to housing need and supply as all other authorities will be subject to Examination of their plans under the revised national policy context which has clear differences in relation to meeting housing need and Green Belt review.

Figure 5 Local Plan status in meeting housing requirements (source: GBBCHMA Development Needs Group Draft SoCG, August 2022)

Area	Plan Period	LHN as of 2022 (homes per annum)	Plan Requirement (homes per annum)	Shortfall / Surplus over Plan Period (total homes)	Plan Status
Birmingham	2011-2031	6,750	2,555	-37,900	Adopted (2017)
Black Country	2020 -2039	4004	2278	-28,239	Regulation 18 (2021)
Bromsgrove	2011-2030	383	368	+ 3,400 ¹⁰	Adopted (2017)
Cannock Chase	2018-2038	276	301	+ 500	Regulation 18 (2021)
Lichfield	2018 - 2040	303	422	+2655 ¹¹	Examination (2022)
North Warwickshire	2014-2033	169	454	+ 3790 ¹²	Adopted (2021)
Redditch	2011-2030	165	337	-3,400 ¹³	Adopted (2017)
Solihull	2016-2036	807	939	+2,105	Examination (2022)
South Staffordshire	2018-2038	243	444	+4,000	Regulation 18 (2021)
Stratford-on-Avon	2011-2031	567	730		Adopted (2016)
Tamworth	2006-2031	145	177	-1825 ¹⁴	Adopted (2016)
Non-HMA					
Shropshire	2016-38	1,147	1,430	+1,500 ¹⁵	Examination (2022)
Telford and Wrekin	2011-31	491	864		Adopted (2018)
Wyre Forest	2016-36	276	276		Adopted (2022)

¹⁰ 3,400 contribution specifically towards the 2011-30 Redditch shortfall

¹¹ 2,000 contribution specifically towards the 2020-38 Black Country shortfall

¹² 913 contribution specifically towards the 2006-31 Tamworth shortfall

¹³ 3,400 met by Bromsgrove Local Plan (2017)

¹⁴ 500 met by Lichfield Local Plan (adopted 2015) and 913 homes met by North Warwickshire Local Plan (adopted 2021)

¹⁵ Shropshire contribution towards Black Country shortfall specifically post 2031

Summary of outcomes and common ground

- Agreement of the defined housing market area for Greater Birmingham (which includes Cannock Chase) and the Black Country as well as acknowledgement of the authorities which form the 'wider market area'
- Agreement of the housing need calculation for Cannock Chase and the annual need calculated using the standard methodology.
- Authorities in the GBBCHMA have used the Strategic Growth Study 2018 as a consistent evidence base for consideration of how to address unmet need across the wider area up until the point at which national plan making reforms spelt uncertainty (Dec 2022 to date).

- The response from all local authorities wrote to on 2nd December 2021 confirmed that none had capacity to accommodate the unmet housing need from CCDC (Appendix 1)
- Signed Statements of Common Ground have been achieved with the following authorities:
 - 4.33..1. (August 2021) Statement of Common Ground between Solihull MBC and Cannock Chase CCDC
 - 4.33..2. (August 2022) GBBCHMA Development Needs Group Statement of Common Ground - signed by 8 of the 14 members of the HMA and Wyre Forest District Council
 - 4.33..3. (November 2022) Statement of Common Ground between Cannock Chase District Council and South Staffordshire District Council - South Staffordshire Local Plan 2018-2039
 - 4.33..4. Text was finalized for a Statement of Common Ground between Lichfield District Council and Cannock Chase District Council to support Lichfield District Local Plan 2040 in September 2022 but was not signed and the plan has since been withdrawn.

Summary of issues and/or uncommon ground

- Although accepted and used as common evidence for all local authorities in the HMA, the recommendations of the 2018 Strategic Growth Study have not been applied uniformly, with local authorities selecting the most appropriate option and defensible position for their area based on further, more detailed investigation, consultation and evidence gathering for their respective Local Plans.
- During production of the Black Country Plan, there was contention over the proportion of need arising from the Black Country which can be met within Cannock Chase local authority boundary.
- Issue of the HMA shortfall which has never been met in full, despite authorities engaging and actively exploring options to try to address the overall shortfall.

Matters arising

- In 2022 the Black Country authorities ceased work on their joint strategic plan and have decided to embark on singular Local Plans for each authority area. This has a yet unknown impact on the housing supply and shortfall position in the Black Country, arising from Dudley Councils position that it would not release Green Belt to meet development needs.
- Issue of the uncertainty arising from the NPPF consultation and change to the planning system post 2024, which triggered delays and alterations to some authorities Local Development Schemes affecting the projected supply position towards the shortfall.

- A SOCG has been drafted to agree to review the 2018 GBBCHMA Strategic Growth Study to support the changing position on housing shortfalls across the housing market area. There was an intention to create an advisory Member Board of local elected members to address housing solutions across the GBBCHMA and beyond. Following the outcome of the revised NPPF the commissioning of this joint evidence is not certain.

5. Meeting the needs of Gypsies and Travellers and Travelling Showpeople

The key strategic Local Plan matters relating to Gypsies and Travellers and Travelling Showpeople are:

- The identification of the accommodation requirements to meet the needs of Gypsies and Travellers and Travelling Showpeople in Cannock Chase
- The ability to meet the need within Cannock Chase and the ability of neighbouring authorities to address their accommodation requirements within their authority boundary.

5.2. The key partners involved in discussions are:

- the members of the Greater Birmingham and Black Country housing market area, in addition to the immediately adjacent authorities as set out in Strategic Matter 4.

Summary of how the matter has been addressed

5.3. There is recognition amongst authorities bordering the strategic A5 road that this is a key route for Gypsies and Travellers travelling through from North Wales, Nuneaton and Bedworth.

5.4. The Gypsy and Traveller Accommodation Assessment was produced for Cannock Chase District Council in March 2019 by ORS. The document contains a section on the Duty to Cooperate, documenting stakeholder engagement as well as how CCDC has worked collaboratively with neighbouring authorities. Telephone interviews were conducted with planning officers in the immediate adjacent authorities to consider cross boundary impacts. The evidence records the full detail.

5.5. South Staffordshire Council acknowledge that there are a cluster of sites near Cannock border but there are no known cross boundary issues arising from the established sites. Discussions had taken place regarding meeting the unmet accommodation needs for South Staffordshire in neighbouring authority boundaries but no capacity had been identified.

- 5.6. Lichfield District Council had engaged with neighbouring authorities to seek assistance in accommodating its unmet need for Gypsy and Traveller sites. However, neighbouring authorities cannot provide this assistance.
- 5.7. Stafford Borough Council cannot meet their own need and acknowledge they have been approached by Lichfield and Cannock with requests to meet their unmet needs.
- 5.8. Walsall are meeting the need for permanent pitches but not transit sites. They are under pressure to accommodate some of Birmingham's unmet accommodation needs.
- 5.9. CCDC wrote to all neighbouring authorities on 2nd December 2021 (appendix 1) as part of a wider letter about unmet housing and economic need, stating the shortfall for Gypsy, Travellers and Travelling Showpeoples accommodation to 2038 was approximately 16 pitches and 10 plots. The question asked was; 'Within your administrative boundary are you able to assist us in meeting this shortfall using land which is not in the Green Belt?'
- 5.10. Responses were received from Lichfield District Council, Stafford Borough Council, Coventry City Council, Birmingham City Council and ABCA all stating that these authorities were unable to accommodate any of the shortfall of pitches or plots for Cannock Chase and no further discussions were sought beyond the existing regular duty to cooperate meetings at that time. South Staffordshire confirmed it could not assist with meeting the need but did seek further discussion. South Staffs have suggested an update of the evidence on the assessment of the accommodation needs for gypsy and travellers which considers a wider geography than just Cannock Chase District and South Staffordshire District given the strategic nature of the A5 corridor. Cannock Chase District Council is open to the consideration of a joint evidence base when producing the next iteration of the GTAA, but the current GTAA produced in 2019 in Cannock Chase did not identify any specific cross boundary need or issues.

Summary of outcomes and common ground

- Agreement of the need for 25 permanent pitches and 10 plots for travelling showpeople over the plan period 2018-2038 in Cannock Chase.
- Acknowledgement that Cannock Chase, all neighbouring councils and Birmingham have struggled to identify sites to meet the accommodation needs of Gypsies and Travellers and due to this authorities are expected to try to meet their need in their own authority areas either through site identification and/or criteria based policies in their Local Plans.
- Agreed to consider joint evidence base in future to address need arising around the A5 corridor

6. Meeting economic needs

The key strategic economic matters relating to the Local Plan are:

- The identification of the Functional Economic Market Area (FEMA) for Cannock Chase
- The amount and type of employment land required
- The ability to meet the employment needs of Cannock Chase and the wider functional economic market area.

The key partners involved in discussions are:

- Local Authorities in Cannock Chase Functional Economic Market Area (FEMA): South Staffordshire, Stafford, Lichfield and Walsall
- Association of the Black Country Authorities (ABCA)
- West Midlands Combined Authority
- Staffordshire County Council
- Stoke-on-Trent and Staffordshire Local Economic Partnership (LEP)
- Greater Birmingham and Solihull LEP

Summary of how the matter has been addressed

How employment matters were discussed

6.2. Economic matters were addressed during Duty to Cooperate meetings held throughout production of the plan with individual local authorities, sometimes necessitating a more broader meeting with multiple authorities in the FEMA.

6.3. Dates of Duty to Cooperate meetings are provided below and minutes were taken:

- Lichfield - 30th May 2018, 18th July 2019, 16th June 2021 (joint with S. Staffs), 10th November 2021
- South Staffordshire - 19th June 2018, 31st August 2019, 16th June 2021 (joint with Lichfield), 1st November 2022
- Stafford - 23rd July 2018, 28th May 2019, 9th November 2022
- Black Country - 22nd April 2021

6.4. All Local Authorities were invited to make representations at key stages of consultation and these responses were key to identifying whether there was a need for further discussion. General progress of respective Local Plans and any key cross boundary issues were raised at the meetings of the Staffordshire Development Officer Group held quarterly which comprised a senior officer from the planning policy team of each local authority in Staffordshire.

- 6.5. Staffordshire County Council, on behalf of The Black Country Local Enterprise Partnership (BCLEP), Coventry & Warwickshire Local Enterprise Partnership (CWLEP), Greater Birmingham & Solihull Local Enterprise Partnership (GBSLEP) and Stoke-on-Trent & Staffordshire area commissioned the West Midlands Strategic Employment Sites Study (May 2021) which provided a focus of discussion on cross boundary employment issues; specifically the demand and supply for strategic sites greater than 25ha, over the course of its production.

Defining the Functional Economic Market Area (FEMA)

- 6.6. The Economic Development Needs Assessment (EDNA) was produced by Lichfields in 2019. To inform the findings, consultation was undertaken with officers in neighbouring authorities regarding cross boundary employment matters and consideration of the extent of the FEMA. The report provides detail of those discussions (pages 40-46 of the EDNA report). The report defined the FEMA by considering a number of influential factors including LEP geography, Travel to work area, housing market area, commercial market and the service market for consumers. The indicative FEMA is shown in Figure 2 and predominantly aligns with Cannock Chase's administrative boundary; an eastwards expansion into Burntwood and Lichfield City itself; a southern expansion towards Walsall; a northern expansion into Stafford Borough.
- 6.7. The FEMA boundary presented in the EDNA (2019) does not directly align with the FEMA boundaries produced in neighbouring authorities employment evidence due to the lack of a national standardised methodology on defining FEMA's. This has not been considered problematic because the assessment of functional relationships remain fairly consistent across evidence base documents, even if the boundaries do not directly align. An example is the South Staffordshire Economic Development Needs Assessment (EDNA) 2020 – 2040 which includes entire authority boundaries including Cannock Chase within the South Staffordshire FEMA . South Staffordshire developed a Statement of Common Ground with members of their FEMA including CCDC which was signed in November 2022.
- 6.8. CCDC sought views on the appropriate economic area at an early stage of plan making using the question: 'Question 5. What do you think is an appropriate geography for the consideration of economic issues? What evidence is there to support this?' in the 2019 Issues and Options Local Plan consultation. This provided the opportunity for local authorities in the proposed FEMA to offer their views formally.
- 6.9. Walsall Council, on behalf of ABCA, stated that Cannock Chase is considered to fall within an area of 'moderate economic transactions' with the Black Country with the most significant commuting pattern occurring with Walsall. South Staffordshire agreed that Cannock Chase was part of their FEMA and stated: 'we look forward to continuing our close working

relationship with the constituent FEMA authorities to explore how any identified shortfall in employment land supply can be addressed'. Stafford Borough Council acknowledged the key cross boundary linkages concerning travel to and from Stafford for employment. Lichfield District Council agreed that issues identified such as the Cannock Chase SAC, AONB, employment and housing and Rugeley Power Station will be cross boundary issues and welcomed the continued recognition of the cross boundary travel relationships between Lichfield District and Cannock Chase District.

- 6.10. Through development of the employment evidence, consultation on the plan and duty to cooperate meetings there has been support for the Cannock Chase FEMA.

Determining the Employment Land target

- 6.11. The Issues and Options consultation for the Black Country Plan in September 2017 identified the 'gap' between anticipated need and existing and future employment land supply in the Black Country to be approximately 300 ha. ABCA wrote to CCDC, and other neighbouring authorities in July 2018 requesting consideration of meeting the unmet housing and employment land requirements through respective Local Plans.
- 6.12. In assessing the Districts own employment needs; the EDNA 2019 determined that Cannock is meeting its own and other authorities' economic needs stating : 'in recent years the recent construction of a number of very large strategic logistics depots clearly suggests that parts of the District are performing a sub-regional (and even regional role), given its excellent connectivity to the Motorway network'. It estimated that the home grown need for warehousing space to be 2 ha but based on past trends 50 ha would be required.
- 6.13. The 2019 study recommended a range of between 30ha to 67ha between 2018 and 2036, and between 33ha and 74ha to 2038. In terms of how the employment land requirement for Cannock Chase District could be split across the B Class sectors, it was considered that a split of 25% for B1a/B1b office and 75% for B1c/B2/B8 industrial/distribution would be appropriate. CCDC commissioned an update to the assessment in 2020 to reflect the impact of the pandemic and to reflect the change in the planning land use classes. The update recommended that Cannock Chase District's employment land OAN should comprise a range of between 48 ha to 66 ha net between 2018 to 2038 (including flexibility), and also suggested higher ranges if required to account for employment land losses. The approximate proportion of employment land uses is recommended to be 20% office 80% industrial/warehousing.
- 6.14. CCDC presented spatial strategy options for meeting employment needs in the Issues and Options consultation but did not present the preferred land supply target until after the EDNA was produced for Preferred Options stage, where the question was asked: 'Do you support the preferred

policy direction to provide land for new employment uses?'. At that stage CCDC consulted on the provision of up to 50 ha.

- 6.15. ABCA welcomed the intention to deliver 50ha employment land at Preferred Options Stage, particularly the proposals for new site allocations alongside the M6 (toll) at Churchbridge and Norton Canes close to the Walsall boundary but sought clarity on whether any of the target would contribute to wider unmet need. Lichfield and Stafford did not specifically comment on the amount of employment land proposed. South Staffordshire District Council supported the provision of a supply of 50 hectares of employment land during the plan period which was informed by the Cannock Chase District EDNA 2020 study. It is considered that greater clarity would be provided by committing to a sufficient supply of identified sites and welcomed the commitment to ongoing dialogue with respect to potential employment requirements arising within the Functional Economic Market Area (FEMA). They also noted that they looked forward to continuing the close working relationship to explore how any identified shortfall in employment land supply could be addressed.

Apportioning Employment need

- 6.16. The West Midlands Strategic Rail Freight Interchange (SFRI) gained development consent from National Government in May 2020. Based in South Staffordshire District, it will deliver up to 8 million sq ft of Class A Logistics warehousing. The hub will allow for the transfer of goods between lorries and trains and requires the creation of a freight terminal, container storage, heavy goods vehicle parking, rail-served warehouses and ancillary buildings. The Black Country Authorities commissioned Stantec to produce a report assessing who the SFRI would serve, to determine how to apportion the employment land between surrounding authority areas, given it would serve a regional need. That study was published in February 2021 and confirmed that the equivalent of 10ha would serve Cannock Chases employment needs. This Study is published on the Black Country website².
- 6.17. An Employment Land Availability Assessment was published in 2020. The document compares land availability to the adopted Local Plan target, but also indicates what employment land is available to contribute towards supply in the new Local Plan. At this stage it appeared that there would be insufficient land to meet the recommended land targets set out in evidence. As such, it was determined not to be possible to contribute to wider unmet need for employment land.
- 6.18. CCDC wrote to all neighbouring authorities on 2nd December 2021 as part of a wider letter about unmet housing need.
- 6.19. Responses were received from Lichfield District Council, Stafford Borough Council, Coventry City Council, Birmingham City Council and ABCA all stating that these authorities were unable to accommodate any of the shortfall of employment land for Cannock Chase and no further discussions

² [Economy & Employment | Black Country Plan \(dudley.gov.uk\)](#) accessed 19/06/23

were sought beyond the existing regular duty to cooperate meetings at that time. The Association of Black Country Authorities stated they still had a shortfall of employment land and also stated that 10ha of B8 land provided at the consented West Midlands Interchange could be apportioned to Cannock Chase and in the case that this is surplus to Cannock's requirement the contribution could be apportioned to the Black Country. South Staffordshire confirmed it could not assist with meeting the need but did seek further discussion. South Staffordshire response in December 2021 advised potentially there may be capacity / sites in an emerging development plan which were not in the Green Belt and sought further discussions. South Staffordshire also sought further discussions regarding Cannock Chase removing land from the Green Belt within its own administrative area to meet the local need for employment land. To date, any surplus has been apportioned to the Black Country.

6.20. Policy development

6.21. CCDC officers also worked closely with Staffordshire County Council on the development of proposed Local Plan policy S04.5 Provision for Local Employment and Skills. This was refined in response to the Preferred Options consultation responses and further drafts sent to SCC focusing on amendments which would aid implementation of the policy and support joint interests to further local job creation and local training arising from new employment development.

Summary of outcomes and common ground

6.22. Stafford Borough, South Staffordshire and Lichfield are all considered to have sufficient land to accommodate their own growth requirements and have not requested Cannock Chase to take on any of their employment land requirements.

6.23. Adjoining districts do not consider Cannock Chase District to be a self-contained FEMA, as it has clear relationships with a number of surrounding authorities, particularly in respect of commuting and migration patterns. However, in respect of the supply of employment land, and the potential for future growth, the district is considered to function in a relatively independent manner to Lichfield, South Staffordshire and Stafford (EDNA, 2019).

6.24. The West Midlands Strategic Employment Sites Study (May 2021) recommended a need to identify a pipeline of new Strategic Employment Sites to meet needs beyond the 7.41 years supply identified located predominantly around motorway junctions.

6.25. The Stantec report: West Midlands Strategic Rail Freight Interchange Employment Issues Response Paper – Whose need will the SRFI serve, identified a land supply of 10ha which could be apportioned to Cannock Chase. The ability to use this to meet some of Cannock Chases employment needs has been supported by other local authorities.

- 6.26. A draft of the South Staffordshire Functional Economic Market Area Statement of Common Ground has been produced and circulated to local authorities included in the FEMA. It has been signed by CCDC.

Matters arising

- 6.27. The proposed West Midlands interchange in South Staffordshire is likely to provide significant employment opportunities for Cannock Chase District residents and is likely to increase commuting patterns between the two districts in future. This should be monitored as it is progressed to determine opportunities and cross boundary impacts.
- 6.28. The Association of Black Country Authorities originally requested CCDC to assist in meeting their unmet employment land need in the region of 300ha in 2018, although the shortfall subsequently dropped to 210ha in the 2021 Reg 18 consultation on the Draft Black Country Plan. CCDC is not able to assist in providing additional employment land. Now that ABCA has ceased production of the Black Country Plan it is uncertain how the unmet need will be addressed.
- 6.29. The Birmingham Local Plan Issues and Option consultation has identified an employment land shortfall of 73.64ha. The plan is at an early stage of development and some lines of enquiry are outlined in the consultation plan.
- 6.30. Staffordshire County Council along with partners including CCDC (see para 6.5) commissioned an update to the West Midlands Strategic Employment Sites Study which is near completion.

7. Protecting the Green Belt

The key strategic matters relating to Green Belt and the Local Plan are:

- Protecting the Green Belt which encircles Birmingham and the wider conurbation.
- Ensuring the integrity of the Green Belt and reasons for designation are not undermined where strategic Green Belt release is proposed under exceptional circumstances through any Local Plan produced in the GBBCHMA.

The key partners involved in discussions are:

- Local authorities in the GBBCHMA

Summary of how the matter has been addressed:

- 7.2. The Strategic Growth Study explored potential areas of search for housing beyond the Green Belt boundaries and within the Green Belt. It provided that very broad context assessing land parcels for the whole of the Green Belt around Birmingham and the Black Country regardless of authority boundary

and assessed the contribution of each area to the five purposes of the Green Belt.

- 7.3. Following the completion of the Strategic Growth Study, release of Green Belt is a topic which has been covered in conjunction with discussions on meeting housing and economic needs. The extent of unmet need set out in the Annual position statements sets the strategic context for the consideration of Green Belt release around Birmingham and the Black Country to ensure housing and economic needs are addressed. However, Green Belt release is a decision for each Local Authority through the production of their Local Plans. Release can only be justified in the case the authority can demonstrate Exceptional Circumstances as defined in the NPPF.
- 7.4. The GBBCHMA Working Group meetings acted as the main basis for discussion regarding Green Belt release providing the opportunity for authorities to update on their position and notify of upcoming consultations on their Local Plans. The mechanism for cooperation and dates of meetings are outlined in detail in section 4 - Meeting Housing Needs.
- 7.5. Additionally, individual discussions with neighbouring authorities as part of more focused Duty to Cooperate meetings provided opportunity for more in depth discussions about all cross boundary matters, including the Green Belt. Meeting dates with individual authorities are listed in Section 6.
- 7.6. CCDC used both the GBBCHMA Working Group meetings and individual Duty to Cooperate meetings over the course of plan making to communicate the strategy, as it developed, with regard for the potential for Green Belt release and to ascertain whether there were any issues with this in terms of cross boundary impacts.
- 7.7. Responses to the preferred options stage which highlighted the preferred sites for Green Belt release revealed the following:
 - South Staffordshire - no specific comments were made regarding Green Belt release
 - Stafford - Noted that the Green Belt release and all site proposals did not have an impact on Stafford Borough.
 - Lichfield - Noted the proposed 3 sites identified for Green Belt release. Noting the Housing Development Capacity Study 2021, the Green Belt Review evidence and CCDC's recent delivery rates they suggested CCDC could review their contribution of 500 dwellings and consider whether further provision could be made towards the HMA over the plan period which is justified and appropriate. Particularly given CCDC's geographical links to the HMA in particular the Black Country Authorities.
 - ABCA - commented on the urban capacity study suggesting that the capacity of all sites outside the Green Belt should be identified, separate to an assessment of the capacity of sites in the Green Belt. They requested consideration for an early review of the CCDC Plan due to the likelihood that the Black Country Authorities would be unlikely to meet all their housing need, and in recognition of the stage of the Black Country Plan

which might make neighbouring authorities nervous to release more Green Belt in plans being produced currently.

Summary of outcomes and common ground

7.8. All authorities in the GBBCHMA contributed to the production of the Strategic Growth Study which has formed common baseline evidence providing a strategic overview of the potential for Green Belt release.

7.9. All neighbouring authorities have acknowledged that CCDC is proposing to release some land from the Green Belt which will deliver 500 dwellings to help contribute to the unmet need of the GBBCHMA. The sites in question are supported.

Summary of outcomes and uncommon ground

7.10. The Black Country Authorities (ABCA) and Lichfield District Council have queried whether CCDC can contribute more to the unmet need of the GBBCHMA acknowledging this would require additional release of Green Belt land.

Matters arising

7.11. Following the release of the revised NPPF in December 2023, it is now unclear to what extent authorities are prepared to review Green Belt in their Local Plans, as it has been clarified this is not required. This may alter both the emerging strategies for neighbouring Local Plans but also the extent to which CCDC would be subject to pressure from neighbouring authorities to release Green Belt to accommodate unmet need now and in future, given that other authorities in the HMA may choose not to do so.

8. Planning for Infrastructure

The key strategic infrastructure matters relating to the Local Plan are:

- Green infrastructure - identifying a multifunctional network of green infrastructure which often spans across local authority boundaries
- Transport - determining the impact of Local Plan proposals on the transport network and working in partnership to deliver new or enhanced transport infrastructure to mitigate the impact of new development.
- Education - Identifying new or improved education facilities required to accommodate planned increase in pupils. Consideration of any cross boundary pupil movements.
- Health - Identifying new or improved health facilities required to accommodate planned increase in patients. Consideration of catchment areas for services and whether there are any cross boundary implications.

- Utilities - Ensuring enough power, water and waste water treatment is available to meet the growth needs expressed in local authorities emerging and adopted Local Plans.

The key partners involved in discussions are:

- 8.2. Staffordshire County Council and neighbouring local authorities- all infrastructure
- 8.3. Natural England, Staffordshire Wildlife Trust - green infrastructure SAC/AONB
- 8.4. Highways England, Network Rail, Transport for the West Midlands (TfWM), Midlands Connect, A5 Partnership, West Midlands Trains - transport
- 8.5. NHS, South West Staffordshire Clinical Commissioning Group (CCG), Primary Care Networks (PCN's) - health
- 8.6. National Grid, Severn Trent Water, South Staffordshire Water - Utilities

Summary of how the matter has been addressed

- 8.7. Green infrastructure - CCDC and Natural England have been communicating throughout the plan process. At the first consultation on Issues and Scoping in July 2018, Natural England noted the Greater Birmingham Housing Market area dialogue emphasises the need for cross border working and stated that synergies may be realised through the formulation and implementation of neighbouring LPAs' infrastructure delivery plans (e.g. green infrastructure as part of transport improvements).
- 8.8. Natural England have worked for many years with CCDC and other cross boundary partners to deliver improvements outlined in the Cannock Chase to Sutton Park Green Infrastructure Plan which was originally identified as a cross boundary Biodiversity Enhancement Area covering 670km² from the edge of Birmingham into Staffordshire in 2006. They supported references to cross boundary working on green infrastructure projects at Issues and Options stage in 2019. A meeting was held with Natural England on 2nd July 2020 which covered a number of topics including the Green Space Network, seeking advice on policy approaches and discussing the evidence base.
- 8.9. Cannock has had a defined Strategic Green Space Network since 1997 and it is proposed to amend the boundary through the new Local Plan to take account of changes since designation. This has been supported by evidence in the form of the Open Space Assessment for the district. Natural England commented on the proposed policy at Preferred Options stage, noting that the proposed policy enabled exceptional conditions which would allow development and stated that any development proposals that either directly or indirectly impact on a SSSI should be refused and that impacts on priority habitats should be avoided. No comment was made by Natural England on the proposed boundary of the network.

- 8.10. Transport - There is an established integrated approach to identify transport solutions to help deliver the policies of the County Council's Strategic Plan, the Local Transport Plan, the Local Cycling and Walking Infrastructure Plan and the Local Plans for each District/Borough. Early dialogue at the start of the plan in March 2018 was undertaken with Highways England and SCC which enabled discussion regarding the potential scope of the Local Plan as well as nationally significant infrastructure projects such as West Midlands Interchange and partnership working on improvements to the A5. A further meeting was held with National Highways (formerly Highways England) in May 2019 to update on projects and proposals.
- 8.11. Consultation responses on the Local Plan fed into the site selection process, policy formulation and the IDP. Highways England were sent indicative site options and dwelling numbers/employment land space and use in 2019 to determine the potential impact of sites on the Highway Network and any mitigation requirements. Meetings were held between CCDC and Highways England on the following dates:
- 20th March 2018
 - 23rd May 2019
- 8.12. Correspondence continued in 2023 as the Local Plan was amended to include a further strategic employment site at Watling Street. A discussion was held on 10th November 2023 which concluded that it was not considered that the principle of adding this site as an allocation was acceptable.
- 8.13. SCC were also sent draft versions of the IDP to enable the Transport Strategy Officer to include any additional schemes and provide up to date information for existing identified projects. Evidence has been jointly commissioned with Staffordshire County Council to update transport modelling and traffic counts and air quality assessments for the spatial strategy around Five Ways. SCC have provided feedback on emerging policies at each stage of consultation and have attended a session of the Local Plan Member Officer Working Group to discuss transport issues.
- 8.14. CCDC is a member of the A5 Partnership which comprises 16 local councils supported by other public agencies along a 77-mile stretch from Gailey in Staffordshire to Stoney Stratford near Milton Keynes (via Leicestershire, Warwickshire and Northamptonshire). Regular officer and member meetings have been held throughout the period of plan production.
- 8.15. Transport for West Midlands; the transport arm of the West Midlands Combined Authority (WMCA) were consulted on the Local Plan and provided detailed comments. At preferred options stage they supported policy directions but suggested greater emphasis should be placed on the regional policy context which highlights the work of Midlands Connect, the West Midlands Rail Executive (WMRE) and other regional transport partners to capture key regional transport opportunities.
- 8.16. Work is ongoing by the SAC Partnership with Natural England to consider Nitrogen deposition and Roads and the interaction between air quality and water quality on Cannock Extension Canal SAC.

- 8.17. With regard to rail, officers from the policy team attend the Chase Line Stakeholder Meetings which provides a forum for discussion on any rail schemes or issues affecting the district. Meetings over the course of plan production have focused on HS2, Walsall-Rugeley electrification and line speed upgrade and the masterplan for Chase Line Stations. Invitees include representatives from Network Rail, HS2, Staffordshire County Council, SSLEP, BCLEP, West Midlands Rail and West Midlands Trains. Rail partnerships and providers have been notified at each stage of consultation which would allow any potential impact of any plans or proposals on the rail network to be raised. Joint working between CCDC, SCC and Network Rail to enable improved pedestrian access from Rugeley town centre to Rugeley Town Station to complement SCC funded highway and environmental improvements along Horse Fair has been investigated. Upgrades to Cannock, Hednesford and Rugeley train stations are identified in the CIL Infrastructure List.
- 8.18. On 10th and 19th October 2023 CCDC met with members of Active Travel England to discuss the remit of this newly created government body which acts as a Statutory Consultee on planning applications of a certain type and scale. Whilst they do not offer tailored advice on Local Plans at present, the nature of policies and sites in the plan were discussed informally, as well as the key principles of active travel which have been interwoven into the Local Plan policies.
- 8.19. Education - CCDC initially engaged with SCC education team in 2016 where a RAG rating for primary school capacity and ability to expand was provided to support the previous plan in preparation. This helped provide a baseline understanding before embarking on the new Local Plan. Engagement with the education team at the County Council has typically been through the consideration of responses to the options and proposals at consultation stages as well as informal correspondence in development of the IDP. Detailed comments have refined the plan and informed the development of site allocation policies determining the specific provision required, cost and funding mechanism which is almost always developer funded contributions. Meetings have taken place with representatives from SCC Education team to discuss issues and options throughout production of the plan which has led to refinement of site allocations, for example the lack of capacity in schools in Norton Canes contributed to reconsideration of the spatial strategy between Preferred Options and Submission Plan consultation stages.
- 8.20. Health - The first meeting was held between officers and the CCG in October 2018 where it was requested that details around health infrastructure capacity could be provided by the CCG to help inform the plan. Consultation with the primary care manager informed production of the sustainability appraisal and a series of meetings were held with the CCG in 2019 which

focused on ensuring the right contacts were involved with regard to the different aspects of health care, to understand proposed changes to the NHS structure in terms of how it operated nationally and in the local area and any issues/GP capacity and infrastructure requirements relating to options arising through the development of the Local Plan. The CCG were invited to comment on the draft text for the Infrastructure Delivery Plan (IDP) to ensure the identified improvements were recorded and they were also invited to submit any sites in their estate which would be surplus to requirements or to make CCDC aware of any sites they would seek to be allocated for health related uses, Meetings between officers of CCDC and the CCG were front loaded to aid development of the Local Plan and IDP:

- 24th October 2018
- 31st January 2019
- 13th March 2019
- 2nd July 2019

8.21. In late 2023, further correspondence was had with Staffordshire County Councils Public Health team including a meeting held 28th September 2023 to discuss the Local Plan and how the draft policies would support healthy lifestyles. The County Council shared data they had gathered on older peoples housing need and supply which fed into the Councils update of the Housing Need Assessment, and provided comments on policies in the Plan which resulted in some amendments to ensure that the plan prioritized health and inclusivity.

8.22. Utilities - Power - In 2018, workshops were held by Western Power Distribution (WPD) which explained investments in the network to facilitate the growth agenda. The Cannock Area Manager confirmed spare capacity in the district and that plans were in place for the area served by Rugeley Power Station. National Grid were consulted at each stage of the plan process. No issues with regard to power were raised throughout production of the Local Plan however National Grid highlighted assets within potential site allocations to inform site selection and policies.

8.23. Water - The Environment Agency commented at Issues and Options stage identifying the potential for cross boundary impacts, particularly within the context of the Water Framework Directive (Humber River Basin Management Plan) and waterbodies which flow in and out of the district from neighbouring authorities as these are conduits for impacts to and from neighbouring growth e.g. sewage treatment works and flood risk. They supported the decision to prepare evidence jointly with neighbouring authorities.

8.24. Working cooperatively; Stafford Borough, Lichfield District, Tamworth Borough, Cannock Chase District and South Staffordshire District have jointly been commissioning evidence on water in the form of a Water Cycle Study and Strategic Flood Risk Assessment (SFRA) since 2010 with the latest version published in 2020. Severn Trent Water and South Staffordshire Water were consulted at each stage of the plan process. They were involved

in developing the Water Cycle Study and Severn Trent Water was also consulted on the SFRA.

Summary of outcomes and common ground

The Infrastructure Delivery Plan (IDP) 2022 details a number of infrastructure proposals including funding and delivery timescales which are the outcome of partnership working. A snapshot of the outcomes detailed in the IDP is provided below.

- Green infrastructure - Cross boundary proposals include a restoration area at Cannock Chase-Sutton Park and Management and there is also enhancement works for habitats at Mill Green/Hawks Green Nature Reserve/Pye Green Valley Spinney to mitigate the impact of further development. Natural England Environmental Stewardship Funding combined with funding from the SAC Partnership will deliver set mitigation schemes. The 'Transforming the Trent Valley' scheme will undertake a wide range of environmental, cultural and community-led projects within the Trent, Tame and Dove river valleys covering some 200 square kilometres from Uttoxeter to Tamworth. The Nature Recovery Network Mapping/Implementation Plan project is being co-ordinated by SCC and Staffordshire Wildlife Trust.
- Transport - Planned improvements to Five Ways island (SCC), proposals to improve pedestrian/cycle access from Rugeley Town Centre to the Station (Network Rail, West Midland Trains) and A5 corridor improvements (A5 Partnership). Some major schemes identified in the IDP have already been completed which demonstrates the success of partnership working between CCDC, neighbouring authorities, the Highways Authority and transport infrastructure providers.
- Education - Consultation with the education authority (SCC) has resulted in the identification of a number of primary school improvement projects with costs as well as the identification of new schools required to accommodate an increase in pupils due to planned development in the Local Plan (listed in the IDP). Funding has been agreed in principle through CIL in February 2023.
- Key new education facilities will be required at Rugeley former power station site (either all through school or 2 new primaries and contribution to secondary education) which will involve further cross boundary work with Lichfield District Council.
- Health - Regular discussion has enabled an understanding of potential impacts of proposals and can be built into NHS Capital Estates Improvement Programme.

- Utilities - No overriding constraints to growth identified. South Staffordshire Water Cycle Study 2020 identifies infrastructure capacity and Waste Water Treatment Works that require improvement for the whole of South Staffordshire. The South Staffordshire SFRA maps areas of flood risk across authority boundaries, identifies flood alleviation projects and schemes and recommendations for policy. The collective evidence provides a consistent evidence base for all local authorities which are connected by the network of natural waterways and overseen by strategic infrastructure providers.
- The Environment Agency has been consulted during the production of the evidence base and did not raise any concerns at Preferred Options Stage.

9. Enhancing Cannock Chase National Landscape (formerly AONB) and protecting the Special Area of Conservation

The key strategic matters relating to Cannock Chase National Landscape and the Local Plan are:

- Assessing and determining the potential impact of proposals in Local Plans and growth as a whole from local authorities in the wider vicinity of Cannock Chase
- Agreeing mitigation measures, where required to avoid any potential harmful impact on Cannock Chase, particularly in regard to the status of the Special Area of Conservation
- Agreeing a plan for Cannock Chase working in partnership with landowners and statutory bodies to implement any mitigation measures

The key partners involved in discussions are:

- Cannock Chase Special Area of Conservation (SAC) Partnership: Staffordshire County Council, Cannock Chase District Council, East Staffordshire Borough Council, South Staffordshire District Council, Lichfield District Council, Stafford Borough Council, Wolverhampton County Council and Walsall Metropolitan Borough Council.
- Natural England

Summary of how the matter has been addressed

- 9.1. The SAC Partnership officer group have met regularly to commission evidence, co-ordinate monitoring information and prepare recommendations for consideration by the Joint Strategic board. The Joint Strategic Board has set agreements to enable the commissioning, production and finalisation of the Cannock Chase SAC evidence base. The board meetings are minuted providing evidence of co-operation.
- 9.2. The SAC Partnership have prepared a number of evidence base documents which are intended to provide a framework for Local Plan Habitats Regulations Assessments. This provides a consistent evidence base in which to determine the potential effect of any policy or proposal from any of the authorities Local Plans within a 15km radius of the SAC and which could therefore potentially impact upon the designated features of Cannock Chase SAC.
- 9.3. The SAC Partnership continues to develop new evidence and is in the process of commissioning joint transport and air quality evidence to understand and mitigate the cumulative effects of more traffic on air quality and if this will negatively impact the designated features of the SAC as a result of growth proposed by Local Plans.
- 9.4. CCDC consult Natural England on proposed mitigation measures on schemes that could affect Cannock Chase SAC.
- 9.5. Cannock Chase was also a member of the Ecological Joint Approach Group; a sub-group of the SAC Partnership which was formed to look at joint approaches to biodiversity net gain and air quality evidence. The group comprises all local authorities surrounding Cannock Chase, the County Council, Nature Space, Natural England and the Cannock Chase SAC Partnership.
- 9.6. Cannock Chase is a member of the Cannock Chase National Landscape Partnership which comprises representatives from Lichfield District Council, Stafford Borough Council, South Staffordshire District Council, Staffordshire County Council and Landscape Officers from the Cannock Chase National Landscape. Regular officer meetings allow discussion of funding, projects, biodiversity, visitor management, governance and communications. Meetings are minuted providing evidence of co-operation. The officer group reports to the Joint Committee which monitors delivery of the AONB Management Plan (now National Landscape).

Summary of outcomes and common ground

- 9.7. Production of the joint evidence base: - 2017 Cannock Chase SAC – Planning Evidence Base Review - 2018 Cannock Chase SAC Visitor Survey update - 2020 Cannock Chase SAC, Strategic Access Management & Monitoring Measures Detailed Implementation Plan: Site User Infrastructure, Education and Engagement - 2020 Cannock Chase SAC, Strategic Access Management & Monitoring Measures Detailed Implementation Plan: Car

Parking - 2021 Cannock Chase SAC Planning Evidence Base Review Stage 2

- 9.8. 2022 Memorandum of Understanding (MOU) signed by all members of the Cannock Chase SAC Partnership. This MOU sets out the updated mitigation measures relating to proposed housing development across the SAC Zone of influence. Each local authority in the SAC Partnership has set a process for charging a tariff on new housing schemes which is collated and spent on the program of improvements.
- 9.9. Agreement of the SAC 15 year programme which will use £7.8 million funding to deliver key projects such as a rationalised car parking strategy, significant work to the Toc H disabled trail, education and signposts/information boards.

10. Conserving and enhancing heritage assets

The key strategic matters relating to heritage and the Local Plan are:

- Ensuring plan proposals conserve and enhance heritage assets both within and across Local Authority boundaries

The key partners involved in discussions are:

- Historic England
- Staffordshire County Council (SCC)

Summary of how the matter has been addressed

- 10.2. Historic England were consulted at each stage of the plan making process as well as regarding specific parts of the evidence base at the earliest stage to help inform the methodology.
- 10.3. CCDC consulted Historic England at the outset of plan making on the Statement of Community Involvement and the Sustainability Appraisal Scoping Report (responses received August 2018).
- 10.4. At Issues and Options Scoping Stage an open invitation was sent when advertising the consultation to allow meetings to be arranged if discussions were desired. Historic England provided detailed comments to help inform the plan development and did not seek a meeting at that stage.
- 10.5. Detailed comments were received from Historic England in response to the Issues and Options consultation (July 2019). Most comments were generally supportive, and any suggestions were considered in the development of the evidence base and document.
- 10.6. CCDC consulted Historic England regarding the proposed site selection methodology. They welcomed the inclusion of heritage on the list of constraints (July 2019). CCDC also consulted Historic England regarding the proposed brief for the Heritage Impact Assessment. Historic England responded on 10th October 2019 expressing support for the approach to undertaking the Heritage Impact Assessment.
- 10.7. Historic England sent a detailed response to the Preferred Options consultation (dated April 2021). Although generally supportive of the plan,

concern was expressed by the omission of some sites from stage 2 of the Heritage Impact Assessment and specific comments were made on the scoring of sites using the heritage objective in the Sustainability Appraisal. CCDC resolved this through further correspondence with Historic England, clarifying any omissions and resolving any queries.

10.8. CCDC also consulted SCC on the development of the IDP to determine whether the proposals in the plan would generate any specific impacts on schemes relating to heritage. Whilst the Transforming Trent Valley Project was referred to, the County Archaeologist did not identify any additions to the IDP.

Summary of outcomes and common ground

- Historic England have been engaged throughout the development of the evidence base and the Local Plan. Correspondence with Historic England throughout the plan making process demonstrates how constructive feedback has helped shape the policies and proposals in the Local Plan.
- Historic England has been generally supportive of the Cannock Chase Local Plan and has not raised any formal objections.
- SCC Environment and Countryside Team have been engaged with the Local Plan and evidence base and have not raised any concerns.

11. Mitigating the impact of Climate Change

The key strategic matters relating to climate change and the Local Plan are:

- Working collectively with all local authorities to mitigate the impacts of climate change.

Summary of how the matter has been addressed

11.1. Climate change is an issue affecting us all. It was therefore a collective issue for all Local Plans to address. CCDC meet quarterly with officers from all Staffordshire Local Planning Authority Planning Policy Teams as well as a representative of Staffordshire County Council for the Staffordshire Development Officers Group (SDOG). This provides a forum for discussion on planning policy matters.

11.2. It was determined to undertake a new assessment which would replace an earlier study on climate change produced by CAMCO in 2010. The Climate Change Adaptation and Mitigation Strategy was produced by AECOM and jointly commissioned by CCDC, Lichfield, South Staffordshire, Stafford, Tamworth, East Staffordshire, Newcastle-under-Lyme and Staffordshire County Council.

11.3. The strategy provides a consistent evidence base to underpin local planning policy, and also identifies differences between authority areas, for example in terms of main source of emissions. It also looks at opportunities for low carbon energy generation over a much wider area than district

boundaries, and therefore provides an important evidence base for considering larger scale projects.

- 11.4. The baseline report, main study and viability assessment was completed in 2020 and could be used to inform the Local Plans for all Staffordshire authorities.

Summary of outcomes and common ground

- Use of a collective evidence document: the Climate Change Adaptation and Mitigation Strategy to inform Local Plans.
- Identified potential sites for renewable energy production in each district

12. Strategic cross-boundary site allocations

The key strategic matters relating to strategic cross boundary sites and the Local Plan are:

- The development of Rugeley Power Station site, a strategic brownfield site for redevelopment. The boundary of the site is shared with Lichfield authority area.

The key partners involved in discussions are:

- Lichfield District Council (LDC)
- Staffordshire County Council (SCC)
- ENGIE, EQUANS

Summary of how the matter has been addressed

- 12.2. Rugeley Power Station ceased operation in June 2016. The site straddles the local authority areas of Lichfield and Cannock Chase. The Councils and owner ENGIE recognized the potential of this large brownfield site for redevelopment prior to the commencement of the new Local Plan for Cannock Chase and therefore most of the cooperative work has been ongoing irrespective of the status of the new Local Plan. However, it is acknowledged that it is a key cross boundary site and that dwellings on site will count towards the Local Plan target, particularly towards the latter end of the plan period.
- 12.3. The Rugeley Power Station Task Force comprising of officer and elected members from CCDC, Lichfield District Council and representatives from Staffordshire County Council, ENGIE, SSLEP and Homes England enabled cooperative working on the consideration and development of plans for the former power station site. Meetings began as early as 2016 and continued as plans progressed.
- 12.4. The principle of development was established in Lichfield District Council's Local Plan Allocations DPD adopted in July 2019. The equivalent plan for Cannock formerly in development was the Local Plan Part 2, but this ceased production in favour of the new Local Plan in 2018 and therefore was not taken to adoption. As such the formal planning policy stance regarding

the redevelopment site was established in a Supplementary Planning Document jointly produced by CCDC and Lichfield District Council in February 2018. This approach was key to ensuring the strategic site was delivered according to policy requirements which were agreed jointly. The SPD was consulted on by both Councils and the responses were considered jointly with the SPD being amended where required.

12.5. In January 2020 outline permission was granted by both councils for the significant redevelopment of Rugeley Power Station. This application was amended in May 21 to change the type of school provision planned on site. The two Councils have had to work closely with regard to proposed amendments to original plans and enable delivery.

12.6. In developing the new Local Plans for both LDC and CCDC officers have been in communication to agree significant areas of detail such as indicative trajectories for the phasing of the site and key infrastructure milestones in conjunction with information provided by ENGIE.

Summary of outcomes and common ground

- LDC and CCDC have shown a commitment to the delivery of Rugeley Power Station as one of the key cross boundary strategic brownfield site opportunities through the development of the separate Local Plans for the authorities.

13. Strategic Site Allocations: Land south of Cannock Road (SH1) Land east of Wimblebury Road (SH2)

The key strategic matters relating to strategic cross boundary sites and the Local Plan are:

- The infrastructure requirements relating to the two strategic residential site allocations in the Local Plan, and how infrastructure will be delivered.

The key partners involved in discussions are:

- Staffordshire County Council (SCC)
- Agents, Developers: Pegasus, Richborough Estates, Taylor Wimpey, RPS

Summary of how the matter has been addressed

13.2. The strategic sites were identified as Preferred Options in the 2021 consultation document of the Local Plan. Whilst the allocations had been informed by evidence and joint discussion with the County regarding infrastructure, issues were raised by Staffordshire County Council with regard to the timing of the delivery of the two sites and whether this would deliver the critical education and transport infrastructure required.

13.3. The District Council instigated a series of meetings, first individually with SCC Education, SCC transport, RPS and Taylor Wimpey for SH2 and Pegasus, Richborough for SH1. These meetings enabled exploration of the

issues pertinent to each party which helped determine the agenda for a round table meeting, and to inform draft policies for each site in the Local Plan.

- 13.4. A working draft of the Local Plan policy including concept diagrams were sent to all parties for comment, and the round table meeting was held on Thursday 23rd November which was attended by representatives of both sites and the County Council. The meeting led to agreement on some key areas such as the positioning of the school and some of the policy wording. Comments were received before and after the meeting which assisted the refinement of the site allocation policies, prior to the Reg 19. Consultation.

Summary of outcomes and common ground

- All key partners have agreed to continue to work collaboratively to ensure the delivery of the development sites and associated infrastructure, with further detail to be determined prior to planning application stage.

Summary of outcomes and uncommon ground

- Not all of the comments on the policies were agreed and it is likely that a Statement of Common Ground will be required prior to examination, if not all issues can be resolved.
- The timing of the delivery of infrastructure, given that the two development sites could be built out at different times is still a concern of the County Council. It may be that the nature of the issue is not able to be resolved by policy wording in the Local Plan, as all opportunities to refine the wording has been provided. CCDC will continue to facilitate joint working between all parties to ensure that site delivery including infrastructure is successful.

14. Conclusion

14.1 This Statement of Compliance has demonstrated how Cannock Chase District Council has legally complied with the Duty to Cooperate. The statement has documented the main partnerships and cooperative activities which address strategic cross boundary matters throughout the development of the Local Plan.

14.2 It should be noted that cooperation does not only occur with prescribed bodies; the Local Plan is informed by collaborative working with the community, smaller partnerships, groups and organisations not listed, the elected members and other departments within the authority. The separate Consultation Statement details how the Local Plan has been developed in line with the Statement of Community Involvement.

14.3 Cooperative working will continue leading up to submission of the Local Plan to the Planning Inspectorate and upon implementation of the plan, subject to successful Examination in Public and adoption of the plan by Cannock Chase District Council.

Appendix 1 - CCDC Letter sent to Local Authorities in the
GBBCHMA on 2nd December 2021

2nd December, 2021

Dear colleague,

Cannock Chase Local Plan Review – Duty to Co-operate

As one of our Duty to Cooperate partners I am seeking to clarify the latest position between our authorities on duty to cooperate strategic matters.

I acknowledge that matters may change but at present seek to establish the latest position on strategic matters to support the preparation of the Publication version of the Cannock Chase Local Plan which is proposed for consultation in winter 2021. By identifying areas of agreement/ disagreement this will provide a means to plan for future meetings as the Local Plan advances.

Set out below is the current position of Cannock Chase and attached to this letter is a form which I would be obliged if you could complete and return to

HeidiHollins@cannockchasedc.gov.uk

Information/ evidence

We have published extensive evidence on our website which has supported the review and preparation of our Local Plan so far. This includes SHLAA, ELAA, Local Housing Needs Assessment, Economic Development Needs Assessment and it's update in 2020. Are you currently aware of any concerns regarding the evidence published?

Greater Birmingham and Black Country Housing Market Area housing shortfall

Our approach to this has been that Cannock Chase Council participate in the GBSLEP HMA Technical Officers Group and are actively seeking to address this strategic matter through the effective and on-going joint working of the group.

Cannock Chase Local Need

The NPPF advises that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic planning authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. (Para 141) One element of this is whether the strategy has been informed by discussion with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

Cannock Chase Local Housing Need

Our latest monitoring has shown that we will be unable to meet our local housing need without utilising land which is currently within the Green Belt. Our shortfall up to 2038 is approximately 1,500 dwellings. Within your administrative boundary are you able to accommodate all or some of this shortfall using land which is not in the Green Belt?

At the time of preparing the Preferred Options consultation document our neighbouring authorities were unable to assist in meeting the housing shortfall identified to 2038 by Cannock Chase Council. The Preferred Options consultation version of the Local Plan therefore proposed to meet the shortfall within our administrative boundary, a strategy which necessitates the removal of land from the Green Belt within our area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of its Pre-submission version Local Plan?

Cannock Chase Local Gypsy, Traveler and Travelling Show people Accommodation Need

Our latest monitoring has shown that we will be unable to meet our locally identified need for gypsies, travelers or travelling show persons without removing sites from the Green Belt. Our shortfall to 2038 is approximately 16 pitches and 10 plots.

Within your administrative boundary are you able to assist us in meeting this shortfall using land which is not in the Green Belt?

Cannock Chase Local Employment Land Need

Our latest monitoring has shown that we will be unable to meet the locally identified need for employment land without removing sites from the Green Belt.

Within your administrative boundary are you able to assist us in meeting some of our employment land need using land which is not in the Green Belt?

The Preferred Options consultation version of the Cannock Chase Local Plan proposed to meet the local need for employment land within Cannock Chase's administrative boundary, a strategy which necessitates the removal of land from the Green Belt within Cannock Chase District's administrative area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of Pre-submission version Local Plan?

Cannock Chase Special Area of Conservation

Cannock Chase Council participates in the Cannock Chase SAC Partnership and are actively seeking to address this strategic matter through this Partnership approach.

Other strategic matters

The NPPF states at paragraph 24 that local planning authorities and county councils (in two tier areas) are under a duty to cooperate with each other, and with other prescribed bodies,

on strategic matters that cross administrative boundaries. Are there any other cross boundary strategic matters which you wish to discuss with Cannock Chase District Council?

If you would like to discuss the completion of the above questions further please don't hesitate to contact either Sushil Birdi or Heidi Hollins at:

Sushil Birdi – SushilBirdi@cannockchasedc.gov.uk

Heidi Hollins – HeidiHollins@cannockchasedc.gov.uk 07747 250631.

I look forward to hearing from you, preferably by 17th December 2021.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'D Piper', with a long horizontal line extending to the right.

Dean Piper

Head of Economic Prosperity

Cannock Chase Local Plan Review – Duty to Co-operate

Latest position on Strategic Matters December 2021

Information/ evidence

Are you currently aware of any concerns regarding the evidence published?

	Yes, further discussions sought.
	No, no further discussions necessary at this time.

Greater Birmingham and Black Country Housing Market Area housing shortfall

Cannock Chase Council participate in the GBSLEP HMA Technical Officers Group and are actively seeking to address this strategic matter through the effective and on-going joint working of the group.

	Request further discussions with Cannock Chase Council individually on this issue.
	No further discussions with Cannock Chase Council individually on this issue considered necessary at this time.

Cannock Chase Local Need

Cannock Chase Local Housing Need

Our shortfall up to 2038 is approximately 1,500 dwellings.

Within your administrative boundary are you able to accommodate all or some of this shortfall using land which is not in the Green Belt?

	No.
	Yes, utilizing sites which already have planning permission and/or are allocated in an adopted development plan.
	Yes, potentially there may be capacity/ sites in an emerging development plan.

	Further discussions sought.
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The Preferred Options consultation version of the Local Plan therefore proposed to meet the shortfall within our administrative boundary, a strategy which necessitates the removal of land from the Green Belt within our area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of its Pre-submission version Local Plan?

	Further discussions sought.
	No, no further discussions considered necessary at this time.

Cannock Chase Local Gypsy, Traveler and Travelling Show people Accommodation Need

Our shortfall to 2038 is approximately 16 pitches and 10 plots

Within your administrative boundary are you able to assist us in meeting this shortfall using land which is not in the Green Belt?

	No.
	Yes, utilizing sites which already have planning permission and/or are allocated in an adopted development plan.
	Yes, potentially there may be capacity/ sites in an emerging development plan.
	Further discussions sought.

Cannock Chase Local Employment Land Need

Within your administrative boundary are you able to assist us in meeting some of our employment land need using land which is not in the Green Belt?

	No.
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	Yes, utilizing sites which already have planning permission and/or are allocated in an adopted development plan.
	Yes, potentially there may be capacity/ sites in an emerging development plan.
	Further discussions sought.

The Preferred Options consultation version of the Cannock Chase Local Plan proposed to meet the local need for employment land within Cannock Chase's administrative boundary, a strategy which necessitates the removal of land from the Green Belt within Cannock Chase District's administrative area. In principle, does your authority have any concerns regarding this approach being continued by Cannock Chase Council in the preparation of its Pre-submission version Local Plan?

	Further discussions sought.
	No, no further discussions considered necessary at this time.

Cannock Chase Special Area of Conservation

Cannock Chase Council participates in the Cannock Chase SAC Partnership and are actively seeking to address this strategic matter through this Partnership approach.

	Request further discussions with Cannock Chase Council individually on this issue.
	No further discussions with Cannock Chase Council individually on this issue considered necessary at this time.

Other strategic matters

Are there any other cross boundary strategic matters which you wish to discuss with Cannock Chase District Council?

	Yes, further discussions sought
	No, no further discussions sought at this time.

Any other comments?

Contact (for further meetings)

Signed.....

Position.....

Local Authority.....

Dated.....

Please return to HeidiHollins@cannockchasedc.gov.uk