

Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s).** We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation									
Name and	Organisation:	Dudley MBC							
Q1. To which document does this representation relate? (Please tick one box)									
⊠ Cannock	Chase Local F	Plan 2018-2040							
□ Sustainal	bility Appraisal	of the Cannock Cha	ase Local Pla	n 2018-204	.0				
☐ Habitats	Regulations As	ssessment of the Ca	nnock Chase	Local Plar	2018-2040				
Q2. To whic	ch part of the	document does thi	is representa	ition relate	?				
Para- graph:	Strategic Objective 3- bullet point 2 and para- graph 6.84	Policy:	Site:		Policies Map:				
Q3. Do you	consider the	Cannock Chase Lo	ocal Plan is:						
A. Legally c	ompliant		Yes: ⊠	No: □					
B. Sound			Yes: □	No: ⊠					
C. Compliant with the Duty to Co-operate Yes: ⊠ No: (Please tick as appropriate).									

For office use

Part B reference



Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The principle of the Strategic Objective 3 is supported, including a contribution towards the unmet housing needs of wider housing market area. However, the text refers to 'Delivering sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market area shortfall where justified in **adopted plans**' (emphasis added). The text is considered unsound as the reference to 'adopted plans' does not take account of evidence from emerging Local Plans, particularly those that have reached more advanced stages.

Paragraph 6.84 refers to the latest position with regards to housing shortfalls from each of the Black Country authorities being unknown, however Dudley MBC and Sandwell MBC have both recently consulted on their Regulation 18 draft Local Plans, with Wolverhampton CC also now consulting on their Regulation 18 Issues and Preferred Options Local Plan. These plans all set out up to date positions on the housing shortfalls within these Black Country authorities, reinforcing previous evidence and reaffirming that the authorities are seeking to address shortfalls via the Duty to Cooperate.

The text is not therefore considered to meet the tests of the Plan being positively prepared, justified, effective and consistent with national planning policy.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text at bullet point 2 of Strategic Objective 3 should be amended to delete reference to 'adopted plans' and be replaced with 'adopted and emerging Local Plans'. Paragraph 6.84 should be updated to reflect the latest position with emerging Local Plans across the Black Country. This will ensure that the Plan is positively prepared, justified, effective and consistent with national planning policy.

(Please continue on a separate sheet if necessary)



Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Submission Dr participate in e Please note that	aft of the Canno xamination hear while this will pro	ing session(s)?	lan, do you cor	nsider it necessary to sh to participate in hear-
	participate in hea	in hearing session aring session(s)	ı(s)	
Q7. If you wish sider this to be		the hearing sess	ion(s), please c	outline why you con-
		(Plea	se continue on a se	eparate sheet if necessary)
those who have	indicated that the your wish to par	letermine the most ey wish to participa	appropriate prod te in hearing ses	cedure to adopt to hear ssion(s). You may be entified the matters and
Signature:			Date:	18.03.2024



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Name and	Organisation:	Dudley I	МВС				
Q1. To whic	ch document	does this	represen	itation rel	ate? (Please	tick one bo	x)
⊠ Cannock	Chase Local F	Plan 2018	-2040				
□ Sustainal	oility Appraisal	of the Ca	nnock Ch	ase Local	Plan 2018-20	40	
□ Habitats l	Regulations A	ssessmen	t of the Ca	annock Ch	ase Local Pla	n 2018-20	40
Q2. To whic	ch part of the	documer	nt does th	is represe	entation relat	e?	
Para- graph:		Policy:	SO3.1	Site:		Policies Map:	
Q3. Do you	consider the	Cannock	Chase L	ocal Plan	is:		
A. Legally co	ompliant			Yes: ⊠	No: □		
B. Sound				Yes: □	No: ⊠		
C. Complian (Please tick as	nt with the Duty appropriate).	Yes: ⊠	No: □				

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Support for the contribution of 500 dwellings to meet the unmet needs of the Greater Birmingham and Black Country Housing Market Area.

However, the policy is considered unsound as it does not include the total housing target figure of 6,308 dwellings taking into account the 500 dwelling contribution to unmet housing needs. The policy does not currently specify which authorities the contribution will be apportioned to. The text is not therefore considered to meet the tests of the Plan being 'positively prepared' or 'effective'.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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The text should be amended to reflect the total housing target figure of 6,308 dwellings and that the contribution to unmet housing needs will be apportioned to Birmingham City and the Black Country authorities. This will ensure that the policy is 'positively prepared' and 'effective'. Amended suggested text below (additional text in red):

'In addition to the local housing need, the plan will deliver 500 dwellings to meet the unmet needs of neighbouring areas in the Greater Birmingham and Black Country Housing Market Area. This gives a total housing requirement of 6,308 dwellings over the plan period. The contribution will serve to address the unmet housing needs of the Black Country authorities and Birmingham City.'

This would be consistent with other parts of Plan where reference to the 6,308 dwellings is made (see paragraph 1.8 and page 35, although note these both state 6,303 dwellings).

(Please continue on a separate sheet if necessary)

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Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?

participate in examination hearing session(s)? Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
☒ No, I do not wish to participate in hearing session(s)☐ Yes, I wish to participate in hearing session(s)(Please tick one box)
Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Please continue on a separate sheet if necessary)
Please note : The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.
Signature: Date: 18 03 2024



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Name and Organisation:	Dudley MBC						
Q1. To which document of	does this represe	ntation relate	? (Please t	ick one box)			
⊠ Cannock Chase Local F	Plan 2018-2040						
☐ Sustainability Appraisal	of the Cannock Cl	nase Local Pla	an 2018-204	10			
☐ Habitats Regulations As	sessment of the C	annock Chas	e Local Plai	า 2018-2040			
Q2. To which part of the	document does t	his represent	ation relate	9?			
Para- 6.398 graph:	Policy:	Site:		Policies Map:			
Q3. Do you consider the	Cannock Chase I	₋ocal Plan is:					
A. Legally compliant		Yes: ⊠	No: □				
B. Sound		Yes: □	No: ⊠				
C. Compliant with the Duty to Co-operate Yes: ⊠ No: □ (Please tick as appropriate).							

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The text only refers to the local housing need figure of 5,808 dwellings and refers to 69 hectares of employment land. This is considered unsound as it does not include reference to the additional 500 dwellings that are to be provided to accommodate unmet housing needs from the wider housing market area (as per Policy SO3.1). The 69 hectares of employment land does not appear to correlate with the 74 hectares of employment land referenced at Policy SO4.1. The text is not therefore considered to meet the tests of the Plan being 'positively prepared' or 'effective'.

(Please continue on a separate sheet if necessary)

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The text should be amended to include reference to the additional 500 dwellings to be provided to accommodate unmet housing needs from the wider housing market area. This should reflect the fact that the overall housing target is 6,308 dwellings. The trajectory that accompanies this paragraph appears to reflect this housing target of 6,308 dwellings.

Clarification should be provided on the employment land target for the plan i.e., is it 69 or 74 hectares.

These changes will ensure that the Plan is positively prepared and effective.

(Please continue on a separate sheet if necessary)

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Name and	Organisation	Dudley	МВС								
Q1. To whic	ch document	does this	represen	tati	on rel	ate?	P (Please	tic	ck one bo	x)	
⊠ Cannock	Chase Local	Plan 2018	-2040								
□ Sustaina	bility Appraisa	al of the Ca	nnock Cha	ase	Local	Plan	2018-20)4(0		
☐ Habitats	Regulations <i>A</i>	Assessmer	nt of the Ca	ınno	ock Ch	ase	Local Pla	an	2018-204	40	
Q2. To whic	ch part of the	documer	nt does thi	is r	eprese	enta	tion rela	te	?		
Para- graph:	1.8, bullet point 10	Policy:			Site:				Policies Map:		
Q3. Do you	consider the	e Cannock	Chase Lo	оса	l Plan	is:					
A. Legally c	ompliant			Ye	es: 🗵		No: □				
B. Sound				Ye	es: ⊠		No: □				
C. Compliant with the Duty to Co-operate Yes: ⊠ No: □ (Please tick as appropriate).					No: □						

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It is noted that the Regulation 19 Local Plan assumes 10 hectares of the district's employment land requirement will be met from the West Midlands Strategic Rail Freight Interchange. It is noted that this is in line with the conclusions of the Stantec 'West Midlands Strategic Rail Freight Interchange- Whose need will the SFRI serve?' (2021) report (as per Table 5 of the report).							
(Please continue on a separate sheet if necessary)							

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N/A	
	(Please continue on a separate sheet if necessary)

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⋈ No, I do not wish to participate in hearing session(s)
☐ Yes, I wish to participate in hearing session(s)
(Please tick one box)



sider this to be r	•	ine nearing sessi	on(s), piease outil	ne why you con-
		(Pleas	e continue on a separa	te sheet if necessary)
those who have in	ndicated that they your wish to parti	etermine the most a	ppropriate procedu in hearing sessior	ıre to adopt to hear
Signature:			Date:	18.03.2024