



**Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form**



**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)*

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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)?**

*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)*

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Signature: [REDACTED]

Date: 18.03.2024



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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'.

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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).

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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'.

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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.

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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).

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N/A

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