

Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form



Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice [www.cannockchasedc.gov.uk/privacynotices](http://www.cannockchasedc.gov.uk/privacynotices). Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

## 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:	Melissa Ross – Lichfield District Council
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### Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

### Q2. To which part of the document does this representation relate?

Para-graph:		Policy:		Site:		Policies Map:	
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### Q3. Do you consider the Cannock Chase Local 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).*

For office use	Part B reference	
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**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.

Thank you for the opportunity to respond to the Cannock Chase Local Plan - Regulation 19 Publication Version.

Lichfield District Council agrees that issues identified such as the Cannock Chase SAC, AONB, employment, housing and Rugeley Power Station are significant cross boundary matters of relevance to the two authorities and welcomes the continued recognition of the cross-boundary travel relationships between Lichfield District and Cannock Chase District.

## **CCSAC & AONB**

### **Policy SO7.3 – Habitat Sites**

### **Policy SO7.5 – Protecting, Conserving and Enhancing the Cannock Chase National Landscape**

Lichfield District Council is supportive of Policy SO7.3: Habitat Sites and SO7.5: Protecting, Conserving and Enhancing the Cannock Chase National Landscape and their supporting text related to the CCSAC and AONB. Lichfield District Council will continue to work with Cannock Chase Council under the Duty to Cooperate on joint evidence and policy updates.

## **Rugeley Power Station site**

### **Policy SM1: Former Rugeley Power Station, Rugeley**

Lichfield District Council supports the cross-boundary strategic site allocation and policy for the Rugeley Power Station site. The site currently benefits from extant outline planning permission granted on 8th April 2021, with the reserved matters planning applications currently pending determination. Given its scale it is clearly a key site for both authorities with the extent of the site within Lichfield District allocated through the adopted Lichfield Local Plan.

### **Policy SO4.2 – Provision for New Employment Sites**

It is noted that the Rugeley Power Station site allocation will provide up to 1,000 dwellings in Cannock Chase and 3.5ha of employment land, as detailed within Table F of Policy SO4.2: Provision for New Employment Sites. It is noted that the split of uses and dwellings will be based on the administrative boundaries between the two authorities with the larger proportion of homes being located within Lichfield District. Lichfield District Council will continue to engage closely with Cannock Chase Council on this strategic redevelopment site.

## **Housing**

### **Policy SO3.1: Provision for New Homes**

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Lichfield District Council is supportive of Cannock Chase Council in meeting its own objectively assessed local housing need through the allocation of a minimum of 5,808 homes (net) between 2018 and 2040, as detailed within Policy SO3.1: Provision for New Homes. It is noted that the plan will deliver a further 500 dwellings towards the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Since the publication of the Strategic Growth Study (2018) the HMA authorities have published and updated a position statement in respect of housing supply and need across the HMA.

Further to this, a number of GBBCHAM authorities have commenced Local Plan reviews and have identified significant housing shortfalls within their areas, these being:

- Birmingham (Regulation 18 – October 2022) – 78,415 homes to 2042
- Sandwell (Regulation 18 – November 2023) – 18,606 homes to 2041
- Dudley (Regulation 18 – November 2023) – 1,078 homes to 2041
- Wolverhampton (Regulation 18 – February 2024) – 11,998 homes to 2042

Whilst these shortfalls have yet to be tested at examination it is evident that the total level of unmet need within the HMA is likely to be significant.

In this context, Policy SO3.1 identifies that a contribution of 500 homes to meet unmet need from within the GBBCHMA is to be provided. The provision of this unmet need is welcomed; however, it is noted this will be at the lower end of the 500-1500 range identified within the previous Regulation 18 consultation. As such it is clear that the level of contribution will need to be fully justified.

It is acknowledged within the supporting evidence (Development Capacity Study 2023) that there is the potential for an additional 457 dwellings from SHLAA restricted and excluded sites with potential. These are excluded from allocation over concerns regarding deliverability. Further evidence/justification as to why these sites have been excluded from allocation and potential supply, particularly given the HMA context, may therefore be beneficial. It is possible that constraints could be overcome within the plan period and could assist in meeting CCDC's and/or wider HMA need.

Lichfield District Council welcomes continuing a positive dialogue with CCDC through the Duty to Co-operate on the cross boundary issues such as the Rugeley Power Station site, and the AONB and the CCSAC.

## **Employment**

### **Policy SO4.2 – Provision for New Employment Sites**

CCDC has updated its Employment Development Needs Assessment (EDNA 2023). This updates the employment land requirements to a range between 52ha and 74ha. It is noted that potential employment land losses over the plan period would increase this range to between 74ha and 96ha. The Regulation 19 Plan has identified a need of up to 74ha.

Lichfield District Council supports Cannock Chase Council in meeting the majority of own needs for employment through the allocation of 8 new employment sites, totalling 22.81ha, including two sites within the Green Belt.

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Lichfield District Council is supportive of Cannock Chase Council attributing 10 ha of supply to land at the West Midlands Strategic Freight Interchange (WMSFI) in South Staffordshire District Council (SSDC). The justification for this is set out within a paper commissioned by the Black Country Authorities and produced by Stantec in February 2021.

It is noted that within the West Midlands Strategic Employment Site Study (2021) that two sites were identified within Cannock Chase District as having potential for employment development. However, neither of these sites have been identified for allocation within the draft Local Plan.

It should be noted that work on the now withdrawn Lichfield District Local Plan 2040 identified that there is a limited supply of employment sites within Lichfield District and as such LDC was not able to assist in meeting unmet employment land needs..

Lichfield District Council welcomes continuing dialogue with Cannock Chase Council as the plan progresses to examination through the Duty to Cooperate process.

*(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.

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(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.**

**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:**

Lichfield District Council would welcome the opportunity to participate in any hearing sessions in relation to the matters noted within our representation, or any other relevant cross boundary matters.

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(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:	
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Date:	13/03/2024
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