

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



Name of the Local Plan to which this representation relates:

Cannock Chase Local Plan

Please return to:

planningpolicy@cannockchasedc.gov.uk or:
Planning Policy, Cannock Chase Council, Civic Centre, PO Box 28,
Beecroft road, Cannock, Staffordshire, WS11 1BG

Please return by:

5:00pm on Monday 18 March 2024 (late forms will not be accepted)

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title		
First Name	Patricia	
Last Name	McCullagh	
Post Town		
Organisation (where relevant)	Sandwell MBC (Team Leader Planning Policy)	
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
E-mail Address		

Do you consent to be notified about progress of the Cannock Chase Local Plan?

Yes No

Notifications: If you consent to be notified about progress on the Local Plan your details will be added to the consultation database. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Contact will be limited to information regarding planning policy and your data will not be shared. You may unsubscribe at any time by email or writing to us using the details on this form. Data will only be held until adoption of the Cannock Chase Local Plan.

For Office Use	Part A Reference	A0029
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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. 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:	Sandwell MBC
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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:	Strategic Objective 3 – bullet point 2 and paragraph 6.84	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	B0029A
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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.

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' 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 currently 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

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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:

(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:	Patricia McCullagh
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Date:	12/03/2024
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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.

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

Para-graph:		Policy:	SO3.1	Site:		Policies Map:	
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Q3. Do you consider the Cannock Chase Local Plan is:

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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)

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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 underlined and bold):

'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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(Please tick one box)

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

Para-graph:	6.398	Policy:		Site:		Policies Map:	
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- B. Sound Yes: No:
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- (Please tick as appropriate).*

For office use	Part B reference	B0029C
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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 to be 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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- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)
(Please tick one box)

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<i>(Please continue on a separate sheet if necessary)</i>

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:	<div style="background-color: black; width: 150px; height: 15px;"></div>
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Date:	12/03/2024
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