

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. 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:	South Staffordshire 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.

n/a

(Please continue on a separate sheet if necessary)

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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.

n/a

(Please continue on a separate sheet if necessary)

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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:

Whilst we do not consider it necessary to appear at the hearings necessarily, we are happy to appear if the inspector feels that this would assist in the discussion, particularly in relation to the Duty to Cooperate and cross boundary matters.

(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.

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Signature:	
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Date:	18 th March 2024
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Planning Policy
Cannock Chase Council
Civic Centre
Beecroft Road
Cannock
WV11 1BG

Please ask for: Ed Fox



Sent via email to: planningpolicy@cannockchasedc.gov.uk

18th March 2024

South Staffordshire Council response to the Cannock Chase Council Local Plan Pre-Submission Regulation 19 consultation

Dear Sir/Madam,

Thank you for providing South Staffordshire Council (SSC) with the opportunity to comment on the Cannock Chase Draft Local Plan Pre-Submission Regulation 19 consultation document.

Strategy

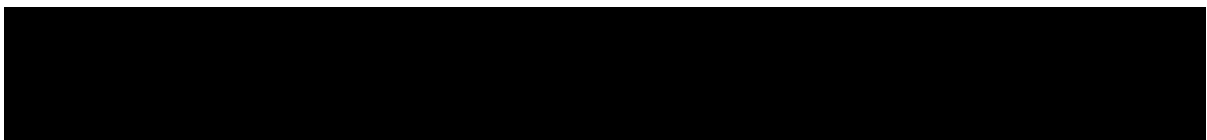
We support the proposed plan strategy of seeking to locate growth in the most sustainable locations focussed on the main existing urban areas and the priority afforded to using previously developed land to meet future development requirements.

Housing

We welcome the commitment to meeting the district's housing need requirement as determined by the standard method. It is noted that the Pre-Submission Plan is retaining a commitment to a proposed 500 dwelling contribution towards meeting the GBBCHMA housing supply shortfall. This shortfall was identified within the context of the 2018 GL Hearn Strategic Growth Study. It is the view of South Staffordshire that this study completed 6 years ago is now dated, but we are pleased to be in active discussion with partner authorities, including yourselves, on progressing an update to the evidence base on the levels of Housing Market Area unmet need. It is intended that the findings of such a review will form the basis for future plan-making decisions on the scale and broad location of areas to be tested to accommodate strategic growth.

Gypsies, Travellers and Travelling Showpeople

SSC published an updated Gypsy and Traveller Accommodation Assessment in 2024 which has identified a need for 162 pitches during the plan period.



SSC wrote to Cannock Chase District Council (and other GBBCHMA and neighbouring authorities) in August 2022, October 2023 and subsequently in March 2024, where we set out that we had only identified a supply of 37 pitches, and this is set against a revised 5-year requirement of 92 pitches. In the letters we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations.

SSC are seeking to ensure that neighbouring and GBBCHMA authorities undertake the same steps that SSC have taken in exploring pitch options so we can have confidence that our Duty to Cooperate partners have taken a consistent approach when considering if they can assist with SSCs unmet needs for pitches. We therefore request that through your plan preparation you explore, and evidence, the following options:

- Intensifying supply on existing sites
- Expanding all suitable existing sites
- Exploring all public land options in the Borough for new public sites
- Approaching sites proposed for general housing allocation to identify if the landowner would be willing to set aside part of the site for pitch needs

SSC would welcome an indication that all such options have been explored and we look forward to continuing to engage with Cannock Chase District Council on this issue.

Employment

We support the commitment within the Pre-Submission Plan to providing a supply of 74 hectares of employment land during the plan period. This figure is at the upper end of the range identified in the recently published Cannock Chase District EDNA 2024 update. We would welcome a clearer presentation on the components of this supply. It is not evident which of the sites within the list in paragraph 6.128 have the potential to contribute towards the 17 hectares of supply quoted as being available in paragraph 6.127. It is assumed that the land supply includes a 10ha contribution from the West Midlands Interchange as identified in the 2021 Stantec report – ‘West Midlands Strategic Rail Freight Interchange -whose need will the SFRI serve?’, subject to agreement through a Statement of Common Ground. However, this could be made more explicit in new employment sites section of the document. SSC supports the inclusion of new specific site allocations in Policy SO4.2 but we are uncertain on the nature of site intensification as identified in Policy SO4.3. We would welcome an indication if this supply is to be delivered through comprehensive site redevelopment and intensification and/or the use of identifiable vacant areas of land within existing employment site boundaries.

We note your position on cross boundary employment needs set out at paragraph 4.15 of the Pre-Submission document where you state:



'Discussions will continue with our Duty to Co-operate partners to ascertain potential assistance to meet unidentified need for employment land within the authorities which share our functional economic market area'

As an authority who shares a FEMA with Cannock Chase District, SSC fully supports this commitment and look forward to continuing our close working relationship to explore how any identified shortfall in employment land supply can be addressed, including those originating from the Black Country.

Nature Conservation

It is anticipated that we will continue an ongoing dialogue with Cannock Chase District Council and the other constituent authorities in the SAC partnership to consider the implications of any cross-boundary issues including the potential of growth and air quality on designated sites of nature conservation value. With reference to the commitment in the plan to undertaking air quality modelling in relation to impacts on internationally designates sites we welcome the commitment to producing a partnership wide mitigation strategy.

It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process.

It is anticipated that we will continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues.

Yours sincerely



Ed Fox

Strategic Planning Team Manager – South Staffordshire Council

