

Statement of Common Ground between  
Cannock Chase District Council and South  
Staffordshire District Council

Cannock Chase Local Plan 2018-2040

South Staffordshire Local Plan 2023-2041

September 2024

## Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Cannock Chase District Council (CCDC)

### Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Cannock Chase District Council (CCDC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2023-2041 and the Cannock Chase Local Plan 2018-2040 by the respective authorities.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the two Local Plans and any areas which remain subject to further discussion and therefore will be updated accordingly. This Statement of Common Ground covers the following matters:
  - Housing (including housing needs across the GBBCHMA);
  - Employment land;
  - Transport and infrastructure matters;
  - Gypsy and traveller accommodation; and
  - Natural environment (Special Areas of Conservation).
3. This SoCG has evolved from a version signed in November 2022 which was originally prepared to support the submission stage of the South Stafford Local Plan. Since that time both the Cannock Local Plan and the South Staffordshire Local Plan has been subject to delay for differing reasons. Consequently there has been revisions to each authorities Local Development Schemes to reflect the revised timescales for submission, as well as extensions to the plan period which will cover 2018-2040 for Cannock and 2023-2041 for South Staffordshire.
4. Cannock Chase Local Plan Publication Reg 19. is subject to public consultation from 5<sup>th</sup> February 2024 - 18<sup>th</sup> March 2024. In line with para 203 of the revised NPPF (published 19<sup>th</sup> December 2023), the Cannock Chase Local Plan will be examined under the relevant previous version of the Framework (last substantively revised in 2021).

### Geography covered by Statement of Common Ground

5. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Cannock Chase District.
6. Both authorities are also within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA)<sup>1</sup> and are either within, or are closely functionally related to, the South

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<sup>1</sup> The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire Borough Council, Redditch Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council

Staffordshire FEMA<sup>2</sup>, Cannock Chase FEMA<sup>3</sup> and Black Country FEMA<sup>4</sup>. There are wider strategic housing and employment shortfalls arising over these geographies that are subject to separate statements of common ground over these wider geographical areas dealing with these issues.

## Key Strategic Matters

7. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. The key strategic matters included within this Statement of Common Ground are; housing provision; employment land; transport and wider infrastructure matters; gypsy and traveller accommodation; and matters relating to the natural and historic environment including designated sites. These discussions have informed the development of adopted plans and other related documents.
8. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed to further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

9. SSDC and CCDC have been active members of the GBBCHMA Technical Officers Group since it was established in 2017 and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek to address any resulting unmet needs. The Black Country authorities<sup>5</sup> similarly declared an unmet need from their urban area as early as their Issues and Options consultation in 2017, later indicating through the Draft Black Country Plan consultation in 2021 that this shortfall stood at around 28,000 dwellings, despite Green Belt release being explored.
10. CCDC and SSDC both recognise the importance of developing a common evidence base across the HMA as far as is feasible and practical in order to ensure that contributions to unmet needs are properly evidenced. As such, both authorities are party to the 2022 GBBCHMA Development Needs Group Statement of Common Ground, which sought to provide a programme of work and governance structure to address the housing shortfalls arising from the HMA as a whole. However, the parties acknowledge that changes to national policy that gives local authorities greater control over when to release Green Belt will likely impact the scope of further HMA-wide evidence to consider housing shortfalls and its potential solutions. Given the scale and complexity of the housing shortfalls arising in the HMA, the Development Needs Group Statement of Common Ground is considered to be the

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<sup>2</sup> South Staffordshire EDNA 2020-2040 defines the South Staffordshire FEMA as Wolverhampton City Council, Walsall Metropolitan Borough Council, Dudley Metropolitan Borough Council, Cannock Chase District Council, Stafford Borough Council

<sup>3</sup> Cannock Chase EDNA 2019 and 2020 update

<sup>4</sup> Black Country EDNA 2017 and 2021 update

<sup>5</sup> City of Wolverhampton Council, Walsall Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council

appropriate vehicle by which to consider the issue holistically. The SoCG is currently signed by 9 of the 17 signatories sought. Government consultations on potential amendments to the plan making system and to the NPPF meant that some parties were reluctant to sign due to the potential implications for their emerging strategies. This is more a reflection of the wider context of proposals at national level and does not represent a failure of cooperative working of the HMA, as there was continuous discussion at the meetings of the GBBCHMA Development Needs Group which was involved representation of all parties.

11. Since the consultation at preferred options stage in 2021, Cannock Chase has consistently presented a contribution of 500 dwellings towards the HMA shortfall in the emerging Cannock Chase Local Plan. South Staffordshire District Council is preparing to finalise the Reg 19. South Staffordshire Local Plan which will be drafted in the context of the revised NPPF.

## Employment

12. SSDC and CCDC both sit within the South Staffordshire functional economic market area (FEMA) and the Cannock Chase functional economic market area (FEMA).
13. The South Staffordshire Local Plan 2023-2041 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own needs and provide a surplus that could contribute towards cross-boundary shortfalls.
14. South Staffordshire's Economic Development Needs Assessment (EDNA) was prepared in 2022 and then updated in 2024. The update comprised details of the pipeline of employment land at 1 April 2023 and rolled forward evidence of labour demand covering the period 2023-2041. As part of its updated evidence base SSDC has identified gross residual needs of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base.
15. The EDNA update (2024) suggests that strategic sites (excluding WMI) within SSDC's area can contribute a surplus of 27.6ha to the unmet needs of other local authorities. In addition to sites in the current pipeline, SSDC is proposing to allocate an additional strategic site at M6 Junction 13 that will add an additional 17.6ha to the pipeline of sites. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (which has had a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). It also recognises that the site provides the only significant opportunity to deliver a non-Green Belt site in the district, at a location identified as a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites (2021). The result of this addition to the pipeline is that the surplus of employment land that is available to unmet needs of other authorities increases to 45.2ha.
16. Additionally, the SSDC Local Plan will allocate the consented large-scale strategic rail freight interchange called West Midlands Interchange (WMI) within SSDC's area. The South Staffordshire EDNA (2022) indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area.

17. Supporting work commissioned to examine the apportionment of WMI<sup>6</sup> suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country authorities making up the Black Country FEMA. CCDC has formally stated their employment land provision in their forthcoming Regulation 19 Pre-Submission Local Plan includes 10 ha of employment land at the West Midlands Interchange as identified in the SFRI 2021 Study. The remaining land supply from WMI aside from the South Staffordshire, Cannock Chase and Black Country apportionment has not to date been formally stated as necessary to meet needs by the other local authorities in the WMI travel to work area. This may increase the apportionment of land from WMI which could potentially be apportioned towards the unmet needs of the Black Country FEMA, dependent on the stance of other authorities related to the site.
18. The minimum proportion of employment land oversupply that can be attributed towards the Black Country and the role of other authorities within the South Staffordshire FEMA in contributing to unmet needs is to be addressed through a separately drafted statement of common ground covering the entire South Staffordshire FEMA geography. SSDC and CCDC consider that this FEMA-wide statement of common ground is the appropriate mechanism by which to address these strategic employment needs, whilst acknowledging that the Black Country FEMA authorities will also need to hold duty to cooperate discussions with other local authorities holding strong or moderate functional economic relationships with that area in addressing employment shortfalls. This separate statement of common ground is also considered a more appropriate mechanism by which to address SSDC and CCDC stances on needs relating to the evidence base on West Midlands Strategic Employment Sites. The original SoCG covering the South Staffordshire FEMA was signed in 2022 by Cannock Chase District Council but will be revisited once the South Staffordshire EDNA has been completed.

### Cross boundary transport impacts

19. SSDC and CCDC are committed to continue working together in partnership, alongside Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. SSDC have not proposed any strategic site allocations in close proximity to Cannock administrative area through the emerging local plan.
20. One site allocation for 43 dwellings is proposed through the Cannock Chase Local Plan at the boundary with SSDC. This site is currently a part developed, mixed-use site immediately adjacent to existing development in Cannock on three boundaries and is part brownfield land. Allocation of the site will result in Green Belt release, although evidence to support the Cannock Local Plan suggests the contribution of the site to the Green Belt is low. Access to the site is within the Cannock boundary and as the closest facilities are within Cannock it is unlikely to have cross boundary implications for traffic or with regard to impacts on other infrastructure. No other cross-boundary transport issues have been identified.

### Infrastructure

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<sup>6</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve? (Stantec, Feb 2021)

21. SSDC and CCDC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
22. Necessary infrastructure (including school places) will be delivered within the respective Councils own authority boundaries. Therefore, no cross-boundary infrastructure issues have been identified.

### Gypsy & Traveller Provision

23. SSDC has an identified a 162 pitch need for Gypsy and Traveller households in South Staffordshire over the local plan period, including 92 pitches within the first 5 year period<sup>7</sup>. SSDC's Gypsy and Traveller evidence base indicates that all suitable sites (including Green Belt options) which have capacity to reduce this shortfall have been maximised. It also indicates that all public land options in the District (including Green Belt options) have been explored for their potential to provide new public site options which could address specific families' needs and thereby reduce the shortfall. Despite these efforts, SSDC can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, even against the District's 5 year pitch need, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area.
24. SSDC has written to all adjacent and housing market area authorities on multiple occasions during the plan preparation regarding the potential shortfall in Gypsy and Traveller pitch needs within the District. Following on from the publication of SSDC's Gypsy and Traveller Accommodation Assessment (GTAA) in late 2021, SSDC wrote to all HMA and neighbouring authorities in January 2022 setting out the extent of the pitch shortfall, despite the Council's efforts to maximise all suitable and deliverable sites (including within the Green Belt) which would address the unmet need. This letter then requested authorities examine their ability to contribute to its unmet pitch needs, specifically in the form of extra supply on publicly run sites where pitches could be ensured for the families in need within SSDC. It then wrote again to these same authorities in August 2022, providing an update on extra efforts that SSDC had made to identify new public sites within the District upon Staffordshire County Council land. Despite these efforts, the letter communicated that a significant shortfall still remained and that SSDC required assistance in addressing its unmet pitch needs through new or expanded publicly run sites. In August 2023 work began on an update to SSDCs GTAA to assess need over the updated plan period to 2041, and neighbouring authorities were advised of this in a further letter in October 2023.
25. CCDC responded stating that there are no public sites within CCDC currently and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This was a point of uncommon ground between the two authorities at that time as SSDC considered that all options should be explored.
26. CCDC published the Cannock Chase Gypsy and Traveller Accommodation Assessment in 2019 which set out a need for 25 pitches across the original plan period (2038) as well as 0-4 to meet undetermined households and 10 plots to meet the needs of Travelling

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<sup>7</sup> South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

Showpeople. It did not identify any need for transit sites and considered the issue of need to be self-contained within Cannock District, however noted the general desire for Gypsy and Travellers to locate close to the A5 strategic road network which runs through the authority areas of South Staffordshire, Cannock and Lichfield. CCDC has not been able to identify sites to meet the need in full and wrote to neighbouring authorities in 2021 asking if any unmet need could be met in neighbouring authority areas. All responses received indicated there was no spare capacity for plots or pitches in adjoining authority areas, including in South Staffordshire and therefore CCDC undertook further work to identify additional capacity within the authority area in preparation for the final Reg 19 stage.

27. SSDC wrote further to neighbouring authorities in October 2023 notifying that there was an intention to progress the South Staffordshire Local Plan after a period of delay. In relation to Gypsy and Traveller Need SSDC requested an update to the steps taken to examine all potential pitch supply options. CCDC responded by confirming that a Gypsy and Traveller Topic Paper was in production to support the Reg 19. Consultation which would set out in detail the work undertaken by the Council to date to explore all sources of sites. However, it was still not possible for the need identified in the 2019 evidence to be met within CCDC, therefore a shortfall remains and there is not considered to be any capacity to accommodate the need of authorities adjacent to CCDC. CCDC published the Topic Paper alongside the Reg 19 consultation in Feb-March 2024. Updates to existing evidence on need is in progress by SSDC.
28. The issue of meeting the needs of Gypsy and Travellers will require review and further discussion between CCDC and SSDC before the Local Plans are submitted and may result in further updates to this SoCG or a separate SoCG on this issue. How SSDC can address their identified unmet need for gypsy and traveller accommodation provision is currently not an area upon which agreement is yet reached.

## Natural Environment

29. SSDC and CCDC are committed to continue working together as part of the Cannock Chase Special Area of Conservation (SAC) Partnership with the aim of ensuring that the integrity of the Cannock Chase SAC is protected and that appropriate mitigation measures are secured in order to ensure development does not have adverse effects on the integrity of the SAC.
30. Both CCDC and SSDC acknowledge the need for both authorities to continue working collaboratively with Natural England in relation to visitor impacts from the residents of new development within 15 km of Cannock Chase SAC; and in relation to air quality impacts from new development and associated commuting on Cannock Chase SAC and the other protected sites relevant to the Cannock Chase SAC Partnership authorities. This includes consideration of cumulative and in-combination effects. Where practicable, SSDC and CCDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs. This includes joint working on a sub-regional (Staffordshire and the Black Country) air quality study that will assess air quality impacts on protected sites as a result of estimated growth. The findings of this study will feed into individual authorities Habitat Regulations Assessment process.
31. SSDC and CCDC are committed to continue working together in respect of matters relating to the natural environment where these are applicable to the authorities.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South Staffordshire District Council and Cannock Chase District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### **South Staffordshire District Council**

**Name: Kelly Harris**

**Position: Lead Planning Manager**

**Signature:**



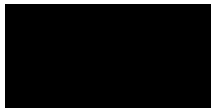
**Date: 02 October 2024**

### **Cannock Chase District Council**

**Name: Dean Piper**

**Position: Head of Economic Development and Planning**

**Signature:**



**Date: 01 October 2024**