



Statement of Common Ground  
between Cannock Chase District  
Council and Stafford Borough  
Council

Cannock Chase Local Plan  
(2018-2040)

August 2024

# Statement of Common Ground (SoCG) between Cannock Chase District Council (CCDC) and Stafford Borough Council (SBC)

## Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Cannock Chase District Council (CCDC) and Stafford Borough Council (SBC), hereafter referred to as “the parties” to inform the submission of the Cannock Chase Local Plan 2018-2040.
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 key strategic matters:
  - Housing;
  - Employment;
  - Transport;
  - Infrastructure;
  - Gypsy and traveller provision; and
  - Natural environment.
3. This SoCG reflects discussion over the period of joint working during the production of both the emerging Cannock Chase Local Plan, and emerging Stafford Borough Local Plan originally beginning in 2017. The Cannock Chase Local Plan has been subject to delay which has led to revisions to the Local Development Scheme (LDS) and amendments to the plan period which is now 2018-2040. Stafford Borough Council is due to revise the LDS for the Stafford Borough Local Plan shortly. The proposed plan period is 2020-2040.
4. Both local plans are prepared in accordance with national policy and guidance, however there is a key difference in how the plans will be examined. Cannock Chase Local Plan Publication Regulation (Reg) 19 was subject to public consultation from 5<sup>th</sup> February 2024 - 18<sup>th</sup> March 2024. In line with paragraph 230 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 with an update in September 2023 related to renewable energy). As Stafford Borough will consult on the Reg 19. Stafford Borough Local Plan after 19 March 2024, it will be examined against the recently published NPPF (December 2023). This point is of note because it potentially has implications for the final strategy set in each Local Plan.

## Geography covered by Statement of Common Ground

5. This SoCG covers the Local Planning Authority areas of Stafford Borough and Cannock Chase District.
6. The two authorities are in separate Housing Market Areas (HMA's). Cannock Chase District Council is within the Greater Birmingham & Black Country Housing Market

Area (GBBCHMA)<sup>1</sup>. Stafford Borough Council comprises a self-contained HMA which aligns with the Stafford Borough Local Authority boundary.

7. The Cannock Chase Economic Development Needs Assessment 2019 identifies the Functional Economic Market Area (FEMA) for Cannock Chase as Cannock Chase District, Stafford Borough, Lichfield, Walsall and South Staffordshire District. The Stafford Borough Economic Development Needs Assessment 2020 identifies the FEMA that predominantly aligns with the Borough's administrative boundary. This is considered in the subsequent section on economy.

## Key Strategic Matters

8. 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; infrastructure; gypsy and traveller provision; and matters relating to the natural environment including designated sites. These discussions have previously informed the development of adopted plans and other related documents.
9. 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

10. Throughout the development of the Cannock Chase Local Plan, CCDC has consistently used the Government's standard methodology to calculate the District's own housing need. CCDC has been an active member of the GBBCHMA Technical Officers Group since it was established in 2017 and have contributed to discussions relating to the delivery of unmet housing need within the GBBCHMA. CCDC also participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire Housing Market Area (HMA) up to 2031 and 2036. This evidence informed potential growth options presented in the emerging Cannock Chase Local Plan to deliver additional housing to help address the unmet needs of the HMA. The final plan strategy seeks to meet the local housing need target of 5,808 dwellings (net) plus an additional contribution of 500 dwellings above the housing requirement for the District towards addressing the unmet need of the GBBCHMA.
11. SBC has a self-contained HMA and does not fall within the GBBCHMA, although the authority has received requests from members of the GBBCHMA to accommodate unmet housing need. The authority has also received requests from neighbouring authority Newcastle under Lyme to accommodate unmet need. Throughout the development of the Stafford Borough Local Plan 2020-2040, SBC has used the Government's standard methodology to calculate the housing need for Stafford

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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



Borough and have provided an uplift based on supplying the workforce to support the core employment growth forecast. The target of 435 dwellings per annum is therefore a 'jobs based' housing projection. SBC have indicated throughout the preparation of the Stafford Borough Local Plan that the housing requirement is able to be met on land within the authority boundary, and that the Green Belt would be protected. The emerging local plan is currently at Preferred Options stage and is therefore subject to change.

12. CCDC has not been able to meet the housing needs of the District or contribute towards the unmet needs of the GBBCHMA without the release of Green Belt land. In December 2021, following the Preferred Options consultation on the Cannock Chase Local Plan, CCDC formally wrote to SBC, and all other neighbouring authorities in December 2021 to ask whether any of the housing shortfall (then estimated to be approximately 1,500 dwellings) could be accommodated in neighbouring authority boundaries using land which is not in the Green Belt. SBC responded stating 'no'. With regard to a question about the proposed strategy presented at preferred options stage to release Green Belt in Cannock Chase District to meet the identified shortfall, SBC indicated that no further discussion was considered necessary at the time, subject to sites being identified.
13. Duty to Cooperate meetings between officers of the two authorities have provided the opportunity to discuss the emerging housing strategy for both the Cannock Chase Local Plan and the Stafford Borough Local Plan. The authorities have engaged by making representations on the local plans at key points where they have been subject to public consultation, and by formal correspondence in relation to the December 2021 letter.
14. There has been no uncommon ground in relation to the calculation of housing need for each authority area, or with regard to the approach set out in the emerging strategies for housing provision. There are no cross-boundary sites for residential development proposed for allocation in either of the emerging local plans.

## Employment

15. There is not a universal methodology for defining a Functional Economic Market Area (FEMA). FEMA's are commonly identified in Economic Development Needs Assessments. Evidence produced for local authorities which neighbour Cannock Chase boundary may vary in the identified boundary for FEMA's. In November 2022 a Statement of Common Ground was produced by South Staffordshire District Council titled 'South Staffordshire Functional Economic Market Area' and was signed by both Stafford Borough Council and Cannock Chase District Council.
16. The SoCG recognised that the EDNA for South Staffordshire encompasses both the local authority boundary for Stafford Borough and Cannock Chase as well as Walsall, Dudley and Wolverhampton. The Cannock Chase Economic Development Needs Assessment 2019 identifies the FEMA for Cannock Chase as Cannock Chase District, Stafford Borough, Lichfield, Walsall and South Staffordshire District. The Stafford Borough Economic Development Needs Assessment 2020 identifies the FEMA predominantly aligns with the Borough's administrative boundary.
17. The emerging Stafford Borough Local Plan 2020-2040 proposes to deliver at least 80 ha of new employment land. This proposed target is based on the Economic and Housing Development Need Assessments (EHDNA's) core projection for 2020-2040

employment growth in the borough plus a 50% uplift to align with housing growth that is planned to be above baseline local housing needs.

18. CCDC commissioned the Employment Development Needs Assessment (EDNA) in 2019, which has been subject to updates in 2020 and 2024. The EDNA identifies employment land need in terms of a range based on different modelling scenarios using Experian forecasts. From this range Cannock Chase initially identified a target of 50 ha at Preferred Options stage, based on the 2020 EDNA, and subsequently 74 ha in the Pre-Submission Local Plan. CCDC's letter to neighbouring authorities in December 2021 also requested assistance in meeting some of the employment land need using land which is not in the Green Belt, to which SBC responded 'no'.
19. The Pre-submission Cannock Chase Local Plan identifies the need for release of the Green Belt to extend existing business parks at Watling Street, A5 and Kingswood Lakeside, Cannock to meet this need in addition to new employment land delivered as part of the redevelopment of the former Power Station site at Rugeley. Only the site at Rugeley is located in close proximity to the Stafford Borough boundary, however there is not known to be any cross boundary issues arising from the site and the site has full planning permission.
20. CCDC has formally stated their employment land provision in the forthcoming Regulation 19 Pre-Submission Local Plan will also include 10 ha of employment land at the West Midlands Interchange, as identified in the Strategic Freight Rail Interchange (SFRI) 2021 Study commissioned by the Black Country Authorities and produced by Stantec.
21. There has been no uncommon ground in relation to the calculation of employment need for each authority area, or with regard to the approach set out in the emerging strategies for employment provision. There are no cross-boundary sites for employment development proposed for allocation in either of the emerging local plans.

## Transport

22. SBC and CCDC are working collaboratively as part of the Special Area of Conservation (SAC) Partnership to produce evidence on the impact of development on air quality around the SAC's and RAMSAR sites, with SSDC. SWECO consultants are undertaking transport and air quality modelling of A roads, with the impact predominantly within 200m of respective SACs. It was noted that agricultural practices and planning consent for livestock units can have an impact on water and air quality issues, which need to be monitored. Work is ongoing with the partnership regarding mitigation from recreational pressure for Cannock Chase SAC. The report on air quality is expected in the coming months.
23. SBC and CCDC are committed to continue working together in partnership, with Staffordshire County Council, with the aim of ensuring the necessary transport and highways improvements are implemented to support sustainable growth across both authorities. There are no proposed strategic site allocations within close proximity to the local authority boundaries where they adjoin through the emerging local plans which would have strategic transport implications.



24. No other cross-boundary transport issues have been identified.

## Infrastructure

25. SBC 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.
26. 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

27. The Stafford Borough Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2022 (Arc4, March 2022) identifies that over the plan period 2021/22 to 2039/40, there is an overall need for 48 additional pitches once expected turnover on the existing council site in the borough is considered (of which 22 Planning Policy for Traveller Sites need and 26 non-PPTS need). The emerging plan proposed allocations to meet the need of Gypsy and Travellers under the Government's definition set in Planning Policy for Traveller Sites (2015) (which has since been amended) and a criteria-based policy would be used to assess sites in future.
28. 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 Showpeople. It did not identify any need for transit sites and considered the issue of need to be self-contained within Cannock Chase 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 Chase and Lichfield. The A5 is not adjacent to Stafford Borough Council local authority boundary and there is no specific identified demand in the vicinity of the shared boundary.
29. 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 Stafford Borough and therefore CCDC undertook further work to identify additional capacity within the authority area in preparation for the final Reg 19 stage. However, it was still not possible for the need identified in the 2019 evidence to be met within CCDC, therefore a shortfall remains. A criteria-based policy has been proposed to assess future applications for sites for Gypsies and Travellers along with small extensions proposed to two existing sites within the local authority boundary.

## Natural Environment

30. SBC 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.

31. Both CCDC and SBC 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, SBC and CCDC will work with other authorities in the Cannock Chase SAC Partnership authorities to address wider impacts of development proposals on all SACs.
32. Following the introduction of requirements related to delivering Biodiversity Net Gain through development, SBC and CCDC will work with Staffordshire County Council to support production of the wider Local Nature Recovery Strategy

## 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 Stafford Borough Council and Cannock Chase District Council. The authorities will continue to work together to address cross-boundary issues on an ongoing basis.

### Stafford Borough Council

Name: *llr Antony F. Reid*

Position: *Cabinet Member for Economic Development & Planning*

Signature: 

Date: *4/8/24*

### Cannock Chase District Council

Name: Sushil Birdi

Position: Planning Services Manager

Signature: 

Date: 23rd August 2024

