

Statement of Common Ground
between Stafford Borough Council and
South Staffordshire District Council

South Staffordshire Local Plan

2023-2041

Position at August 2024

Statement of Common Ground (SoCG) between South Staffordshire District Council (SSDC) & Stafford Borough Council (SBC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by South Staffordshire District Council (SSDC) and Stafford Borough Council (SBC), hereafter referred to as “the parties” to inform the submission of the South Staffordshire Local Plan 2023-2041.
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 South Staffordshire Local Plan 2023-2041 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;
 - Employment land;
 - Transport and infrastructure matters;
 - Gypsy and traveller accommodation; and
 - Natural environment (Special Areas of Conservation).

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of South Staffordshire District and Stafford Borough Council. SSDC and SBC both sit within the South Staffordshire functional economic market area (FEMA).

Key Strategic Matters

4. 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.
5. 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

6. SSDC and SBC are in separate housing market areas but continue to engage constructively on housing related issues.

Employment

7. SSDC and SBC both sit within the South Staffordshire functional economic market area (FEMA).
8. The South Staffordshire Local Plan 2023-2041 proposes to deliver sufficient employment land on local and strategic employment sites to both meet its own local needs and provide a surplus that could contribute towards cross-boundary shortfalls. Stafford Borough Council's latest 2022 Regulation 18 Preferred Option consultation sets out the borough's current position on employment land provision. This indicates there is no surplus in employment land provision to be exported through the Duty to Cooperate to the Black Country. Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the borough in the work to apportion land from that site.
9. 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.
10. 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. Nevertheless, it should be noted that Stafford Borough Council are making provision to fully meet employment need within the Borough area and therefore are not seeking to identify any employment land need for the Borough from the site at M6 Junction 13.
11. 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. Supporting work commissioned to examine the apportionment of WMI 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. The remaining land supply from WMI aside from the South Staffordshire, Black Country and Cannock apportionment has not to date been formally stated as necessary to meet needs by 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.

12. 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 SBC 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 SBC stances on needs relating to the evidence base on West Midlands Strategic Employment Sites.

Cross boundary transport impacts

13. SSDC and SBC 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's are proposing four strategic housing site allocations, however none are within close proximity to the Stafford administrative area. As these sites progress the local authorities will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

Infrastructure

14. SSDC and SBC will work together where required, with the aim of ensuring the necessary infrastructure improvements are delivered to support sustainable growth across both administrative areas.
15. Necessary infrastructure (including school places) will be delivered within South Staffordshire. Therefore, no cross-boundary infrastructure issues have been identified.

Gypsy & Traveller Provision

16. 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 period¹. SSDC considers that latest evidence from Council'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.

¹ South Staffordshire Council Gypsy and Traveller Accommodation Assessment - Final Report 2024

17. 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. It should be noted that SSDC and SBC are in separate housing market areas. In August 2023 work began on an update to SSDC's 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, which SBC responded to in November 2023.

18. SBC's response to the August 2022 correspondence provided additional clarification in order to confirm their previous position in January 2022 that Stafford Borough would not be able to accommodate any identified unmet Gypsy and Traveller accommodation needs from South Staffordshire. SBC is currently seeking to provide sufficient sites to meet its own Gypsy and Traveller accommodation needs, and is progressing with the Local Plan 2020-2040. The call for sites process remains open, and relevant policy context is available through the Preferred Options consultation currently taking place during October to December 2022. In SSDC's view it is therefore currently unclear as to what extent SBC may or may not be able to assist in meeting unmet pitch need arising from SSDC, as the call for sites identification process is still on-going, including covering the Green Belt areas. In addition, SSDC's view is that the potential for additional public pitch options in SBC has not been fully explored. SBC consider that public pitch options have been fully explored, with all of the plots on existing public sites currently occupied and therefore unable to support South Staffordshire's unmet need. In addition, the Borough Council hold a waiting list for plots for when any become available. This unfortunately is rare as we have recently had to reduce the number of pitches during a refurbishment and most of the residents on the site have lived there for long periods of time and are not considering moving. Based on current market conditions and available resources for effective delivery within Stafford Borough all potential site delivery options for gypsies, both public and private, have been considered through submissions from landowners / developers, including in the Green Belt areas. At this stage the Borough Council are not aware of any publicly owned land which is available to deliver new gypsy sites despite reviewing Stafford Borough Council's land and working with Staffordshire County Council over a number of years in an attempt to identify new gypsy sites. Based on exploring the options set out by SSDC in its letter dated 8 August 2022, at this stage SBC's position is that it is consequently unable to identify potential new gypsy sites to accommodate the needs from South Staffordshire.

Natural Environment

19. SSDC and SBC 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.

20. Both SBC 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 SBC 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 processes.
21. SSDC and SBC 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 Stafford Borough 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:



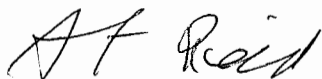
Date: 04/09/2024

Stafford Borough Council

Name: Antony S. Reid

Position: Cabinet member for Economic Development & Planning

Signature:



Date:

4/9/24