

Your ref South Staffordshire Local Plan Review Regulation 19  
Our ref  
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Dear Strategic Planning Team,

### **South Staffordshire Local Plan Review Regulation 19 Publication Plan Consultation**

Thank you for the opportunity to respond to the South Staffordshire Local Plan Review Regulation 19 Consultation.

Lichfield District Council (LDC) and South Staffordshire District Council (SSDC), have both reached a similar stage in the preparation of local plans for their respective districts, albeit that LDC is preparing for the Examination of their document, and SSDC is gathering formal representations before requesting an Examination.

Given that the authorities are both at an advanced stage work has been undertaken to prepare Statements of Common Ground during the last year for the respective plans. This means that the position in relation to strategic policy matters has been refined and detailed through those SoCG. These subjects are outlined below:

- Housing (including housing needs across the GBBCHMA);
- Green Belt;
- Employment land;
- Gypsy and traveller accommodation;
- Transport and infrastructure matters; and
- Natural environment (including designated sites).

The responses proposed to the SSDC LP document reflects the joint working to address identified strategic matters that has been undertaken between Lichfield District Council and South Staffordshire District Council over a number of years. The authorities will continue to work together to address cross-boundary issues. In providing a formal response to the Publication version of the SSDC Review LP LDC also wishes to rely on the stated positions in the emerging SoCG for the SSDC plan and the agreed SoCG for its own local plan.



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## Key Strategic Matters

Given that SSDC has now published a pre-Submission version of its local plan, the following are specific comments on the policies / contents of that document but related particularly to strategic level policies which have implications beyond the SSDC boundaries.

### Housing

LDC along with SSDC have been active members of the GBBCHMA Technical Officers Group since it was established and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA. SSDC proposes to contribute 4000 units or 44% of its housing supply to the unmet need of the wider area. Policy DS4 outlines this position. LDC acknowledges the scale of the contribution proposed by SSDC, and asks it to note the significant level of provision being made by LDC itself (almost 40% of the annualised provision from 2027) in cooperating with the wider GBBCHMA area.

#### Formal response

- LDC supports the strategic level of housing provision being made by SSDC in policy DS4.

### Green Belt

The SSDC Local Plan proposes to release sites from the Green Belt to assist in meeting the housing requirement set out within the plan. LDC notes the necessity that has caused SSDC to do this.

#### Formal response

- LDC supports the position in policy DS1 whereby SSDC is making releases from the Green Belt to meet its own and wider area housing need.
- It should be acknowledged that authorities across the GBBCHMA continue to work together to potentially progress a HMA wide Statement of Common Ground and associated governance arrangements.

### Employment

SSDC is part of a different functional economic market area (related to the Black Country) to that of LDC which has linkages to Greater Birmingham. SSDC is able to meet its own needs and to contribute to the wider unmet need in that area. SSDC has not approached LDC for assistance in accommodating employment land need. In any case LDC's view is that evidence supporting the LDC Local Plan 2040 indicates that there is only sufficient land within Lichfield District to accommodate its own need within the plan period.

#### Formal response

- LDC supports the approach taken by SSDC in addressing local and wider need in the Black Country for employment land as expressed in policy DS4.

### Transport and infrastructure

LDC and SSDC are committed to continue working together in partnership, with the aim of ensuring the necessary transport; highways improvements; and infrastructure to support sustainable growth across the GBBCHMA. Both parties will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

#### Formal response

- None specifically

### Gypsy & Traveller Provision

SSDC is only able to accommodate 37 additional pitches against an emerging gypsy and traveller need of 121 pitches across the 15-year plan period, despite maximising Green Belt pitch options and exploring all



SSDC-owned land for public site options. It notes in policy DS4 that it will continue to look for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals.

#### **Formal response**

- LDC acknowledges the position that SSDC is having to take regarding gypsy and traveller provision and supports the proposals in policy DS4.

#### **Natural Environment – Cannock Chase (SAC)**

LDC and SSDC 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. Both LDC 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 the SAC and in relation to air quality impacts from new development and associated commuting.

Policy NB3 outlines the SSDC approach to the SAC which is consistent with approach at LDC.

#### **Formal response**

- LDC supports the approach taken by SSDC in policy NB3 to ensure the integrity of the Cannock Chase SAC

#### **Conclusion and summary**

LDC considers the South Staffordshire Council Local Plan Review – Publication Plan to be:

- Legally compliant
- Sound
- Complies with the Duty to Cooperate

Representations of support are offered for:

- Policy DS1 in respect of changes proposed to the Green Belt
- Policy DS4 in respect of housing; employment land and gypsy and traveller provision
- Policy NB3 in respect of the treatment of the Cannock Chase SAC

LDC wishes to acknowledge the separate and more detailed Statements of Common Ground which have been prepared for the individual local plans. These are available as an agreed final version for the Lichfield Local Plan 2040, and as a draft for the South Staffordshire Council Local Plan Review – Publication Plan. These deal with some items which are subject to review or on-going discussions.

Yours faithfully

*Lucy Robinson*

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