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Comment

Document Element: Spatial strategy for housing, 5.12**Respondent:** Cannock Chase District Council**Date received:** 21/05/2024 via Web**Summary:**

Cannock Chase District Council consider the Local Plan to be sound and legally compliant, and consider it has been produced in compliance with the Duty to Cooperate however, the Council has some concerns with regard to the wording around the validity of the joint evidence base. The Council have produced detailed comments on the strategy and cross boundary issues.

Full text:

South Staffordshire Local Plan

As one of the direct neighbouring authorities, we welcome the opportunity to comment on the Reg. 19 South Staffordshire Local Plan Review. Cannock Chase District Council (CCDC) has sought to work cooperatively with South Staffordshire District Council (SSDC) over the course of production of our respective Local Plans and this has informed the joint draft Statement of Common Ground which features in the Publication Plan Duty to Cooperate Topic Paper.

Strategy

It is noted that the Local Plan strategy has changed since the former Reg 19 plan was released in 2022 (now superseded). CCDC are pleased to see that the plan will still meet the Objectively Assessed Needs of South Staffordshire District and will not further exacerbate the shortfall of the wider Greater Birmingham and Black Country Housing Market Area, of which both authorities are a part of.

The Publication Plan notes that the Strategic Growth Study (2018) on which the previous 4,000 home contribution was based is no longer up to date. It is recognised that the joint evidence commissioned by the authorities within the HMA (Strategic Growth Study, GL Hearn and Wood) is dated 2018, but this remains the only jointly agreed evidence which has informed options to address the HMA shortfall in Local Plan preparation to date. The options presented in the study have informed the contribution to the shortfall presented in the emerging Cannock Chase Local Plan (500 dwellings) based on the 'proportionate dispersal' approach, taking into account the constrained nature of the district (approx. 60% of land area within Cannock Chase National Landscape and/or Green Belt). The study did consider options to enable the shortfall to be addressed in full, if collectively all authorities contributed.

Therefore, CCDC would contend the evidence still has validity, although it is accepted that an update is now required which both CCDC and SSDC have expressed support for through the joint HMA Development Needs Group meetings. CCDC supports the position that authorities in the HMA should determine the appropriate contribution to help reduce unmet need based on evidence and note that South Staffordshire have produced further evidence and tested additional options to inform the final housing target in the plan. However, this is not linked to the conclusions of the joint evidence base.

Cross boundary issues

There are no strategic cross boundary sites proposed in either the Cannock Chase or South Staffordshire Local Plan which affect the shared boundary. It is however noted that Cheslyn Hay and Great Wyrley is defined as a Tier 1 settlement and is subject to several housing proposals, two of which are within close proximity to the boundary of Cannock Chase District (sites 139 and 704, Land off Norton Lane and Pool View) as well as the extension to the Kingswood Colliery site for 9 pitches. Whilst most of the proposed allocations proposed are modest in scale, it is essential that the cumulative impact of proposals have been considered through evidence, particularly any transport impacts which may affect the Churchbridge interchange and surrounding road network.

The Publication Plan sets out that South Staffordshire are able to meet their identified employment need and provide a considerable surplus from the SFRI development which could be meet a significant proportion of the shortfall in employment land for the Black Country, subject to agreement through Statements of Common Ground. This position is welcomed by CCDC. The Publication Plan also recognises CCDC seek to claim 10ha towards the employment supply in the Cannock Chase Local Plan, which is on the basis of the evidence commissioned by the Black Country and produced by STANTEC 'Employment Issues Response Paper', which sought to apportion the employment supply to the authorities whose need it was likely to serve.

CCDC support the commitment to protecting the Cannock Chase SAC outlined in Policy NB3: Cannock Chase SAC. We continue to work with SSDC as members of the SAC Partnership to mitigate the cumulative impact of growth on designated sites including the Cannock Chase SAC and Cannock Chase Extension Canal SAC. We note that both emerging Local Plans seek to achieve 10% Biodiversity Net Gain.

CCDC support the shared commitment to achieving reductions to carbon emissions and mitigating the impact of climate change, and note parallels between the two Local Plans in relation to delivering more sustainable construction and developments including net zero development.

Any further detailed issues are considered within the Draft Statement of Common Ground.

Change suggested by respondent:

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Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None