

## Stafford EiP (Local Plan Part 2: Allocations)

### Update on representations submitted by Cannock Chase Council

Extract from our representations, with key issues from these in **bold** and updated comments in **bold red, underlined**.

It is accepted that the Local Plan Part 2 is a continuation of the recently adopted Local Plan Part 1 and has been prepared entirely within the context of this, and Cannock Chase Council accepts this approach. However, it is considered that Paragraph 2.19 is rather rigidly worded and does not allow for any flexibility in terms of enabling the consideration of Green Belt in relation to the cross boundary needs of neighbouring districts although **it has been accepted through the Duty to Co-operate that this is a strategic matter rather than one which relates directly to the delivery of an Allocations Plan. This still stands.**

The reason for requiring some flexibility in the wording to enable the potential need for consideration of exceptional circumstances relating to development in the Green Belt relates to a shortfall of housing provision in the Greater Birmingham Housing Market Area (GBHMA) within which lies Cannock Chase District. A report by Peter Brett Associates (Greater Birmingham and Solihull LEP Black Country Local Authorities Strategic Housing Needs Study Stage 3 report, August 2015) has identified a cumulative shortfall – mainly arising from Birmingham – of a minimum of 37,600 homes over the period 2011 – 2031. **Work is currently ongoing across the GBHMA to establish how this shortfall should be distributed and how this will link to the development of the GBSLEP Spatial Plan for Recovery and Growth. This is still the case. Additionally, the Secretary of State called the Birmingham Plan in after the Inspector had found it sound but prior to its adoption. At the time of preparing this update, the Plan remains with the Secretary of State.**

It is highly likely that Cannock Chase District will be required to take a proportion of that shortfall, and indeed that likelihood has been addressed through the Cannock Chase Local Plan Part 1, which was adopted in June 2014, with provision being made through that Plan to be able to address any issues arising as a result of this shortfall via Local Plan Part 2. **Whilst Cannock Chase Council does not yet know the scale of the issue it is going to have to address through Local Plan Part 2, it remains that a number of options and alternatives for accommodating growth are going to have to be considered, and the potential exists for the need to have to discuss these issues with neighbouring authorities although this is not certain at this point. Since this was written, Cannock Chase Council has agreed to test whether it is able to accommodate a further 1000 homes within its own boundaries and this work is currently underway, with evidence being prepared and the intention is to consult on a Local Plan Part 2 Issues and Options document in the Autumn.** What is certain, however, is that GBHMA Authorities will need to undertake Green Belt Reviews to explore the potential of some Green Belt being released to accommodate some of the shortfall. **Cannock Chase Council is currently undertaking a Green Belt Review which is nearing completion. This has now been published but the outcomes of this are still under consideration as Local Plan Part 2 is being developed: no conclusions have yet been reached.**

Whilst Stafford Borough does not, in itself, fall within the GBHMA, its boundary with Rugeley (in Cannock Chase District) means that it does not remain entirely unaffected, **as options relating to Rugeley allocations have not yet been explored. This is still the case, although it is worth noting that Rugeley Power Station closed in June 2016, so the future of this cross**

**boundary site (Cannock Chase / Lichfield Districts) is currently in the early stages of consideration in terms of its redevelopment and use (it is being promoted as a residential-led scheme through the respective SHLAAs).**

Cannock Chase Council understands the reasons why a Green Belt Review for Stafford has not been undertaken as it clearly explains there are other options for delivering its own growth in line with the parameters set out in Local Plan Part 1. Cannock Chase Council has therefore been working with Stafford Borough Council under the Duty to Co-operate when undertaking its own Green Belt Review in assessing (at a high level) a parcel of land which borders Rugeley but which lies within Stafford Borough. This is to enable further discussions to take place *should they be required* as work on the Cannock Chase Local Plan Part 2 progresses, and depending on the outcomes of the GBHMA work and the emergent GBSLEP Spatial Plan. **As stated earlier, however, both parties have accepted that this would be a higher level strategic matter than perhaps would be appropriate for this Allocations Plan. A reference to a potential review / partial review depending on the outcomes of these ongoing strategic matters would, however, be considered appropriate at this stage. It is still felt that this is an appropriate request and it would be helpful to have this 'hook' but Cannock Chase council fully accepts that this is a strategic matter which does not need to be dealt with specifically through an Allocations Plan.**

In terms of the modification we were requesting, we said:

Suggest paragraph 2.19 is amended to read (new additions in bold) 'In Stafford Borough there are two areas of Green Belt: around the North Staffordshire conurbation and in the south eastern area of the Borough which includes Cannock Chase Area of Outstanding Natural Beauty. The National Planning Policy Framework sets out the government's commitment to maintaining areas of Green Belt and states that these designations should only be reviewed in exceptional circumstances, There has been no need to review the Green belt within Stafford Borough as ample land is available in locations outside of the Green Belt to meet the development needs of the Borough, Therefore no review of the Green Belt has been undertaken. **However, dialogue with Cannock Chase Council under the Duty to Co-operate is ongoing and the situation may need to be reviewed in the future as a result of work being progressed on the Cannock Chase Local Plan Part 2 and in the context of the housing shortfall relating to the Greater Birmingham Housing Market Area and the GBSLEP Spatial Plan for Recovery and Growth, and the potential for this to impact upon Rugeley'**.

**Ideally , we would still like this modification to be included because of the ongoing work in relation to Rugeley options. However, all Local Plans are likely to need to be reviewed soon in any case in the light of the recent (and ongoing) changes to the planning system, so the need for this 'hook' is now not so vital in relation to this one very specific issue.**

Update provided on 13<sup>th</sup> July 2016 by Clare Eggington

Planning Policy Manager

Cannock Chase Council