

Your ref South Staffordshire Local Plan Review Regulation  
19 Publication Plan  
Our ref SSLP-05-24  
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28<sup>th</sup> May 2024

Dear Strategic Planning Team

### **South Staffordshire Local Plan Review Regulation 19 Publication Plan Consultation 2024**

Thank you for the opportunity to respond to the South Staffordshire (SSDC) Local Plan Review Regulation 19 2024 consultation.

Lichfield District Council (LDC) previously provided comments in response to the SSDC Local Plan Regulation 19 consultation in December 2022. It is noted that significant changes have been made to the plan in relation to housing provision and Green Belt release and these matters are discussed in more detail below.

#### **Housing and HMA shortfall**

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. In the 2022 Regulation 19 Local Plan, SSDC proposed to contribute 4000 units or 44% of its housing supply to the unmet need of the wider area. However, it is noted that SSDC are now proposing an alternative strategy (Spatial Option I) that limits Green Belt release to its Tier 1 settlements. The outcome of this is that the total number of dwellings to be delivered within the plan period has been reduced to 4,726 dwellings, of which only 640 dwellings or 13.5% of its total housing supply will contribute towards unmet needs of the wider area. This approach is justified in paragraph 5.2 which reflects paragraph 145 of the NPPF which states;

*“there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated”, and that “Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process”.*



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SSDC will therefore need to fully justify and evidence that there are no exceptional circumstances that exist that could justify further potential Green Belt release. This should also take into account the potential impact upon neighbouring authorities and the significant scale of the unmet housing needs within the GBBCHMA.

#### Formal response

- Lichfield District Council is supportive of SSDC in meeting its own objectively assessed local housing need through the allocation of a minimum of 4,086 homes as detailed within Policy DS4: Development Needs.
- Lichfield District Council welcomes the contribution of 640 dwellings towards unmet need within the wider HMA, however the reduced level of contribution will need to be robustly evidenced and justified in the context of the emerging unmet housing needs within the GBBCHMA.

#### Green Belt

It is noted that SSDC is now pursuing an alternative approach that seeks to limit Green Belt release to Tier 1 settlements (Option I). As such, previous Green Belt site allocations SA2 and SA7 have been deleted. The outcome of this is a significantly reduced contribution to wider unmet housing needs from 4,000 dwellings to 640 dwellings. Whilst LDC notes the necessity that has caused SSDC to do this, LDC's view is it should not be automatically the case that SSDC determine to no longer consider the Green Belt boundaries, particularly given the significant scale of the unmet needs within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). There are limited areas beyond the Green Belt within the GBBCHMA and should all authorities determine not to consider their Green Belt boundaries this will significantly limit the ability of the authorities to address the shortfall.

#### 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
- The deletion of Green Belt site allocations SA2 and SA7 and the resultant fall in HMA contribution will need to be fully and robustly justified in the context of the significant scale of the HMA housing shortfall, particularly given South Staffordshire's geographical and transport links with the Black Country and Birmingham.

#### 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 that supported the now withdrawn LDC Local Plan 2040 indicates that there is only sufficient land within Lichfield District to accommodate its own need.

#### 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 162 pitches, despite exploring all options through the Duty to Cooperate process and all SSDC-owned land for public site options. It is noted in policy DS4 that SSDC 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 the Zone of Influence around 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 DS4 in respect of housing; employment land and gypsy and traveller provision
- Policy NB3 in respect of the treatment of the Cannock Chase SAC



The responses proposed above to the SSDC Local Plan 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 Local Plan, LDC also wishes to rely on the stated positions in the emerging SoCG for the SSDC plan.

LDC welcomes continuing dialogue with SSDC as the plan progresses to examination through the Duty to Cooperate process.

Yours faithfully

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