

Statement of Common Ground
between Lichfield District Council
and South Staffordshire District
Council

Lichfield District Local Plan 2040

July 2022



Statement of Common Ground (SoCG) between Lichfield District Council (LDC) and South Staffordshire District Council (SSDC)

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Lichfield District Council (LDC) and South Staffordshire District Council (SSDC), hereafter referred to as “the parties” to inform the submission of the Lichfield Local Plan 2040.
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 Lichfield Local Plan 2040 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 (including housing needs across the GBBCHMA);
 - Gypsy and traveller accommodation;
 - Employment land;
 - Transport and infrastructure matters; and
 - Natural and historic environment including designated sites.

Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of Lichfield District and South Staffordshire District.
4. These authorities are both within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA). The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire District Council, Redditch District Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth District Council, Walsall Metropolitan Borough Council and Wolverhampton City Council.

Key Strategic Matters

5. 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 (including housing needs across the GBBCHMA); gypsy and traveller accommodation; employment land; transport and infrastructure matters; 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.
6. 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 further dialogue moving forward, not just limited to the periods of plan preparation.

Housing

7. 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. Both authorities also previously participated in the GBBCHMA Strategic Growth Study (2018), which examined need and supply across the entire HMA up to 2031 and 2036, before proposing potential growth options for authorities to consider through their own plan-making process in order to seek address any resulting unmet needs.
8. The GBBCHMA authorities published their latest position statement in 2020 and addendum in December 2021 in respect of housing needs. This position statement details that the need arising from the GBBCHMA and in particular Birmingham City and how this need has primarily now been met. Additionally, further emerging unmet need arising from the Black Country authorities is detailed within the position statement, this emerging need has yet to be tested at Examination.
9. LDC as part of the Local Plan 2040 are proposing to contribute 2,665 to the HMA shortfall from 2027. Of the 2,665 homes, a capped contribution of 2,000 is to be made for the Black Country authorities'. This contribution is considered by LDC to be appropriate and deliverable within the District in addition to LDC Local Housing Need (LHN) of 7,062 dwellings between 2018 and 2040. SSDC have concerns about this figure for the following reasons:
 - Concern that the approach adopted in making a contribution of 2,665 dwellings towards addressing the shortfall in housing provision arising within the Greater GBBCHMA is not a sufficient contribution to meeting the needs of the HMA in light of the recommendations for LDC in the GBBCHMA Strategic Growth Study (2018) and is that failure to deliver all of these recommendations is likely to push housing delivery to other, potentially less sustainable, locations in the HMA.
 - The 4,500 which had been proposed within the Lichfield District Local Plan Review: Preferred Options document is considered by SSDC to be a more appropriate contribution and better reflects the identification of three strategic growth locations in Lichfield District in the GBBCHMA Strategic Growth Study (2018).
 - The decrease in contribution from 4,500 dwellings in the Preferred Options document to 2,665 in the Local Plan 2040 has not been fully justified and that other options should be robustly considered if Strategic Growth Study recommendations are not being delivered.
 - The Lichfield District LP2040 demonstrates supply in excess of the housing requirement as a 'buffer' to ensure flexibility in the supply of land within the plan. SSDC consider this 'buffer' to be overly large and that any buffer for plan flexibility should be planned for in addition to any unmet housing needs contribution, rather than being used as a reason for reducing any contribution.
10. LDC considers the proposed contribution of 2,665 dwellings within the Local Plan 2040 to be appropriate and deliverable within the plan period and supported by evidence. In respect of the outputs from the GBBCHMA Strategic Growth Study (2018) LDC has considered all options through its plan-making exercise and in particular through the 'Preferred Options and Policy Directions' and 'Preferred Options' stages of the Local Plan 2040. Where it has been

considered sound these options have been progressed or discounted for the reasons set out within those documents. LDC do not agree that it has 'failed to consider' the potential growth options set out within the Strategic Growth Study and has, as is set out, considered these through its plan-making process.

11. LDC consider it appropriate to include a 'buffer' in respect of housing supply to ensure that the LP2040 is flexible and deliverable across the plan period. LDC considers that the buffer is appropriate due to the SHA1 Allocation to the North of Lichfield is not expected to be delivered in full before the end of the plan period. A footnote is to be included within the plan to note that 10% of the buffer will not be delivered in the plan period.
12. It is agreed by the parties that the areas of disagreement noted at paragraph 9 to 11 (above) amount to issues of soundness of the Local Plan 2040. SSDC agree that LDC has satisfied the legal duty to cooperate test. It is acknowledged at an officer level that authorities across the GBBCHMA are continuing to work together to potentially progress a HMA wide Statement of Common Ground and associated governance arrangements.
13. It is acknowledged that LDC published consultation material and invited comments relating to its Local Plan 2040 process at the following stages:
 - Scope, Issues and Options – April to June 2018;
 - Preferred Options and Policy Directions – January to March 2020;
 - Preferred Options – November 2019 to January 2020; and
 - Publication Version – July to August 2021.
14. At each stage SSDC have been consulted on these documented and responded as they considered appropriate.
15. The Lichfield District Local Plan 2040 proposes to release sites from the Green Belt to assist in meeting the housing requirement set out within the plan. LDC wrote to neighbouring authorities including SSDC in 2020 to ascertain if sites beyond the Green Belt in neighbouring authorities were available and able to assist LDC in meeting its housing requirements outside of the Green Belt. SSDC confirmed that no such sites were available to meet wider need and would be making a contribution toward GBBCHMA need within their Local Plan.

Other Strategic Matters / Cross boundary matters

Employment

16. The Lichfield District Local Plan 2040 proposes to deliver approximately 85 hectares of land for employment uses to meet its own employment land requirements. The Local Plan 2040 (at paragraph 9.5) notes that evidence demonstrates that beyond the land proposed for allocation there is a limited supply of potential further options for employment growth within Lichfield District.
17. It is agreed by the parties that Lichfield District has not approached SSDC for assistance in accommodating employment land need. It is agreed by the parties that SSDC has not approached Lichfield District Council for assistance in accommodating employment land need.
18. It is understood by the parties that the Lichfield District Local Plan 2040 does not seek to provide employment land for potential wider unmet needs. SSDC consider that it is for LDC

to discuss this position with authorities in the area declaring employment shortfalls, specifically the Black Country. LDC have through discussions with the Black Country Authorities made clear that it will not be able to assist in meeting unmet need of employment land. LDC's view is that evidence supporting the Lichfield District Local Plan 2040 indicates that there is only sufficient land within Lichfield District to accommodate its own need within the plan period.

Transport

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

Gypsy & Traveller Provision

20. LDC will support the delivery of a minimum of seven residential pitches to meet the identified needs of gypsies and travellers to 2040 including meeting the identified need for four of these pitches by 2024. The Local Plan 2040 does not identify sufficient sites to meet these requirements.
21. LDC has previously written to neighbouring authorities including SSDC to ascertain if authorities were able to assist Lichfield District Council in meeting the unmet need in relation to accommodation for Gypsies and Travellers. SSDC confirmed they were unable to assist in meeting this unmet need.
22. SSDC has similarly written to LDC to advise that the SSDC is only able to accommodate 42 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. LDC have responded to this indicating that based on their existing site assessment evidence base, they do not have sufficient site options to assist with SSDC's unmet pitch needs.
23. LDC and SSDC will continue to cooperate with neighbouring authorities within the HMA area in relation to housing matters, including gypsy and traveller provision.

Infrastructure

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

Natural and Historic Environment

25. 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.
26. SSDC supports the policies and approach taken within the Lichfield Local Plan 2040 with regards to the Cannock Chase SAC.

27. 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.
28. LDC and the SSDC are committed to continue working together in respect of matters relating to the natural and historic environment where these are applicable to the authorities.

Signatures

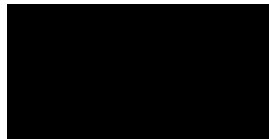
We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between Lichfield District Council and South Staffordshire District Council. The authorities will continue to work together to address cross-boundary issues

Lichfield District Council

Name: Councillor Iain Eadie

Position: Deputy Leader

Signature:



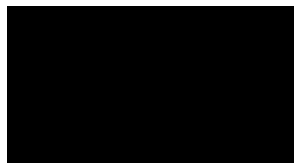
Date: 29/06/2022

South Staffordshire District Council

Name: Councillor Terry Mason

Position: Cabinet Member for Planning and Business Enterprise

Signature:



Date: 22/07/2022