

STOKE-ON-TRENT LOCAL PLAN 2020-2040

DUTY-TO-COOPERATE STATEMENT OF COMPLIANCE



JULY 2026



City of
Stoke-on-Trent

Contents

1	Purpose	3
2	Legislation	4
3	Strategic Context	5
4	Current Position on Engagement	6
5	Prescribed Bodies	7
6	Conclusion	8

Appendices

1	List of Duty to Cooperate Meetings	9
2	Statements of Common Ground	11

1 Purpose

- 1.0.1** This statement forms part of the evidence base for the Stoke-on-Trent City Council Draft Local Plan 2020-2040 (Regulation 18) (hereafter referred to as 'the Plan'). It sets out the Council's approach to compliance with the Duty-to-Cooperate in the production of the Plan and identifies how the outcomes of this co-operation have influenced the Plan.
- 1.0.2** The engagement concerns neighbouring Local Planning Authorities, Staffordshire County Council, and other prescribed bodies in relation to strategic cross-boundary matters during the preparation of the Plan.
- 1.0.3** Such matters include (but are not limited to) housing and employment needs and distribution, Gypsy and Traveller needs, Green Belt, cross boundary infrastructure, highways, transport, and air quality.
- 1.0.4** It is written as a draft document that sets out the situation at the present time to support the Regulation 18 and Regulation 19 stages of the Local Plan.

2 Legislation

- 2.0.1** The 'duty to cooperate' was introduced by section 33A of the Planning and Compulsory Purchase Act (2004) and the Localism Act (2011) as a strategic planning mechanism. Section 110 of the Localism Act 2011 places a legal duty on Local Planning Authorities, County Councils and prescribed public bodies to engage constructively, actively, and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.
- 2.0.2** Strategic matters regarding plan-making refers to: 'sustainable development or use of land that has or would have a significant impact on at least two planning areas.'
- 2.0.3** Paragraphs 24 – 27 of the National Planning Policy Framework (NPPF) recognises this duty and considers effective, joint working between relevant bodies as integral to a positive and well-prepared strategy. Paragraph 26 also identifies joint working as helping to determine additional infrastructure, and whether development needs that cannot be wholly met within a particular plan area could be met elsewhere.
- 2.0.4** Further to this, two of the four 'tests of soundness' of Local Plans (NPPF Paragraph 35) directly relate to the 'duty to cooperate'. Specifically:
- a. "Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
 - c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 2.0.5** A written Ministerial Statement by the Planning Minister in November 2025 announced that it had been decided not to 'save' the Duty of Cooperate, thereby removing this requirement for plans in the current plan-making system. However, Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and Planning Inspectors to continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'.
- 2.0.6** The council continues discussions with Newcastle-under-Lyme Borough Council; Stafford Borough Council; Staffordshire Moorlands District Council and Staffordshire County Council and will prepare statements of common ground as appropriate.

3 Strategic Context

- 3.0.1** Stoke-on-Trent is in North Staffordshire. The city is located between Manchester and Birmingham and borders Newcastle-under-Lyme to the north, Stafford to the south and Staffordshire Moorlands to the east.
- 3.0.2** The local planning authorities that border the Borough and therefore could share cross-boundary strategic issues that impact both planning areas, include: -
- Newcastle-under-Lyme Borough Council
 - Stafford Borough Council
 - Staffordshire Moorlands District Council
 - Staffordshire County Council
- 3.0.3** Stoke-on-Trent is a unitary authority.
- 3.0.4** The prescribed public bodies are outlined at Part 2 Regulation 4 of the Town and County Planning (Local Planning) England) Regulations and comprise the following that apply to Stoke-on-Trent City Council:-
- The Environment Agency;
 - Historic England;
 - Natural England;
 - Staffordshire and Stoke-on-Trent Integrated Care Board);
 - Homes England;
 - Local Highway Authority;
 - National Highways;
 - Integrated Transport Authority;
 - The Civil Aviation Authority;
 - The Office of Rail and Road;
 - Coal Authority
- 3.0.5** Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty, but Local Planning Authorities should co-operate with them and have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making. From April 2024, the government withdrew central government support (core funding) from Local Enterprise Partnerships and transferred functions to local and combined authorities.
- 3.0.6** The Plan identifies the strategy for growth alongside the sites expected to deliver the strategy. It includes a suite of strategic and non-strategic policies to support the achievement of sustainable development in the city. The Plan, when adopted will replace legacy Local Plans, including the Newcastle-under-Lyme and Stoke-on-Trent City Council Core Strategy (adopted 2009).

4 Current Position on Engagement

- 4.0.1** Stoke-on-Trent City Council Council has proactively engaged and undertaken the 'duty-to-co-operate' with neighbouring Local Planning Authorities, Staffordshire County Council and other key partners. The specific means utilised for engagement has varied between different partners but generally involved: -
- Duty-to-Co-operate discussions at appropriate times in the development of the Local Plan.
 - Formal and informal correspondence (where necessary).
 - Consultation during the various Regulation 18 and Regulation 19 (plan making) consultations undertaken to inform the Plan. The 'Regulation 18' consultations undertaken to inform the Local Plan include: -
 - Issues and Strategic Options Consultation 10 May 2021 to 21 June 2021
 - Draft Local Plan Consultation 8 September 2025 to 20 October 2025
 - Duty-to-Co-operate discussions will also continue during the preparation and formal consultation on the Regulation 19 Local Plan.
- 4.0.2** At an officer level, informal structures exist though the Stoke and Staffordshire Officer District Group meetings which are held quarterly.
- 4.0.3** There are also examples of joint evidence base documents produced during the preparation of the previous Joint Local Plan between Newcastle-under-Lyme and Stoke-on-Trent which remain relevant, especially in regard to Green belt and Retail and Leisure.
- 4.0.4** As part of the preparation of the Plan, the council has discussed several issues with neighbouring authorities regarding strategic cross boundary matters.
- 4.0.5** This section sets out the emerging position with neighbouring authorities regarding strategic cross border matters. These will be reflected in a statement of common ground (SOCG) with each council (currently under preparation). The purpose of the SOCG is to define which strategic matters require cooperation, set out which strategic matters have an agreed position on and set out where further work is required, and the process to date in addressing these matters.

5 Prescribed Bodies

5.0.1 The council engages with prescribed bodies on relevant strategic issues, varying in frequency and approach dependent on the nature and scale of the issues.

Table 1 Prescribed Bodies

Prescribed Bodies	Involvement in Local Plan and Strategic Matters
Natural England	Ongoing engagement in Local Plan development through consultation. Consultation engagement on the preparation of documents including the Integrated Sustainability Appraisal.
National Highways	Ongoing engagement in Local Plan development through consultation.
Environment Agency	Ongoing engagement in Local Plan development through consultation. Engagement on the outcomes of the Strategic Flood Risk Assessment / Water Cycle Study. Consultation engagement on the preparation of documents including the Integrated Sustainability Appraisal.
Historic England	Ongoing engagement in Local Plan development through consultation. Consultation engagement on the preparation of documents including the Integrated Sustainability Appraisal Engagement. Specific engagement in the historic environment policies.
United Utilities	Ongoing engagement in Local Plan development through consultation. Engagement on the preparation and outcomes of the Strategic Flood Risk Assessment / Water Cycle Study. Engagement on the preparation infrastructure capacity assessment.
Severn Trent Water	Ongoing engagement in Local Plan development through consultation. Engagement on the preparation and outcomes of the Strategic Flood Risk Assessment / Water Cycle Study. Engagement on the preparation infrastructure capacity assessment.
Network Rail	Ongoing engagement in Local Plan development through consultation.
Homes England	Ongoing engagement in Local Plan development through consultation.
NHS England / Integrated Care Board	Ongoing engagement in Local Plan development through consultation. Engagement on the preparation of infrastructure capacity assessment.
Office of Rail Regulation	Ongoing engagement in Local Plan development through consultation.
Civil Aviation Authority	Ongoing engagement in Local Plan development through consultation.
Coal Authority	Ongoing engagement in Local Plan development through consultation.

6 Conclusion

- 6.0.1** As part of the preparation of the Local Plan, the council has discussed several issues with neighbouring authorities regarding strategic cross boundary matters.
- 6.0.2** This statement demonstrates that the council continues to take a proactive and structured approach to compliance with the DtC throughout the preparation of the Local Plan. The council has undertaken structured discussions and ongoing engagement with neighbouring authorities, infrastructure providers and key stakeholders, and has demonstrated collaborative working on the strategic priorities set out in the NPPF, resulting in tangible outcomes and agreements.
- 6.0.3** Cooperation is an ongoing process which the council will continue to monitor regularly. An updated Duty to Cooperate statement will be issued at the Regulation 19 stage of the Local Plan.

1 List of Duty to Cooperate Meetings

Table 2 Duty to Cooperate Meetings

Local Planning Authority	Nature of Engagement	Date
Newcastle-under-Lyme Borough Council	Duty to Cooperate - Liaison	26/04/2021
	Duty to Cooperate - Liaison	21/06/2021
	Duty to Cooperate - Liaison	09/09/2021
	Duty to Cooperate - Liaison	17/02/2022
	Duty to Cooperate - Liaison	29/03/2022
	Duty to Cooperate - Liaison	02/03/2023
	Duty to Cooperate - Liaison	28/06/2023
	Duty to Cooperate - Liaison	07/08/2023
	Duty to Cooperate - Liaison	30/01/2024
	Duty to Cooperate - Liaison	15/04/2024
	Duty to Cooperate - Liaison	07/10/2024
	Duty to Cooperate - Liaison	14/11/2024
	Duty to Cooperate - Liaison	03/04/2025
	Duty to Cooperate - Draft Local Plan Regulation 18	17/09/2025
	Duty to Cooperate - Draft Local Plan Regulation 18	15/10/2025
	Duty to Cooperate - Draft Local Plan Regulation 18 Duty to Cooperate - Draft Local Plan Regulation 19	23/02/2026 24/06/2026
Stafford Borough Council	Duty to Cooperate - Preferred Options	22/11/2022
	Duty to Cooperate - Draft Local Plan Reg 18	03/04/2025
	Duty to Cooperate - Draft Local Plan Reg 18	17/09/2025
	Duty to Cooperate - Draft Local Plan Reg 18 Duty to Cooperate - Draft Local Plan Regulation 19	24/02/2026 25/06/2026
Staffordshire Moorlands	Duty to Cooperate - Draft Local Plan Reg 18	04/04/2025
	Duty to Cooperate - Draft Local Plan Reg 18	16/09/2025
	Duty to Cooperate - Draft Local Plan Reg 18 Duty to Cooperate - Draft Local Plan Regulation 19	24/02/2026 22/06/2026
Staffordshire County Council	Duty to Cooperate - Draft Local Plan Reg 18	03/04/2025
	Duty to Cooperate - Draft Local Plan Reg 18	26/09/2025

1 List of Duty to Cooperate Meetings

Local Planning Authority	Nature of Engagement	Date
	Duty to Cooperate - Draft Local Plan Reg 18 - Transport	22/10/2025
	Duty to Cooperate - Draft Local Plan Reg 18 - Education	18/11/2025
	Duty to Cooperate - Draft Local Plan Reg 18 Duty to Cooperate - Draft Local Plan Regulation 19	03/03/2026 22/06/2026

2 Statements of Common Ground

- 2.0.1** Statement of Common Grounds are being prepared with each local authority and will be agreed for inclusion with the submission of the Local Plan to the Secretary of State for Housing, Communities and Local Government.

