



Local Plan Issues and Options Consultation


May 2019



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Contact Details

 **Address:** Planning Policy
Cannock Chase Council
Civic Centre
PO Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG

 **Telephone:** (01543) 462621

 **E-mail:** planningpolicy@cannockchasedc.gov.uk

 **Website:** www.cannockchasedc.gov.uk/planningpolicy

1. Introduction

What is this document about?

- 1.1 We are consulting on a new Local Plan for Cannock Chase District. The Local Plan will help shape the way in which the physical, economic, social and environmental characteristics of Cannock Chase District will change until at least the year 2036.
- 1.2 It will need to ensure that we provide the right amount and types of homes, sufficient and appropriate land to provide a range of local employment opportunities as well as providing the right conditions for retail, leisure and other kinds of uses. It will need to ensure that the natural and built environment, especially the highest quality and most sensitive areas, are protected and enhanced.
- 1.3 The plan will also have to provide the right infrastructure including transport, open and green spaces, education and the health and wellbeing of our communities.
- 1.4 The Local Plan is a statutory document and is therefore important in informing decisions on planning applications.
- 1.5 The Local Plan we currently use (Local Plan (Part 1)) was adopted by the Council in 2014 and set the strategic policies to guide development in the District up to the year 2028 e.g. number of new homes and employment land required.
- 1.6 We originally intended to follow this with Local Plan (Part 2) which was considering how we might choose which sites were suitable for which uses (housing, employment and so on) and if any more detailed policies were needed.
- 1.7 However, changes to the planning system mean that we now need to review our plans every five years, which means that we would need to be reviewing Local Plan (Part 1) in 2019. The need for review requires a Council to consider if any of its policies need to be updated or not. Given the changes to several key policy areas at the national level, the Council considered that an update of some of the key Local Plan (Part 1) policies would be necessary. The Council therefore decided to cease work on Local Plan (Part 2) instead beginning work on a new Local Plan which will be able to take account of the changes to the planning system.
- 1.8 We started the process of developing the new Local Plan in February 2018, and published Issues and Scope paper in Summer 2018, to consider what matters a new local plan should be considering, and how the current Local Plan (Part 1), and work already undertaken on Part 2, should be incorporated, We consulted on this between July 2nd and 28th August 2018, alongside a Scoping report for the Sustainability Appraisal and a reviewed Statement of Community Involvement.
- 1.9 Consultation responses have been published on our website and we include a summary of these in the relevant sections of this document to show how these have been considered.

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- 1.10 This 'Issues and Options' consultation is focused upon considering the issues raised and the suggested scope of the new plan, and suggesting various options for dealing with these.

What does preparing a Local Plan involve?

- 1.11 Preparing a Local Plan is complex, and we set the timescales out for its preparation in the Local Development Scheme. The table below sets out the key stages we will need in order to prepare the plan, and the timing of these. The Local Plan also has to be informed by a Sustainability Appraisal which is a legal requirement, and which ensures that we are taking 'reasonable alternatives' into account for delivering the development we need whilst ensuring that we do this in a balanced way taking account of environmental, economic and social considerations.

PREPERATION	DESCRIPTION	TARGET DATE
Commencement of work including evidence base updating	Evidence needs to inform the plan, we gather this at the early stages and update where needed.	February 2018
Regulation 18 Scoping and Issues Consultation	We are looking at the issues and scope which the plan needs to cover.	July 2018
Regulation 18 Issues & options consultation	This is the stage we are currently consulting on. At this stage we consider the feedback from the Issues and Scope consultation, look at any further issues, and then suggest options for dealing with these.	February 2019. (report to Cabinet to seek authority to consult)
Preferred Option Consultation	This is a non statutory stage where we refine the plan into a draft version, based on the feedback of the previous consultation and using the evidence available. The will contain draft policies and site allocations, for example.	October 2019
Pre-Submission (Regulation 19) consultation	Once we have considered the feedback from the previous consultation, this is the final draft, which we have to publish for comment before submitting the plan to the Secretary of State (Planning Inspectorate) for independent examination. Feedback at this stage will need to be focused very specifically on whether the plan is 'sound', which is currently defined as: Positively prepared – does the plan allocate enough land to meet all needs for the various uses where it is reasonable to do so and consistent with placing development in the right locations? Justified – is the plan the most appropriate strategy when considered against reasonable alternatives? Effective – can the proposals in the plan be	July 2020

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	delivered over its period? Consistent with national policy – is the plan in accordance with national policies?	
Submission	This is the stage where the plan is submitted to the Planning Inspectorate.	December 2020
Examination in Public	A planning inspector is assigned to examine the plan to see whether it can be found ‘sound’ (see above) and whether it is then capable of adoption by the Council. The examination will focus on the main areas of contention and will normally involve public hearings.	March 2021
Adoption	Once the plan has been confirmed as being sound then the Council can adopt it and it will set policy for making decisions on planning matters in the district.	September 2021

How does the Local Plan fit with the rest of the planning process?

- 1.12 We have to prepare the Local Plan so that it is consistent with Government policy, which is set out within the National Planning Policy Framework (NPPF) and ministerial statements and supported by the National Planning Practice Guidance (NPPG). The Local Plan forms part of the Development Plan for the wider area. Staffordshire County Council prepare plans for minerals and waste, and Cannock Chase Council will prepare the Local Plan (as described above) for shaping development in its own District. We will also need to work alongside other Councils and agencies to ensure our plans align and deliver on the more strategic issues – even though the plans of other areas may be prepared at different times. We need to work together under the legal ‘Duty to Co-operate’.
- 1.13 Once we have adopted our new Local Plan we can also choose to provide more detail for our policies if we need to, by preparing ‘Supplementary Planning Documents’ (SPDs). For example our current Local Plan is supported by SPDs on Design, on Developer Contributions and on a development brief for the site of the closed Rugeley Power Station. As part of this process we may need to consider whether we will also need to make changes to any of our SPDs or whether we may need to add new ones.
- 1.14 Communities can also choose to prepare their own Neighbourhood Plans should they so wish. These set planning policies at a much more local (often Parish) level. They need to broadly conform to the Local Plan, are independently examined and then voted on by the community at referendum. If there is a majority vote in favour of the plan they are then ‘made’ (i.e. adopted) and become part of the Development Plan for the area. We currently have an adopted Neighbourhood Plan (Hednesford) and two designated areas (Brereton & Ravenhill and Norton Canes) where Neighbourhood Plans are in the early stages of preparation.

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- 1.15 All of the policies contained in these plans are then used in helping the Council to decide whether planning applications in the District should be approved or refused.

Consultation Information

- 1.16 We will be consulting from **Monday 13th May until Monday 8th July 2019.**
- 1.17 We will be holding a series of drop in events around the District. We will publicise these on our website and social media pages, via the local press, and via leaflets and posters which we will leave at a range of venues in the District. We will also write to / email everyone who is registered on the Planning Policy consultation database.
- 1.18 Documents can be viewed at the following locations during normal office hours:
- Cannock Chase Council, Civic Centre, Beecroft Road, Cannock WS11 1BG
 - Cannock library, Manor Avenue, Cannock WS11 1AA
 - Rugeley library, Anson Street, Rugeley WS15 2BB
 - Hednesford library, Market Street, Hednesford WS12 1AD
 - Norton Canes library, Burntwood Road, Norton Canes WS11 9RF
 - Brereton library, Talbot Road, Brereton WS15 1AU
 - Heath Hayes library, Hednesford Road, Heath Hayes WS12 3EA
 - Burntwood Library, Sankeys Corner, Bridge Cross Road, Burntwood, WS7 2BX
- 1.19 All information is also on our website at www.cannockchasedc.gov.uk/planningpolicy.

How to respond

- 1.20 Responses can either be submitted online via the web link above (social media pages will also link to this) or via hard copy forms which will be available at the venues listed above and at the drop in sessions. All information will be used in accordance with our Fair Processing procedures which can be seen via the above link and a summary of which will be reproduced on the response forms.

2. The District Context

- 2.1 It is important to include a profile of the District in the Local Plan as this sets the context for the plan and the issues it should be addressing in terms of town planning. The district profile asks: 'What are the key features of our District and what are the key issues it faces?' We consulted on an updated version of the profile which is included in Local Plan (Part 1), and the following paragraphs set out the comments received.
- 2.2 Some supported the profile as suggested (this had been updated from the version in the adopted Local Plan to take account of changing circumstances). The inclusion of Rugeley Power Station was welcomed, and suggestions were made as to the future of the site e.g. infrastructure needs, and the need to help businesses relocate to the site, especially where they want to relocate from residential areas. Infrastructure was also mentioned in wider terms, for example education. The potential role of Parish/Town councils in project management and delivery was also raised.
- 2.3 Some respondents (mainly statutory agencies and individuals/interest groups/organisations) wanted more emphasis on particular topics e.g. a dedicated section for the historic environment, more focus on the role of canals and waterways and their role in addressing a range of agendas such as health, the economy and tourism, and more specific reference to affordable housing, and healthy and active lifestyles.
- 2.4 The need for the profile to reflect current national policy, the need to address the housing market area shortfall and the need to take into account an up to date evidence base were recurrent themes. Those representing the development industry were keen to state that the housing need identified by the new standard methodology is a minimum figure, that housing should have more of an emphasis in the profile, that Cannock Chase District Council (CCDC) should play a role in addressing the shortfall and Green Belt release would need to be considered as part of this. Reference was made to the Council's own economic growth ambitions and the need to ensure sufficient sites were available to deliver this, but also that the area should be helping to deliver the wider growth aspirations of the region (e.g. the LEPs), and that this would have implications for the need for more housing and an integrated approach.
- 2.5 Some respondents then commented that employment land should not be lost to housing, and that environmental matters should be balanced with growth needs. Some felt there was a need to emphasise sustainability of communities; this varied from the need to identify the economic sustainability of towns (citing decline in Rugeley) to those representing some parts of the development industry stating that Cannock/Hednesford and Heath Hayes should be identified as the district's most sustainable settlement, along with the need to strengthen the sustainability of Norton Canes. Finally, some pointed out elements which need updating or correcting in terms of factual accuracy.
- 2.6 Consultation responses and other updated information have been included in an updated profile.

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Updated District Profile

What are the key features of our District and what are the key issues it faces?

Sub-national Context

Cannock Chase District lies within Southern Staffordshire on the northern edge of the Black Country areas. At the heart of the District lies the nationally significant Cannock Chase Area of Outstanding Natural Beauty (AONB) and around 60% of the District is designated Green Belt, testament to its strategic role as part of the West Midlands rural-urban fringe. The District acts as a strategic link between wider Staffordshire and the West Midlands conurbation.

The strongest residential migration flows to and from the District have typically been with Lichfield, South Staffordshire, Stafford and Walsall¹. There are strong two way flows of commuters between Lichfield and Cannock Chase. The most common commuter destinations for Cannock Chase residents are Lichfield, Walsall, Stafford, South Staffordshire and Birmingham². The conurbation also offers larger-scale retail and leisure provision. In recognition of these key economic and social links the District Council is a member of both the Stoke on Trent and Staffordshire Local Enterprise Partnership (LEP) and the Greater Birmingham and Solihull LEP although it should be noted that the Government is currently undertaking a review of LEPs. The Council is also a non-constituent member of the West Midlands Combined Authority (LEP) which is a body that has developed powers from central Government to implement budgets and policy in relation to key areas such as transport and housing.

Population

The District has a growing population of 98,513 (mid-2016, an increase of 1.1% since the 2011 Census) which is estimated to increase to 104,100 in 2036. In the 2016 18.6% of Cannock Chase residents were aged 65 and over. The trend of an ageing population is evident with the proportion of residents aged over 65 in the District projected to rise faster than the National average – an increase of 23.1% by 2026. The proportion of Cannock Chase residents aged 85 and over is estimated to rise by 50% during the same period³. At the time of the 2011 Census 96.5% of residents described themselves as ‘White British’ – a smaller proportion than in the 2001 Census (97.5%). The District is becoming more ethnically diverse with the 2011 Census revealing a large number of residents identifying with a variety of ethnic groups (3.5% - around 3,400 people). The next largest ethnic group is of Indian origin at just over 1% of the population.

Health and Education

Cannock Chase suffers from a relatively poor health profile compared to the national picture on all indicators. The District has particular health related issues in the areas of life expectancy and infant mortality, obesity, alcohol-related conditions, early deaths from cardiovascular conditions and rates of diabetes. The early death rate from heart disease has fallen but still remains higher than the national average⁴. The 2011 Census indicates that 20.7% of residents in the District experienced a long-term

¹ Southern Staffordshire Strategic Housing Market Assessment (2012).

² NOMIS: Official Labour Market Statistics

³ ONS Sub-national population projections

⁴ Public Health England – Local Authority Health Profiles (2017)

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limiting illness which was above the England average of 17.6%. The prevalence of long-term limiting illness increased to 60.9% among residents aged 65 and over which was again higher than the England average of 51.5%.

Evidence and monitoring for Local Plan (Part 1) shows that access to indoor leisure facilities in the north of the District has improved with the completion of Rugeley Leisure Centre and swimming pool. In 2012/13 Cannock Leisure Centre's new facilities became available to the public after undergoing major modernisation (and further improvements are planned). However, the most recently produced evidence⁵ and monitoring highlights further improvements are required to meet the recognised needs of the rest of the District in terms of both indoor and outdoor facilities and in terms of quantity, quality and accessibility e.g. there is a need to increase playing pitch provision across the District. The evidence base for indoor and outdoor sports facilities is currently in the process of being updated.

Whilst the AONB is a vital asset for outdoor leisure and recreation the most recently produced evidence⁶ identified there are areas within the District deficient in access to alternative open spaces, particularly semi-natural sites. This evidence base is the process of being updated and will be available late 2019. Monitoring of the Local Plan (Part 1) identifies there have been a number of new open and play spaces provided alongside new developments but that deficiencies are likely to still remain. Work is continuing on former stadium site in Cannock to provide an adventure play area, green gym equipment, BMX track and more which will improve access to healthy living opportunities in this area⁷.

The District's educational performance has improved recently, however it continues to have lower levels of educational attainment compared to national and sub-national rates. The proportion of those achieving equivalent to NVQ Level 4 (equivalent to HND or Degree Level and above) remains below the national and West Midlands averages. GCSE attainment for Cannock Chase pupils is significantly worse than the England average. In addition there are inequalities within the district with achievement ranging from 25% in Cannock North ward to 59% in Hawks Green ward.⁸

Community Deprivation

Cannock Chase District is the most deprived Local Authority in Staffordshire (excluding Stoke-on-Trent) and ranks 128th out of 326 local authority areas. Deprivation occurs mainly in Education Skills and Training, Employment, Health and Disability and Income⁹. Such deprivation can be attributed to the legacy of industrial decline in the Districts reducing access to employment, but can also be related to the need for appropriate social infrastructure. It is estimated that approximately 23% of children in Cannock Chase are classified as living in poverty¹⁰. Average gross weekly earnings for full time employees that are Cannock Chase District residents are around

⁵ CCDC Indoor and Outdoor Sports Facilities Assessment (2010)

⁶ CCDC Open Space Assessment (2009)

⁷ CCDC Annual Report 2016/17

⁸ NOMIS: Official Labour Market Statistics Cannock Chase Locality Profile (2016), Public Health England – Local Authority Health Profiles (2017)

⁹ Index of Multiple Deprivation, 2015

¹⁰ www.endchildpoverty.org.uk

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6% lower than the Great Britain average, increasing to around 15% for female full time workers¹¹.

Crime

Recorded crime in Cannock Chase has shown an increase over recent years. During 2016/17 there were 6,966 crimes recorded. This is an 18% increase (1085 crimes) when compared with the previous year and 14% higher than the number recorded in 2010/11. Key areas of concern include the levels of violent crime and increasing levels of domestic violence. Levels of anti-social behaviour have reduced.¹²

Housing

Local Plan (Part 1) housing requirements were drawn from the Strategic Housing Market Assessment (SHMA, 2012) which tested a range of scenarios including 2008-based household projections (and updated 2011-based household projections) to recommend a range of provision for the District of 250 to 280 houses per annum.

From a detailed analysis of the market the SHMA identified a need for future provision to be smaller dwellings suited to younger people, whilst recognising the aspirations of people to live in larger properties (3 and 4 bedrooms). The SHMA report identified in Cannock Chase an annual need for 197 affordable dwellings.

The housing evidence base has been updated to reflect the most up to date situation and is published alongside this Issues and Options consultation. The most recent 2014-based household projections indicate an increase from 42,250 households (2016) to 46,739 households (2036), and these are the ones the Government has chosen to utilise for its draft standard housing methodology which indicates a housing requirement of 284 dwellings per annum (2016-2036) for the District.

Furthermore, there is a significant housing shortfall to the year 2036 across the Greater Birmingham and Black County Housing Market Area, and as one of the fourteen authorities in this area¹³, Cannock Chase Council will need to play a role in helping to address this.

Employment

The local economic base has developed and diversified significantly from the mining heritage of the not too distant past with expansion of the tourism sector and growth arising from businesses locating near the strategic M6 Toll/A5 corridor. The District now has a more diverse employment structure with 42% of the District employed in Group 1-3 occupations (including Managers, Directors, Professional, Associate Professional and Technical occupations). However, there is still an over representation of manufacturing, skilled trades and elementary occupations in comparison to regional and national averages. Figures show that the District has an over reliance upon jobs in the distribution and construction sectors (with the proportion of employee jobs in these sectors being almost double the national and regional average) and that there is an under-representation of employee jobs in the service-based sectors such as professional services (including financial activities) and public administration.¹⁴

¹¹ NOMIS: Official Labour Market Statistics

¹² Office for National Statistics, www.police.uk, Public Health England – Local Authority Health Profiles (2017)

¹³ Local Authority areas: Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford upon Avon, Tamworth, Walsall and Wolverhampton.

¹⁴ NOMIS: Official Labour Market Statistics

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The Districts employment rate has increased over the past few years and remains higher than both the regional and national average. Youth unemployment has increased slightly but remains under the national average. Over the past 4 years enterprises within the District have increased by almost 10%.¹⁵ Out commuting (largely within Staffordshire and the West Midlands conurbation) is an integral feature of the local labour market with commuting flows resulting in a population decrease of 8,655 in the District (i.e. the difference between those commuting in the District and those commuting out of the District).¹⁶ Given the low levels of skills in the District (see Health and Education, above) there are also problems with linking residents to local jobs.

In an assessment Index of Resilience for Council's in England (Experian 2010) of resilience to economic changes, including public sector funding cuts, Cannock Chase was ranked 293rd from a total of 324 Council areas (with 1 being the most resilient). In the Business theme index, which assessed factors such as business density, business start-ups, and employment sectors, the District was ranked within the 10 least resilient areas in the Country. Key long standing economic structural weaknesses include the District being overly reliant on vulnerable traditional industry and manufacturing employment and the high proportion of young people in the area with poor skills and educational attainment levels.

It should be noted that this section has been produced in the light of evidence available at the time of writing. The employment evidence base has since been updated to reflect to most up to date situation and is published alongside this Issues and Options consultation. Future iterations of the district profile will be updated to reflect any changes contained therein.

Town Centres and Shopping

Cannock Town Centre is ranked 508 against other town centres and retail parks for 2016/17. The data also shows that Rugeley is at rank 608 and Hednesford is ranked 2,815. This reflects their smaller settlement size on a national register of retail centres.¹⁷ Cannock represents the largest town within the District's retail hierarchy and is suitable for larger scale retail and leisure developments. Hednesford town centre has undergone significant regeneration in recent years to deliver an improved retail and leisure offer for the area, as well as other public realm improvements e.g. at Hednesford Park. Rugeley town centre has also seen investment in terms of a new retail food store, improvements to the public realm and a flood alleviation scheme which will enable further redevelopment projects to be taken forward. There continue to be a number of local centres which serve local daily shopping needs in and around the District. The evidence base for retail needs will be updated. Since the Local Plan (Part 1) was adopted a retail designer outlet village has been approved and is now under construction at Mill Green (just outside Cannock town centre boundary) which the updated retail evidence will need to take account of.

Transport and Infrastructure

The District is located at a strategic road/rail transport crossroads between the North West and South East via the M6T/M6 and West Coast Main Line railway and East-West A5/M54 corridor, and the West Midlands and wider Staffordshire. A new

¹⁵ NOMIS: Official Labour Market Statistics

¹⁶ NOMIS: 2011 Census- Location of usual residence and place of work

¹⁷ Venuescore (Javelin Group)

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M6T/M6-M54 link road is also proposed as well as the long term upgrade of the A5 Trunk Road to 'Expressway' status. Rugeley benefits from the Rugeley Eastern Bypass and direct rail services to London on the West Coast Main Line.

The Rugeley-Hednesford-Cannock-Walsall-Birmingham, 'Chase Line' rail service continues to grow in its popularity and the three stations at Cannock, Hednesford and Rugeley Town carry over 700,000 passengers' per year. The £100m Chase Line electrification is expected to be in full use in Spring 2019 and will see the introduction of faster, longer and more frequent services, including two trains per hour throughout the day to Birmingham, and new direct services to the NEC/Birmingham Airport and London Euston. At the same time the line speed will be increased from 45mph to 60mph.

The Council is also actively involved in the innovative Chase Line 'Stations Alliance', with the West Midlands Combined Authority, LEPs, Network Rail and West Midlands Trains (the new West Midlands franchise operator). Cannock station in particular is the focus of attention for a major upgrade, in view of its close proximity to the £120m, Mill Green retail designer outlet village, which will attract 3-4 million visitors per annum.

Rugeley has also benefited due to its position on the West Coast Main Line (WCML) including the introduction of hourly services to Crewe, Stafford, Milton Keynes and London. The High Speed 2 (HS2) railway from London to Crewe will not directly run through the District however the Council will need to be kept up to date on the latest information in terms of its power supply, which could have an impact locally depending on final details.

While there is a good core urban and inter urban bus service network from Cannock to Wolverhampton, Stafford, Lichfield, Walsall and Wolverhampton and from Rugeley to Stafford and Lichfield, these are not immune from the national trend in falling passenger numbers. Recent County Council budget cutbacks have led to the loss of evening services and there are no longer any Sunday bus services.

In terms of the road network the A5/M6T/A460/A34 Churchbridge Junction only has a design life to 2020 and much of the A5 in the District is also designated as an Air Quality Management Area, as is the area around Five Ways junction in Heath Hayes. Congestion along the A5 has been cited as an issue for road freight and the reliability of journey times, and there is an A5 Partnership which produces an Action Plan to address issues in this regard.

The historical development of the District has provided a wealth of canal network assets which provide connections to neighbouring areas and potentially offer opportunities for improved linkages including cycling and walking, contributing to sustainable communities and providing a wealth of other benefits (e.g. tourism, health and wellbeing, green infrastructure and biodiversity). Ongoing initiatives by the Lichfield and Hatherton Canal Restoration Trust, propose the phased restoration of the Hatherton Canal, partly on a new alignment.

Environment

The District comprises land rising from the low lying, largely urbanised areas in the south-west and Green Belt area around Norton Canes in the south-east to the higher plateaux within the Cannock Chase AONB. These plateaux then fall to the wide valley of the River Trent with the urban area of Rugeley and Brereton bordered by Green

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Belt in the north. Cannock Chase AONB provides a strategic area of accessible countryside with conservation, recreation, economic and tourism benefits. The Green Belt is also important for recreation, maintaining the District's character and its wildlife and safeguarding the wider open countryside. The District supports 2 Special Areas of Conservation, 3 Sites of Special Scientific Interest, over 30 local Sites of Biological Interest, 3 Local Nature Reserves and 1 Local Geological Site. The southern part of the District also lies within the cross authority Community Forest of Mercia. However, some elements of the District's biodiversity assets are at potential risk of decline due to development and recreational pressures unless appropriate mitigation measures are put in place¹⁸. This natural environment gives the District a valuable semi-rural landscape, which combined with the historical influence of human activities results in a distinctive landscape character.

The District's medieval origins, mining legacy and industrial/agricultural heritage provide a wealth of valuable assets, which contribute to this distinctive character and provide a range of recreation and tourism benefits. There are 8 Conservation Areas within the District (primarily focused around Rugeley), 70 listed buildings and 5 Scheduled Ancient Monuments. There are also a range of non-designated heritage assets including archaeological features of interest, potential sites of national importance related to military activities and locally significant historic farmsteads. The canal network represents a key heritage asset that can contribute towards the natural and built environment including opportunities for heritage-led regeneration and high quality design. The central landscape areas of the District are in a fairly good and strong condition overall and are of high sensitivity to change; those in the weakest and poorest condition are primarily at southern and eastern parts (around Norton Canes), mainly due to the extent of change in this area; although some parts are still sensitive to further change¹⁹

In addition, the District's mining legacy has resulted in a variety of issues and constraints. Surface hazards, such as mine entries and fissures, are present throughout the District and rising mine water is an issue that The Coal Authority is monitoring due to its potential pollution and flooding effects. Southern parts of the District are still classified as potential mineral resource areas for coal. Central and northern parts of the District are also classified as having potential mineral resources (sand and gravel).²⁰

Green Belt

Given that 60% of the District is designated Green Belt, it is a key feature of the District's overall character. It provides a range of multifunctional benefits (as outlined above) and serves to maintain the openness of the rural-urban fringe (with the West Midlands conurbation) as well as the District's separate urban areas and their identities. A Green Belt study (2016) provides an overview of the current condition of the Districts' Green Belt (in terms of how it performs against the nationally defined purposes of Green Belt).

Climate Change

The District's per capita carbon emissions are below the national average and they are the second lowest in Staffordshire. There has been a general reduction in the

¹⁸ CCDC Appropriate Assessments (2009 onwards) AND Cannock Chase SAC Guidance to Mitigate (2017)

¹⁹ Landscape Character Assessment for Cannock Chase District (2016) and Addendum (2017)

²⁰ Staffordshire County Council Minerals Local Plan (2017)

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levels of CO2 emissions from all sectors within the District. The overall 'Per Capita Emissions' has fallen from 6.3 (2005) to 4.2 (2015). The domestic sector is the largest source accounting for 39% of all emissions²¹. There are currently four notable renewable/low carbon energy schemes running in the District²². In terms of the impacts of climate change middle estimates suggest a temperature rise of between 1.4- 3.4 degrees up to 2080, with decreases in summer rainfall, increases in winter rainfall and a potential increase in flood risk²³.

Key Issues

From the profile the following key issues for the District can be identified:

- Levels of crime, and perceptions of crime, remain a concern;
- Low standards of health and educational attainment require improvement;
- Future housing needs, particularly affordable housing requirements, have to be met including a contribution to the shortfall across the wider housing market area;
- Economic growth and regeneration needs have to be met and access to employment opportunities and local labour skills require improvement;
- The natural and built environment (inclusive of indoor, built and outdoor sports) should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community.
- Educational provision will need to be provided for including school expansions or new provision where applicable
- Provision of comprehensive transport networks need to be better supported to help reduce social exclusion and unsustainable development impacts;
- The town centres need to adapt and increase their competitiveness to maintain local shopping provision, be responsive to changing consumer needs and the role and function of centres, maximise opportunity, reverse decline and contribute to regeneration;
- The highly valuable and sensitive natural environment, historic environment and landscape character, green linkages and the canal network need to be protected and enhanced whilst meeting demands and providing opportunities for housing, recreation and economic activity including heritage-led regeneration;
- The natural and built environment including indoor, built and outdoor facilities and including the role of green infrastructure, the canal networks and linked cycleways and walkways should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community
- Potential challenges posed by the need to respond to climate change need to be tackled e.g. alternative forms of energy supply, addressing flood risk, helping local wildlife to adapt, along with wider sustainable development concerns. For example, air and water quality concerns as well as more specific local issues (such as those related to minerals and the coal mining legacy).

²¹ Department for Business, Energy & Industrial Strategy

²² CCDC Authority Monitoring Report 2016/17

²³ CCDC Strategic Flood Risk Assessment 2014

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These District-wide issues manifest in the localities of the District in different ways, reflecting local features. The key points are summarised below with brief profile characteristics.

Cannock/Hednesford/Heath Hayes

- These areas are described together as they form a continuous urban area. The combined population is 65,423, 67% of the District total (2011 Census).
- Parts of Cannock, Heath Hayes, Hawks Green, Pye Green and Hednesford have seen reduced levels or even loss of their bus services and are now more isolated. Social isolation is an issue for many people who do not have access to cars. In contrast, rail services have seen significant improvements and continue to experience strong growth in passenger numbers.
- Housing provision is a mix of age, size and tenure. There have been a number of recent Council-led programmes to regenerate public housing estates which were of poor quality, being constructed from defective pre cast reinforced concrete.
- This urban area, particularly Cannock, provides the majority of employment opportunities for the District with particular concentrations along the A5/M6 Toll corridor, which links into the neighbouring West Midlands conurbation.
- Health provision is via small doctors' surgeries across the area rather than from larger health centres, with the exception of Hednesford. There are 14 primary and 4 secondary schools and a number of community facilities, including the Chase Leisure Centre.
- The area is served by a series of major open recreational spaces e.g. Hednesford Hills, a recently designated SSSI²⁴, and major parks at Cannock, Hednesford and Heath Hayes. Improvements to the quality of play areas/hubs have occurred including a Cannock Stadium and ongoing maintenance/improvements to the District's parks which have achieved 'Green Flag' status.²⁵ However, some residential areas do not have good access to children's play facilities. Indoor leisure provision requires improvement, which is being partly addressed via modernisation of the Chase Leisure Centre.
- Since the sixteenth century, coal extraction has had a major impact on the landscape character, resulting in extensive industrialisation. Cannock Town Centre Conservation Area, with its 12 listed buildings, requires management and investment to enhance its character whilst North Street, Bridgtown Conservation Area, illustrative of the area's growth during the late Victorian period, has benefited from recent investment and major enhancements.

Hednesford Town Council recently produced a Neighbourhood Plan (adopted in 2018) which sets out local issues and aspirations in more detail including a particular focus upon local regeneration and the town centre area.

Rugeley & Brereton

- The combined population of 24,650 is 25% of the District total (2011 Census).
- Rugeley town centre has had limited new investment since the mid 1980s and

²⁴ Included as part of the Chasewater and the Southern Staffordshire Coalfield Heaths SSSI

²⁵ CCDC Authority Monitoring Report 2016/17

2. The District Context

is in continued need of regeneration. However, more recent investment in the form of a new supermarket, public realm enhancements and a flood alleviation scheme have brought about new opportunities and improvements to the town. The Towers Business Park (developed on the former Lea Hall Colliery site) is now almost fully committed being home to major companies, such as Amazon. The now well established Eastern Bypass also provides links to nearby employment opportunities. However, some issues of out commuting and lack of access to local high quality employment opportunities remain.

- Rail services have seen significant improvements to Birmingham, London and the north-west. The off-peak Chase Line service frequency to Birmingham has been doubled to half hourly from May 2018, while the £100m electrification scheme was completed in December 2018, including the introduction of longer, faster services to Birmingham with direct services to Birmingham International (Airport/NEC) and hourly to London.
- Bus services have followed the national trend of gradual decline in passengers and a diminishing network. County Council budget cutbacks in April 2018, have led to the withdrawal of many evening services and there are no longer any Sunday bus services in the District.
- Apart from the Victorian residential streets around Rugeley Town Centre, the historic core of Brereton village and areas of north-west Ravenhill most housing is post 1945 with several estates of public housing including the former National Coal Board Pear Tree estate, which has environmental and infrastructure problems.
- There are two health centres, 9 primary schools, and 1 secondary school. There are also a number of community facilities including the recently developed Rugeley Leisure Centre and swimming pool. Despite being adjacent to the AONB, there is a lack of alternative recreational sites and deficiencies in access to play areas.
- There is a wealth of historic natural and built assets in the area e.g. 6 Conservation Areas in and around Rugeley Town Centre, along the Trent and Mersey Canal and at Main Road, Brereton. Rugeley's position alongside the strategic River Trent corridor has resulted in its development since early Domesday records and the layout of the town pattern is largely unchanged from the sixteenth century

Norton Canes

- The population of 7,479 is almost 8% of the District total (2011 Census). Originating as a mining village it expanded to include estates of public and private housing during the 1960/70s. There have been more recent expansions in the form of housing developments to the south east of the urban area (at the former Greyhound Stadium) and there is a large housing development planned for the south east of the urban area (450 homes). There are 2 primary schools, a secondary school, new library and community centre together with a limited range of local shops. A new health centre opened in late 2007 and three GP surgeries operate from this, however concerns about local capacity have been raised (noting that there are cross boundary linkages with Great Wyrley in South Staffordshire in terms of the local catchment). The centre and east of the village has relatively good bus services, however the southern parts of Norton

2. The District Context

Canes have lost their services, and as with the rest of the District, no longer have any Sunday bus services.

- Access to recreational sites in the area is relatively good, particularly given the proximity to the Chasewater Country Park (in Lichfield District). Access to indoor leisure facilities is mainly outside the settlement at Cannock, Burntwood or Walsall.

The Rural Areas

The Cannock Chase AONB contains one of the largest areas of readily accessible recreational land in the West Midlands, being a statutory designation under the Countryside and Rights of Way Act 2000. It is a significant asset for nearby communities as well as comprising important heathland areas covered by the European designated Special Area of Conservation (SAC). The landscape is dominated by forestry plantations, however within the AONB and around its fringes there have been, and continue to be, a number of influences on its landscape and heritage e.g. hunting and military activities, mining, agriculture, equestrian activity and recreation. Modern-day activities require careful management in view of the areas sensitivities.

- Slitting Mill, Prospect Village and Cannock Wood village are all situated in the northern area outside the Green Belt. All have village halls; however Prospect Village and Slitting Mill have no shops or schools. Cannock Wood has access to a local primary school and shop. Prospect Village, Rawnsley, Hazel Slade and Cannock Wood have a daytime and Saturday bus service to Cannock, Hednesford, Burntwood and Lichfield, albeit reduced in 2018. All Sunday bus services were withdrawn in April 2018 due to County Council budget cut backs. Slitting Mill has a limited demand responsive community bus service, the future of which is currently under review. Social isolation is now an issue.
- The rural area south of the M6 Toll contains the hamlet of Little Wyrley, scattered dwellings and farms, commercial developments at Watling Street, Lime Lane and a recently completed landfill site at the former Grove Colliery. It also contains the Cannock Extension Canal Special Area of Conservation (SAC). This area contains some of the most intact rural landscape character in the District, particularly south of the A5.
- The rural areas, by their largely undeveloped nature, have a unique character by virtue of the surviving historic farmsteads and field patterns, largely from the 18th and 19th centuries. However the District also retains wealth of late medieval and early post medieval industrial sites including glass working, mining and metal working. Such sites throughout the West Midlands represent the first stirrings of what was to become the Industrial Revolution during the 19th Century, though by this time much of the industrial focus had moved away from the District. These assets are sensitive to development pressures and require careful consideration.

Questions on the District Profile

Question 1. Do you have any comments on the District Profile? Is there anything missing and if so what, and what source of information should we use?

3. How the Local Plan fits within the wider context

Cannock Chase Councils' Corporate Plan

3.1 The Council's Corporate Plan covers the period 2018 to 2023. This states that the Councils key priorities are Promoting Prosperity and Community Wellbeing.



3.2 In terms of Promoting Prosperity there are six strategic objectives:

- Establishing Mill Green Designer Outlet Village as a major visitor attraction and maximise the benefits it will bring to the District
- Increased housing choice
- Create a positive environment in which businesses in the District can thrive.
- Increase the skill levels of residents and the amount of higher skilled jobs in the District
- Create strong and diverse town centres to attract additional customers and visitors
- Increase access to employment opportunities
- Commencement of regeneration of the Rugeley Power Station site

3.3 For Community Wellbeing there are four strategic objectives

- Opportunities for healthy and active lifestyles
- Sustaining safe and secure communities
- Supporting vulnerable people
- Promoting attractive and healthy environments

3.4 The new Local Plan will therefore need to help the Council to achieve its ambitions.

3. How the District Fits within the Wider Context

- 3.5 The geography of the West Midlands is complex and Cannock Chase Council is involved in a range of different partnerships and groups formed under the Duty to Co-operate delivering a range of different functions. Some key ones include:
- The Greater Birmingham and Solihull Local Economic Partnership (LEP)²⁶
 - Staffordshire and Stoke LEP²⁷
 - The West Midlands Combined Authority²⁸
 - The 14 authorities comprising the Greater Birmingham and Black Country Housing Market Area²⁹
 - The Cannock Chase AONB Partnership³⁰
 - The Cannock Chase Special Area of Conservation Partnership (SAC)³¹
- 3.6 The Council will need to ensure that the new Local Plan helps these (and other) partnerships to deliver their ambitions and obligations. As the Local Plan develops we will need to ensure that the plan links to a range of strategies and plans, for example:
- The Government's Industrial Strategy
 - The Government's 25 Year Environment Plan
 - The West Midlands Engine Growth Strategy and Midlands Connect Strategy
 - Strategic Economic Plans
 - The West Midlands Combined Authority Spatial Investment and Delivery Plan
 - Transport Strategies
 - Various environmental strategies and management plans
 - Infrastructure and delivery strategies (these can cover a range of issues such as utilities, health, education, community infrastructure and so on)
- 3.7 The Council will also need to work with neighbouring authorities on a range of strategic issues as well as a number of organisations who are listed in the

²⁶ Local Authority areas: Birmingham, East Staffordshire, Lichfield, Tamworth, Bromsgrove, Cannock Chase, Redditch, Solihull, Wyre Forest

²⁷ Staffordshire and Stoke, list of partners at <https://www.stokestaffslep.org.uk/about-us/our-people-partners/>

²⁸ Constituent local authorities: Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall, Wolverhampton. Non constituent local authorities: Cannock Chase, North Warwickshire, Nuneaton & Bedworth, Redditch, Rugby, Shropshire, Stratford-upon-Avon, Tamworth, Telford & Wrekin

²⁹ Local Authority areas: Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford upon Avon, Tamworth, Walsall and Wolverhampton.

³⁰ Local Authorities involved: Cannock Chase, Lichfield, Stafford, South Staffordshire; Staffordshire County Council also working with a range of other organisations

³¹ Local authorities: Cannock Chase, East Staffordshire, Lichfield, South Staffordshire, Stafford, Staffordshire County Council, Walsall, Wolverhampton also with a range of other organisations

3. How the District Fits within the Wider Context

National Planning Policy Framework as prescribed bodies under the statutory Duty to Co-operate. These are:

- Local Planning Authorities
- County Councils
- Local Enterprise Partnerships
- Environment Agency
- Historic England; Natural England
- Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups
- Office of Rail and Road
- Local Integrated Transport Authority
- Highways Authorities
- Local Nature Partnerships

3.8 The new NPPF requires that Statements of Common Ground will need to be prepared to demonstrate how the Duty to Co-operate has been met. We will also need to be able to demonstrate how we are preparing the plan in the context of the most appropriate functional geographical/market areas for housing and the economy.

3.9 In terms of 'other cross boundary issues' which should be addressed, a range of issues were mentioned in the consultation responses including health linked to the protection and enhancement of landscape character, recreation and economic activity; housing needs; gypsy and traveller needs; employment; retail; Green Belt (including those for, and against its release); green infrastructure; green corridors/ecological links and networks; water supply and drainage; Cannock Extension Canal SAC; Cannock Chase Special Area of Conservation (SAC); transport links; mineral resources; air quality and water impacts under the Habitats Regulations 2017; protection of the route for the restored Hatherton Canal; Rugeley Power Station site; Rugeley having different needs to Cannock (i.e. Rugeley not getting economic benefits from the Midlands Conurbation due to geographical separation by Cannock Chase).

3.10 Taking the above into account, we think an updated list of key cross-boundary issues are likely to be:

- Housing growth
- Housing need (including Gypsy, Traveller and Travelling showpeople provision)
- Economic growth and activity
- Retail
- Transport
- Health
- Recreation

3. How the District Fits within the Wider Context

- Education
- Green Belt
- Environmental protection and enhancement including green infrastructure and ecological linkages, canals (including Cannock Extension Canal and the route for the restored Hatherton Canal), Cannock Chase SAC, air quality, water impacts, SAC
- Landscape
- Mineral resources
- Strategic sites such as Rugeley Power Station
- Differing needs of different communities including consideration of their geographical location

Figures 1 and 2 provide an overview of the geography of the District and its wider context.



Figure 1: Location of Cannock Chase District in sub-regional setting

3. How the District Fits within the Wider Context

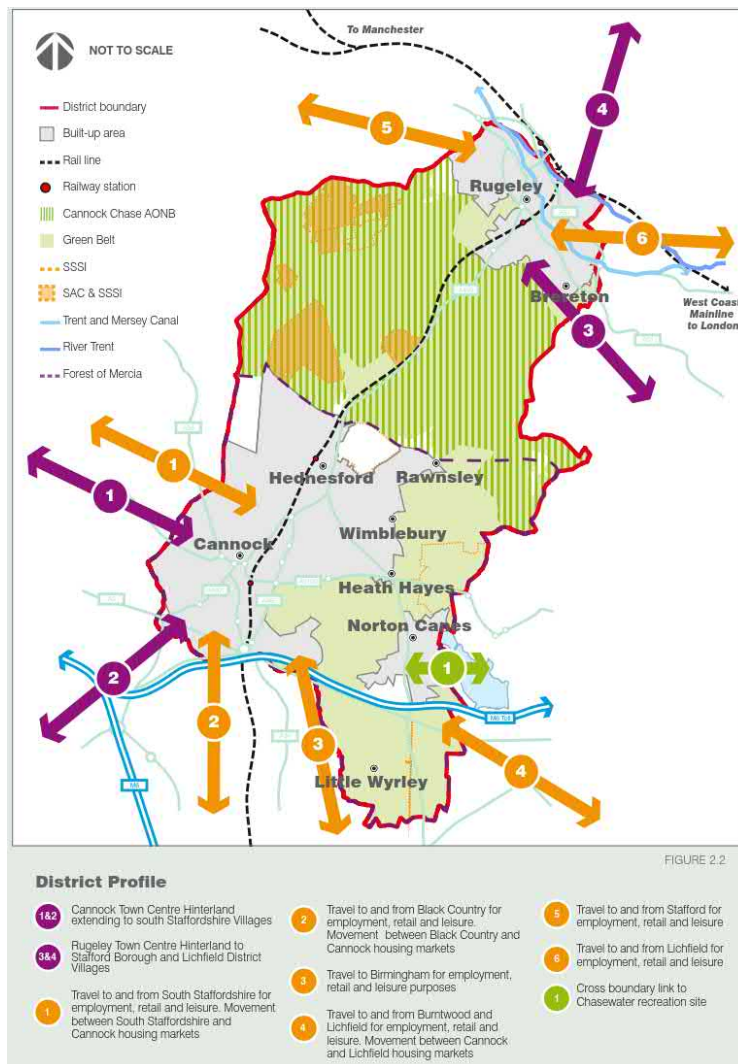


Figure 2: District Profile and key cross boundary linkages (extracted from Local Plan (Part 1))

Questions on the wider context

Question 2. We reference strategies and plans with which we think we need to align throughout the document, is there anything you need to be aware of in terms of the context within which we are preparing the new local plan?

Question 3. What do you think should be the key areas of focus for the preparation of Statements of Common Ground, and who should be involved in these?

Question 4. We think that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country Housing Market Area. Do you agree? If not what evidence is there for any alternative approach?

Question 5. What do you think is an appropriate geography for the consideration of economic issues? What evidence is there to support this?

Question 6. Do you have any other comments on the issues in this chapter?

4. Local Plan Vision and Objectives

- 4.1 We consulted on the vision and objectives contained in Local Plan (Part 1). In terms of the consultation responses, these were mostly supportive of the current vision and objectives. Two representations felt that the vision was too long and undeliverable, whereas others felt that more needed to be included, with more emphasis on housing delivery and meeting housing need; supporting the needs of neighbouring authorities via the Duty to Co-operate; supporting well designed and sustainable development close to/in the AONB including brownfield sites and linked opportunities to enhance the AONB; emphasising the importance of the canal network (and the need for a policy to substantiate this); the need to cross reference heritage to other areas of the vision; adding in reference to water quality/prevention of soil loss; reflecting the need to promote sustainable brownfield /urban sites; encouraging innovation e.g. in housing or new technologies for energy creation and storage; creative approaches to policy across boundaries to deal with cross boundary issues such as housing, open space, developer contributions etc.; more emphasis upon project delivery and partnership working; making reference to Active Travel; continuing to support Designing out Crime; protecting the Green Belt; referencing the need for high quality education. Stafford Borough Council also stated that it generally supported the vision and objectives as set out but would not be in a position to provide for any unmet Gypsy, Traveller and Travelling showpeople needs in the Borough.
- 4.2 The following section therefore contains an updated vision.

The District will continue to be made up of distinct communities with strong local character. People will be safer and healthier and will be proud of the area in which they live and work.

- People will be proud of where they live and work within Cannock Chase District and will take pride in encouraging others to visit the area. New developments will be designed to a high standard, carefully thought out to complement and enhance the surrounding area, minimise impact on existing residents and designed in such a way that opportunities for crime and anti-social behaviour are kept to a minimum. Appropriate redesign and uses will be promoted in places which are 'hot spots' for crime and anti-social behaviour as the opportunity arises, in order to reduce these problems. Partnership organisations and the local community will work together to ensure that local solutions are relevant to the different needs and aspirations of each community.
- People will be proud of their District's heritage, environment and town centres. They will have seen progress towards enhancement of the District's Conservation Areas in Rugeley, Brereton, Cannock town centre and Bridgtown, and safeguarding of other heritage assets across the District. They will continue to be proud of Cannock Chase Area of Outstanding Natural Beauty and the protected areas of open space and countryside.
- There will be plenty of choice and opportunity to live healthy lifestyles. The quality, quantity and range of accessible indoor and outdoor sport and recreation facilities will be improved, particularly leisure facilities around Cannock. Open spaces within the urban areas will be enhanced and local

4. Local Plan Vision and Objectives

needs in terms of play facilities for children and young people will be met. There will be better links between the town and countryside where appropriate, and between urban open spaces providing increased opportunities for active travel such as walking and cycling. People will have easy access to a range of services which are relevant to their needs. Primary health care provision, such as doctor's surgeries, will be available from modern accessible buildings within all the main urban areas. People living in rural communities will be able to access health services through good public transport links and, where possible, through services brought directly to the village where there is particular need. There will also be access to a range of other services such as local convenience stores and community centres. These will be relevant to local needs and flexible in order to be able to adapt to future changes within the community, for example as the population ages.

- Housing will be of a good quality and will suit peoples' circumstances so they will have a choice of where and how to live. New housing will be built to the highest possible sustainable standards to ensure it is environmentally friendly and flexible to be able to adapt to the changing needs of residents. There will be a range of affordable and market housing which provides for local needs, which makes an appropriate and sustainable contribution to the wider housing market area shortfall and which also encourages more people in managerial and professional jobs who work or invest in the District to live here. Estates of poor quality public housing will be redeveloped or redesigned to improve standards of living and the environment.

The potential of the District's accessible location along major transport routes will be maximised to achieve a thriving local economy.

- The range of employment opportunities available in the District will be widened, and local people will have the education, skills and training to access these opportunities. There will be new investment in areas of growth, and the levels of commuting will be reduced.
- Cannock, as the District's main strategic centre, will have a wider choice of non-food shopping and commercial leisure facilities. Rugeley town centre will serve the north of the District and surrounding rural parts of Stafford Borough and Lichfield District. It will see new investment in food and non-food retail, commercial and leisure developments guided by an Area Action Plan. Hednesford will see new shopping development to re-establish its role as one of the District's three town centres. The district centre at Hawks Green and local centres of Norton Canes, Heath Hayes, Chads Moor, Bridgtown, Fernwood Drive and Brereton will have improved local facilities. In the rural areas, neighbourhood planning initiatives to retain or develop retail facilities will be supported as part of the Localism agenda.
- There will be more opportunities for sustainable transport across the District. Rail services will be faster and more frequent, including the introduction of new inter-regional services. There will be better integration between bus and rail services and improved services to the rural areas. A demand-responsive community transport system will have been introduced to reduce social isolation in those areas where conventional bus services are not appropriate.

4. Local Plan Vision and Objectives

- The cycle network will have been expanded and used for both work and leisure; routes will be attractive and link together more effectively.
- More people will want to stay in Cannock Chase District overnight or longer, taking advantage of the business and leisure opportunities available and the accessibility of appropriate areas of Cannock Chase, Chasewater and the open countryside.

People will lead greener, more environmentally friendly lifestyles, inspired by Cannock Chase Area of Outstanding Natural Beauty.

- New development will provide high quality design of both individual buildings and public spaces using sustainable principles and methods of construction. It will incorporate renewable or low carbon energy, water conservation, flood prevention, waste reduction and material management features. Measures for adapting to climate change and reducing the severity of its effects will be developed and used. Brownfield land regeneration opportunities, including that of the former Rugeley Power Station, will be maximised and key pollution hazards in the District will be managed and reduced (e.g. Air Quality Management Areas).
- People will be proud of their local environment which will be well managed. All of the District's landscapes, habitats, heritage assets and cultural heritage will be conserved and enhanced in a way which protects local identity and distinctiveness. There will be no inappropriate development within or on the edge of the Cannock Chase Area of Outstanding Natural Beauty. The Green Belt will be protected from inappropriate development, will be well managed and will be linked to the Area of Outstanding Natural Beauty. There will be a 'green corridor' of restored lowland heathland habitat linking the Cannock Chase Area of Outstanding Natural Beauty to Sutton Park.
- Cannock Chase Area of Outstanding Natural Beauty will be better known as a place for day visits and also as a place for longer stays nearby, as guided by the AONB Management Plan and Cannock Chase SAC mitigation measures. There will be greater understanding of the area's heritage e.g. former military sites, canal networks. The network of open green space, including canals and the Forest of Mercia, will be strengthened and positively managed in the interests of recreation and biodiversity. Agriculture and forestry will continue to play major roles in managing the rural landscape. Good standards of water quality will be ensured and soil loss will be prevented.

4. Local Plan Vision and Objectives

4.3 Objective 1: Promote pride in attractive, safe local communities

- To ensure the highest standards of good design of buildings and spaces are achieved to help promote sustainable communities
- To retain and enhance the distinct and separate character of the District's settlements to ensure people have a sense of belonging and pride
- To work with the Police and the community in promoting better design and use of spaces to minimise opportunities for crime, improving environmental quality of spaces, adopting 'Secured by Design' principles (or similar), ensure the safety of pedestrians/cyclists and promoting health through 'active design,' (i.e. design that encourages people to walk / cycle).
- To promote appropriate design and uses in town centres with 'active' street frontages and high quality public space to ensure centres are well used and cared for and to maximise community interaction whilst minimising the opportunity for crime and anti-social behaviour.

4.4 Objective 2: Create healthy living opportunities across the District

- To support improved health care provision;
- To help developments which cater for longer, healthier, more active and more independent living;
- To facilitate provision of accessible, good quality, sustainably managed open space, sport, physical activity, leisure and entertainment and community facilities;
- To encourage the use of canals and other watercourses in providing sport and leisure opportunities including walking and cycling; and
- To help support measures which address issues of obesity
- To help support measures which contribute to good mental health.

4.5 Objective 3: Provide for housing choice

- To facilitate sustainable housing provision.
- To manage the release of sufficient land for housing to meet the district's own need and an appropriate and sustainable contribution to the wider housing market area shortfall in appropriate locations.
- To help meet local need for both affordable and aspirational housing.
- To provide housing choices for an ageing population
- To cater for the needs of different communities

4. Local Plan Vision and Objectives

4.6 Objective 4: Encourage a vibrant local economy and workforce

- To maximise the strategic location of the District and provide a continuous supply of good quality accessible employment land to attract more new businesses.
- To help support improvements in workforce skills, a broader economic base and training opportunities to enhance local recruitment.
- To provide for the employment needs of existing local businesses.
- To facilitate a range of sizes and types of employment sites to meet modern business needs.
- To provide employment opportunities in locations which best respond to market demands and which will attract inward investment (ensuring consistency with other sustainable development principles of the Local Plan).
- To ensure that business locations and centres are accessible by public transport from all areas of the District, reducing travel needs where possible.
- To ensure the land based economies of the District, including agriculture and forestry, can continue to operate, diversify and prosper.
- To enable the growth of sustainable tourism balanced with the protection of the AONB and the District's two SACs.

4.7 Objective 5: Encourage sustainable transport infrastructure

- Working in partnership, to implement a sustainable and integrated transport strategy that includes the continued development of the core strategic network.
- To reduce reliance on private cars for local journeys where possible, through spatial development choices and well designed layout of communities.
- To locate development in areas accessible by public transport, cycling and walking as well as reducing the need to travel.
- To achieve improvements to public transport, walking and cycling, including access for all sections of the community to work, shopping, health, education, leisure, valued environments and other facilities.
- To secure the continued development of the Chase Line rail services and infrastructure as the preferred means of transport to Walsall and Birmingham.
- To support the safe and efficient use of the highway network through traffic management schemes determined by local need.

4. Local Plan Vision and Objectives

- To support the construction of new roads only as a last resort and where they are related to environmental enhancement, public transport or road safety.
- To support sustainable freight distribution by road, rail and water.
- To safeguard land from prejudicial development required for new sustainable transport proposals, including road, rail, and water.

4.8 Objective 6: Create attractive town centres

- To ensure town centres maintain their positions within the retail hierarchy.
- To support growth of shops, offices, business, leisure, arts, cultural and tourism in town centres improving access to employment in order to achieve town centres with good vitality and viability.

4.9 Objective 7: Provide well managed and appreciated environments

- To protect, conserve and enhance the District's natural and historic environment assets, particularly the strategic Cannock Chase Area of Outstanding Natural Beauty, via the appropriate management of development pressures and maximise opportunities for access and enjoyment.
- To conserve, expand and link natural habitats through habitat creation and improvement to ensure a robust, coherent network of sites that provides wildlife with the opportunity to prosper.
- To conserve and enhance significant elements of cultural heritage including designated sites and important elements of historic landscape character.
- To achieve new development designed to provide a high quality of built form and public realm which enhances the District's distinct natural and historic environmental assets.

4.10 Objective 8: Support a greener future

- To position Cannock Chase District to face the future changes and challenges of climate change via strategic development location choices and design standards.
- To reduce carbon emissions in line with national targets.
- To ensure sustainable resource use by reducing waste, increasing recycling and safeguarding potential minerals reserves.
- To promote appropriate renewable energy and green technologies.
- To maximise flood protection and manage the effects of flooding.
- To promote sustainable construction methods/materials including 'climate proofed' developments to assist adaptation;

4. Local Plan Vision and Objectives

- To reduce pollution and its impact on local communities and the environment, particularly to contribute in achieving good status in the local waterbodies as set out in the Water Framework Directive.

4.11 These objectives are monitored annually against a series of targets and indicators as reported in the annual Authority Monitoring Report. Information from these reports is drawn upon throughout this consultation document to identify what issues the District still needs to address, what progress has been made and any new issues arising.

Questions on the review of the Vision and Objectives

Question 7. Do you have any comments on the updated Vision and Objectives?



Local Plan Policy Options

Objective 1: Promote Pride in Attractive, Safe Local Communities

Issues and Options for delivering Objective 1: Promote Pride in Attractive, Safe Local Communities

National policy

- 5.1 National policy relating to this objective is contained in the NPPF Chapter 12: achieving well designed places but also has particular links to Chapter 11: Making effective use of land and chapter 8: promoting healthy and safe communities.
- 5.2 NPPF Chapter 12 paragraph 127 states that. *‘Planning policies and decisions should ensure that developments:*
- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.’*
- 5.3 NPPF Chapter 11 paragraph 122 places emphasis on the importance of mixed use schemes, the different potential functions of undeveloped land (e.g. wildlife, recreation, managing flood risk, cooling/shading, carbon storage, food production). It also sets a framework for achieving appropriate densities having regard to the prevailing character of the area and securing well designed, attractive and healthy places.
- 5.4 NPPF Paragraph 123 emphasises the need to avoid building at low *densities ‘where there is an existing or anticipated shortage of land for meeting identified housing needs’* and states that minimum density standards should be set for *‘city and town centres that are well served by public transport which should ‘result in a significant uplift in the average density of residential development within these*



Local Plan Policy Options

Objective 1: Promote Pride in Attractive, Safe Local Communities

areas'. The NPPF also recommends that minimum density standards should be considered for other parts of the plan area, or a range of densities reflecting different areas.

5.5 Chapter 8 of the NPPF focuses on 'promoting healthy and safe communities'. Paragraph 91 states:

'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

5.6 In terms of parking standards these are covered in more detail under Objectives 5 (Sustainable transport) and 6 (Create attractive town centres). Setting standards is optional but if pursued will need to be developed in accordance with the NPPF paragraphs 105, 106 and 105. Local justification for setting such standards will need to be '*clear and compelling*' (paragraph 106).

5.7 In terms of housing, the National Planning Practice Guidance states that:

'Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.'

5.8 Mandatory Building Regulations covering the physical security of new dwellings came into force on 1 October 2015 and planning authorities should no longer seek to impose any additional requirements for security of individual dwellings



Local Plan Policy Options

Objective 1: Promote Pride in Attractive, Safe Local Communities

through plan policies, though designing for security of site layout remains a valid planning consideration. (Paragraph: 002 Reference ID: 56-002-20160519)'

- 5.9 It should be noted that, at the time of writing, National Planning Practice Guidance in relation to Design had not been updated to accord with the new NPPF and so regard will need to be had to any revised wording which may emerge.

Local policy

- 5.10 Local Plan Policy CP3 (Chase Shaping – Design) currently sets policy for design, including considering design in its context in terms of both the built and natural environment, the historic environment and encouraging reuse of buildings, including measures to design out crime, encouraging vibrant town centres with 'active street frontages', ensuring ease of access and mobility, promoting 'active design' (encouraging opportunities for physical activity), efficient resource use, appropriate use of the Green Belt and preserving and enhancing the scenic beauty of Cannock Chase AONB.
- 5.11 The policy is supported by a Supplementary Planning Document on Design which was adopted in April 2016. This provides further guidance on design principles for different types of development and in relation to different topics and provides details of Local Character Areas. It also makes reference to developing a Local List although this has not yet been progressed.

Consultation feedback/other issues

- 5.12 Some respondents felt that the policy needed bolstering in terms of active, high quality and innovative design. The main topic of the responses was concerned with densities and there was a strong feeling that a) this should be dealt with via the Local Plan rather than SPD because of its implications for viability and b) policy enforcing specific densities across all sites would not be appropriate as provision should be made for area character (including design guides / codes) and also the need to factor in other on site needs such as SUDS for example. Some felt that minimum density standards could work in town centres.
- 5.13 In terms of other issues, there were comments about the need for policy to link to good practice in terms of designing out crime and addressing matters of public safety. Other more specific matters were raised including the need for new standards for parking, site layout, servicing etc. However, whilst some respondents were supportive of further standards being introduced or older guidance (such as the parking standards SPD) amended and updated, others were concerned that such standards (e.g. densities, the nationally described space standard and so on) could be unduly restrictive. It is clear further consideration needs to be given to the matter in the light of new and emerging government guidance.



Local Plan Policy Options

Objective 1: Promote Pride in Attractive, Safe Local Communities

- 5.14 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 1: Promote pride in attractive, safe local communities

DESIGN POLICY OPTIONS

Option A: Strengthen the current policy to address the range of issues raised and update the Design SPD to include more detail, which reflects the increased emphasis of the NPPF of design matters

It is felt that the policy and SPD are already comprehensive and address many of the issues raised; however there is scope for an update and further elaboration of particular themes

Option B: As Option A but set minimum density standards for key areas such as town centres in Local Plan Policy and provide further guidance on optimum densities for other areas including character areas via a revised SPD

This would reflect the emphasis of the NPPF on density and minimum standards for town centres. It would help to achieve effective use of land, reducing the need for greenfield sites in other areas, and provided residential uses were balanced with other town centre uses, could help town centres become more vibrant places.

Questions on Design Policy Options:

Question 8. Is there any local evidence to support the need for the Council to adopt minimum internal space standards for new dwellings (the nationally described space standard)? If so, what?

Question 9. Are there other standards we should be including, and if so what evidence can you provide which would provide the local justification for this?

Question 10. Is the Local Plan still the right place to include a Local List, or would this be more appropriate to be developed by local communities (for example Hednesford Neighbourhood Plan has identified buildings of local significance which it wishes to protect).

Question 11. The NPPF (paragraph 70) states that 'planning policies and decisions should avoid the development of isolated homes in the countryside' but sets out exceptions to this. Should we be elaborating further to define local policy in this context and if so what should we focus on and what local evidence is there to support this?



Local Plan Policy Options

Objective 2: Create Healthy Living Opportunities across the District

Issues and Options for delivering Objective 2: Create Healthy Living Opportunities across the District

National Policy

- 6.1 Chapter 8 of the NPPF focuses on 'promoting healthy and safe communities'. Paragraph 91 states:

'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

- 6.2 The NPPF then goes on to state (paras 92/93/94) that planning policy should plan positively for community facilities and shared spaces and other local facilities, support the delivery of other related strategies, guard against the loss of valued facilities and services, ensure that established shops, facilities and services can be modernised and be retained to benefit the community, and ensure that the location of housing, economic uses, facilities and services are properly coordinated. There is a specific focus on the need to provide adequate schools provision (Paragraph 94). Estate regeneration is encouraged. There is also emphasis on promoting public safety (paragraph 95).

- 6.3 Chapter 8 also sets out national policy in relation to open space and recreation, requiring up to date assessments for the need for open space, sport and recreation facilities to inform and develop 'access to a network of high quality open spaces and opportunities for sport and physical activity' (Paragraph 96). Paragraph 97 sets the national context for protecting open spaces, sports and recreational buildings. Paragraph 90 references the need to protect and enhance



Local Plan Policy Options

Objective 2: Create Healthy Living Opportunities across the District

public rights of way and access. Paragraphs 99 to 101 provide the framework for designating Local Green Space.

- 6.4 Air quality is another issue which can have a significant impact upon human health. This issue cross-cuts a number of objectives in particular Objective 5 (sustainable transport), Objective 7 (well managed and appreciated environments, in terms of the impact of air quality on habitats) and Objective 8 (in terms of wider pollution issues). NPPF paragraph 181 states:

‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’

- 6.5 National Planning Practice Guidance (at the time of writing not yet updated to accord with the new NPPF) states:

‘Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Therefore in plan making, it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality. Air quality is a consideration in Strategic Environmental Assessment and sustainability appraisal can be used to shape an appropriate strategy, including through establishing the ‘baseline’, appropriate objectives for the assessment of impact and proposed monitoring.’

- 6.6 Drawing on the review of air quality carried out for the local air quality management regime, the Local Plan may need to consider:

- the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments;
- the impact of point sources of air pollution (pollution that originates from one place); and,
- ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying



Local Plan Policy Options

Objective 2: Create Healthy Living Opportunities across the District

measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable. (Paragraph: 002 Reference ID: 32-002-20140306)

Local Policy

- 6.7 Local Plan Part 1 Policy CP5 Social Inclusion and Healthy Living focuses mainly on the delivery of infrastructure relating to health and wellbeing and securing developer contributions where it is appropriate to do so.
- 6.8 The policy lists a range of infrastructure types which will be supported (e.g. health and education facilities, parks, open spaces, play areas, sports, cultural, leisure and community facilities and so on) and, where appropriate, states that developers will need to contribute to facilities in line with needs assessments and standards as set out in the Developer Contributions Supplementary Planning Document.
- 6.9 The policy also sets out a presumption against the loss of Green Space Network sites and community buildings unless they are surplus to requirements or else if there are demonstrable wider community benefits to be gained or if an acceptable level of replacement facilities can be provided.
- 6.10 Air quality is currently referenced in Local Plan policies CP10 (sustainable transport), CP13 (Cannock Chase SAC) and CP16 (Climate Change and sustainable resource use).

Consultation feedback/other issues

- 6.11 From the representations received and from other issues raised it is clear that the policy needs both updating and its remit expanding although in general terms it is still NPPF compliant. The emphasis of adopted policy CP5 is mainly upon the provision of infrastructure in relation to health, and suggestions were made in terms of how this could be expanded for example the role of canals and other 'blue' (i.e. water) networks in contributing to health and wellbeing and the need to include more detail on health, education and other local services and being more specific in relation to particular communities. There were specific comments on the need to include the route of the Hatherton Branch canal which is part of a major canal restoration project linking cross boundary with Lichfield, Walsall and South Staffordshire.
- 6.12 It was considered that the evidence base needs to be updated in terms of open space, sport and recreation and standards set in policy where relevant³², with supplementary planning documents not being considered adequate for this

³² NB. Sport England do not want standards for playing pitches and sports provision in policy but think that policy should link at an up to date evidence base which sets out requirements



Local Plan Policy Options

Objective 2: Create Healthy Living Opportunities across the District

purpose given that clarity needs to be provided in Local Plan policy due to the increased emphasis upon viability and deliverability at the plan making stage. This would also include an update to the current mapped Green Space network and any approach to designating Local Green Spaces which would have to meet a stringent series of tests.

- 6.13 The issues consultation also asked for feedback on biodiversity offsetting: this is considered under Objective 7 (well managed and appreciated environments) as it is felt the 'fit' was better under that theme.
- 6.14 In terms of bolstering the policy it was felt that it needs to be stronger in terms of encouraging both active lifestyles and encouraging healthy eating habits to address the evidence showing that the district is experiencing particularly high levels of obesity and associated health related problems. It was also felt that there needs to be more emphasis on mental health and wellbeing and the role that services and facilities play in encouraging social contact and avoiding isolation and the adverse health consequences of this.
- 6.15 Air quality and impacts on health were also mentioned in representations to the Issues paper. Whilst previously these issues have been covered in policy relating to transport, biodiversity and climate change, it is felt that the section on health also needs to address air quality, particularly given that there are three designated Air Quality Management Areas (AQMAs) in the district (two along the A5 corridor and a third at Five Ways in Heath Hayes) and taking into account the fact that air quality is an issue rising rapidly up the national agenda.
- 6.16 Further evidence is underway to inform the development of policies in relation to social inclusion and healthy living including an updated Playing Pitch and Indoor Sports strategy, an updated Open Space assessment and strategy and joint working between Staffordshire Authorities on Green Infrastructure. Consideration is being given to evidence on air quality (including AQMA action plans) and how this should influence the development of local policy.
- 6.17 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 2: Create healthy living opportunities across the District.

SOCIAL INCLUSION AND HEALTHY LIVING POLICY OPTIONS

Option A: Update and bolster existing Policy CP5 to include more emphasis on providing linkages and opportunities for healthy lifestyles, healthy eating, and mental health and wellbeing including reducing isolation. It could also include more on public safety issues. This would also need to include a link to the most up to date playing pitch and indoor sports strategies to inform developments on a case by case basis depending on local need. Standards for open space assessment would need to be based on updated evidence and set in Local Plan policy, and this would also include



Local Plan Policy Options

Objective 2: Create Healthy Living Opportunities across the District

allocation of the Greenspace network at a district-wide level and any Local Green Space if appropriate.

This would ensure compliance with the NPPF and with Sport England's requirements as their representation stated that standards for sport should not be set in policy but should be informed by the latest evidence (which needs to be kept up to date on an annual basis). Detailed information on specific types of infrastructure required would be summarised via an updated Infrastructure Delivery Plan. This would include increased emphasis upon the network of green and blue (waterways etc.) infrastructure and the role it can play in encouraging people to get outside more and live healthier and more active lives, as well as stressing the importance of safety and accessibility

Option B: As per Option A but with further policy elaboration via supplementary planning documents

As per representations to the Issues consultation it is not felt appropriate to continue to set standards for open space in SPD (they are currently set via our developer contributions SPD) as they need to inform the evidence for Local Plan viability testing as required by the NPPF. This would also apply to other standards. However SPDs could provide further elaboration of policy in some instances should there be justification to do so.

Option C: As per Option A but make clear that the role of the greenspace network would be to allocate green spaces of strategic significance on a district scale (i.e. significant sites and sites which are key to delivering and maintaining green linkages and corridors as per updated evidence) and that it would be for local communities, through local policy i.e. neighbourhood plans, to designate smaller areas of green space which are of particular importance at the community level.

It would not be practical or manageable for the Local Plan to allocate every single green space in the district, however it is recognised that some spaces will be of significance to local communities so this supports mechanisms to consider such matters at the local scale.

Option D: As per Option A and create separate policy for the Hatherton Branch canal restoration and seek to safeguard the canal route

This would create a separate policy for the Hatherton Branch Canal. It would reflect updated policy wording in neighbouring local authority plans (given the cross boundary nature of the project) and would reflect the changed context since the Local Plan (Part 1) was adopted. The route for the canal would be safeguarded in line with neighbouring authorities, with any potential allocation needing further detailed evidence.

Questions on Social Inclusion and Healthy Living Policy Options

Question 12. Which options or combinations of options do you support and why?

Question 13. Are there any other options we should be considering? What are these?

Question 14. How should we be seeking to develop local policy concerning air quality, and what evidence can we use to support this?



Issues and Options for delivering Objective 3: Provide for Housing Choice

Overall Housing Growth

National policy

- 7.1 Local Plans must contain strategic policies that make sufficient provision for housing within the area (NPPF, para.20). Strategic policies should address the strategic priorities of the area, and any relevant cross boundary issues. Under the duty to cooperate, local authorities and other prescribed bodies must cooperate with each other on strategic matters that cross local authority boundaries (NPPF, para. 21 and 24).
- 7.2 National planning policy (NPPF, para. 60) sets out the starting point for local authorities in terms of identifying the local housing need. This is the 'local housing need assessment' figure which is calculated via a standard methodology (set out in detail in national guidance). The NPPF makes it clear that this is a minimum requirement and alternative approaches to calculating housing need should only be used in exceptional circumstances. It also states that any housing needs which can not be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for³³.
- 7.3 Updated national guidance sets out that in relation to the evidence for housing needs, policy making authorities should work together to establish the housing market area, or geography which is the most appropriate for policies on housing need across local authority boundaries. This relates to the duty to cooperate requirements, as set out above.

Local policy

- 7.4 Local Plan (Part 1) Policy CP6 currently sets out the overall housing requirement for the District, but this needs to be updated to reflect the updated national policy context (particularly the standard methodology for calculating local housing needs). The Local Plan (Part 1) makes reference to the issue of a wider housing supply shortfall, arising primarily from Birmingham, and the need for this issue to be considered further, as appropriate. This reflects the fact that the evidence and discussions in relation to this issue were at an early stage in 2013/14.

³³ The Government recently consulted upon an update to the standard methodology for calculating local housing needs (October-December 2018). The local housing need assessment for the District has been undertaken in line with this updated methodology.



Consultation Feedback/Other Issues

- 7.5 In response to the Local Plan Review Issues and Scope consultation (2018) many respondents highlighted the need for the Council to consider the local housing needs arising from the new standard methodology. Responses highlighted that this should be considered a minimum figure, in line with national policy and that any needs in addition to this minimum should be informed by matters such as economic growth, affordable housing needs and unmet needs from neighbouring authorities. Many respondents stated that the Council should consider how it could help contribute to the housing shortfall within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which would be in addition to local housing needs. One response suggested the GBBCHMA shortfall figure of 60,900 should be considered a minimum. One response suggested the adopted Birmingham Development Plan housing shortfall figure (of 37,900 dwellings) should be used and identified an option of circa 1,200 dwellings to be considered for Cannock Chase District's contribution to the housing market area shortfall (in addition to local housing needs).
- 7.6 In terms of key issues, the housing growth requirements will have to be set out within strategic policy in the Local Plan. The policy options to be considered need to take into account the updated local housing need assessment figure, as set out above under 'national policy and guidance', which will provide a housing need figure for the District only. This currently equates to **284 dwellings per annum**. This is based upon the amended standard methodology for calculating local housing need (see Appendix 1 for further details).
- 7.7 The policy options also need to take into account the fact that Cannock Chase District lies within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Under the duty to cooperate, the Council has been working with the other 13 local authorities in the GBBCHMA to address the strategic matter of housing supply across the market area. In February 2018, the Strategic Growth Study (GL Hearn/Wood) was published. This study provided an update on the overall housing needs across the housing market area and the shortfall in supply arising. It provided an analysis of the potential options for addressing this shortfall.
- 7.8 This study considered all evidence on housing need and supply as of 31st March 2017 and identified a cumulative total shortfall of around 60,900 dwellings across the HMA up to 2036. The study indicated that this shortfall largely arose from Birmingham and the Black Country authorities. A position statement (issued in September 2018) from the GBBCHMA authorities provided an update on housing supply which indicated some additional capacity may be available (circa 6,000 dwellings). However, a significant shortfall up to 2036 in particular still remains.



Local Plan Policy Options Objective 3: Provide for Housing Choice

- 7.9 In terms of options for addressing the housing supply shortfall, the Strategy Growth Study considered the following:
- Potential additional urban supply from increasing densities and/or identifying additional urban site opportunities;
 - Proportionate dispersal area options- this would involve smaller urban extensions (500-2,500 dwellings)
 - Strategic development area options including larger urban extensions (1,500-7,500 dwellings); employment-led strategic development (housing developments of 1,500-7,500 dwellings alongside employment developments); and new settlements (10,000+ dwellings).
- 7.10 The study identified that the potential additional urban supply would not be sufficient to address the shortfall. Therefore, consideration would need to be given to the other options, as outlined above. These options were considered across the GBBCHMA taking in Green Belt and non-Green Belt locations. The study applied a series of stages of analysis³⁴ to recommend a refined list of 11 options ('areas of search for strategic development') for local authorities to test through their Local Plans. It recommends that these should be considered in the first instance, alongside options for potential additional urban supply and proportionate dispersal, or smaller urban extensions (for the latter, 7 potential options for areas to accommodate such development were identified³⁵).
- 7.11 For Cannock Chase District, the study identifies an area of 'proportionate dispersal' within which small urban extensions (500- 2,500 dwellings) could be considered. This is identified as being in 'the vicinity of Cannock, Great Wyrley, Burntwood, Brownhills and Aldridge'. As the study notes, further testing via Local Plans using more detailed evidence at the local level is required to determine if these options are feasible and appropriate e.g. local Green Belt assessment findings and local infrastructure assessments. The study does not identify any 'areas for strategic development' within Cannock Chase District (on the refined list of 11 options).
- 7.12 Despite the further testing required on its recommendations, the Strategic Growth Study offers a consistent independent assessment of the potential capacity of all fourteen authorities to accommodate the housing needs of the GBBCHMA. The Strategic Growth Study recommendations imply Cannock Chase District should consider accommodating a minimum of 500 dwellings to contribute to the GBBCHMA shortfall (minimum suggested capacity for the 'proportionate

³⁴ Taking into account for example a Green Belt assessment; strategic transport links; key development constraints such as environmental designations; overall sustainability; deliverability. Applied to an initial list of 25 options for 'areas of search for strategic development'.

³⁵ Identified as part of the wider search for areas for strategic development, taking into account key considerations such as a Green Belt assessment; public transport links; development constraints such as environmental designations. The 7 options for 'proportionate dispersal' are in addition to the 11 options for 'areas for strategic development'.



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Objective 3: Provide for Housing Choice

dispersal' option). If other authorities in the GBBCHMA were to take the approach of seeking to accommodate the minimum capacity implied by the Strategic Growth Study 'areas for strategic development'³⁶ in their respective local areas, then the housing shortfall up to 2036 would be met. Existing information from the Birmingham Development Plan and the Black Country Core Strategy Review Issues and Options consultation indicates that the majority of this unmet need comes from Birmingham and the Black Country. Therefore, this contribution to unmet wider housing market area needs would be in addition to Cannock Chase District's own local housing need. The Council's suggested approach is consistent with the recent policy options that have been considered in the South Staffordshire Local Plan Review Issues and Options consultation (September- October 2018).

- 7.13 Whilst it is noted that the 'proportionate dispersal' option identified for Cannock Chase is potentially a cross boundary one with Walsall, South Staffordshire and Lichfield local authority areas (i.e. the area referred to includes Great Wyrley, Burntwood, Brownhills and Aldridge) it is assumed at this stage that these authorities will also be contributing to the housing shortfall by taking into account other options within their areas (e.g. South Staffordshire District Council is considering large urban extensions and smaller urban extensions). In addition, as one of the Black Country authorities from where the housing shortfall is arising, Walsall MBC will need to consider how it can meet its own needs as far as possible. It therefore seems reasonable at this stage for Cannock Chase District to consider the recommended area of proportionate dispersal on its own as basis for identifying the potential quantum of development for Cannock Chase District to help meet the housing shortfall (this is also aligned to the South Staffordshire District Council approach).
- 7.14 The policy options for overall housing growth will have to be further tested at the local level to determine the most appropriate figure. This will take into account matters such as deliverability, infrastructure considerations and overall sustainable development matters. As additional housing supply within Cannock Chase District could potentially require Green Belt release, any housing requirement set through the Local Plan will require thorough consideration of non-Green Belt options both within and outside Cannock Chase District before being finalised (see further detail under 'Strategy for meeting overall housing growth').
- 7.15 The policy options for overall housing growth have been put into context by reference to the extent of the uplift over and above the local housing need figure (284 dwellings per annum) and in relation to recent delivery rates in Cannock Chase. Whilst it is recognised that past delivery rates can be reflective of the

³⁶ As per the refined list of 11 options of 'areas for strategic development', plus capacity from urban supply and the 7 options for 'proportionate dispersal'.



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Objective 3: Provide for Housing Choice

planning policies that apply at the time, they also identify if current Local Plan targets are being met (providing an indication of market delivery) and they provide a useful 'reality check' when considering the implications of scales of development e.g. infrastructure implications. In the previous 12 years (going back to start of the current plan period at 2006) the average delivery rate has been **275 net dwellings per annum** with 2017/18 being the highest single year delivery rate (625 net dwellings- owing to a number of relatively larger development sites within the District being under construction at the same time). This contrasts with the lowest single year delivery rate of -6 dwellings in 2015/16 (owing to low gross completions and high number of demolitions from estate regeneration).

- 7.16 Based on the above information we think that the following policy options for housing growth need to be considered to help us deliver Objective 3: Provide for housing choice.

OVERALL HOUSING GROWTH POLICY OPTIONS

Option A: Local Housing Need alone with no unmet need. Based upon current standard methodology the Districts' local housing growth for the plan period of 2018-2036 would be 5,112 net dwellings (284 net dwellings per annum).

This would represent 3% uplift above recent average delivery rates. It should be noted that the Council will need to assess this local housing need figure on an annual basis until the point at which the Local Plan is submitted for examination (when the local housing need figure is 'fixed' for two years- programmed to be 2020 for Cannock Chase District). The annual updates prior to this will be undertaken when new affordability ratios are published (in Spring) and when new population and household projections are released (in 2020).

Option B: Local Housing Need figure plus unmet need of an additional 500 dwellings giving a total housing growth figure of 5,612 net dwellings for the District (2018-2036) or 312 net dwellings per annum.

The additional 500 dwellings need is based upon the minimum capacity identified for the 'proportionate dispersal' option identified in the Strategic Growth Study. Cannock Chase District has one proportionate dispersal option to consider. It is an uplift of 10% over local housing needs. This annual housing growth rate represents an uplift of 13% above recent average delivery rates. See Option A commentary on local housing needs.

Option C: Local Housing Need figure plus unmet need of an additional 1,500 dwellings giving a total housing growth figure of 6,612 net dwellings for the District (2018-2036) or 367 net dwellings per annum.

The additional 1,500 dwellings need is based upon the median capacity identified for the 'proportionate dispersal' option identified in the Strategic Growth Study. Cannock Chase District has one proportionate dispersal option to consider. It is an uplift of 30% over local housing needs. This annual housing growth rate represents an uplift of 34% above recent average delivery rates. See Option A commentary on local housing needs. This option also covers the range of an option identified in response to the Issues and Scope consultation which suggested an additional 1,137 dwellings for unmet need (based upon an alternative apportionment approach).



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Option D: Local Housing Need figure plus unmet need of an additional 2,500 dwellings giving a total housing growth figure of 7,612 net dwellings for the District (2018-2036) or 423 net dwellings per annum.

The additional 2,500 dwellings need is based upon the maximum capacity identified for the 'proportionate dispersal' option identified in the Strategic Growth Study. Cannock Chase District has one proportionate dispersal option to consider. It is an uplift of 50% over local housing needs. This annual housing growth rate represents an uplift of 54% above recent average delivery rates. See Option A commentary on local housing needs.

Questions on Overall Housing Growth Policy Options:

Question 15. Which option do you support and why?

Question 16. Are there any further options to be considered? Please provide supporting evidence for any alternative options suggested.

Strategy for meeting overall housing growth

National Policy

- 7.17 Local Plans must contain strategic policies that make sufficient provision for housing within the area and set out an overall strategy for development (NPPF, para.20). Strategic policies should address the strategic priorities of the area, and any relevant cross boundary issues. Under the duty to cooperate, local authorities and other prescribed bodies must cooperate with each other on strategic matters that cross local authority boundaries (NPPF, para. 21 and 24).
- 7.18 National policy overall sets out a framework for sustainable development, which local plans must ensure is delivered (NPPF, Chapter 2). The three key objectives of sustainable development overall (economic, social and environmental objectives) must therefore underpin any strategy for development within the District. This includes considering matters such as appropriate levels of infrastructure provision to support future growth and the protection and enhancement of built and natural environmental assets.
- 7.19 Planning policies should identify a sufficient supply and mix of housing sites to deliver the levels of housing growth identified (NPPF, para.67). It needs to be shown that these sites have a realistic prospect of being developed when required (national guidance offers further detail on how to assess this). Updated national policy sets out the contribution that small and medium sized sites can make in terms of delivering housing more quickly; local planning authorities should identify a good mix of sites to meet their growth requirements (NPPF, para. 68). National policy also states that a supply of large numbers of new homes can often be best achieved by large scale developments, such as new settlements or large urban extensions. However, the importance of ensuring appropriate infrastructure and facilities provision is set out (NPPF, para. 72).



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- 7.20 Updated national policy emphasises the need for planning policies to promote an effective use of land. This includes making as much use as possible of brownfield land opportunities. An effective use of land can be promoted by achieving higher densities (particularly in areas where there is a shortage of land for meeting housing needs); promoting the development of under-utilised land and buildings such as spaces above shops; considering the reallocation of land uses e.g. employment to housing (NPPF, Chapter 11).
- 7.21 This relates to the updated national policy approach for Green Belt land. Before concluding that Green Belt boundary changes are justified (by exceptional circumstances) local authorities must demonstrate they have examined all other reasonable options for delivering development. This includes making as much use of brownfield and under-utilised land; considered increased densities of developments; and undertaken discussions with neighbouring authorities on whether or not they could accommodate additional development (NPPF, para. 137). Where Green Belt land release is justified, first priority should be given to brownfield sites and/or those that are well-served by public transport. Measures to off set the impact of the Green Belt release such as improvements to the environment and accessibility of the remaining Green Belt should also be considered (NPPF, para. 138).
- 7.22 Given the District context, national policy in relation to Areas of Outstanding Natural Beauty (AONBs) is also relevant to considering the development strategy. National policy gives great weight to the conservation and enhancement of AONBs. It states that the scale and extent of development within these designated areas should be limited; major development should not be allowed unless there are exceptional circumstances and where development is in the public interest (NPPF, para. 172). The scope for meeting development needs elsewhere i.e. outside of the AONB needs to be fully assessed (NPPF, para.172).

Local Policy

- 7.23 Local Plan (Part 1) Policy CP1 and CP6 set out the overall strategy for meeting housing growth requirements within the District. The current strategy focuses development, investment and regeneration mainly on the built up, urban areas, conserving and enhancing the landscape of the AONB, Hednesford Hills, Green Belt and the Green Infrastructure of the District. Housing growth is directed towards the main existing urban areas (Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes) in a proportionate manner relative to their existing sizes, with urban extensions to each main urban area (including the Strategic Housing Site allocated for up to 750 homes (with potential capacity for 900 homes) at Land West of Pye Green Road, urban extensions for up to 670 homes south of Norton Canes, and 500 dwellings adjacent to Rugeley/Brereton within Lichfield District at the former power station site). Land east of Wimblebury Road is safeguarded land, which should be reviewed via a Local Plan review



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alongside the need for any Green Belt boundary amendments elsewhere in the District. Development within the identified villages is limited to infill sites only.

- 7.24 The Rugeley Power Station SPD provides detailed guidance on the development of this large site.

Consultation feedback/other issues

- 7.25 A number of site specific representations were received, with respective landowners/developers promoting individual sites and some parties raising concerns with specific sites. A number of responses suggested that the current strategy and approach of retaining Green Belt boundaries needs to be reviewed, particularly in light of the GBBCHMA housing shortfall issues. Extensions to existing urban areas were promoted as a suitable option to consider. A number of responses also supported the current strategy of retaining Green Belt boundaries and AONB protection, suggesting these designated areas shouldn't be considered for future development. The Districts environmental constraints (in terms of landscape and ecological designations) were widely recognised and the need for the strategy to continue to reflect these was highlighted. Some statutory consultees highlighted the need for key issues to be considered in the selection of housing sites, including highways matters and the protection of natural assets.
- 7.26 There was some support for retaining the current settlement hierarchy approach. Some responses supported the Cannock/Heath Hayes area being the principal focus for development going forward. Other responses suggested Rugeley/Brereton, Hednesford and some areas at Norton Canes should accommodate future development. Equally, some responses expressed concern about further developments around the respective urban areas of the District. Some responses expressed concern about developments close to the District boundary not being counted towards Cannock Chase Districts' housing requirements. Responses highlighted the need to have regard to where residents are accessing employment opportunities and where employment growth is forecast, taking account of existing and future transport networks. It was outlined that infrastructure capacity considerations should inform the preferred strategy e.g. education and transport capacity. A number of responses recognised the opportunity for redevelopment of the former Rugeley Power Station site and that it could contribute to housing needs. However some responses suggested a cautious approach was needed in terms of estimating how much this site could contribute to housing needs, taking into account the complexity of redeveloping it. Whilst the majority of relevant responses supported the principle of using brownfield land, some responses highlighted issues to consider in redeveloping brownfield sites e.g. viability. One response highlighted rural community issues in terms of allowing development adjacent to settlement boundaries. One response highlighted the issue of the proximity of livestock and residential dwellings.



Local Plan Policy Options
Objective 3: Provide for Housing Choice

- 7.27 In terms of key issues, clearly the current Local Plan (Part 1) policies will need to be updated to reflect the overall levels of housing growth in the District for the plan period and the most appropriate strategy for delivering that growth. The Council needs to consider how the local context influences the choice of policy options for delivering housing growth. Given that all land outside of our existing urban areas is Green Belt (approximately 60% of the District overall) with a significant proportion of this also being designated as an Area of Outstanding Natural Beauty, the sequential approach set out in national policy for considering the release of Green Belt land needs to be considered i.e. other options have been exhausted. A similar approach is required in relation to any development sites within the AONB. The national policy requirements to maximise the use of under-used and particularly brownfield land influences the approach to be taken.
- 7.28 The Council undertakes its annual assessment of housing land availability (Strategic Housing Land Availability Assessment- SHLAA) to identify the amount of dwellings expected to be developed to meet local plan housing requirements.
- 7.29 The most recent assessment (August 2018) currently identifies capacity for a minimum of 3,200 dwellings (deliverable and developable) for the current plan period (up to 2028) which is primarily made up of the following:

AREA	0 5 YEAR DELIVERABLE SITES (NO OF DWELLINGS) (MAJOR AND MINOR SITES COMBINED)	6 15 YEAR DEVELOPABLE SITES (UP TO 2028) (NO OF DWELLINGS) (MAJOR AND MINOR SITES COMBINED)
Cannock, Hednesford and Heath Hayes	1,006	1,112
Rugeley and Brereton	148	242
Norton Canes	194	473
TOTALS	1,348	1,827

- 7.30 It is distributed across the main urban areas in the following proportions (includes a small proportion of limited infill developments in some of the Districts' villages):

AREA	PROPORTION OF DWELLINGS (AND DWELLING NO.)
Cannock, Hednesford and Heath Hayes	67% (2,100)
Rugeley and Brereton	12% (400)
Norton Canes	21% (700)



Local Plan Policy Options

Objective 3: Provide for Housing Choice

- 7.31 This demonstrates that there is existing capacity from Brownfield and Greenfield sites focused around the District's urban areas (with approximately 75% of the supply identified being permissioned/under construction). This existing capacity can form the basis of the strategy for meeting housing needs. The assessment (SHLAA) also identifies the potential for further urban housing sites in the longer term, which could be explored further.
- 7.32 Taking into account this existing supply the Council needs to identify land for an **additional circa 1,900-4,400 dwellings** (dependent upon the final overall housing growth figure). The assessment (SHLAA) identifies that there are a number of options for additional housing land, including potential additional urban sites. However, a large proportion of the potential site options currently lie within the Green Belt (and some within the AONB too).
- 7.33 As set out above, the national policy approach requires the Council to consider a sequential approach to the release of Green Belt land for development. To justify Green Belt release the Council must demonstrate that the local plan:
- makes as much use as possible of suitable brownfield sites and underutilised land;
 - optimises the density of development, with significant uplift to be considered in town centres and other locations well served by public transport;
 - has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.
- 7.34 As a result, the Council will need to explore any opportunities for non-Green Belt site options both within the District and outside the District (in neighbouring authorities) before being able to justify the release of Green Belt sites within Cannock Chase District.
- 7.35 However, it is recognised that Cannock Chase District and the wider GBBCHMA housing needs should ideally be met as close to the source of those needs as possible. In reality the neighbouring Black Country authorities are already struggling to meet own needs from urban site capacity, and they are also Green Belt constrained. Other neighbours (South Staffordshire, Lichfield) whilst potentially having capacity (as set out in Strategic Growth Study) have also set out in their recent Local Plan Review consultations that they are considering Green Belt options given the characteristics of their Districts and the Strategic Growth Study 'areas of search' identified (however, this is subject to those authorities also confirming there is no non-Green Belt site capacity within their respective Districts and neighbouring authorities). Stafford Borough is not identified as part of the GBBCHMA and a significant part of the Borough which adjoins Cannock Chase District is also designated Green Belt. Therefore, whilst



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Objective 3: Provide for Housing Choice

the need for any Green Belt land release within the District would need to be clearly justified and confirmed via further discussions with the District's neighbouring authorities, this wider current context is recognised.

- 7.36 In terms of maximising existing urban capacity, as set above there is an existing supply of sites available to meet needs of around 3,200 dwellings. In addition to this the Council is undertaking work to assess additional capacity which could be generated by increasing densities and identifying additional non-Green Belt sites.
- 7.37 In relation to density increases the Strategic Growth Study identified that requiring a minimum density of 30-40 dwellings per hectare could generate a maximum additional 20% dwellings on top of the existing supply within Cannock Chase District (from sites without planning permission at the time). This equated to a maximum of 200 dwellings from a supply of 1,000 dwellings. Given that 75% of the 3,200 dwellings identified within the urban supply already have planning consent/are under construction there is limited scope for increasing densities from the existing supply. Assuming a similar 20% uplift on the 800 dwellings with no consent would not meet the minimum needs of 1,900 additional dwellings alone (gives an additional 160 dwellings). However, the impact of increasing densities on future sites identified can be taken into account. Higher densities on new urban sites identified could yield further dwellings e.g. town centre sites in particular. The appropriateness of increased densities needs to be considered with regard to overall sustainable development considerations e.g. meeting range of housing needs identified within the District (such as different dwelling sizes) and open space provision.
- 7.38 In relation to additional non-Green Belt sites, given the District context the source of these would have to primarily come from the reallocation of existing land uses e.g. redeveloping employment sites or open spaces for housing. However, the implications of reallocating land uses in wider sustainable development terms need to be borne in mind e.g. loss of employment sites or open spaces. Any opportunities for the redevelopment of existing housing areas to provide higher density housing could also be assessed. Permitted development right extensions could provide encouragement to further supply from changes of use of retail and office premises; however monitoring indicates it is unlikely to offer a substantial increase in housing (particularly given that there have already been several of the larger potential sites developed in recent years e.g. office blocks in Cannock town centre). As part of the recent Strategic Growth Study, no further significant site opportunities for brownfield land supply were identified at that time. However, further local evidence which is now underway in relation to the assessment of existing employment areas and open spaces will help inform this understanding of any newly arising capacity.
- 7.39 There are already a number of existing employment sites (such as Gestamp, Cannock) which have been suggested for redevelopment for housing that are accounted for within the 3,200 dwelling urban supply. The Council's land availability assessments (for housing- SHLAA, employment-ELAA and the Brownfield Register) are considered to be as comprehensive as possible in terms of identifying potential sites for development. No additional methods for identifying further sites were suggested to the Council in response to the Local



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Plan Issues and Scope consultation and a small number of additional urban and brownfields sites were suggested for consideration. However, the Council is undertaking an 'urban capacity study' in order to bring the various pieces of existing evidence on urban capacity together for a comprehensive picture and to reflect any new evidence on additional sites, in line with the updated national planning policy context. This can take into account any relevant findings from other parts of the evidence base, including an assessment of the District's existing employment areas (to consider if any of these should be protected for employment use or if they could be redeveloped for other uses) and an open space assessment.

- 7.40 The former Rugeley Power Station is a large brownfield site, outside of the Green Belt. It offers a key opportunity for helping to meet the future development needs of the District on non-Green Belt land. The landowners of the site (Rugeley Power Ltd) outline that a housing-led scheme should be promoted. Whilst no firm dwelling numbers were suggested in response to the Local Plan Issues and Scope consultation, it has been suggested in recent announcements by the landowners that around 2,000 dwellings could be provided (total across the whole site which also crosses over into Lichfield District). The results of a recent 'community planning event' in December 2018 gave an indicative masterplan which suggested a mix of high-medium density housing, employment and live/work units, a primary school, sports pitches and retained battery storage facility on the part of the site within Cannock Chase District (but with no figures on quantity of development). Lichfield District Council has assumed that the part of the site within their District could provide around 800 dwellings up to 2029. Based on Cannock Chase Council's methodology for assessing site capacities, it is assumed for the purpose of the policy options at this stage that a housing-led development of the former Rugeley Power Station could generate a minimum of 800 dwellings (on the part of the site that lies within Cannock Chase District)³⁷. This capacity could be increased with higher density developments such as apartments³⁸, but the capacity will also depend on other land uses for the site e.g. employment.
- 7.41 The Rugeley Power Station Supplementary Planning Document (SPD) adopted 2018 sets out an indicative vision for the redevelopment of the site, produced jointly with Lichfield District Council. This currently identifies the part of the site within Cannock Chase District as appropriate for employment-led redevelopment. This is therefore also reflected within the policy options (and reflects consultation comments received regarding the future use of the site, as outlined above). An employment/mixed use led redevelopment of the site would still be likely to generate housing supply within the District; however it would obviously be at a lesser scale than a housing-led scheme on the site.

³⁷ Site area of approx.36 hectares (brownfield part of site which excludes the golf course/flood plain area). Assume 60% net developable area (as per CCDC SHLAA methodology, and consistent with Lichfield District assumption) which gives net site area of approx.22 hectares. Assume 35 dwellings per hectare, based on Strategic Growth Study recommendations for minimum densities in housing market area and CCDC/LDC SHLAA assumptions. Gives total site capacity of approximately 800 dwellings.

³⁸ As an example, based on current indicative density for town centre developments within the District of 50 dwellings per hectare, the site could deliver 1,100 dwellings.



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- 7.42 **These options for additional urban capacity including the former Rugeley Power Station will be fully explored before any consideration of Green Belt sites for meeting housing needs (alongside discussions with neighbouring authorities for meeting needs on non-Green Belt sites). If there is a need for further land to deliver sustainable housing growth within the District then the development options for urban capacity and Rugeley Power Station will need to be considered in combination with options for the development of Green Belt sites.**
- 7.43 The policy options for Green Belt sites reflect the nature of site submissions received to date and consultation comments to the Local Plan Issues and Scope. Given the nature of the District, Green Belt options are limited to urban extensions i.e. there is no physical capacity for new settlements. Again, given the physical context of the District these sites are likely to be relatively smaller urban extensions (as also identified in the Strategic Growth Study under the 'proportionate dispersal' model, which suggested smaller urban extensions of 500-2,500 dwellings). As part of the 'long list' of 'areas of search for strategic development' recommended by the Strategic Growth Study, an area for a large urban extension (1,500-7,500 dwellings) was identified, known as 'North of Walsall, around Brownhills'. Such a scale of development would need to be considered on a cross-boundary basis with the relevant local authorities rather than just by Cannock Chase District alone. There is also a degree of overlap with the option of 'proportionate dispersal' in terms of the geographical area covered.
- 7.44 The strategy for future development in relation to Green Belt urban extensions could seek to focus on areas to the north of the District at Rugeley/Brereton. This could assist in reducing pressures upon infrastructure issues identified to the south of District, including the A5/A460/M6 Toll (Churchbridge) and Five Ways (Heath Hayes/Norton Canes) junctions, as well as air quality issues (there are 3 AQMAs in the District which are all located in the Cannock/Hednesford/Heath Hayes area). It could help to support the regeneration of Rugeley Town Centre by providing additional customers and investors to the town. As the second largest settlement area in the District, there are an existing range of facilities and services for future residents to access e.g. rail services, leisure centre, schools. However, there are also infrastructure capacity issues to consider in this area, such as school capacity and traffic e.g. that associated with the employment areas at Towers Business Park. It is recognised that the urban edge of Rugeley/Brereton largely directly abuts the AONB boundary (with some suggested site options for development lying within the AONB). In addition, if housing-led redevelopment of the former Rugeley Power Station is pursued in combination with this option it would mean the area of Rugeley/Brereton potentially accommodating a substantial proportion of the overall housing needs of the District.
- 7.45 The strategy for future development in relation to Green Belt urban extensions could seek to focus on areas to the south of the District at Cannock/Hednesford/Heath Hayes and Norton Canes. This is where the vast majority of potential housing supply from Green Belt sites has been promoted to date by landowners and developers so there is a wider range of sites to consider. As the largest urban area, Cannock/Hednesford/Heath Hayes provides the



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largest range of facilities and services available for future residents to access e.g. two town centres at Cannock and Hednesford, a number of local centres offering further shopping and services provision e.g. Heath Hayes, rail services, leisure centre, schools. Norton Canes has a range of facilities such as smaller scale shopping provision in the local centre, schools and a library; access to larger facilities (such as indoor leisure and larger shopping outlets) is mainly provided for in other nearby settlements (such as Cannock and Burntwood). However, the key issues identified above in relation to infrastructure and environmental issues would need to be considered (particularly those related to education and transport, as highlighted by statutory consultees previously). A substantial part of the urban area at Cannock/Hednesford lies adjacent to the AONB (with some suggested site options for development lying within the AONB) and there are a number of nationally and internationally protected ecological sites in the vicinity (e.g. Hednesford Hills, Bleak House, and Cannock Extension Canal).

- 7.46 The strategy for future development in relation to Green Belt urban extensions could consider all site options suggested to date across the District. This would include suggested sites which lie adjacent to the existing village boundaries e.g. at Cannock Wood and Slitting Mill. In relation to these options, it would need to be considered how sustainable such development could be, given the relatively limited services and facilities currently available at those villages and the fact that the majority of the site options at the village locations also lie within the AONB.
- 7.47 In relation to all of the policy options for development, the Council will need to demonstrate that the housing sites identified are realistic prospects for future development i.e. they will require more detailed assessment covering a range of issues including landownership and landowner intentions; viability of the development; any key constraints such as physical problems, environmental designations and impacts of the developments. The site selection methodology provides further detail on how sites will be assessed and this process will help inform the preferred spatial strategy.
- 7.48 In terms of safeguarded land and 'reserve sites' issues, these are discussed further under 'Other Policy Considerations' paragraph 13.14 – 13.19.
- 7.49 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 3: Provide housing choice in terms of how housing growth is distributed.

STRATEGY FOR MEETING OVERALL HOUSING GROWTH POLICY OPTIONS

Option A: Urban Areas- use sites already identified for housing within the urban areas and explore opportunities for further housing on urban sites.

There is currently a minimum of around 3,200 dwellings identified on brownfield and greenfield housing sites within the urban areas (including large sites to be developed at Land West of Pye Green Road and Norton Hall Lane/Butts Lane) distributed broadly as follows:



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AREA	PROPORTION OF DWELLINGS (AND DWELLING NO.)
Cannock, Hednesford and Heath Hayes	67% (2,100)
Rugeley and Brereton	12% (400)
Norton Canes	21% (700)

This means additional land would need to be identified to deliver a minimum of 1,900 dwellings (depending on the overall levels of housing growth). To identify further land for housing this option would include considering higher densities on new sites (i.e. those that do not already have planning permission) and identifying additional urban sites from sources such as employment land, open spaces, redeveloped housing areas. This could involve reassessing sites that are not considered appropriate for development at present and seeking to identify additional sites that are not currently being considered for housing development. This option would also allow for infill developments within the village settlement boundaries, as per the current policy approach but would not extend the village boundaries with any new development. It is unlikely that this option would meet the minimum additional levels of housing growth of 1,900 dwellings alone but it can be considered alongside other options.

Option B: Rugeley Power Station

Option B1: Urban Areas and housing-led redevelopment of former Rugeley Power Station

This combines Option A with the housing-led redevelopment of the former Rugeley Power Station. The part of the site within Cannock Chase District could potentially generate a minimum of 800 dwellings. This option may not provide for the additional levels of housing growth alone (minimum of 1,900 dwellings) but can be considered alongside other options, if necessary.

Option B2: Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station

This combines Option A with an employment-led/mixed use redevelopment of the former Rugeley Power Station. The site would therefore generate less housing supply than Option B1. This option may not provide for the additional levels of housing growth alone (minimum of 1,900 dwellings) but can be considered alongside other options, if necessary.

Option C: Green Belt Urban Extensions

Option C1: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Rugeley/Brereton urban edges

This would include consideration of Green Belt urban extensions at Rugeley/Brereton, focusing additional housing growth towards that urban area. There are relatively fewer site options with less housing capacity to consider in order to meet the additional levels of housing growth (minimum of 1,900 dwellings) compared to the Cannock/Hednesford/Heath Hayes and Norton Canes areas. This does not allow for the testing of the Strategic Growth Study options which suggested exploring urban extensions in the southern part of the District. However, it reflects alternative site options which have been suggested to the Council. Site options within the District are focused around the southern and eastern edges of the urban area. This could also allow for testing of cross boundary/edge of settlement options with other local authorities. In line with the NPPF, first consideration to be given to 'land which has been previously-developed and/or is well-served by public transport'. Consideration would also need to be given to ways in which the 'impact of removing land from the Green Belt can be offset through



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compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. This option would also allow for infill developments within the village settlement boundaries, as per the current policy approach but would not extend the village boundaries with any new development.




Option C2: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges

This would include consideration of Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes, focusing additional housing growth towards those urban areas. There is relatively a greater number of site options with greater housing capacity to consider in order to meet the additional levels of housing growth (minimum of 1,900 dwellings) compared to the Rugeley/Brereton urban area. This allows for the testing of the Strategic Growth Study options which suggested exploring urban extensions in the southern part of the District. This includes the 'proportionate dispersal' option and the 'urban extension' option for an area North of Walsall, around Brownhills. Site options within the District are focused around the southern and eastern urban edges of Cannock/Hednesford/Heath Hayes and the western and south-east edges of Norton Canes. This could also allow for testing of cross boundary/edge of settlement options with other local authorities (Lichfield, South Staffordshire and Walsall). In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to ways in which the '*impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*' This option would also allow for infill developments within the village settlement boundaries, as per the current policy approach but would not extend the village boundaries with any new development.


Option C3: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions distributed across the District

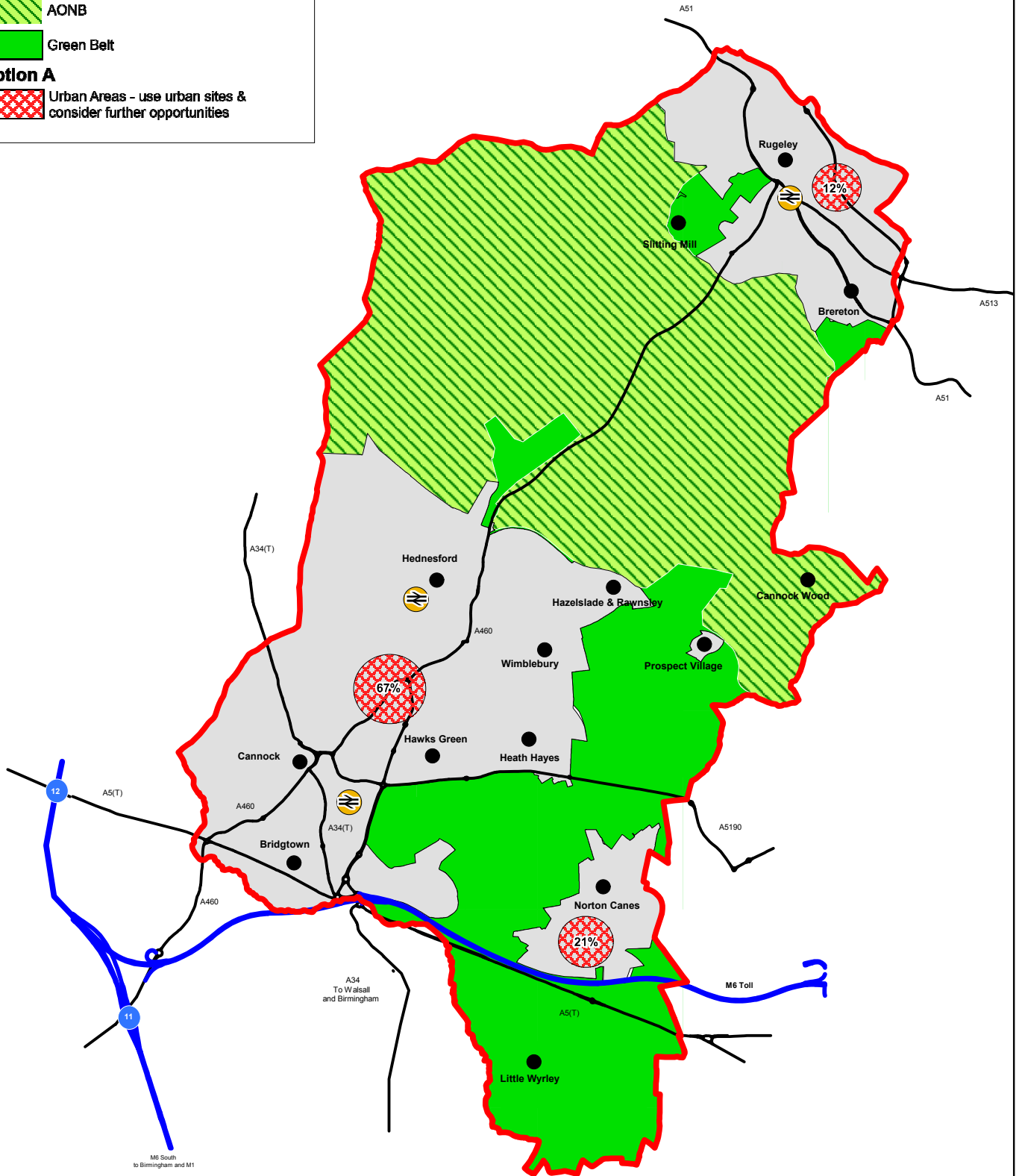
This would include testing all of the suggested urban extension site options across the District. This option could also consider the appropriateness of extending the current settlement boundaries of the Districts' villages (Cannock Wood, Hazelslade, Prospect Village and Slitting Mill) where sites beyond the current boundaries have been suggested. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to ways in which the '*impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*'

Key




-  Urban Areas
-  AONB
-  Green Belt

Option A


-  Urban Areas - use urban sites & consider further opportunities




Key

-  Urban Areas
-  AONB
-  Green Belt


Option A

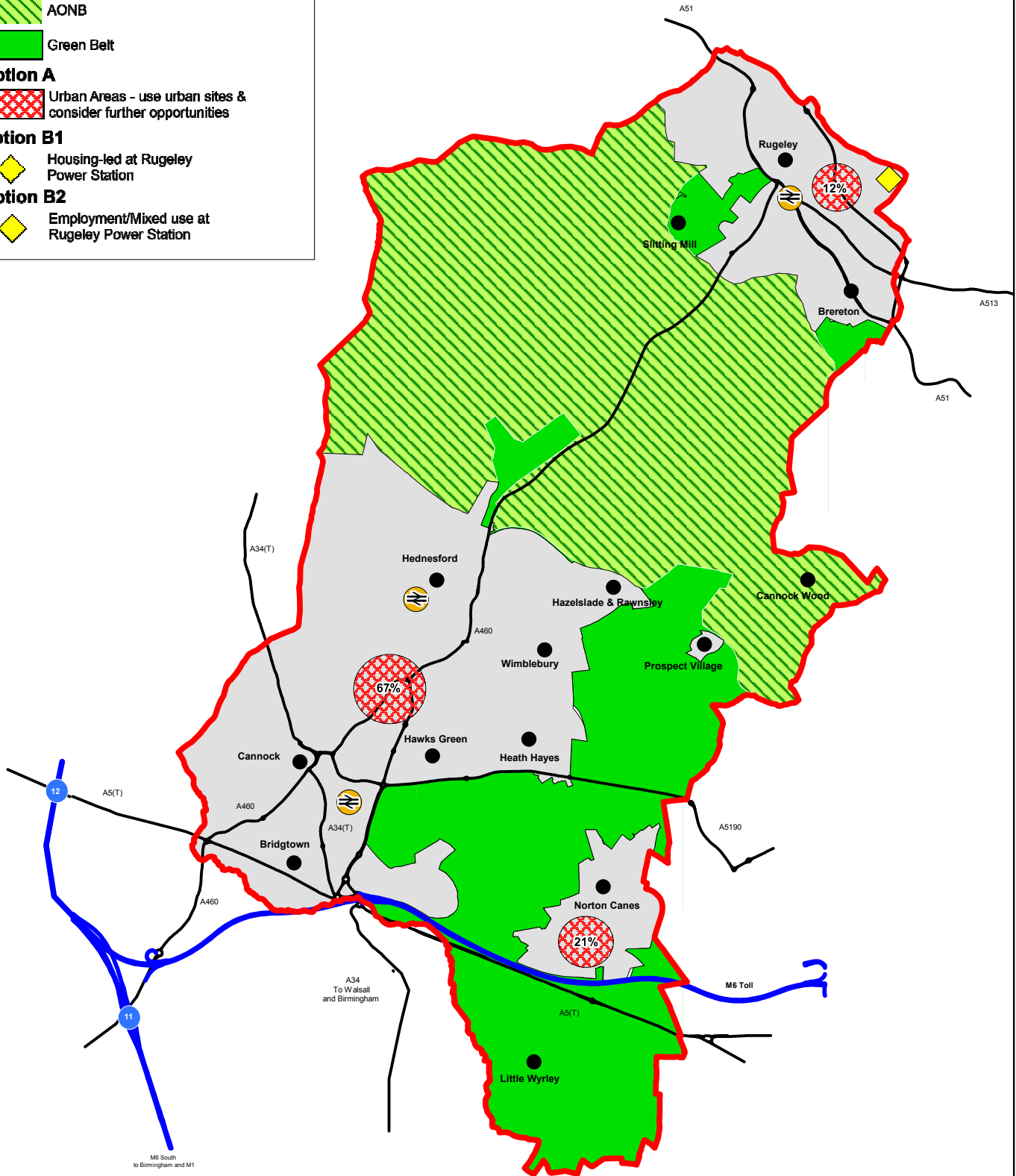
-  Urban Areas - use urban sites & consider further opportunities

Option B1

-  Housing-led at Rugeley Power Station




Option B2

-  Employment/Mixed use at Rugeley Power Station







Key

-  Urban Areas
-  AONB
-  Green Belt


Option A

-  Urban Areas - use urban sites & consider further opportunities


Option B1

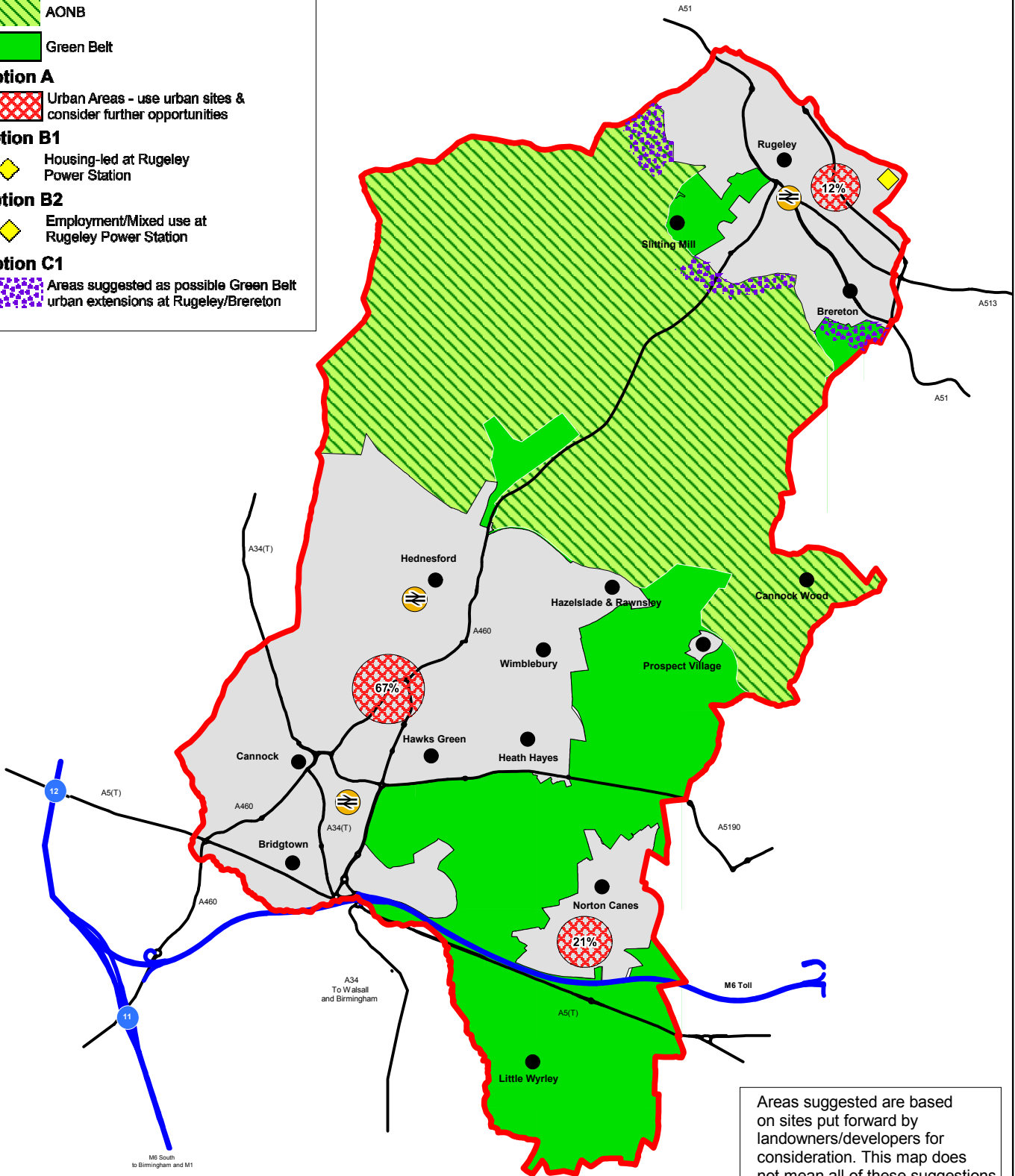
-  Housing-led at Rugeley Power Station

Option B2

-  Employment/Mixed use at Rugeley Power Station

Option C1




-  Areas suggested as possible Green Belt urban extensions at Rugeley/Brereton




Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.




Key

-  Urban Areas
-  AONB
-  Green Belt


Option A

-  Urban Areas - use urban sites & consider further opportunities


Option B1

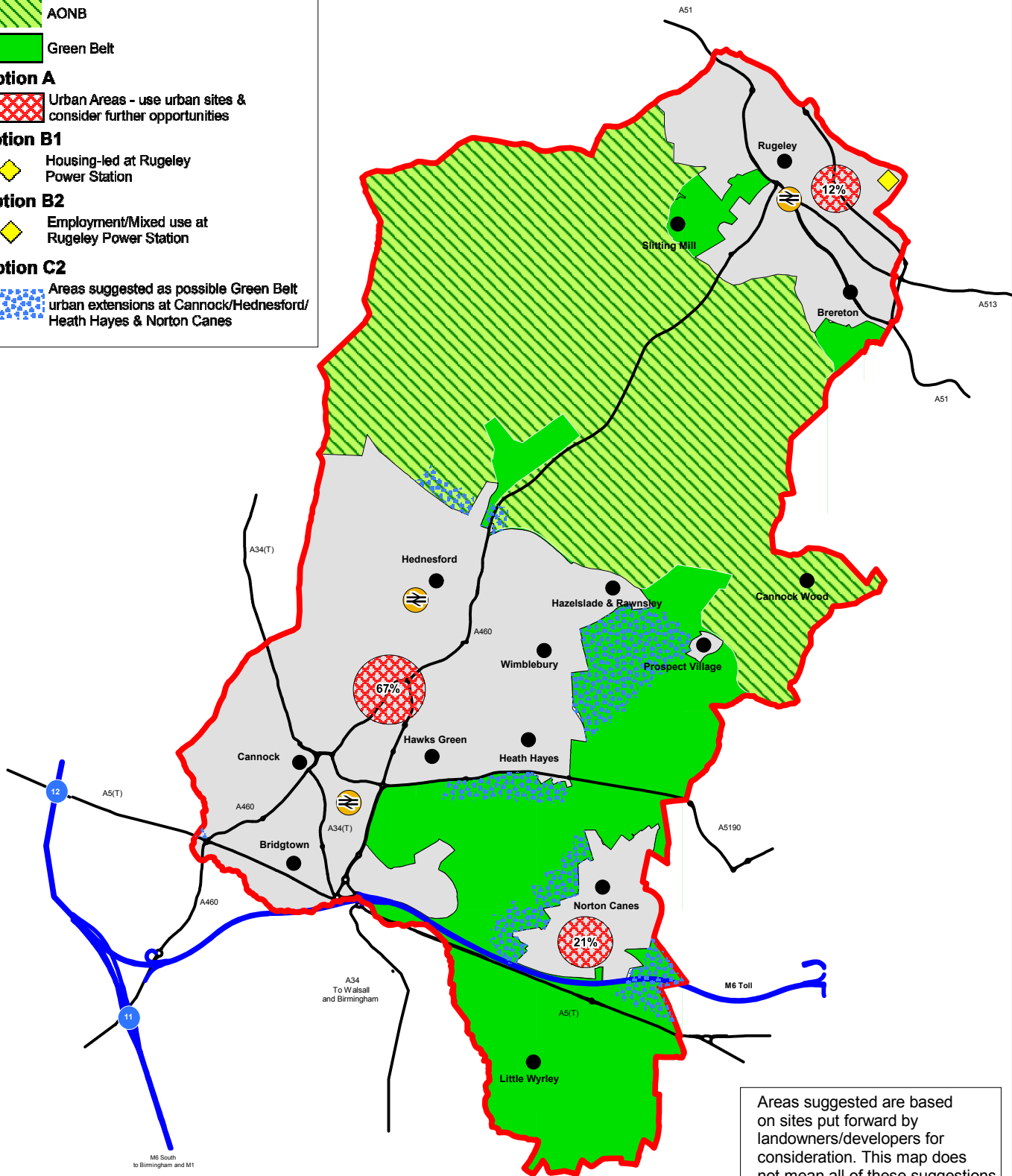
-  Housing-led at Rugeley Power Station

Option B2

-  Employment/Mixed use at Rugeley Power Station

Option C2




-  Areas suggested as possible Green Belt urban extensions at Cannock/Hednesford/Heath Hayes & Norton Canes




Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.




Key

-  Urban Areas
-  AONB
-  Green Belt


Option A

-  Urban Areas - use urban sites & consider further opportunities


Option B1

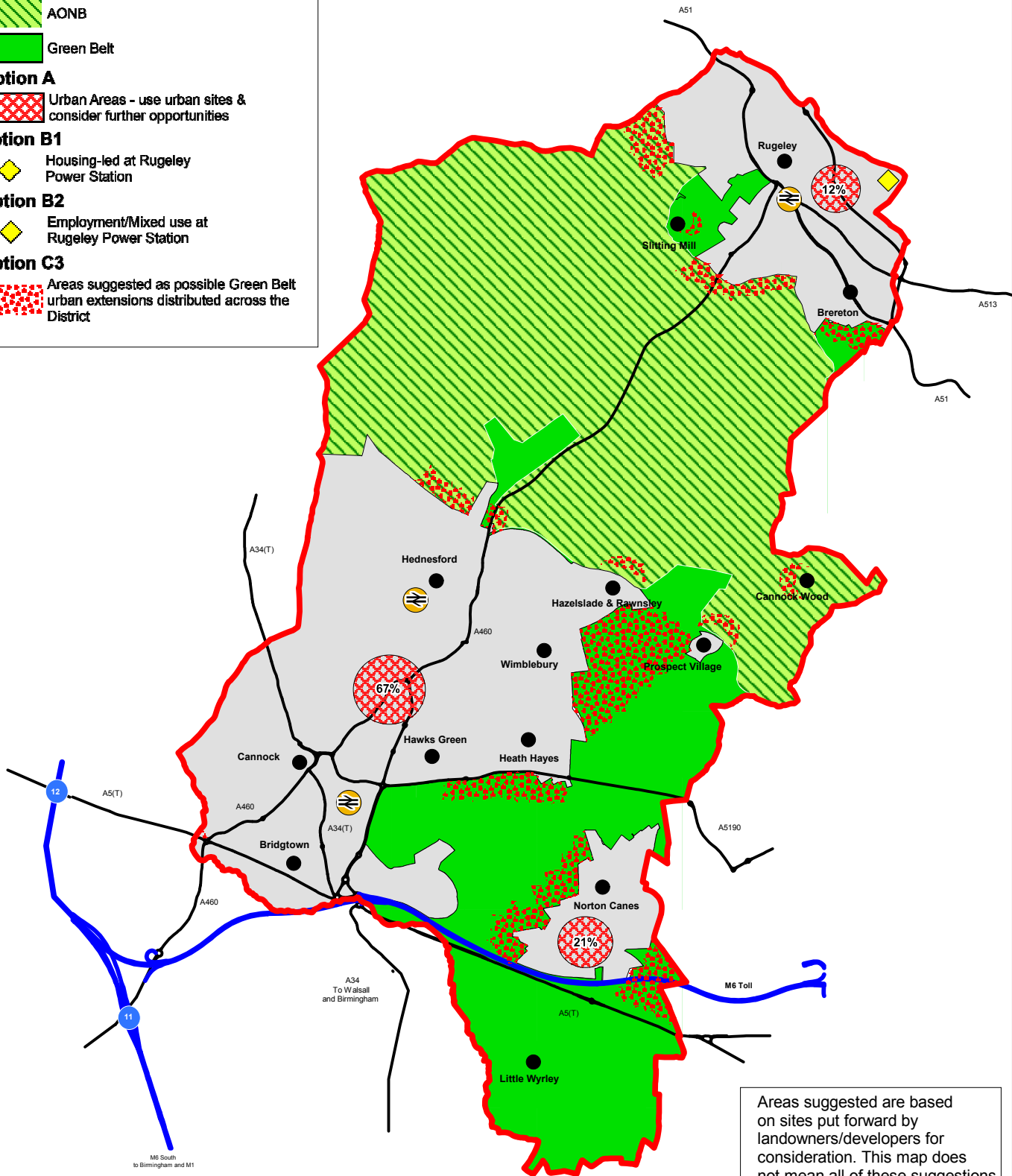
-  Housing-led at Rugeley Power Station

Option B2

-  Employment/Mixed use at Rugeley Power Station

Option C3

-  Areas suggested as possible Green Belt urban extensions distributed across the District



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.



Questions on Strategy for Meeting Overall Housing Growth Policy Options:

Question 17. Which combination of options do you support and why? Should any further options be considered?

Question 18. Are the current settlement boundaries for the District's villages appropriate? If not, how should they be amended and why?

Affordable Housing percentage requirements

National Policy

- 7.50 National policy sets out the requirement for planning policies to identify the level, size, type and tenure of homes required to meet the needs of those requiring affordable housing. Affordable housing contributions should only be sought on major developments i.e. sites of 10 or more dwellings, or with a site area of 0.5 hectares or more. In designated rural areas (including AONBs) consideration can be given to lowering the threshold to 5 dwellings. Provision should be on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified (NPPF, paras. 61-63). National guidance provides a methodology for assessing local affordable housing needs, drawing upon a range of data sources in order to inform specific policy requirements.
- 7.51 Updated national policy states local plans should set out the developer contributions expected from developments, including affordable housing. The contributions sought should not make developments unviable, therefore undermining the deliverability of the plan (NPPF, para. 34). National guidance provides detail on how to assess the viability of plan policies. It states that affordable housing requirements should be set as a single figure, rather than a range to provide certainty. Different requirements can be set for different sites, or types of development and the specific circumstances of strategic sites (those that are critical to delivery of the overall local plan) may need to be considered.

Local Policy

- 7.52 The current Local Plan (Part 1) Policy CP7 and the Developer Contributions and Housing Choices SPD (2015) require developments of 15 dwellings or more to provide 20% on-site affordable housing, with developments of 10-14 dwellings providing financial contributions towards off-site affordable housing provision (in exceptional cases, schemes of 15 dwellings or more may also make off site financial contributions). This approach has been informed by the feasibility of seeking on-site provision on sites of less than 15 dwellings. Registered Providers typically look to provide a minimum number of affordable houses on a site in order for a scheme to be feasible (this varies according to the provider and the local context). The set threshold of 15 dwellings for on site provision assumes that a minimum of 3 affordable dwellings on site is the typical number of units that



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a Registered Provider would consider acquiring. Below that minimum on-site provision of affordable housing may not be feasible.

Consultation feedback/other issues

- 7.53 The approach to updating the evidence base was generally supported. A number of responses suggested that a range of sites should be allocated to meet housing needs, including affordable, and some responses suggested larger sites provided the greatest opportunity for delivering a mix of housing. One respondent highlighted the need for viability assessments of sites to take into account cross boundary issues (Rugeley Power Ltd). One respondent referred to the issue of affordable housing in perpetuity and suggested that this should not be required in policy.
- 7.54 In terms of key issues, the current affordable housing percentage requirement is set on a District-wide basis as previous evidence did not identify any significant variations in affordable housing need or viability which would warrant different percentage requirements in different parts of the District. It is suggested this continues to be an appropriate approach given the District characteristics. The policy options suggested reflect the national policy and local issues context.
- 7.55 The policy updates will be supported by the updated Housing Needs Assessment, which identifies the overall levels of affordable housing needs within the District. The Council has updated its Housing Needs Assessment. This is available for comment as part of the Issues and Options consultation. A viability assessment of the affordable housing requirements (and other developer contributions) will be undertaken to inform the Preferred Options of the Local Plan Review. This will then determine the overall updated affordable housing requirement for the District. The viability assessment of the Local Plan will be undertaken in accordance with national policy and guidance. This suggests a 'typologies' based approach to assessing local plan viability e.g. assuming a series of 'typical' sites that are likely to come forward within the District such as small-sized greenfield developments or medium-sized brownfield developments.
- 7.56 The option for site specific affordable housing requirements is suggested to account for any site allocations which may not necessarily fit into one of these 'typologies' e.g. sites with more significant on-site infrastructure requirements (such as a school) or significant land remediation costs. It is also in line with national guidance on considering site specific circumstances of any strategic or large sites that are critical to the overall housing land supply for the local plan.
- 7.57 Whilst the AONB is technically a 'designated rural area' under the NPPF, the nature of the District means that much of the areas within the AONB are Green Belt and semi-rural (i.e. not remote from main urban areas). As outlined under 'Housing Mix' below, this has meant the District Council has not adopted a rural exceptions policy to date. Furthermore, the District is not entirely covered by the



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AONB as some local authorities elsewhere in the country may be. Given the availability of land for development outside of the AONB local housing needs, including affordable, have been met elsewhere in the District. This means a lower threshold of 5 dwellings within the AONB has not been applied to date. However, it is noted that some of the site options for future development within the District are within the AONB so the need for such a threshold will largely depend on the eventual preferred strategy for overall development (see 'Strategy for meeting overall housing growth'). Given this local context we would welcome views on whether it would be appropriate to set a lower affordable housing requirement threshold in line with the NPPF for developments within the AONB.

- 7.58 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 3: Provide for housing choice in terms of how we address affordable housing percentage requirements.

AFFORDABLE HOUSING PERCENTAGE REQUIREMENTS POLICY OPTIONS

Option A Amend strategic policy to reflect updated overall affordable housing needs (based on Housing Needs Assessment) including updated District-wide affordable housing percentage requirement. Require affordable housing provision from schemes of 10 dwellings or more (percentage subject to overall Local Plan viability assessment) with presumption this is to be on site, unless circumstances justify off site financial contributions. Continue to allow off-site financial contributions in lieu of on site provision in exceptional circumstances. Continue to require review of viability on large sites over 2 year period. Subject to Local Plan viability assessment results, consider the need for a continuation of current policy approach i.e. sites of 10-14 dwellings making off-site financial contributions.

This option would mean that the policy is updated to reflect new national policy and the most current local context. It would provide some flexibility for off site provision, where justified. It could take into account any minimum levels of feasible on site affordable housing provision as per the current policy approach, if necessary.

Option B: In combination with Option A, implement specific affordable housing requirements for large site allocations.

This option would consider the need for any site specific affordable housing requirements on large site allocations that differ from the District wide requirements. It would focus specifically on sites that may not fit with the general 'typologies' of sites covered by the Local Plan viability assessment e.g. sites with more significant infrastructure requirements, and/or those which are critical to the overall housing land supply. Would require site specific viability assessments.

Questions on Affordable Housing Percentage Requirements Policy Options:

Question 19. Which option, or combination of options do you support and why? Should any further options be considered?

Question 20. Do you have any comments on the Housing Needs Assessment for the District?



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Question 21. Are there any other options for securing affordable housing supply that we should be considering?

Question 21. Should the Council consider a lower threshold of 5 dwellings for seeking affordable housing contributions from schemes within the AONB, taking into account the local context?

Question 22. Should affordable housing requirements for schemes be set higher than the needs identified in the Housing Needs Assessment to off set no contributions from schemes under 10 dwellings?

Question 23. Is there a minimum level of feasible on site affordable housing provision that the Council should take into account as part of its evidence base work e.g. currently assumed to be 3 affordable dwellings on site?

Question 24. Previous consultation responses suggest that affordable housing should not be retained 'in perpetuity'. In what other ways could the Council secure the affordable housing supply within the District if an 'in perpetuity' requirement is not included within policy i.e. so that any recycled funding from the sale of affordable housing is spent on replacement/new affordable housing supply within the District?

Housing Mix (including affordable housing and specialist housing)

National Policy

- 7.59 National policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and then reflect these needs in planning policies (NPPF, para.61). It outlines that the needs of those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes should all be considered (and other groups, where necessary). National guidance provides information on how to assess the local housing needs (including affordable housing).
- 7.60 The national policy definition of affordable housing has recently been widened to incorporate a number of home ownership options. Four categories now exist consisting of: affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership. On major developments (10 dwellings or more) 10% of homes should be provided as affordable home ownership as part of the overall affordable requirement, unless local needs justify otherwise (NPPF, para. 64).
- 7.61 Local authorities can consider adopting optional standards related to specific elements of building design, including standards set out in Part M4 of the Building Regulations relating to accessibility, adaptability and wheelchair users. National policy confirms that local authorities should make use of the optional technical standards where this would address an identified need for such properties (see also discussion under Objective 1). Any additional standards need to be the



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subject of viability testing, alongside other policy requirements (NPPF, paras.34 and 127).

- 7.62 National policy encourages local authorities to support the development of entry-level exception sites which are those that are suitable for first time buyers and are not already allocated for housing. They must provide for affordable housing only and meet other criteria in terms of their location and scale (NPPF, para.71). Rural exception sites are also supported by national policy, where these respond to local circumstances. Such small sites must provide for those that have a local connection to the specific local community and are typically affordable housing-led (NPPF, para. 77).
- 7.63 The 'Independent Review of Build Out' (Oct 2018, also known as 'the Letwin Review')³⁹ was commissioned by the Government to consider how to close the significant gap between housing completions and the amount of land allocated or permissioned. It makes recommendations to boost the delivery rates of large housing sites in particular. This suggests that diversifying the housing mix on these sites would aid delivery and increase build out rates.

Local Policy

- 7.64 Local Plan (Part 1) Policy CP7 and the Developer Contributions and Housing Choices SPD (2015) set the current context for the local housing mix. Policy CP7 aims to achieve a balanced housing market by requiring new housing developments to provide for a mix of housing sizes, types and tenure which meet the needs and aspirations of the current and future population, informed by the Strategic Housing Market Assessment. Particular encouragement is given to increases in particular types of provision including smaller dwellings suited to younger people and larger 3 and 4 bedroom houses for aspirational needs. There is also specific support for meeting the needs of an ageing population via encouragement for new schemes catering specifically for this group and developments achieving 'lifetime homes' standards.
- 7.65 No specific proportions for any housing sizes, types and tenures are specified in the policy itself. The Developer Contributions and Housing Choices SPD (2015) provides further detail on the expectations for the affordable housing element of schemes including the Council's preferred tenure split and house sizes. This is still subject to site by site negotiation, where necessary.
- 7.66 There are no policies for rural exception or entry-level exception sites within the Local Plan (Part 1).

Consultation feedback/other issues

- 7.67 The approach to updating the evidence base was generally supported. It was suggested that the Council should consider not setting housing mix for individual

³⁹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf



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sites within a Local Plan policy. Some responses suggested policies direct to the latest available evidence on housing needs in order to inform the housing mix on new schemes. Some respondents suggested specific policies and/or site allocations were necessary to meet specific housing requirements, namely housing for older people. Responses outlined the need for specific evidence to support any additional policy requirements such as higher optional technical standards, including local needs and viability testing (issues arising in relation to cross boundary sites should be considered too). Some responses suggested larger sites offered the greatest opportunity for meeting housing mix needs. One respondent suggested locating housing for older people nearest to town centres or good transport links to access services. One respondent suggested more consideration needed to be given to the housing needs of rural or agricultural workers. One respondent suggested the importance of discounted housing should be recognised as part of the housing mix.

- 7.68 In terms of key issues, the local policy will be updated to reflect the most recent evidence on housing needs. The Council has updated its Housing Needs Assessment. This is available for comment as part of the Issues and Options consultation. A viability assessment of any housing mix policy requirements (and other developer contributions) will be undertaken to inform the Preferred Options of the Local Plan Review.
- 7.69 The current approach sets out the key District wide expectations of developments based upon evidence of local needs and viability. However, it then provides flexibility for site specific solutions (following negotiations between the Council and the developer). For instance, on smaller sites in particular it may not be feasible to provide for the range of local housing needs as a larger site could. The local context e.g. existing provision in the vicinity may also influence the optimum housing mix of the development site. However, the approach also does not guarantee that the housing mix required will be delivered e.g. by setting specific percentages.
- 7.70 The current policy does not include any reference to rural or entry level exception sites. There have been no such sites in the District delivered to date (or actively promoted by local communities). The Local Plan (Part 1) outlines that context of the Districts main villages and hamlets has not warranted any local policy coverage of these sites to date i.e. these settlements are primarily within semi-rural areas (which are not considered to be 'remote' from the main urban areas) and are largely covered by both Green Belt and/or AONB designations. Accessible, affordable housing provision can be provided for within the urban areas. In addition, in relation to entry level exception sites, the vast majority of the District's urban areas are built up to Green Belt and/or AONB designations which national policy identifies as constraints to the development of such sites.
- 7.71 As such no specific policy options are suggested at this stage in relation to this matter, but further views would be welcomed (however Option D below does consider the allocation of sites to meet a range of housing needs). There is no



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specific policy coverage related to rural/agricultural workers dwellings for similar reasons, and due to the fact that there is a very limited number of people employed in this sector in the District. Given that all the land outside the urban areas is designated Green Belt, the position in relation to any such schemes would be considered in line with the relevant national planning policy.

- 7.72 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 3: Provide for housing choice by delivering an appropriate housing mix.

HOUSING MIX POLICY OPTIONS

Option A: Continue with current policy approach of encouraging appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment.

Policy based on current evidence, with link to take into account any updated evidence (further detail could be elaborated in non-strategic policy to provide more detailed guidance e.g. Development Management Policy or SPD). Precise housing mix on individual sites would continue to be determined via negotiation. Developers to demonstrate how their proposed mix provides for the range of District housing needs on a site by site basis e.g. housing for older people: adopting additional technical standards or by the type of dwellings to be provided (such as bungalows). For example, policy may read: *'Affordable and market housing schemes should seek to provide for range of housing needs as evidenced in the local Housing Needs Assessment. Affordable housing- current evidence identifies the need for a higher proportion of x tenure and a lower proportion of x tenure. Of this there is a need for a higher proportion of x bedroom properties and lower proportion of x bedroom properties.'* This option would mean that the policy is updated to reflect new national policy and the most current local context.

Option B: Require specific percentages for mix of housing sizes, types and tenures for different groups in the community on individual sites, informed by the Housing Needs Assessment.

Precise housing mix to be set as a requirement for individual sites to comply with. Set within strategic policy and not non-strategic policy. This could include a percentage requirement of homes to be built to the optional higher technical standards and a percentage requirement for self build plots. Any requirements for specific groups would have to be justified by local evidence of needs. Would need to be tailored to reflect the ability of different schemes to deliver housing mix e.g. smaller sites will have less potential to deliver the whole range of required housing mix. For example, policy may read: *'Affordable and market housing schemes should seek to provide for range of housing needs as evidenced in the local Housing Needs Assessment. Affordable housing- the Council will require x% to be social rented and x% to be affordable home ownership. Of this x% should be 2 bedroom, x% should be 3 bedroom.'* This option would mean that the policy is updated to reflect new national policy and the most current local context.

Option C: In combination with Option A, require specific percentages for mix of housing sizes, types and tenures for different groups in the community on large site allocations only.

Precise housing mix to be set as a requirement for individual sites to comply with on large site allocations only. This could include a percentage requirement of homes to be built to the optional higher technical standards and a percentage requirement for self build plots. Any requirements for specific groups would have to be justified by local evidence of needs. This



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would reflect the ability of larger sites to accommodate a greater range of housing mix and could provide more certainty in providing for the housing mix needs in the District. This option would mean that the policy is updated to reflect new national policy and the most current local context.

Option D: In combination with other Options, allocate specific sites for different housing needs e.g. 100% affordable housing sites, sites for care homes, self build sites.

This could take into account any appropriate specific site criteria e.g. locating housing for older people nearer to town centres for accessibility of services.

Questions on Housing Mix Policy Options:

Question 25. Which option, or combination of options do you support and why? Should any further options be considered?

Question 26. Do you have any comments on the Housing Needs Assessment for the District?

Question 27. Should there be different approaches to the affordable housing tenure mix/bedroom mix and the market housing bedroom size mix i.e. affordable housing tenure percentage requirements specified in policy only? Should this be strategic or non-strategic policy?

Question 28. Should there be a separate policy for meeting the needs of an ageing population?

Question 29. Are there any sites that should be considered for specific housing needs allocations? Are there any site specific criteria that should be considered in allocating sites for meeting specific housing needs?

Question 30. Do you have any other comments on the suggested housing mix policies, taking account of recent Letwin Review and NPPF requirement for 10% affordable homeownership?

Question 31. Do you agree that the local context does not justify the need for further local policies on rural exception or entry level exception sites over and above existing national policy?

Question 32. Do you agree that the local context does not justify the need for further local policies on rural or agricultural workers dwellings, over and above national policy?

Gypsy, Traveller and Travelling Showpeople

National Policy

- 7.73 National policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and then reflect these needs in planning policies (NPPF, para.61). This includes the needs of travellers. There is a specific guidance on the definition of travellers and how to consider their needs within the national Planning Policy for Travellers (2015). The



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requirement within the Housing Act (1985, as amended) to assess the needs of caravan and boat dwellers is also relevant.

Local Policy

- 7.74 Local Plan (Part 1) Policy CP7 sets out the level of need for additional gypsy and traveller pitches and travelling showpeople plots within the District based upon an assessment produced in 2012. It identifies an 'area of search' for sites to meet the needs identified, which is located around the A5 corridor (mainly the part of the District which lies to the south of the Cannock/Lichfield Road). It was noted that this area is almost entirely covered by Green Belt land. However, the local context warranted the 'exceptional circumstances' to consider sites within this area i.e. the A5 corridor represents a main travelling route and the vast majority of the District's existing gypsy, travelling and travelling showpeople sites are located within the area already. The policy sets out a number of criteria for assessing the suitability of sites. The allocation of sites was to be considered via the Local Plan (Part 2). The Design SPD (2015) provides guidance on the design and layout of new gypsy and traveller sites.

Consultation feedback/other issues

- 7.75 One respondent outlined that the needs assessment should take into account the updated definition of travellers and should also assess needs for caravan & houseboat accommodation. There is likely to be a considerable overlap between the accommodation required for Gypsies and Travellers who meet the definition, and those who fall outside it; sites should be allocated as suitable for both groups of travellers. The response suggested that appropriate sites outside the current area of search should be considered and that policies should require the provision of pitches through the largest housing development sites. The response outlined that much of the demand from Gypsies & Travellers is for small, extended family sites (up to 5 or 6 pitches). One response suggested that additional provision should not be met simply by increasing the size of existing sites, but by increasing the number of sites themselves. This response also suggested that sites should generally be small (five to ten pitches) and, where possible occupied by one extended family group. This response highlighted the issue of transit sites. It stated that these should be provided but not situated near existing Gypsy and Traveller sites. Stafford Borough Council stated they were not in a position to assist with any unmet needs.
- 7.76 In terms of key issues, the Local Plan Review will need to reflect the updated evidence on needs for new pitches and plots within the District. The updated Gypsy, Travelling and Travelling Showpeople Accommodation Assessment is available for comment alongside the Issues and Options consultation. The Local Plan Review will need to take forward the work that had been undertaken on the consideration of site allocations via the Local Plan (Part 2).



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- 7.77 The previous Issues and Scope consultation highlighted the difficulties the Council had faced to date in allocating sites to meet the needs identified. There still remains a significant issue with identifying land available for gypsy, travelling and travelling showpeople accommodation, particularly when landowners are seeking to promote potentially higher land value options on their sites e.g. housing and employment uses. As part of the options for meeting needs, if the allocation of sites remains problematic going forward the Local Plan could consider setting out specific policies for determining planning applications for such developments which reflect the local context (taking forward and adding to the existing Policy CP7 criteria, as appropriate). However, the degree to which this will actually secure new accommodation is less certain. Monitoring indicates that there have been very few planning applications for such uses in recent years, which is perhaps reflective of the difficulties the local community is also facing in identifying sites for additional accommodation.
- 7.78 In line with the Local Plan (Part 1) adopted policy, the search for sites has predominately been focused upon areas of Green Belt land to date (and particularly given that many available sites within the urban areas are also being developed and/or promoted for alternative uses, such as housing). As with the housing growth strategy issues, national Green Belt policy makes clear that before we release Green Belt land we must demonstrate that the local plan makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development; and has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. However, it is recognised that there is pressure upon sites within the urban areas for alternative uses (namely housing and employment) and that a number of neighbouring local authorities have already stated that they would be unable to help meet such needs (as they too are either unable to meet their own current needs or have an existing need of their own to meet which already requires Green Belt site options to be considered).
- 7.79 The policy options on how to meet accommodation needs reflect the consultation comments received and the work that has been progressed to date on identifying appropriate sites.

GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE HOUSING NEEDS POLICY OPTIONS

Option A: Seek to provide for the needs identified in the updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment within the District via a criteria-based approach to determining planning applications- do not allocate specific sites via the Local Plan.

This option would mean that the policy is updated to reflect new national policy and the most current local context. This could reflect some of the existing criteria for new sites within current Local Plan (Part 1) Policy CP7.



Local Plan Policy Options

Objective 3: Provide for Housing Choice

Option B: Seek to provide for the needs identified in the updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment within the District via the allocating of sites within current 'Area of Search' identified in Local Plan (Part 1) (an area currently designated as Green Belt land in the main). Work with neighbouring authorities to identify any opportunities for meeting needs.

This option would mean that the policy is updated to reflect new national policy and the most current local context. This could utilise some of the existing criteria for new sites within current Local Plan (Part 1) Policy CP7 for identifying suitable allocations. It would involve considering new sites and any feasible extensions to existing gypsy, traveller and travelling showpeople sites. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to ways in which the '*impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*.' Some neighbouring local authorities have also identified exporting their needs to other local authorities as a potential option.

Option C: Seek to provide for the needs identified in the updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment within the District via the allocating of sites and expanding the current 'Area of Search' to a District wide search for sites (still likely to include consideration of Green Belt sites). Work with neighbouring authorities to identify any opportunities for meeting needs.

This option would mean that the policy is updated to reflect new national policy and the most current local context. This could utilise some of the existing criteria for new sites within current Local Plan (Part 1) Policy CP7 for identifying suitable allocations. It would involve considering new sites and any feasible extensions to existing gypsy, traveller and travelling showpeople sites. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to ways in which the '*impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*.' Some neighbouring local authorities have also identified exporting their needs to other local authorities as a potential option.

Option D: In combination with other Options, require new large housing sites to provide for gypsy, traveller and travelling showpeople accommodation needs.

This could be required as part of the planning application or Local Plan site allocations processes.

Questions on Gypsy, Traveller and Travelling Showpeople Housing Needs Policy Options:

Question 33. Do you have any comments on the Gypsy, Traveller and Travelling Showpeople Assessment for the District?

Question 34. Do you have any comments on how sites could be secured for gypsy, traveller and travelling showpeople accommodation given the difficulties faced to date e.g. is there a need to consider the provision of public sites?



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

Issues and Options for delivering Objective 4: Encourage a Vibrant and Local Economy and Workforce

Overall Employment Land Needs and Strategy

National Policy

- 8.1 Local Plans must contain strategic policies that make sufficient provision for employment development within the area and set out an overall strategy for that development (NPPF, para.20). Strategic policies should address the strategic priorities of the area, and any relevant cross boundary issues. Under the duty to cooperate, local authorities and other prescribed bodies must cooperate with each other on strategic matters that cross local authority boundaries (NPPF, para. 21 and 24).
- 8.2 National policy overall sets out a framework for sustainable development, which local plans must ensure is delivered (NPPF, Chapter 2). The three key objectives of sustainable development overall (economic, social and environmental objectives) must therefore underpin any strategy for development within the District. This includes considering matters such as appropriate levels of infrastructure provision to support future growth and the protection and enhancement of built and natural environmental assets.
- 8.3 Planning policies should give significant weight to the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development (NPPF, para. 80). Planning policies should set out a clear economic vision and strategy which encourages sustainable economic growth; set criteria, or identify strategic sites, to match the strategy; seek to address potential barriers to investment, such as inadequate infrastructure; and be flexible enough to accommodate needs not anticipated in the plan (NPPF, para. 81). Within this, the specific locational requirements of different sectors should be taken into account, such as making provision for storage and distribution operations in suitably accessible locations (NPPF, para. 82). National policy also provides support for enabling the rural economy to prosper; accounting for specific issues in rural contexts e.g. the retention and development of key local services (NPPF, paras. 83-84).
- 8.4 National guidance provides detail on the methodologies to be used for assessing employment growth and land requirements for the plan period. There is no standard methodology for assessing employment needs (unlike housing needs).
- 8.5 National policy highlights the importance of supporting high quality communications, including high quality digital infrastructure (NPPF, Chapter 10).
- 8.6 Updated national policy emphasises the need for planning policies to promote an effective use of land. This includes making as much use as possible of brownfield land opportunities. An effective use of land can be promoted by



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

achieving higher densities; promoting the development of under-utilised land and buildings; considering the reallocation of land uses e.g. employment to housing (NPPF, Chapter 11). Whilst there is an emphasis upon meeting housing needs within this Chapter, the needs of other land uses are referenced. In addition, the implications of potentially using existing employment land to meeting housing needs have to be considered in the context of the overall economic strategy (NPPF, para.121).

- 8.7 This effective use of land also relates to the updated national policy approach for Green Belt land. Before concluding that Green Belt boundary changes are justified (by exceptional circumstances) local authorities must demonstrate they have examined all other reasonable options for delivering development. This includes making as much use of brownfield and under-utilised land; considered increased densities of developments; and undertaken discussions with neighbouring authorities on whether or not they could accommodate additional development (NPPF, para. 137). Where Green Belt land release is justified, first priority should be given to brownfield sites and/or those that are well-served by public transport. Measures to off set the impact of the Green Belt release such as improvements to the environment and accessibility of the remaining Green Belt should also be considered (NPPF, para. 138).
- 8.8 Given the District context, national policy in relation to Areas of Outstanding Natural Beauty (AONBs) is also relevant to considering the development strategy. National policy gives great weight to the conservation and enhancement of AONBs. It states that the scale and extent of development within these designated areas should be limited; major development should not be allowed unless there are exceptional circumstances and where development is in the public interest (NPPF, para. 172). The scope for meeting development needs elsewhere i.e. outside of the AONB needs to be fully assessed (NPPF, para.172).

Local Policy

- 8.9 Local Plan (Part 1) Policy CP1, CP8 and CP9 provide the current policy context for supporting economic growth within the District. Policy CP1 and CP8 set out the overall strategy for meeting employment land requirements and the amount of employment land that is required. The current strategy focuses development, investment and regeneration mainly on the built up, urban areas, conserving and enhancing the landscape of the AONB, Hednesford Hills, Green Belt and the Green Infrastructure of the District. Employment growth is directed towards the main existing urban areas (Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes) in a proportionate manner relative to their existing sizes, but with a focus upon the high quality employment sites of Kingswood Lakeside (Cannock) and Towers Business Park (Rugeley/Brereton) which are capable of accommodating priority sectors for growth within the District.



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

- 8.10 Policy CP9 provides further support for delivering the overall economic vision for the District setting out key sectors that are important for continued regeneration. Support is provided for proposals that increase access to local employment opportunities, such as skills initiatives and improved broadband connectivity. Support is also provided to the visitor economy.
- 8.11 Other local issues are also reflected within the policies, including existing employment sites within the Green Belt and out of town office developments. A criteria-based approach is used to determine whether or not existing employment sites should be redeveloped for other uses. The Design SPD provides further guidance on improvements to existing employment areas, including those within the Green Belt. The Rugeley Power Station SPD provides detailed guidance on the development of this large site.

Consultation feedback/other issues

- 8.12 There was general support for the evidence base updates with some further recommendations on how assessment was carried out and how the wider policy context was taken into account.
- 8.13 In relation to the overall strategy, there was some support for considering Green Belt sites and some support for the continued approach of retaining Green Belt and AONB boundaries. Some responses referred to specific sites suggesting they were appropriate for meeting future employment development needs. In relation to the former Rugeley Power Station, the landowner (Rugeley Power Ltd) stated there was a need to consider the employment generating potential of non-B class uses too. The response also outlined that the site should be considered for housing-led regeneration, not employment-led and that a specific level of employment land should not be allocated on the site; a more flexible approach should be taken that allows a range of employment uses. One respondent suggested the timescale for the delivery of any employment land at the Rugeley Power Station needed to be considered carefully (i.e. if it would be within the plan period). One respondent highlighted the Green Belt Review scorings that related to the employment site options previously considered and suggested these should be used to determine the most appropriate future employment land allocations.
- 8.14 There was support for extending existing employment sites rather than developing wholly new sites in terms of infrastructure benefits. There was support for allocating employment sites to ensure they are not lost to residential development in the future. However, other respondents stated the potential for redeveloping unviable/lower quality employment for other uses should be considered.



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

- 8.15 Issues related to Heavy Goods Vehicles/lorry parking were highlighted by some responses (this issue is addressed under Objective 5 'Sustainable Transport'). Some responses stated there was a need for a balance between jobs and homes in the District. Some statutory consultees highlighted the need for key issues to be considered in the selection of employment sites, including highways matters and the protection of natural assets. One response highlighted greater reference could be made to the M54/M6/M6 Toll link road and its potential to support local economic growth.
- 8.16 In terms of key issues to consider, the current local plan policies will need to be updated to reflect the overall levels of employment land required in the District for the plan period and the most appropriate strategy for delivering that growth. Updated employment land requirements for the Local Plan Review will be informed by the updated Economic Development Needs Assessment. This is available for comment alongside the Issues and Options consultation. It takes into account the wider context, such as the strategies of the economic partnerships covering the District. An assessment of the Districts existing employment areas and an updated land availability assessment (ELAA) will be produced to inform the Preferred Options Stage of the Local Plan.
- 8.17 The overall quantum of employment land development required for the plan period will inform the strategy for delivering that growth. This strategy could require a combination of protecting key existing employment locations from redevelopment for other uses as well as the provision of new, additional employment land. Employment land delivers a mix of use classes, particularly B1 office, research and design and light industrial uses; B2 Industrial and B8 logistics and distribution uses and these can have specific locational requirements e.g. access to the strategic highway network is of particular importance to the distribution sector. Therefore the type of employment land required to deliver the Districts economic growth will also influence the strategy and selection of the most appropriate site options for employment developments.
- 8.18 The strategy for employment land within the District will need to have regard to the wider context too and any medium-longer term factors that may influence it e.g. the recently announced M6/M54/M6 Toll link (see Objective 5) and the Strategic Rail Freight Interchange (known as West Midlands Interchange) proposal within South Staffordshire District (north of Four Ashes industrial estate) which was submitted directly to the Secretary of State in August 2018 (however as the planning application is unlikely to be determined before 2020 the implications of this will not be clear until late in the plan-making process).
- 8.19 The Council needs to consider how the local context influences the choice of policy options for the employment growth strategy. Given that all land outside of our existing urban areas is Green Belt (approximately 60% of the District overall)



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

with a significant proportion of this also being designated as an Area of Outstanding Natural Beauty, the sequential approach set out in national policy for considering the release of Green Belt land needs to be considered i.e. other options have been exhausted. A similar approach is required in relation to any development sites within the AONB. In addition, the national policy requirements to maximise the use of under-used and particularly brownfield land influences the approach to be taken.

- 8.20 The Council undertakes its annual assessment of employment land availability (Employment Land Availability Assessment- ELAA) to identify the amount of employment land expected, or available to be developed to meet local plan requirements.
- 8.21 The most recent assessment (August 2018) identifies that there is around 25hectares of land available for employment development, split across the District as follows:

AREA	PROPORTION OF CAPACITY (AND QUANTITY) (UP TO 2028)
Cannock, Hednesford and Heath Hayes	72% (18ha)
Rugeley and Brereton	16% (4ha)
Norton Canes	12% (3ha)

- 8.22 This demonstrates that there is existing urban capacity to help employment development needs going forward. However, it should be noted that the latest assessment (ELAA) does identify some potential for a reduction in this supply with sites at Norton Canes and Rugeley potentially being considered for other uses more recently. So this 25ha is treated as a maximum at present. As noted above, the suitability of these sites for meeting the employment land requirements of the District will also need to be considered via an updated land availability assessment (ELAA) in 2019, taking account of the Economic Development Needs Assessment findings.
- 8.23 The vast majority of the suggested site options for additional new employment land (over and above the existing urban capacity of 25 hectares) lie within the Green Belt. As set out above, the national policy approach requires the Council to consider a sequential approach to the release of Green Belt land for development. To justify Green Belt release the Council must demonstrate that the local plan:
- makes as much use as possible of suitable brownfield sites and underutilised land;



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

- optimises the density of development, with significant uplift to be considered in town centres and other locations well served by public transport;
- has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

8.24 As a result, the Council will need to explore any opportunities for non-Green Belt site options both within the District and outside the District (in neighbouring authorities) before being able to justify the release of Green Belt sites within Cannock Chase District.

8.25 However, in relation these issues it is noted that there are already potential pressures upon the existing employment land supply within the District in terms of helping to meet housing needs. Given the wider housing market shortfall, there will be pressure to utilise additional land for housing needs. In relation to the potential for neighbouring authorities to accommodate needs, South Staffordshire Council has recently identified a potential oversupply of employment land within their District (as part of their Issues and Options consultation 2018) and that they shared a 'functional economic market area' with Cannock Chase, Dudley, Walsall and Wolverhampton. However, it was noted that the Black Country authorities have recently identified a significant potential gap in their employment land supply (the Black Country Local Plan Review Issues and Options suggested this was around 400hectares taking into account land supply available within the Black Country only). Further work is being undertaken on this to establish what the eventual 'gap' may be and implications for neighbouring authorities, particularly South Staffordshire District. Cannock Chase District's neighbouring authorities are also Green Belt constrained (particularly the areas of those authorities that adjoin Cannock Chase District). Therefore whilst the need for any Green Belt land release within the District would need to be clearly justified and confirmed via further discussions with the District's neighbouring authorities, this wider current context is recognised.

8.26 In relation to additional urban capacity one key potential source of further land supply is the former Rugeley Power Station (a large brownfield site, outside of the Green Belt). It offers a key opportunity for helping to meet the future development needs of the District on non-Green Belt land. As detailed under the section on the housing growth strategy, the landowners of the site (Rugeley Power Ltd) outline that a housing-led scheme should be promoted. The results of a recent 'community planning event' in December 2018 gave an indicative masterplan which suggested a mix of high-medium density housing, employment and live/work units, a primary school, sports pitches and retained battery storage facility on the part of the site within Cannock Chase District (but with no figures on quantity of development).



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

- 8.27 The Rugeley Power Station Supplementary Planning Document (SPD) adopted 2018 sets out an indicative vision for the redevelopment of the site, produced jointly with Lichfield District Council. This currently identifies the part of the site within Cannock Chase District as appropriate for employment-led redevelopment. This is therefore also reflected within the policy options (and reflects consultation comments received regarding the future use of the site, as outlined above).
- 8.28 Clearly, the quantum of employment land that can be delivered on the former Rugeley Power Station site will inform the need for additional employment land sites within the District.
- 8.29 **These options for additional urban capacity including the former Rugeley Power Station will be fully explored before any consideration of Green Belt sites for meeting employment land needs (alongside discussions with neighbouring authorities for meeting needs on non-Green Belt sites). If there is a need for further land to deliver sustainable employment growth within the District then the development options for urban capacity and Rugeley Power Station will need to be considered in combination with options for the development of Green Belt sites.**
- 8.30 As per national planning policy, where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. All of the suggested site options for new employment land within the Green Belt are largely Greenfield (with those that contain elements of brownfield land not being well-served by public transport). Therefore the policy options reflect the prioritisation of well-established employment areas in closest proximity to existing public transport links i.e. Kingswood Lakeside is in closest proximity to existing bus routes, Cannock train station and cycleways. The options also reflect the potential for enhanced links by focusing development at existing employment locations.
- 8.31 The policy options for Green Belt sites reflect the nature of site submissions received to date and consultation comments to the Local Plan Issues and Scope. These are mainly focused around the north/east of Kingswood Lakeside; north and south of the A5 corridor (around Churchbridge, Watling Street Business Park, Norton Canes, and Little Wyrley); south east of Brereton; and Cannock Wood. It is noted that not all of the employment land site options suggested to date are necessarily for purely B class employment land uses (i.e. some represent leisure uses) and this too will have to be taken into consideration in the site selection process.
- 8.32 In relation to all of the policy options for development, the Council will need to demonstrate that the employment sites identified are realistic prospects for future



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

development i.e. they will require more detailed assessment covering a range of issues including landownership and landowner intentions; viability of the development; any key constraints such as physical problems, environmental designations and impacts of the developments. The site selection methodology provides further detail on how sites will be assessed and this process will help inform the preferred spatial strategy.

- 8.33 It is noted at this stage that there are relatively fewer site options for employment land developments across the District. If site options are discounted as inappropriate for employment development a result of the site selection process (and overall employment land needs cannot then be met) there may be a need to consider what alternative sites could be made available within the District (such as mixed use housing/employment sites drawing upon the site options for housing developments, as set out under Objective 3).
- 8.34 In terms of safeguarded land and 'reserve sites' issues, these are discussed further under 'Other Policy Considerations' paragraph 13.14 – 13.19.
- 8.35 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 4: Encourage a vibrant local economy and workforce, in terms of meeting overall employment needs.

STRATEGY FOR MEETING OVERALL EMPLOYMENT NEEDS POLICY OPTIONS

Option A: Urban areas- use sites already identified for employment developments within the urban areas and explore opportunities for further supply on urban sites.

Plan to meet employment land needs identified for the District, taking into account the wider functional economic market area. There is around 25ha of employment land to be developed within the existing urban areas. To provide any additional employment land supply required this option would include identifying additional urban sites from sources such as redeveloped employment land (to generate higher density of development) or open spaces. This could involve reassessing sites that are not considered appropriate for development at present and seeking to identify additional sites that are not currently being considered for employment development. Need to consider balance between losses of other uses to employment land.

Option B: Rugeley Power Station

Option B1: Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station

Plan to meet employment land needs identified for the District, taking into account the wider functional economic market area. To provide any additional employment land supply required over the current 25ha urban supply, in combination with Option A seek to deliver employment led redevelopment of the former Rugeley Power Station site. This option will depend upon the housing strategy in terms of the redevelopment of the former Rugeley Power Station.

Option B2: Urban Areas and housing-led redevelopment of former Rugeley Power Station

This option means no employment land provision at the former Rugeley Power Station. This option will depend upon the housing strategy in terms of the redevelopment of the former Rugeley Power Station. As the Green Belt site options (see Option C) are primarily located in the south of the District, this could mean no further employment developments at Rugeley/Brereton other than those identified under Option A.



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

Option C: Green Belt sites




Option C1: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt sites. Prioritise extensions to Kingswood Lakeside followed by extensions to other existing employment sites.

Plan to meet employment land needs identified for the District, taking into account the wider functional economic market area. To provide any additional employment land supply required over the current 25ha urban supply, in combination with other options consider Green Belt sites. This option would mean considering areas of Green Belt around Kingswood Lakeside and other existing employment areas, such as Watling Business Park. Site options at Kingswood Lakeside would be prioritised followed by site options for extensions to other employment sites and then any stand alone employment site options would be considered lastly (i.e. those that are not connected to an existing employment site). The current site extent of Kingswood Lakeside lies outside of the Green Belt. Some other existing employment areas, such as Watling Street Business Park, lie within the Green Belt. Site options at these locations would therefore need to consider if the removal of the whole existing employment site from the Green Belt was necessary, not just the suggested extension. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to ways in which the '*impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*.'


Option C2: In combination with the options for the Urban Areas and former Rugeley Power Station consider all Green Belt site options across the District with no prioritisation to Kingswood Lakeside.

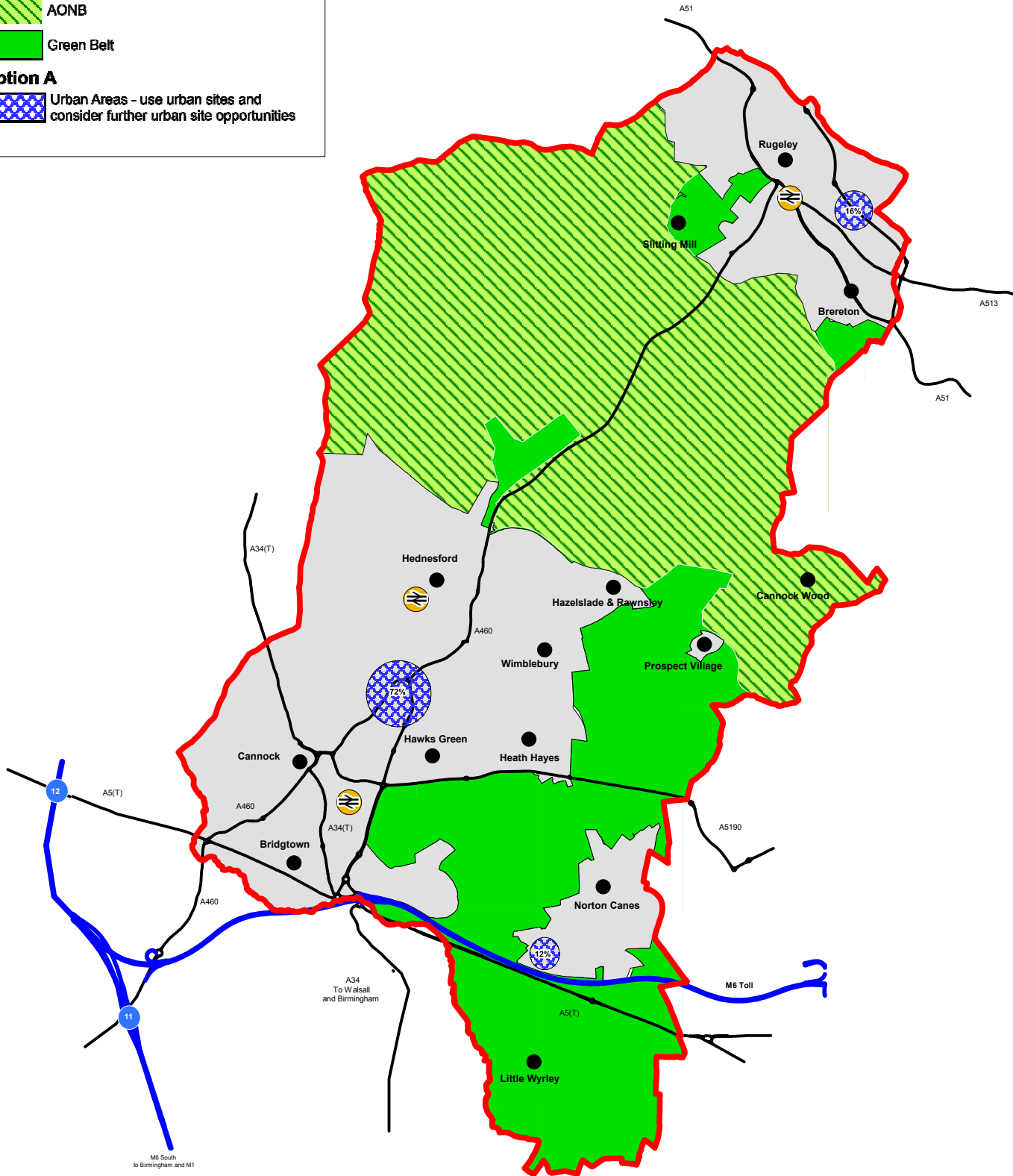
As Option C1, but with no prioritisation given to Green Belt site options at Kingswood Lakeside at this stage. Would still need to consider NPPF principles of first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to ways in which the '*impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*.'

Key




-  Urban Areas
-  AONB
-  Green Belt

Option A


-  Urban Areas - use urban sites and consider further urban site opportunities




Key

-  Urban Areas
-  AONB
-  Green Belt


Option A

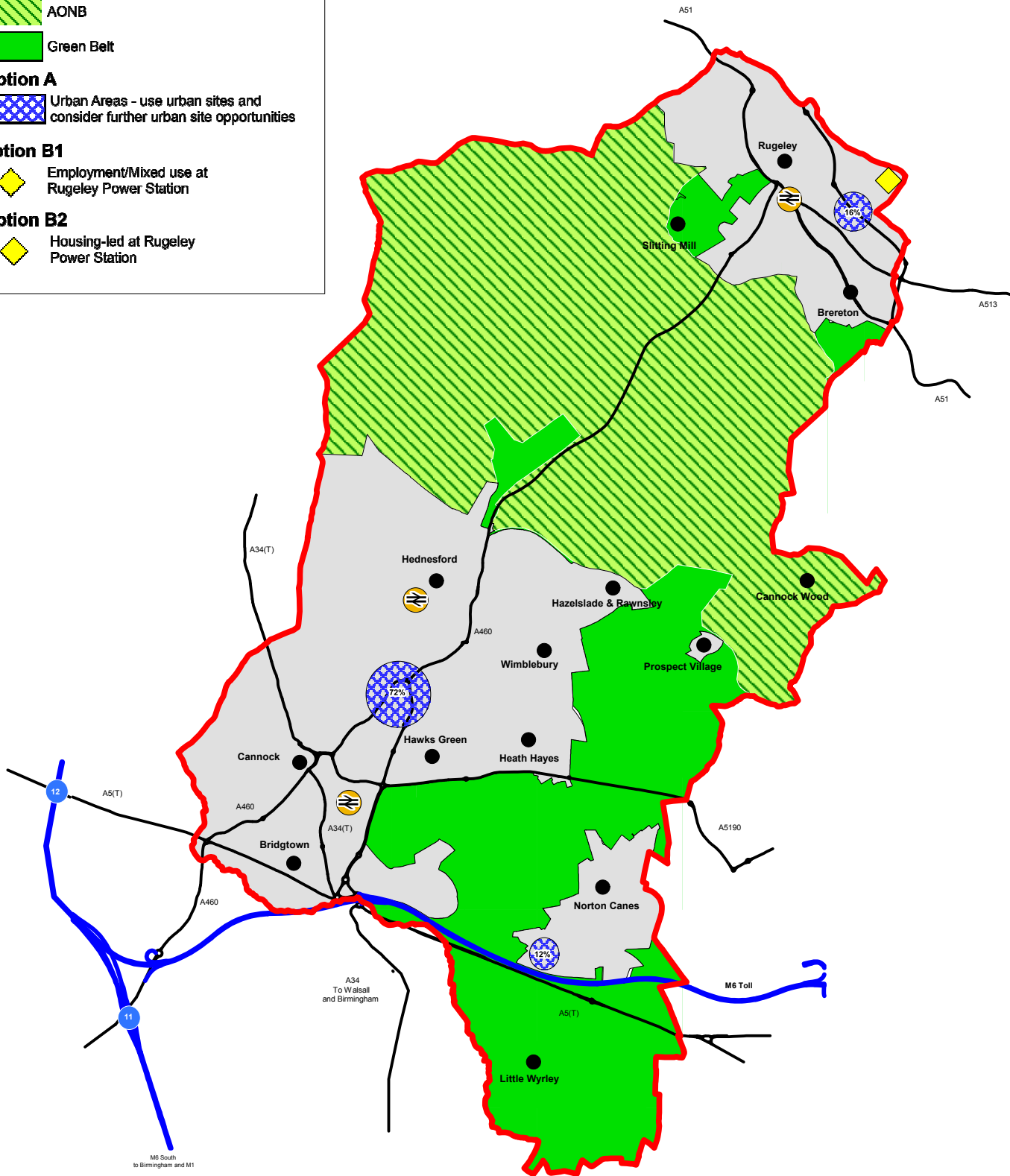
-  Urban Areas - use urban sites and consider further urban site opportunities

Option B1

-  Employment/Mixed use at Rugeley Power Station

Option B2

-  Housing-led at Rugeley Power Station





Key

 Urban Areas

 AONB

 Green Belt

Option A

 Urban Areas - use urban sites and consider further urban site opportunities

Option B1

 Employment/Mixed use at Rugeley Power Station

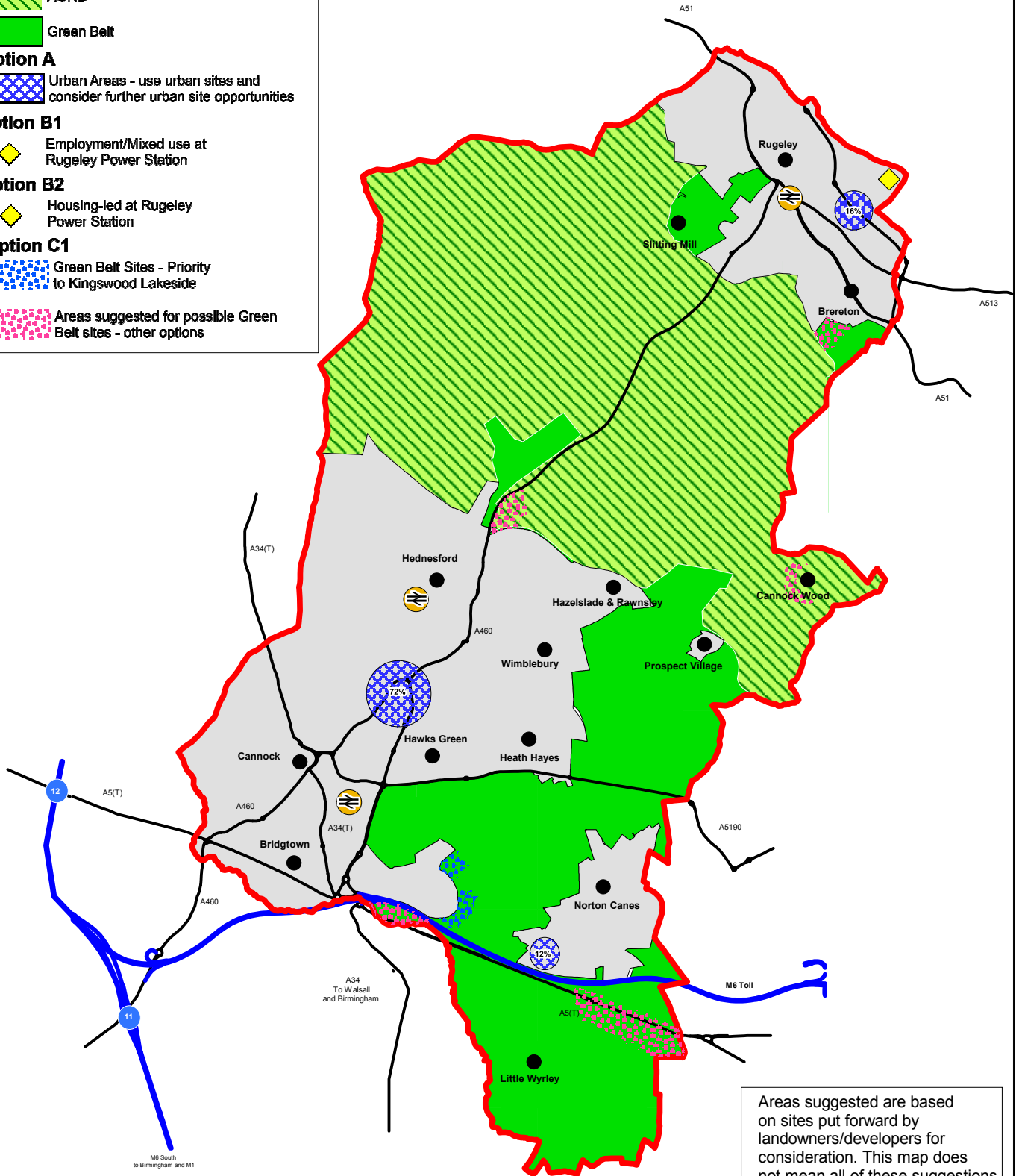
Option B2

 Housing-led at Rugeley Power Station

Option C1

 Green Belt Sites - Priority to Kingswood Lakeside

 Areas suggested for possible Green Belt sites - other options



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.

Key

-  Urban Areas
-  AONB
-  Green Belt

Option A

-  Urban Areas - use urban sites and consider further urban site opportunities


Option B1

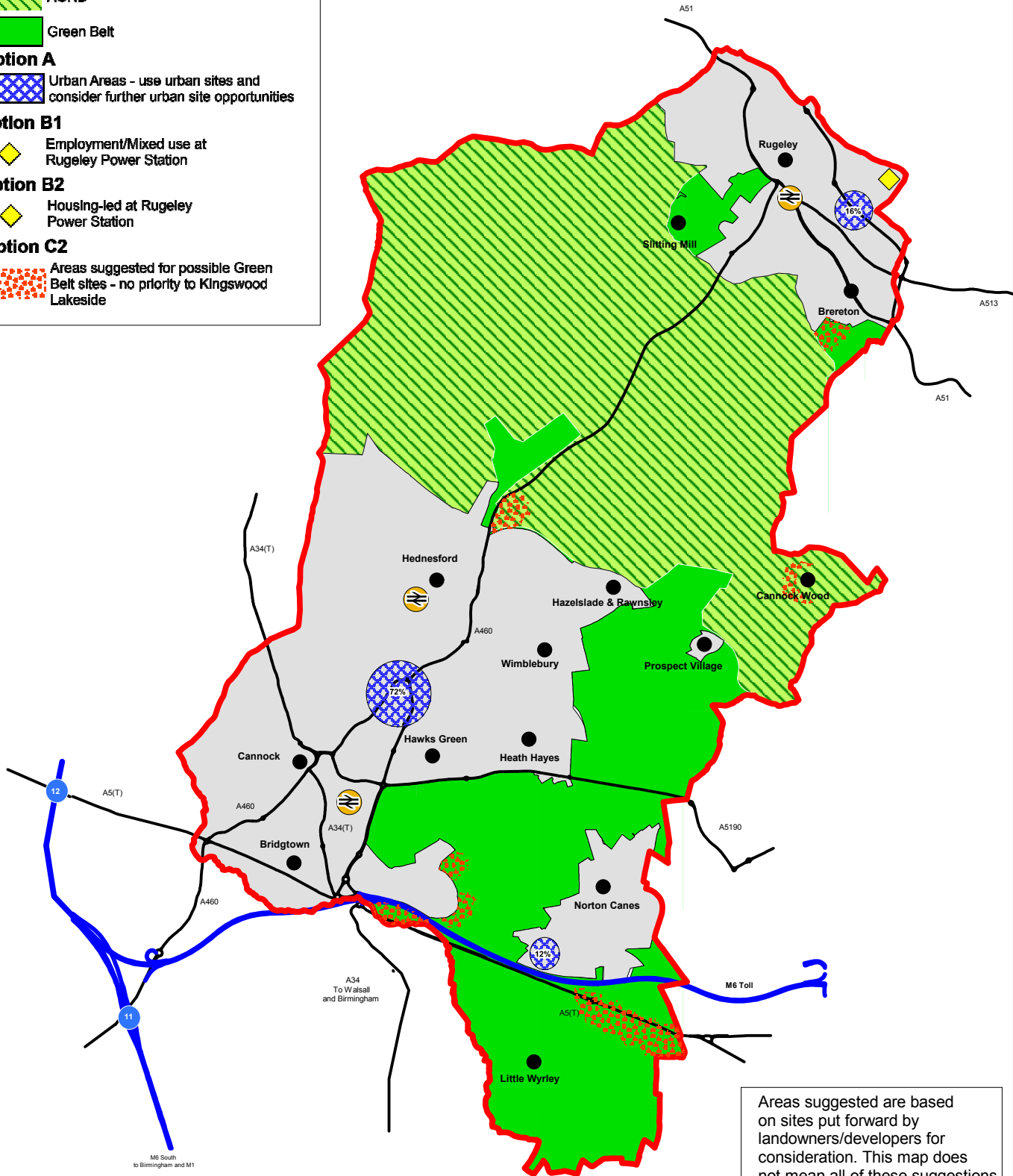
-  Employment/Mixed use at Rugeley Power Station

Option B2

-  Housing-led at Rugeley Power Station

Option C2

-  Areas suggested for possible Green Belt sites - no priority to Kingswood Lakeside



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

OTHER EMPLOYMENT LAND POLICY OPTIONS

Option A: Alongside preferred option for District wide strategy, continue with criteria based policy to loss of employment sites. Continue support for redevelopment of existing sites in the Green Belt and continue to specify criteria for considering out of town office developments, reflecting local circumstances.

This would continue the site-by-site approach to considering the loss of any employment areas to non-employment uses. The approach would provide local elaboration to national policy in terms of existing employment sites in the Green Belt and out of town office developments.

Option B: Alongside preferred option for District wide strategy, allocate existing employment areas to be protected and do not allocate those that have potential for reallocation for any protection. Continue support for redevelopment of existing sites in the Green Belt and continue to specify criteria for considering out of town office developments, reflecting local circumstances.

This would go beyond the current local plan policy criteria based approach. It could provide further certainty but could also reduce flexibility over the plan period. The approach would provide local elaboration to national policy in terms of existing employment sites in the Green Belt and out of town office developments.

Questions on Strategy for Meeting Overall Employment Needs Policy Options:

Question 35. Which combination of options do you support and why? Should any further options be considered?

Question 36. Do you have any comments on the levels and types of employment land needs identified in the Economic Development Needs Assessment for the District?

Question 37. Should employment sites be allocated for specific B classes uses, or just a broad B class uses? If the former, which sites should be allocated for specific uses?

Question 38. Are there any further employment land development sites that should be considered for assessment?

Economy and skills

National Policy

- 8.36 As outlined above under 'employment land needs and strategy', national policy places great emphasis upon local plans setting out and delivery an economic vision for the area.
- 8.37 In addition to this, national policy highlights the importance of supporting high quality communications, including high quality digital infrastructure (NPPF, Chapter 10).



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

Local Policy

- 8.38 As outlined above under 'employment land needs and strategy', Local Plan (Part 1) Policy CP8 and CP9 currently set out the District's economic vision and strategy. These policies will need to be reviewed to reflect updated evidence on economic development needs.

Consultation feedback/other issues

- 8.39 Responses in relation to the current Policy CP9 focused mainly upon the issues related to the restoration of the Hatherton Branch Canal. This is addressed under Objective 2, 'Create healthy living opportunities across the District'. One response outlined the need for the role of the agricultural, food and rural based businesses within the District to be reflected in updated policy. Further guidance on agricultural or horticultural developments within the District could be provided. Some responses referenced the need for town centre regeneration (specifically Rugeley in one response) and local jobs for local people. One response highlighted that an extension to Watling Street Business Park could provide quality, market specific provision to meet needs.
- 8.40 As set out in the Issues and Scope consultation, there remain key economic issues to address within the District, particularly related to improving skills and related job opportunities. There are a number of economic-related strategies that the Local Plan needs take into account as part of its own economic vision and strategy for the District. This includes, for example, the emerging Local Industrial Strategy (being jointly produced by the West Midlands Combined Authority and relevant Local Enterprise Partnerships). Local strategies, such as the Council's Corporate Plan provide a steer on the economic priorities for the District. The overarching themes of these locally relevant strategies are reflected in the overall Local Plan draft 'Vision'.
- 8.41 It is therefore considered appropriate to address such issues via an updated local plan policy. The updated Local Plan policy will reflect the findings of the Economic Development Needs Assessment in terms of identifying those sectors that remain important, or need further support, for delivering the economic growth of the District (having regard to the wider economic policy context as outlined above). This policy update will address the range of different sectors within the District, from manufacturing to the visitor economy, linking into related policies where necessary (e.g. retail policies).
- 8.42 The policy options to be considered reflect a broad continuation of the current approach or a strengthening of the approach to require developers to submit more detailed information on how their proposals contribute to the overall economic priorities of the District. For example, in recent years large scale developments (such as schemes at Kingswood Lakeside and the designer outlet



Local Plan Policy Options

Objective 4: Encourage a Vibrant Local Economy and Workforce

village at Mill Green) have been asked to provide 'Employment and Skills Plans' which can require measures such as apprenticeships; formal links to school and colleges courses or recruitment via local employment agencies.

ECONOMY AND SKILLS POLICY OPTIONS

Option A: Update current Local Plan Policy CP9 in order to ensure the Local Plan continues to set out a clear economic vision for the District.

This would update the current Local Plan (Part 1) Policy CP9 to reflect current national and local policy and evidence on the local economy and skills. Would continue to provide overview of which sectors of the local economy are particularly important to retain and which need to be further developed and/or supported (linking to the employment land strategy). It would continue to reflect key local issues, such as the improvement of skill levels. It would continue to encourage developments to demonstrate how they are helping to address key issues identified (but with no specific requirements) e.g. retain current references to considering sustainable transport links and improved ICT services favourably as part of development schemes.

Option B: In combination with Option A, set out specific requirements from developments.

In addition to Option A, this option could consider ways in which the Council would require developers to demonstrate new development schemes are addressing the economic issues identified e.g. requiring Employment and Skills Plans, procuring locally sourced materials, or demonstrating connectivity to full fibre broadband, for example. Consider applying requirements to all developments, or setting a threshold (see question below).

Questions on Economy and Skills Policy Options:

Question 39. Do you have any comments on what the policy focus should be in terms of sectors that need to be supported to deliver the overall economic vision and growth for the District?

Question 40. If the policy was to set out specific requirements from new developments should these be required from all developments, or only those above a certain threshold e.g. major developments only (10 dwellings or 1,000m² floorspace)?

Question 41. What other requirements would help assist deliver the economic growth and vision for the District?



Local Plan Policy Options

Objective 5: Encourage Sustainable Transport Infrastructure

Issues and Options for delivering Objective 5: Sustainable Transport Infrastructure

National Policy

- 9.1 Chapter 9 of the National Planning Policy Framework sets the context for promoting sustainable transport. Paragraph 102 states that transport issues should be considered at the earliest stages of plan making to address impacts of development; maximise opportunities from transport infrastructure and changing technology; promote walking, cycling and public transport use; take account of the environmental impacts and mitigate for adverse effects / achieve net environmental gains accordingly; ensure patterns of movement, streets, parking etc. are integral to the design of schemes and contribute to making high quality places.
- 9.2 NPPF Paragraph 103 states that the planning system should actively manage patterns of growth in support of these objectives. Development locations *'should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes'*.
- 9.3 In terms of issues of particular relevance to Cannock Chase district, NPPF Paragraph 104 states that planning policies should: *'support an appropriate mix of uses across an area and within larger scale sites to minimise number / length of journeys; be prepared with the active involvement of highways authorities and other transport infrastructure providers; identify and protect critical sites and routes where there is robust evidence; provide for high quality walking and cycling networks'*
- 9.4 The NPPF does not insist that parking standards must be set but states (in paragraph 106) that if this option is pursued then they should take into account the accessibility of the development, its type, mix and use; the availability of / opportunities for public transport; local car ownership levels and the need to ensure an adequate provision of spaces for charging plug – in and other ultra low-emission vehicles.
- 9.5 NPPF Paragraph 107 states that the importance of overnight lorry parking facilities needs to be recognised and that *'proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use'*.

Local Policy

- 9.6 Policy CP10: Sustainable Transport sets out a commitment to work with bus and rail operators, Staffordshire County Council, the West Midlands Integrated Transport Authority, the Local Enterprise Partnerships, local transport bodies and developers to help develop and promote sustainable transport modes that provide realistic alternatives to the car, which help address climate change



Local Plan Policy Options

Objective 5: Encourage Sustainable Transport Infrastructure

targets and which reduce air pollution. It sets out approaches to developer contributions, with a link to the Developer Contributions SPD, to ensure that sustainable transport matters are addressed.

- 9.7 The policy is split into different sections, covering buses, rail, roads, walking, cycling, taxi ranks and car parking / servicing.

Consultation feedback/other issues

- 9.8 It was commented that policy wording and the Infrastructure Delivery Plan needs to be updated to reflect current developments and partnerships, including the need to assess the impact of development on the strategic road network and the potential to use the Midlands Region Transport Model (to be discussed with Highways England). Transport for West Midlands (TfWM) sets out details of rail policy and how this applies locally, which would need to be included in the local plan (e.g. electrification, redevelopment of Cannock station, improvements to Rugeley and Hednesford Town stations, improvements and connections at Rugeley Trent Valley, promotion of the extension to Chase Line services beyond Rugeley Trent Valley post HS2, promotion of improved bus and rail integration between stations, promotion of initiatives to develop rail freight especially to support the mid Cannock site as a multi modal freight terminal). TfWM also references the West Midlands Stations Alliance and its remit, including Cannock station as one of the master planning pilots. Finally, TfWM references a new link road between the M6 / M54 and M6 Toll to support economic growth and improve traffic flow in the area.
- 9.9 The Road Haulage Association highlights the importance of reliable and consistent journey times and the need for lorry parking facilities. It also points out the importance of air quality policies and the need for these to take account of the movement of goods.
- 9.10 Other responses highlighted the need for improvements to stations including better services (e.g. late evening trains) and the need for disabled access at the Rugeley stations. Some expressed concern about the decline in bus service provision / public transport generally with some areas having no provision at all, and the need for more investment including developer contributions. The reference to Active Travel was welcomed, and opportunities for developing sustainable travel networks in relation to canals were set out.
- 9.11 Concerns were also cited about cuts in bus services and lack of late trains from Birmingham to Rugeley as these stop at Hednesford.
- 9.12 Others had commented previously that servicing and access standards needed to be included in the Local Plan to ensure that these were factored in at the outset of any relevant planning application. It had also been commented that the role of the canal network should feature in transport policy.



Local Plan Policy Options

Objective 5: Encourage Sustainable Transport Infrastructure

Road

- 9.13 In terms of the issues which will need to be addressed in the new plan, it should be noted that the A5/M6T/A460/A34 Churchbridge junction only has a design life to 2020. This will need improvement to resolve existing and future congestion. In September 2018, Highways England confirmed its preferred route for a link road from the M54 to the M6/M6 Toll although the preferred route is not a direct link and will terminate at M6 Junction 11. Discussions with Highways England and other stakeholders will need to be ongoing as the plan progresses, to assess the impacts of cumulative development across different local authorities on the strategic road network and any mitigation which would be required. It is clear further evidence will be needed in this regard. This will include any impacts arising in South Staffordshire resulting from the West Midlands Interchange (Strategic Rail Freight Interchange).
- 9.14 Further, more localised evidence will also be needed depending on which options are progressed, for example it is known that Five Ways Island in Heath Hayes is already restricted in capacity.
- 9.15 Traffic movements and congestion are particularly concerning in the south of the district as highlighted above, and further work will need to be undertaken also taking into account impacts on air quality given that there are designated Air Quality Management Areas (AQMAs) along the A5 corridor and at Five Ways Island (air quality is addressed in more detail under Objective 2 (create healthy living opportunities)). It is important that traffic issues and congestion are also addressed in terms of ensuring the district can realise its ambitions of economic prosperity, and encouraging inward investment / ensuring reliable and consistent journey times.
- 9.16 Parking (including lorry parking) will also need detailed consideration, noting that the current parking SPD is out of date and that the NPPF provides updated context with any introduction of standards needing to be clearly evidenced and justified. The need to support overnight lorry parks will also need to be considered. Parking is an issue also picked up under Objectives 1 (Promote Pride in attractive, safe local communities) and 6 (Create attractive town centres). Furthermore, with declining bus services (see below) there may well be a rise in taxi usage for which parking will need to be considered.
- 9.17 Linked to parking matters, the plan will need to support electric charging points. Currently there are only two Council charging points at Hednesford Park. A limited number of facilities are available at hotels in CCDC. Tesco have announced in December, they are to provide charging points at 600 stores and have three stores in the District. Other retail stores are likely to follow. However this is an issue which the plan will need to address.



Local Plan Policy Options

Objective 5: Encourage Sustainable Transport Infrastructure

Rail

- 9.18 Now that the £100m electrification and linespeed upgrade to the Chase Line has been completed (but due to be in operation in May 2019), there is need to recognise the regeneration benefits and implications. Electrification schemes are followed by the 'sparks effect,' which lead to increases demand for rail travel, station parking, increased property values and increased demand for commuter housing.
- 9.19 Improvements to Cannock Station are being pursued with the progression of Mill Green Designer Outlet Village being the catalyst for this. The electrified rail service will increase the attractiveness and patronage of services with the introduction of faster, longer trains, not only to Birmingham but also new direct services to the NEC/Airport and London. Options to upgrade Hednesford station, building on the successful 'Heart of Hednesford' community initiative and Rugeley Town station, including parking facilities and CCTV, need to be pursued.

Bus Services

- 9.20 Bus services nationally are declining at 2-4% nationally. Staffordshire County Council reduced their bus support budget to £1.3m from 1 April 2018 which has led to the reduction in evening and weekend services. There are no longer any bus services in the District on Sundays. 96% of bus services in the District are operated on a commercial basis.
- 9.21 Cannock Chase council is jointly working with TfWM to introduce the Swift bus travelcard initiative, in early 2019. It is hoped this will make bus travel more attractive and assist in reversing the decline. Swift readers will be introduced at five locations in Cannock, Hednesford and Rugeley, funded by this Council. Once implemented, TfWM assume responsibility for subsequent management.
- 9.22 Bus access to key employment sites remains an issue. Bus services to Kingswood Lakeside, Cannock and i54 employment sites at Cannock have now been withdrawn.

Walking & Cycling

- 9.23 A coherent strategy to promote and develop a network of pedestrian and cycling routes is needed and the Cannock Chase Integrated Transport Strategy will need to be updated, taking this issue into account.



Local Plan Policy Options

Objective 5: Encourage Sustainable Transport Infrastructure

SUSTAINABLE TRANSPORT POLICY OPTIONS

Option A: Update existing Policy CP10 to ensure the most up to date situation is reflected, retaining the current sub-themes (Rail, Roads, Walking, Cycling, Taxi Ranks and Servicing) and adding in strategic references to opportunities from canals / the canal network (including towpaths), lorry parking and electric vehicle charging for example

This option may need to be considered in combination with other options (below) to ensure full compliance with the NPPF. Furthermore, Policy CP10 stated that local parking and servicing standards would be addressed in Local Plan Part 2 and given that work on Part 2 ceased in order to enable a full Local Plan review to progress, there is still a gap needing to be considered.

Option B: As per Option A but with the addition of standards for parking, access and servicing, lorry parking and electric vehicle charging set in Local Plan Policy

This option would ensure that expectations are clearly set out in policy and would have clear links to delivering the updated NPPF and ensuring the policy is fit for the future given the anticipated ban on new diesel /petrol vehicles by 2040. As standards are considered to be local rather than strategic issues they would need to be included as Development Management Policy. Including standards in the Local Plan would enable more detail to be assessed in terms of viability, the requirements for which have been increased at the plan making stage.

Option C: As per Option A but with standards for parking, access and servicing, lorry parking and electric vehicle charging being set in a supplementary planning document

This option would require a 'hook' in Local Plan policy to make clear that an SPD is required. By including detailed standards in SPD rather than in the Local Plan itself this would provide more flexibility to update requirements especially given the fast pace of technological change.

Questions on Sustainable Transport Policy Options:

Question 42. Which combination of options do you prefer and why?

Question 43. Are there any other options we should be considering and if so, what should these be?



Local Plan Policy Options

Objective 6: Create Attractive Town Centres

Issues and Options for delivering Objective 6: Create Attractive Town Centres

National Policy

- 10.1 The NPPF Chapter 7 sets out national policy for ensuring the vitality of town centres including the need to define a network and hierarchy of town centres to allow them to grow and diversify; to define their extent (including primary shopping areas); to allocate suitable sites to meet development needs; to consider edge of centre sites should suitable locations not be forthcoming within town centres, and to recognise the role residential development can play in ensuring the vitality of centres.
- 10.2 National Planning Practice Guidance provides further elaboration. It states that *'Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work. Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.'*
- 10.3 The NPPF defines town centre uses in Annex 2, and in order to add detail to the 'town centre first' approach sets out the sequential test for dealing with town centre uses being proposed beyond town centre boundaries (either through local plans or through planning applications), looking first at edge of centre (also defined in the annex) and then beyond the edge of centre. For town centre uses that, via the sequential test, demonstrably cannot be located in town centres the NPPF then makes provision for an Impact Test to be applied to ensure they do not have 'likely significant adverse impacts'. The national default threshold for this is development of over 2,500 square metres (gross); however subject to evidence the NPPF makes provision to allow for local thresholds to be set.
- 10.4 The PPG states that a *'positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a Local Plan, including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other government departments and the sector may be useful in producing such a strategy.'*



Local Plan Policy Options

Objective 6: Create Attractive Town Centres

- 10.5 The PPG then goes on to elaborate what such a strategy should contain. This includes the role, function and hierarchy of town centres over the plan period; a vision for each town centre; an appropriate mix of uses; whether the centre can accommodate the scale of assessed need and options for dealing with this; timeframes for providing new retail floorspace; complementary strategies and consideration of parking provision, charges and enforcement. Strategies should also *'manage decline positively' and should 'take account of relevant market signals....and should keep their retail land allocations under regular review'*.
- 10.6 The role of tourism is also included in this section of the NPPF stating that Local Plans should consider the specific needs of the tourism industry including location or sectoral requirements, engage with representatives of the tourism industry, examine the broader social, economic and environmental impacts of tourism, analyse opportunities for tourism to support local services and enhance the local environment and have regards to non-planning government guidance.

Local Policy

- 10.7 Current adopted local policy sets out the approach to town centres in Local Plan (Part 1) Policy CP11: Centres Hierarchy (And Area Action Plans)
- 10.8 This policy sets out a hierarchy and sets policy accordingly for the different centres across the District. The main centre is Cannock, which is designated as the strategic town centre for the district, with the next tier being the town centres of Rugeley and then Hednesford, followed by the District Centre at Hawks Green and then the Local Centres at Norton Canes, Heath Hayes, Chadsmoor, Bridgtown, Fernwood Drive and Brereton.
- 10.9 The policy sets out appropriate growth levels for town centre uses (retail and office) based on evidence used at the time, and details the need to take a sequential approach for town centre uses in their local context including retail, office, commercial, leisure and cultural facilities to ensure that regeneration of town centres is not undermined by town centre uses being located out-of-town.
- 10.10 The policy sets out a clear approach to the regeneration of town centres. For Rugeley Town Centre an Area Action Plan is referenced and incorporated into the Local Plan (Part 1). This sets out more local detail, defining a Primary Retail area and identifying a range of Opportunity Sites within the town centre boundary. For Cannock, the policy states that development within the town centre will be guided by a Supplementary Planning Document or Area Action Plan.
- 10.11 For the other centres, the approach for Hednesford is focused upon local regeneration and maximising appropriate tourism as a gateway to the Cannock Chase AONB. The role of Hawks Green as a District Centre is to provide shops, services and community facilities to serve local communities. The Local Centres'



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role is to provide small scale shops, services and community facilities: the policy aims to protect and enhance these and to support the creation of new local centres where appropriate to serve the needs of existing and new communities.

Consultation feedback/other issues

- 10.12 Generally the current centres hierarchy was felt to be appropriate although it is clear that the evidence base needs to be updated to ensure that the plan is informed by up to date guidance. The role of Area Action Plans needs to be considered further in terms of whether the Council's current approach remains appropriate or whether any alternative mechanisms would be more appropriate to articulate and implement a strategy or series of strategies for the district's town centres to accord with the NPPF and its guidance. This includes the need for further elaboration and evidence in relation to tourism.
- 10.13 The introduction of a lower threshold for triggering an Impact test needs further consideration as the current (2015) evidence base shows a clear justification for lower thresholds in the district's centres (as set out in the Issues and Scope consultation paper): this would need to be tested through an updated evidence base.
- 10.14 Further consideration also needs to be given to the inclusion of standards in local plan policy which could add more detail to the national framework.
- 10.15 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 6: Create attractive town centres.

TOWN CENTRES HIERARCHY OPTIONS

Option A: Retain the existing centres hierarchy as set out in Policy CP11 with some minor updates to wording ensure the policy is up to date, and set clear town centre boundaries and development quanta where appropriate based on updated evidence base

The evidence base was produced in 2015 and will be updated shortly to ensure that the most up to date information is taken into account. Wording would be revised to take into account of the increasing emphasis upon the need for town centres to be adaptable to changing economic circumstances and consumer/visitor patterns in the way in which town centres are used, also linking to emerging evidence from other sectors e.g. the GBSLEP⁴⁰

Option B: As per Option A but introduce a local policy on local thresholds which would trigger the need for an impact test for town centre uses which are proposed in out of town locations

The national default threshold for an impact test is 2,500 sq.m. gross floorspace if there is no locally set threshold (NPPF para 89). The evidence base produced for the council in 2015 suggested there was a case for introducing lower thresholds for town centres to protect their vitality and viability (1000 sqm gross for Cannock and Rugeley, 500 sqm for Hednesford and

⁴⁰ <https://gbslep.co.uk/what-we-do/place/develop-thriving-towns-local-centres>
<https://gbslep.co.uk/wp-content/uploads/2018/05/Towns-and-Local-Centres-and-Housing-Frameworks.pdf>



Local Plan Policy Options

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200 sqm for Local and Neighbourhood Centres). This would need to be checked against an updated evidence base.

Option C: Produce separate Area Action Plans (AAPs) for the larger town centres, including the retention and updating of the adopted Rugeley AAP and the continued pursuance of the emerging AAP for Cannock Town Centre

Local Plan Part 1 supports the production of AAPs to provide a clear framework for investing in and regenerating Rugeley (the AAP was adopted in 2014 but will need reviewing) and Cannock (Issues and Options was consulted on in 2017). AAPs however are like 'mini local plans' i.e. have to go through the same rigorous processes including independent examination by a planning inspector, and given the speed of change in the town centre / retail economy there is concern that these may not be the best way to keep up with the fast pace of change in this area.

Option D: Support the preparation of local policy and guidance to direct investment to centres / town centres via a range of means as most appropriate to the local context e.g. Masterplan, prospectus, Supplementary Planning Documents, Neighbourhood Plan etc.

This option could provide an alternative approach to the more rigid framework afforded by an Area Action Plan and, whilst not having the same level of statutory status as an AAP could provide a range of options and approaches relevant to the local context and which could provide the adaptability and flexibility needed to keep up with fast paced change.

Questions on Town Centres Hierarchy Options:

Question 44. Which option or combination of options do you prefer and why?

Question 45. Are there other options we should be considering and if so what are they and what evidence is there to support this?

Question 46. The National Planning Guidance states that 'local authorities should be seeking to improve the quality of parking in town centres.....and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers.' How might this be achieved in practice, through the planning system? Should we be setting any other standards for town centre development? If so, what, and what evidence could be used to support this?

Question 47. What further work needs to be undertaken in relation to tourism in order to ensure compliance with the NPPF? Is there evidence available already which could assist with this?



Local Plan Policy Options

Objective 7: Provide Well Managed and Appreciated Environments

Issues and Options for delivering Objective 7: Provide Well Managed and Appreciated Environments

National Policy

- 11.1 The environment is one of the three key strands of sustainable development as set out in paragraph 8 of the NPPF.
- 11.2 NPPF Chapters 15, 'Conserving and enhancing the natural environment' and 16 'conserving and enhancing the historic environment' contain the overarching national policies for achieving this objective.

Natural Environment

- 11.3 In terms of conserving and enhancing the natural environment, paragraph 170 sets out the need to protect and enhance valued landscapes; recognise 'the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land and of trees and woodland; minimising impacts on and providing net gains for biodiversity.
- 11.4 Paragraph 171 states that: *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework 53; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*
- 11.5 Paragraph 171 goes on to emphasise the importance of conserving and enhancing landscape and scenic beauty; this includes Areas of Outstanding Natural Beauty.
- 11.6 National Planning Practice Guidance was updated in 2016 and provides further context, *stating 'Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside'*, and emphasising the need for landscape character assessments 'where appropriate'. Guidance also states that planning policies and decisions should have regard to AONB management plans as they set the strategic context for development.
- 11.7 In terms of habitats and biodiversity, paragraph 174 of the NPPF states that plans should:
 - a) *'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife*



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corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and*
- c) identify and pursue opportunities for securing measurable net gains for biodiversity.'*

- 11.8 National Planning Practice Guidance provides further detail, including the need to collaborate with other partners including Local Nature Partnerships. It also provides further guidance on the evidence base which may be required including the identification and mapping of local ecological networks, mitigation / compensation and offsetting measures (including that relating to 'Habitats Development' i.e. that protected under the Habitats Regulations 2017) and guidance on planning for green infrastructure and its role in delivering sustainable development.

Historic Environment

- 11.9 NPPF paragraph 185 sets out the context for the historic environment in terms of local plan preparation. It states:
- 11.10 *'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place. '*
- 11.11 The National Planning Practice Guidance (dated 2014, not yet updated at the time of writing to accord with the new NPPF), sets out more detail:
- 'In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets.*



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This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.

11.12 *The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Local planning authorities should consider the relationship and impact of other policies on the delivery of the strategy for conservation.’ (Paragraph: 004 Reference ID: 18a-004-20140306)*

11.13 In terms of how the plan should deal with non-designated heritage assets the guidance states:

‘While there is no requirement to do so, local planning authorities are encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public.

In this context, the inclusion of information about non-designated assets in Local Plans can be helpful, as can the identification of areas of potential for the discovery of non-designated heritage assets with archaeological interest.’

Local Policy

Biodiversity and Geodiversity

11.14 Policy CP12: Biodiversity and Geodiversity sets out the Council’s approach to ensuring the District’s biodiversity and geological assets will be protected, conserved and enhanced. It follows national planning policy and guidance and makes reference to supporting key local strategies and plans e.g. the Local Biodiversity and Geodiversity Action Plans.

11.15 The policy highlights key local assets which should be protected, conserved and enhanced including Hednesford Hills and identifies local initiatives to be supported such as the Forest of Mercia.

11.16 Criteria-based policies for where ecological and geological sites may be affected are set out for decision making (in line with national policy and legislation). Policy requirements for individual development schemes to consider integrating biodiversity into their proposals are also set out.

Cannock Chase SAC

11.17 Policy CP13: Cannock Chase SAC safeguards the Cannock Chase Special Area of Conservation (SAC). The SAC is unique heathland habitat, protected by European Law and the Habitats Regulations. Evidence has shown that increasing



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visitor numbers from visitors to Cannock Chase as a result of new development could potentially damage the fragile environment. The evidence base which informed Local Plan (Part 1) showed the majority of visitors to be coming from an 8km radius from Cannock Chase, with a lesser but still significant number coming from a wider 8 – 15 km radius.

- 11.18 Cannock Chase Council works with partners impacted by this radius (the ‘Zone of Influence’) on the Cannock Chase SAC Partnership. There is a programme of measures to mitigate for the impacts of development on the SAC and this programme has been formulated based on the levels of housing to be delivered by current adopted local plans.

Landscape Character and Cannock Chase AONB

- 11.19 Policy CP14: Landscape Character and Cannock Chase AONB seeks to protect the District’s landscape character and maximise opportunities for restoring and enhancing landscape features and creating green infrastructure links in conjunction with new development. Development proposals in the AONB which are compatible with its Management Plan objectives are supported as are development proposals across the District which help to facilitate these objectives. Appropriate development within the Green Belt must be sensitive to distinctive landscape character. Consideration is being given to allocate land at Rawnsley Road/Rugeley Road, Rawnsley as Local Green Space (NB this last issue is considered under Objective 2.)

Historic Environment

- 11.20 Policy CP15: Historic Environment seeks to protect and enhance the District’s historic environment by maintaining a balance between safeguarding historic buildings, areas and other sites and their settings according to their status and supporting development proposals which are sensitive to and inspired by their context and which add value to the existing historic townscape and landscape character of the District.
- 11.21 The policy encourages a focus of regeneration around historic urban areas stating that Rugeley has benefitted from partnership working and financial investment resulting from a Town Centre AAP in conjunction with Local Plan (Part 1). The policy states that support for regeneration of Cannock Town Centre will be taken forward in conjunction with the Local Plan Review including views received during publicity for the Cannock Area Action Plan in 2017. Key development guidance to support and enhance Hednesford town centre was set out in the Design SPD 2016 and is expanded as part of the Hednesford Neighbourhood Plan.
- 11.22 The policy also promotes the sustainable access and enjoyment of heritage assets District-wide through creation of footway/cycle routes, enhancements to



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the canal network and the conservation and enhancement of all types of heritage assets.

Consultation feedback/other issues

Biodiversity and Geodiversity

- 11.23 From the Issues consultation and from the new NPPF it is clear that while the broad principles of the policy to protect, conserve and enhance the district's biodiversity and geodiversity assets should remain, considerable updating of the policy theme will be needed. 'Do nothing' is therefore not an option as the policy would not comply with the NPPF. Issues raised included the following:
- The need for a strategic approach to biodiversity including mapping, measurable ways of providing net gains for biodiversity, maximising 'natural capital' (i.e. ways of capturing the economic and social benefits that are derived from the natural environment) and requiring plans to provide further details of biodiversity assessments to be clear on how these impact developable areas of sites.
 - More emphasis on the canal network including a strategy for the water environment
 - The need for a specific policy on the Cannock Extension Canal Special Area of Conservation (SAC)
 - The need to engage farmers and landowners and strengthen policy in relation to natural capital assets
- 11.24 The following section therefore sets out the options for updating policy on matters relating to biodiversity and geodiversity.

BIODIVERSITY & GEODIVERSITY POLICY OPTIONS

Option A: Update existing Policy CP12: biodiversity and geodiversity which sets out the Council's approach to ensuring the district's biodiversity assets will be protected, conserved and enhanced. The policy follows national policy and guidance and makes reference to supporting key local strategies and plans. It highlights key local assets which should be protected, conserved and enhanced. It sets out criteria based policies to aid decision making.

This option would mean that the policy is updated to reflect new national policy and the most current local context. An updated version could contain links to the most up to date evidence in relation to the requirements for biodiversity offsetting, natural capital, linkages and mapping (including those relating to the water environment) meaning that planning decisions would be made based on the most up to date information available.

Option B: as above but also introducing a new policy for Cannock Extension Canal Special Area of Conservation (SAC)

Under the Habitats Regulations the Council must ensure that development does not cause harm to the SAC which is designated due to the canal containing Floating Water Plantain. Its location close to the A5 corridor which is designated as an Air Quality Management Area



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(AQMA) is of particular concern. The impacts of traffic pollution (atmospheric nitrogen deposition) and any other issues which may cause harm need to be further understood before any mitigation measures can be considered. This work is ongoing and further detailed policy development will need to be informed by its outcomes.

Questions on Biodiversity & Geodiversity Policy Options:

Question 48. Which biodiversity and geodiversity option do you support?

Question 49. Have you any other issues you wish to raise in respect of biodiversity and geodiversity?

Cannock Chase Special Area of Conservation (SAC)

- 11.25 Representations made clear that the current policy may need to be updated depending on a review of the evidence base which is currently underway.
- 11.26 The current policy safeguards the Cannock Chase Special Area of Conservation (SAC). The SAC is unique heathland habitat, protected by European Law and (in the UK) the Habitats Regulations. Evidence has shown that increasing visitor numbers from visitors to Cannock Chase as a result of new development could potentially damage the fragile environment. The evidence base which informed Local Plan (Part 1) showed the majority of visitors to be coming from an 8km radius from Cannock Chase, with a lesser but still significant number coming from a wider 8 – 15 km radius.
- 11.27 Cannock Chase Council works with partners impacted by this radius (the ‘Zone of Influence’) on the Cannock Chase SAC Partnership. There is a programme of measures to mitigate for the impacts of development on the SAC and this programme has been formulated based on the levels of housing to be delivered by current adopted local plans.
- 11.28 The evidence base is currently under review to any updated policy would need to be informed by its outcomes. We therefore think there is only one policy option at this point which is to update the wording of the current policy as necessary depending on the updated evidence base to ensure that the plan complies with the Habitats Regulations.

CANNOCK CHASE SAC POLICY OPTIONS

Option A: Update the Cannock Chase SAC policy CP13 as necessary to reflect the updated evidence

Policy must comply with the Habitats Regulation to ensure that no harm arises to the SAC as a result of applicable development pressure. An up to date evidence base and mitigation strategy is essential and policy wording may need to change to reflect this. This work is ongoing at present through the Cannock Chase SAC Partnership.

Questions on Cannock Chase SAC Policy Options:

Question 50. Do you have any comments on this option?



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Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB)

- 11.29 The NPPF (para 172) states that ‘great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues’.
- 11.30 Comments to the Issues consultation were mainly focused upon emphasising the importance of the AONB and landscape character, ensuring its protection. It was generally felt that the current policy was appropriately worded. Some felt that there should be exceptions to policy set out to allow for some development although the council considers the existing policy already allows for this assessment on a case by case basis, and furthermore is still broadly worded in a way which complies with national policy.
- 11.31 Notwithstanding this however, Paragraph 172 of the NPPF does state that planning permission should be refused for major development ‘other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest’. It is therefore considered that only one policy option applies: to provide minor updates to exiting policy CP14 to reflect the most up to date evidence.
- 11.32 In addition Policy CP14 sets criteria for assessing acceptable quantum of development (extensions / replacement buildings) in the Green Belt so the approach for this will need considering in the light of the new NPPF.

LANDSCAPE CHARACTER AND CANNOCK CHASE AREA OF OUTSTANDING NATURAL BEAUTY (AONB) POLICY OPTIONS

Option A: retain current policy wording with minor amendments to update and reflect the most up to date evidence base and national policy context if applicable

Existing policy wording largely robust and flexible enough to be able to address the issues which were raised through the previous consultation. Minor changes to ensure the policy wording remains up to date.

Option B: include detailed criteria in policy for assessing suitability of different types of application, including retaining the current criteria for extensions / replacement buildings in the Green Belt

This would have to be evidenced in terms of how more detailed elaboration could be justified within the local context.

Option C: Retain current policy wording (with minor modifications to update) and provide further elaboration if required via an updated design SPD

This could provide for more flexibility in approach and a clearer definition between ‘strategic’ policy and ‘non strategic’ (i.e. local) policy as required by the NPPF



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Questions on Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB) Policy Options

Question 51. Which option or combination of options do you support?

Question 52. Have you any other issues you wish to raise in respect of Landscape character and Cannock Chase AONB?

Historic Environment

- 11.33 The updated NPPF 2018 retains its support for conserving and enhancing the historic environment in its widest sense. Local Plan Policy CP15 emphasis this approach at a local level, and a full coverage of Conservation Area Appraisals and Management Plan SPD's for the District will shortly be in place. The Design SPD 2016 seeks to provide historic character-based design coverage of specific areas of the District and the adopted Hednesford Neighbourhood Plan 2018 reinforces this approach in defining special character areas and a Local List of key buildings considered to be of importance to the history and development of Hednesford. Progress on the District Local List will progress as resources allow.
- 11.34 Responses to the Issues consultation included:
- the need to include specific policy on canals, as the network is important, not just the designated conservation areas;
 - to ensure the plan provides a positive and proactive strategy (including setting) for heritage;
 - heritage policy should not be 'stand alone';
 - heritage –led references are welcomed;
 - planning decisions in Rugeley are undermining the conservation area policies;
 - the recognition of the Historic Environment Character Area and Extensive Urban Survey work is welcomed (though some updating may be needed);
 - the Chase Through Time project may need to be included;
 - the mining history of the area should be celebrated;
 - interpretation boards in suitable locations are supported (eg the Hatherton Canal);
 - the plan needs to recognise that the protection of historic assets requires use of statutory powers;
 - any consideration of the regeneration of Brereton Colliery should be limited in scale and reflect the character of the area as AONB and Green Belt.
- 11.35 The key issue which links many of these responses is the need to reinforce local policy to link aspects of heritage across the District in a multi-functional sense



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with other objectives and ambitions so that actions across the board dovetail with and reinforce each other to create a strong positive and proactive context for future change. For example, the canal network has potential to assist with biodiversity, recreation and health, economic regeneration unlocking the potential for waterside development, sustainable transport, green and blue infrastructure, drainage and floor management and education and awareness raising via interpretation, as well as more specific heritage protection and enhancement. A further example is in town centres to maximise benefits of the historic environment to accommodate diverse uses on multiple floors whilst providing the community with a strong sense of identity and USP, enhancing local distinctiveness.

- 11.36 Whilst some refreshing of evidence/ a degree of review may be required (such as incorporating references to The Chase Through Time and updating of Conservation Area Appraisals at intervals) generally historic environment evidence stands the test of time well and the need for updates tends to be limited either to coverage of additional heritage topics which have not been fully covered in the past (eg progressing a Local List) or more selective updates in areas subject to more substantial change.
- 11.37 The Issues and Scope consultation asked questions about the review of Policy CP15 based upon responses to the previous Issues and Options Local Plan (Part 2) consultation responses which strongly supported using the historic environment as a catalyst to encourage the positive regeneration of the District. Options relating to town centres, canals and collieries and former mineral railway lines were all supported:
- to help bring new life into town centres and historic commercial buildings;
 - to use the Conservation Area Management Plans as a guide for development;
 - to consider Cannock Extension Canal and Brereton Colliery as regeneration/leisure opportunities;
 - and to enhance the footway/cycleway network via former mineral railways lines across the District, linking existing routes and having health and wellbeing benefits as a green infrastructure opportunity.
- 11.38 There was also support through the consultation for elaborating existing policy CP15 by providing historic environment guidelines for managing change at relevant allocated sites, including avoidance/mitigation measures, indicating key matters for consideration by developers and opportunities to better reveal significance of the historic environment. Finally a wider role for maximising interpretation of the historic environment was supported, with suggestions for heritage trails across the area which may require a specific strategic policy framework, a District-wide interpretation strategy guiding developers involved



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with sensitive sites and more acknowledgement of the community and landscape history of Cannock Park, including a heritage trail and information boards.

HISTORIC ENVIRONMENT POLICY OPTIONS

Option A: Expand existing policy CP15 to embrace the historic environment as a catalyst for positive regeneration with referenced links to related policy areas and any updates to the evidence base.

Existing policy direction largely robust and flexible in accordance with national policy however wording would benefit from updating to better address responses made.

Option B: as above but also to add more specific reference to particular local heritage opportunities in town centres, canals and collieries and former mineral railway lines to help bring new life into town centres and historic commercial buildings, consider other regeneration/leisure opportunities and enhance the footway/cycleway network. This more specific reference to heritage opportunities could also refer in generic terms to the (forthcoming) Heritage Impact Assessment evidence to provide guidance for managing change at allocated sites.

Builds on updated existing policy wording to elaborate upon local heritage opportunities (by generic type rather than site specific), providing framework for development management and making clear potential benefits available.

Option C: as above but incorporating a District-wide Interpretation Strategy policy framework.

Builds on updated existing policy wording to elaborate upon local heritage opportunities (by generic type rather than site specific), providing framework for development management and range of potential benefits available including a Heritage Interpretation Strategy for the District to contribute to the quality of life for existing and future generations.

Questions on Historical Environment Policy Options

Question 53. Which option or combination of options for the historic environment do you support?

Question 54. Have you any other issues you wish to raise in respect of the historic environment?

Issues and Options for delivering Objective 8: Support a Greener Future

National Policy

- 12.1 National planning policy (NPPF, Chapter 14) states that local plans should support the transition to a low carbon future in a changing climate, taking full account of flood risk. Policies and decisions should contribute to reductions in greenhouse gas emissions; minimise vulnerability and improve resilience to climate change; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. As delivering sustainable development is an overarching objective of national planning policy, these matters also relate to other areas of the NPPF such as sustainable transport.
- 12.2 National policy (NPPF, para 150) and supporting national guidance state that local authorities can make use of the Governments optional technical standards for housing, which includes higher standards for water efficiency. This does not contain any optional standards for energy efficiency or low carbon/renewable energy sources. National policy refers to local requirements for low carbon/renewable energy sources but there are no references to energy efficiency; it has therefore been assumed to data that national policy limits energy efficiency standards to the current Building Regulations (and local policy can not go above these). However, in its responses to the national policy consultation the Government suggested that local authorities were not limited in their ability to set such standards⁴¹ highlighting that the Clean Growth Strategy (2017) supports improvements in energy efficiency standards for new developments (although this then refers to a review of Building Regulations).
- 12.3 National policy (NPPF, para 178-183) addresses ground condition and pollution issues, with particularly locally relevant references to the legacy of mining activities and pollution impacts, including air quality and artificial light. The new 'agent of change' principle is introduced, which states existing businesses should not have unreasonable restrictions place on them as a result of a development permitted after they were established; suitable mitigation should be provided by the new development. Planning policies should not duplicate other pollution control regimes.
- 12.4 National planning policy (NPPF, Chapter 17) requires relevant local authorities to ensure there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods needed. This involves the protection of areas for minerals workings. There is also a specific national planning policy framework for

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf - See Question 33 response

waste matters, which requires the relevant local authorities to plan for the management of waste e.g. via the provision of sufficient and appropriate waste management facilities.

Local Policy

- 12.5 Local Plan (Part 1) Policy CP16 identifies key local issues related to climate change, pollution, flood risk, minerals and waste. There are links to the relevant Staffordshire County Council plans for minerals and waste (as well as flood risk management). There are links to the national plans for the management of water quality. It links to other, related Local Plan policies such as design, healthy living, sustainable transport, and biodiversity reflecting the cross-cutting nature of these issues.
- 12.6 Support is given to renewable and low carbon energy schemes, subject to other local plan policies. A series of development management criteria are set out for individual development schemes to take into account including exceeding national standards for carbon reduction; improved energy efficiency; flood risk; water quality and drainage; green infrastructure; sustainable construction methods; and minerals sterilisation. The policy is supported by the Design SPD which provides further detail on how developments can take such issues into account as part of their design and layout.
- 12.7 The Staffordshire County Council Waste and Minerals Plan also form part of the local planning policy framework. These address the requirements set out within national planning policy for the sustainable management of minerals and waste.

Consultation feedback/other issues

- 12.8 Individual responses suggested specific additional references and/or wording to be included within the updated policy. These included reference to potential role of canal network in contributing to low carbon technologies and surface water drainage; measures to protect 'controlled waters'; matters to consider in relation to regulated sites, such as waste processing facilities, reflecting the 'agent of change' principle; and enhancing links to the role of green/blue infrastructure in supporting a greener future. Support was given to the current policy wording related to coal mining legacy issues and safeguarding of minerals.
- 12.9 The approach to updating the evidence base received support. Information was provided on key existing strategies, management plans and evidence to be taken into account e.g. River Basin Management Plans and foul drainage capacity. Some respondents supported seeking higher building standards from new developments, such as the optional higher water efficiency standard.
- 12.10 In terms of key local issues, it is recognised that many of those identified in the current local plan policy remain relevant e.g. air quality management areas within the District and flood risk zones. Updated local evidence will enable the policy to

reflect the current local context, identifying the key local issues that need to be addressed. This evidence includes a Strategic Flood Risk Assessment and Water Cycle Study update. Some of these matters also link to other Local Plan policies, such as air quality impacts upon healthy living and natural environments (see Objectives 2 and 7 respectively).

- 12.11 Consideration needs to be given to the extent to which the updated local plan policies encourage or require new developments to achieve higher standards of sustainable construction (above the minimum building regulations requirements). As per national planning policy (NPPF, para.34) any standards and/or requirements would need to be considered as part of the overall local plan viability assessment to ensure any additional costs to developments arising from these were taken into account at the plan making stage.
- 12.12 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 8: Support a greener future.

GREENER FUTURE POLICY OPTIONS

Option A: Update current Local Plan (Part 1) Policy CP16 to reflect up to date evidence base work. Include reference to potential role of canal network in contributing to low carbon technologies and surface water drainage; measures to protect ‘controlled waters’; matters to consider in relation to regulated sites; such as waste processing facilities, reflecting the ‘agent of change’ principle. Enhance links to the role of green/blue infrastructure in supporting a green future.

This would update the current Policy CP16 to reflect updated national and local policy and local evidence. This includes the Staffordshire County Council Minerals and Waste Local Plans; Staffordshire County Council SUDS handbook; Humber River Basin Management Plan; Water Resources Management Plans. Evidence updates to support this policy would include a Strategic Flood Risk Assessment and Water Cycle Study, foul drainage assessments, air quality assessment work, waste and minerals safeguarding assessment. Evidence related to low carbon and renewable technologies would be drawn from nationally available data. The suggested additional elements of the policy relate to consultation comments received

Option B: In combination with Option A, continue current policy approach of encouraging sustainable construction standards, but not requiring them.

In combination with Option A continue to encourage, but not require, improved sustainable construction standards such as energy efficiency improvements and low carbon/renewable energy technologies. It would continue to be supported via an updated Design SPD which could set out the standards to be encouraged and how to achieve them. Including more detail on preferred standards in SPD rather than in the Local Plan itself would provide more flexibility to update those standards, especially given the fast pace of technological change.

Option C: In combination with Option A, require developments to meet specific building standards, including sustainable construction standards such as water efficiency, energy efficiency, low carbon/renewable technologies and include in local plan policy.

In combination with Option A require individual developments to achieve specific sustainable



Local Plan Policy Options

Objective 8: Support a Greener Future

construction standards or provide specific assessments as part of the planning application process. As standards are considered to be local rather than strategic issues they would need to be included as Development Management Policy. Including standards in Local Plan would enable more detail to be assessed in terms of viability, the requirements for which have been increased at the plan making stage. It would continue to be supported via an updated Design SPD which could set out how to achieve the required standards.

Questions on Greener Future Policy Options:

Question 55. Does the updated NPPF and other recent Government policy (e.g. Clean Growth Strategy 2017) allow the Council to set higher energy efficiency standard requirements, where justified by local evidence?

Question 56. Apart from a viability assessment of the costs of such measures, what local evidence would be needed to justify the need for higher sustainable constructions standards over and above building regulation requirements?

Question 57. If specific standards are considered appropriate, should these be required on a certain threshold of site e.g. large sites only?

Question 58. Are there any new or emerging technologies that should specifically be taken into account in gathering the evidence?



Local Plan Policy Options Other Policy Considerations

Issues for other policy considerations

Development Contributions and Infrastructure

National policy

- 13.1 The need for appropriate infrastructure to support the overall levels of housing and economic growth outlined within local plans is a theme that runs through national policy (e.g. NPPF para 72 and 81). Any barriers to investment that are linked to inadequate infrastructure should be considered. Any opportunities for further investment and growth from infrastructure projects should also be considered. Engagement with infrastructure providers is a key part of the local plan making process (and is related to the overall 'duty to cooperate' in terms of demonstrating effective cooperation on strategic matters).
- 13.2 National policy requires local plans to set out strategic policies that make sufficient provision for a range of infrastructure including transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), community facilities and green infrastructure (NPPF, para 20). Non-strategic policies should be used for the provision of infrastructure at a local level (NPPF, para 28).
- 13.3 National guidance provides further information on how local plans can demonstrate how they can deliver on strategic matters, including infrastructure. This includes early engagement with infrastructure providers and other stakeholders to identify infrastructure deficits and requirements, and opportunities for addressing them. Account should also be taken of the need for any strategic infrastructure within the area.
- 13.4 National policy sets out that local plan's should set out the contributions expected from development. This should include setting out the levels and types of affordable housing required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan (NPPF, para 34).
- 13.5 National policy sets out the circumstances when planning conditions and obligations are appropriate (NPPF, paras 54-57). Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. There are specific tests to be met if planning obligations are sought. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the developer to demonstrate



Local Plan Policy Options Other Policy Considerations

whether particular circumstances justify the need for a viability assessment at the planning application stage.

- 13.6 National guidance provides more detail on how to undertake viability assessments for local plans and individual development schemes. There is an increased emphasis upon testing the viability of local plan policies to avoid delays at the planning application stages due to viability issues. There is also an increased emphasis upon making viability assessments and developer contributions (particularly how they are spent) more transparent and publicly accessible.
- 13.7 The Government has recently announced (Autumn/Winter 2018) that it will be taking forward reviews to the developer contributions system, namely updates to the Community Infrastructure Levy.⁴²

Local policy

- 13.8 Local Plan (Part 1) Policy CP2 provides an overarching policy for developer contributions and infrastructure. Policy CP7 sets out the District's affordable housing requirements. These policies are supported by the Developer Contributions and Housing Choices SPD (2015) which also provides detailed information on the Council's approach to developer contributions, taking account of the locally adopted Community Infrastructure Levy charges. Specific guidance is provided on developer contributions to the Cannock Chase Special Area of Conservation (Guidance to mitigate the impact of new residential development, 2017).
- 13.9 The Local Plan (Part 1) is also accompanied by an Infrastructure Delivery Plan, which identifies a range of infrastructure requirements to support the Local Plan housing and economic growth. These include a variety of projects including those related to formal and informal leisure facilities, schools, waste water management and flood risk management. Key infrastructure requirements are reflected throughout the Local Plan (Part 1) policies.
- 13.10 The Council adopted its Community Infrastructure Levy (CIL) charging regime in June 2015. This includes a Regulation 123 list which identifies a number of projects that may be eligible for CIL funding. Local guidance on the CIL processes is also available.

Consultation feedback/other issues

- 13.11 Some responses to this issue were high-level e.g. those from statutory agencies citing the need to engage as the plan progresses (Natural England also requested more emphasis on green / blue (i.e. water-related) infrastructure).

⁴² 'Reforming developer contributions' MHCLG consultation (Dec 2018 – Jan 2019)



Local Plan Policy Options Other Policy Considerations

- 13.12 Many respondents cited the need for updated viability assessment work and the need for robust evidence to justify where contributions were needed and the need for clarity on how CIL would be allocated (and how proposed changes in CIL regulations would need to be applied). Some developers commented that a site by site approach might be needed to take account of specific circumstances; a generalised approach might not be appropriate. West Midlands HARP (representing a range of housing associations) commented that such providers should not have to pay contributions, and exceptions should apply for care homes / extra care facilities as these often provide their own health care facilities. Some commented that if a developer could not deliver on the required infrastructure then the site should not be considered viable.
- 13.13 Other respondents provided information about their particular product (e.g. rent-to-buy housing). Some set out what they felt should be provided for in terms of developer contributions and an updated infrastructure delivery plan, including a range of projects and problems with local infrastructure, funds for the restoration of the Hatherton Canal, sport and recreation facilities as shown by updated evidence for the Rugeley Power Station redevelopment, and the need for a new or expanded police custody facility in the southern Staffordshire area.
- 13.14 In terms of key issues to consider, the overall local plan strategy for housing and economic growth will need to be informed by infrastructure capacity considerations. This includes assessing where future development may not have significant infrastructure implications (or could be accommodated by existing infrastructure provision) and identifying where future development would require further infrastructure provision. The deliverability of this infrastructure will need to be carefully considered, particularly in terms of funding. These requirements may therefore impact upon the viability of developments within the District, where funding is necessary from the developments themselves.
- 13.15 Development contributions can be in the form of planning conditions, planning obligations (Section 106/278 agreements) and CIL charges. Therefore the local plan will need to consider the most appropriate ways for different types, and scales, of infrastructure to be provided for. This will need to take into account the ongoing national Government changes to the development contributions system. It is likely that the local plan will need to be supported by an update to its CIL charging regime. The issue of affordable housing contributions is discussed further under 'Objective 3- Provide for Housing Choice'. The level of development contributions sought through policies in the Local Plan will need to be subject to an overall local plan viability assessment, as per national policy and guidance. This will help guide the content of policies i.e. by providing a steer on what levels of contributions are viable within the District and what are not.
- 13.16 Development contributions and infrastructure requirements will continue to be reflected in a range of policies within the Local Plan Review e.g. policies on



Local Plan Policy Options Other Policy Considerations

healthy living may contain open space standards, policies on sustainable transport will contain information on key infrastructure projects and the housing policies will set out affordable housing contribution requirements. Therefore the Council would welcome views on whether or not a specific policy similar to the existing Local Plan (Part 1) Policy CP2 is still required; and if so, what further information (if any) should it contain over and above the existing Local Plan (Part 1) policy. We would also welcome views on which elements of developer contributions should be contained within strategic and non-strategic policies (the Council has set out its current view in relation to what elements may be considered non-strategic in other parts of this consultation e.g. see Objective 3 Provide for Housing Choice (housing mix), Objective 5 Sustainable Transport, and Objective 8 Support a Greener Future.)

- 13.17 An updated Infrastructure Delivery Plan (IDP) will be prepared to support the new Local Plan to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP will include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses, following consultation with infrastructure providers and other stakeholders. The latest version of the IDP is available for comment as part of this Issue and Options Consultation. It has been updated to reflect the most recently available information to the Council. We would welcome views on any further updates required at this stage and the evidence required to inform further updates as the Local Plan progresses. We would also welcome views on the most appropriate ways to engage with infrastructure providers and other stakeholders as the Local Plan progresses. For example, do you consider a 'workshop' event would be useful or are one-to-one meetings with individual providers more appropriate?

Questions on Policy Development Contributions and Infrastructure:

Question 59. Is there a need for continued overarching policy which sets out Council overall approach to developer contributions i.e. continuation or Policy CP2 (with updates to reflect changed national and local context)? If so, what updates should be made to the policy?

Question 60. Do you have any comments on specific development contributions and infrastructure requirements that should be contained within strategic or non-strategic policies?

Question 61. Are there any developments which should be exempt from developer contributions (e.g. currently housing for the elderly is exempt from CIL)?

Question 62. Do you have any comments on the most recent updated Infrastructure Delivery Plan?

Question 63. Do you have any comments on the evidence required to ensure it reflect the infrastructure requirements of the new Local Plan? Are there any existing evidence base documents, strategies or action plans from relevant organisations that could help inform the Infrastructure Delivery Plan updates?



Local Plan Policy Options Other Policy Considerations

Question 64. As an infrastructure provider, in what ways would you be able to best engage with the updates of the Infrastructure Delivery Plan on a regular basis?

Neighbourhood Planning

National Policy

- 13.18 The importance and role of neighbourhood plans is reflected throughout national policy, for instance in terms of how neighbourhood plan policies can support the strategic policies of the Local Plan (NPPF, para 13 and 29-30); allocate sites for a range of uses (open space, housing etc.); and develop local policies such as those on design. National guidance provides detail on the production of neighbourhood plans and their role in the plan and decision making processes.

Local Policy

- 13.19 The current Local Plan (Part 1) contains a generic Neighbourhood Planning policy (Policy CP4) which largely reiterates national policy. Further specific guidance is provided on neighbourhood planning within the Statement of Community Involvement (how the Council will assist with the production of neighbourhood plans) and in other specific, informal Council guidance.
- 13.20 The Hednesford Neighbourhood Plan is the only adopted neighbourhood plan in the District (November 2018). There are two other designated neighbourhood areas; Brereton and Ravenhill and Norton Canes. These areas are in the early stages of their plan production.

Consultation feedback/other issues

- 13.21 The majority of respondents stated that the specific current local plan policy on neighbourhood plans was no longer required due to national policy coverage. Some respondents supported continued guidance on neighbourhood plans at the District level and suggested that the local plan should set out clear links between it and neighbourhood plans. Some respondents suggested that there should be a policy if neighbourhood plans allocate sites for housing.
- 13.22 Following consideration of these responses and the updated national policy context, the Council has concluded that it would be more appropriate to reflect the role and importance of neighbourhood planning by making references to the opportunities for neighbourhood plans to support Local Plan policies across the whole plan, rather than in one single generic policy. For example, the need for a housing requirement to be assigned to neighbourhood areas would be reflected in the overall housing strategy policy for the Local Plan. Opportunities for smaller scale site allocations or more local design guidance at the neighbourhood plan level could be reflected in Local Plan policies on housing, open spaces and design. This approach would align with that taken in national planning policy.



Questions on Neighbourhood Planning:

Question 65. Do you agree with the Council's suggested approach to reflecting the importance of neighbourhood planning throughout the Local Plan policies, rather than retaining a separate and generic neighbourhood planning policy as at present?

Approach to strategic and non-strategic policies and site allocations
National Policy

- 13.23 National planning policy (NPPF, para.20-30) is clear that strategic policies should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies. Strategic policies should address the overall strategy for the pattern, scale and quality of development providing for housing needs; employment and other commercial development needs; all forms of infrastructure; conservation and enhancement of the natural, built and historic environment; and addressing climate change.
- 13.24 Non-strategic policies should be used to set out more detailed policies for specific areas or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.
- 13.25 Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a Policies Map. Strategic policies should plan for and allocate sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies) (NPPF, para 23). This suggests not all sites need to be allocated in the Local Plan strategic policies.

Local Policy

- 13.26 The current Local Plan (Part 1) policies contain elements of strategic and non-strategic policy. It is considered some of the policies could be more clearly defined in light of updated national policy requirements. There is one Strategic Housing Site allocated at Land West of Pye Green Road and there are other site allocations, such as the Green Space Network, within the current Local Plan (Part 1).



Consultation feedback/other issues

- 13.27 In light of the updated national policy context, we would welcome views on which Local Plan (Part 1) policies, and elements of them, could be further refined to reflect strategic and non-strategic matters.
- 13.28 In relation to site allocations, there is a similar need to differentiate between strategic and non-strategic sites. National planning policy states that strategic policies should provide a clear strategy for identifying sufficient land to address needs. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).
- 13.29 The local context could help determine what constitutes a strategic and non-strategic site e.g. those sites that are critical to the overall strategy. For the Local Plan (Part 1) the only strategic housing site allocated in the District is Land West of Pye Green Road for 900 homes in recognition of its crucial contribution to the overall housing strategy. The Local Plan (Part 2) Issues and Options suggested allocating major sites (with planning permission) of 30 dwellings or more and major sites (without planning permission) of 10 dwellings or more. This approach ensured sufficient allocations to meet the entire housing requirement; however, it did not differentiate between strategic and non-strategic sites.
- 13.30 Strategic sites would need to be allocated via the Local Plan strategic policies and identified on the Policies Map as allocations. It is envisaged that the contribution of non-strategic sites to the overall supply of development could be identified either through non-strategic policies in the Local Plan (e.g. by reference to the most up to date land availability assessments which identifies such sites) or Neighbourhood Plans i.e. these would not be allocated on the Policies Map. However, we would welcome views on this approach.
- 13.31 National planning policy states that local plans should identify land to accommodate 10% of the authorities housing requirement on small sites no larger than 1 hectare (unless justified otherwise by strong reasons). This threshold could be used for non-strategic sites. However, this potentially means sites of 1ha or above would be considered 'strategic' which may not provide a proportionate approach (i.e. a potentially large proportion of sites could require allocation via strategic policies; this may not reflect the intended purpose of a strategic policy).
- 13.32 Another approach could be to use the thresholds used to consider which applications are so significant as to warrant recovery by the Secretary of State in the planning appeal process. This would mean strategic sites would be defined as:



Local Plan Policy Options Other Policy Considerations

- Any site providing a minimum of 150 dwellings
- Any housing or employment site of 5ha or greater

13.33 This approach would align with that recently suggested by South Staffordshire District Council in its recent Issues and Options consultation. The applicability of these thresholds to the local context could be tested further as the Local Plan strategy for development emerges. As per the previous approach in Local Plan (Part 2) Issues and Options, the Council is considering whether sites with planning permission should also be allocated via the Local Plan to secure delivery. However, there is also a need to ensure a proportionate approach by focusing upon strategic matters within the Local Plan. We would therefore welcome views on this approach.

Questions on approach to strategic and non-strategic policies and site allocations:

Question 66. Do you have any comments on the approach of separating the updated Local Plan policies into clear strategic and non-strategic elements, where necessary?

Question 67. Do you have any comments on the approach to considering the allocation of strategic sites and non-strategic sites in the Local Plan?

Question 68. Do you have any comments on the site threshold for strategic and non-strategic site allocations within the Local Plan?

Question 69. Should sites with planning permissions and/or those that are already under construction be considered for allocation in the Local Plan?

Safeguarding future land for development and 'reserve' sites National Policy

13.34 National policy states that local plans should, where necessary, identify areas of safeguarded land between an urban area and the surrounding Green Belt to meet longer-term development needs, stretching well beyond the plan period. Planning permission for safeguarded land can only be granted following an update to the plan which proposes the development (NPPF, para.139). Plans should also be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period (NPPF, para.139).

Local Policy

13.35 The current Local Plan (Part 1) identified that the need for the safeguarding of land for future development, including the existing land east of Wimblebury Road, would be considered via Local Plan (Part 2). The only remaining safeguarded land within the District is that site which lies east of Wimblebury Road (as identified in Policy CP6 and on the Policies Map). The Local Plan Review has since taken over the Local Plan (Part 2) work. Whilst not safeguarded land, Local Plan (Part 1) Policy CP8 highlighted the potential need to extend Kingswood



Local Plan Policy Options Other Policy Considerations

Lakeside (into current Green Belt land) should the demand for additional land at the District's high quality employment exceed supply.

Consultation feedback/other issues

- 13.36 Some responses highlighted the need for the Council to consider the safeguarding of land for future development beyond the plan period. Some responses identified the need for flexibility in terms of identifying a range of sites that can deliver the local plan growth.
- 13.37 Given the District context in terms of its Green Belt designations, there is a need to consider whether or not land should be safeguarded for future development. The current safeguarded land east of Wimblebury Road will be considered in terms of the overall preferred strategy for development, and taking into account any responses to this issue.
- 13.38 Since the Local Plan (Part 1) was adopted the requirement to review Local Plans every five years has been introduced. National policy now also places more emphasis upon local plans delivering on their requirements (e.g. via the Housing Delivery Test). This means there is an even greater need for local plans to identify suitable sites, with sufficient flexibility to account for changes in circumstances, so that housing requirements are actually delivered on the ground. One way of trying to ensure this is by identifying more sites than are actually needed at the outset, so that if for whatever reason some sites are not developed there will still be enough sites to meet local housing requirements. These can be referred to as 'reserve sites' which are different to Green Belt safeguarded land in that they would potentially not require another plan review to come forward (in line with national policy). The use of such 'reserve sites' would most likely be triggered by any shortfall in delivery from other sites identified within the Local Plan.
- 13.39 Cannock Chase District sits within a housing market area of significant unmet housing needs and the options to address this are still being explored across the 14 local authorities via Local Plan reviews. In combination with the requirement to review the plan every five years, the approach of identifying safeguarded land to ensure development boundaries are maintained "well beyond the plan period" may not be an appropriate response housing market areas' needs. However, whilst 'reserve sites' may offer more flexibility, the point at which they would be released for development would need to be considered carefully and the Local Plan process would need to prioritise the preferred development sites using the site selection methodology. This could also involve releasing sites from the Green Belt, rather than only safeguarding them. An issue with both approaches is how much land should be identified to ensure a proportionate approach.



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Other Policy Considerations

Questions on safeguarding future land for development and 'reserve' sites:

Question 70. Should the Council consider identifying additional safeguarded land or reserve sites through the new Local Plan taking into account national policy and the local context? Are there any alternative approaches that the Council could take?

Question 71. If safeguarded land or reserve sites are necessary, how much capacity should be identified and should this be distributed in accordance with the overall preferred strategies for housing/employment development?



Local Plan Policy Options Draft Methodology for Site Selection

- 14.1 The Local Plan will need to decide which locations have potential to accommodate future growth. In determining the preferred strategy the Council will have regard to relevant matters, taking an evidence-based approach to identifying the most appropriate sites via assessment against the proposed Methodology to determine the 'best performing' sites thus most suitable for development.

National policy

- 14.2 The NPPF sets out in paras 7-9 that the purpose of the planning system is to contribute to the achievement of sustainable development. Consequently the planning system has three overarching objectives to deliver which are interdependent – economic, social and environmental – with development guided towards sustainable solutions taking account of local circumstances to reflect the character, needs and opportunities of each area. NPPF para 23 explains that broad locations for development should be indicated on a key diagram with land use designations and allocations identified on a Policies Map; strategic policies should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address objectively assessed needs over the plan period and include planning for and allocating sufficient sites to deliver the strategic priorities of the area. The NPPF also provides guidance on identifying land for new homes (paras 67-72) though is not explicit in the process of selecting sites for development. It also emphasises the need to make effective use of land (paras 117-121) in meeting the need for homes and other uses. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, which should only be altered where exceptional circumstances are fully evidenced and justified (para 136). Before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the Council must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (para 137).

Consultation feedback/other issues

- 14.3 The Issues and Scope consultation for the new Local Plan did not consult specifically on a site selection methodology although it did pose questions for consideration in developing this. Previously however, when work on Local Plan Part 2 was being progressed (before this was ceased in favour of taking forward a full review of the Plan), a suggested methodology was proposed. This can be seen at:
https://www.cannockchasedc.gov.uk/sites/default/files/local_plan_part_2_issues_and_options_final_0.pdf (Pages 12-15)
- 14.4 In terms of the responses received, many broadly supported the approach. Comments were made that the 2016 SHLAA was a robust starting point for



Local Plan Policy Options Draft Methodology for Site Selection

identifying options. Some commented that the matrix approach was a useful tool. Some felt it was rather simplistic albeit supported by a narrative – style approach and felt that numerical scoring should not be used for ranking purposes and that assessment should be supported by a robust evidence base (expressing concerns with some areas of evidence and / or suggesting alternative methodology such as a ‘traffic light’ approach).

- 14.5 Some felt there was not enough detail to comment and that examples should have been provided. Some references and terminology were felt to be unclear e.g. in terms of ‘stringent policy constraints’ or ‘sites for which for various reasons are restricted’. Links between the Sustainability Appraisal and Green Belt review were considered to be imprecise and could not therefore result in a fully informed judgement, with the approach being ‘superficial and subjective’.
- 14.6 One representation stated that the matrix was illogical and that Green Belt should not restrict the options for assessment, they should be selected on the basis of sustainability without prejudice to their Green Belt status. It was also commented that there should be another assessment stage before proceeding to Proposed Submission.
- 14.7 Comments were also received in terms of further specifics which respondents felt should be included in the appraisal i.e. the AONB; the potential for Compulsory Purchase (unwillingness to make land available should not be a ‘showstopper’); heritage and setting, ground conditions and land stability (coal mining legacy) ; potential sterilisation of mineral resources; high priority given to brownfield sites; capacity issues in infrastructure; access; formal sport; flood risk; public rights of way (protecting these); and in terms of employment the likely development which would be expected on a site.
- 14.8 In relation to the more recent Issues and Scope consultation for the new Local Plan, we asked questions pertinent to developing a site selection methodology for a range of uses (e.g. housing, gypsy and traveller/travelling showpeople provision, and employment sites). We asked how we could ensure we had considered all potential brownfield opportunities first and invited suggestions for additional brownfield sites (to accord with the new NPPF and its increased focus on a ‘brownfield first’ approach). We also asked what key locations / cross boundary sites might be considered ‘reasonable options’ to consider, and we asked for suggestions on specific criteria for screening out sites which could NOT be considered to be ‘reasonable’ options for development and the justification for this.
- 14.9 In terms of the responses received the following points, expressing a range of views, were made:
- Agree with the ‘brownfield first’ approach



Local Plan Policy Options Draft Methodology for Site Selection

- Need to avoid an over reliance on brownfield sites: these carry risks.
- Restricting greenfield sites will not guarantee that brownfield land will come forward
- Brownfield land is a 'finite' resource – supplies will decline over time
- Need to be a range of deliverable sites over the plan period, the SHLAA is key to identifying this to identify a sufficient supply of available, suitable and viable supply
- At least 10% of the housing requirement should be on sites no larger than one hectare
- A trajectory of expected housing delivery over the plan period will be needed
- Larger strategic housing sites with multiple sales outlets are key to increasing supply but need to be accompanied by smaller scale, non-strategic, sites
- Sustainability and deliverability is key (including edge of settlements) and can demonstrate the exceptional circumstances needed to justify Green Belt release; the Green Belt should not be used to screen out sites
- The NPPF should be used as the starting point including para 138 and using a full range of criteria
- A flexible approach is needed
- An up to date SHLAA / call for sites and brownfield land register should provide sufficient information already to inform the supply of brownfield sites
- Various developers promoted the merits of their particular sites for inclusion as 'reasonable options' (including cross boundary where applicable) for consideration
- Proposed sites which compromise the provision of waste related facilities should be screened out so safeguard infrastructure needed
- Different views on weighting and scoring, some supported a numerical approach others stated that numerical scoring should not be used
- Sites should be considered 'in the round' and on their own merits not screened using pre defined criteria
- AONB sites should not be screened out just because they are AONB: some sensitive development might be acceptable depending on circumstances
- AONB sites should be screened out, also sites subject to national / European designations relating to ecological or heritage value



Local Plan Policy Options Draft Methodology for Site Selection

- When screening out sites, information needs to be used in relation to SSSI risk zones, and the best and the most versatile land (links and details provided)
- Some sites in the 'SHLAA' are classified as 'not available or deliverable' when in fact they could be.
- For employment, business needs (e.g. expansion, modernisation, and location) need to be taken into account and could help justify Green Belt release.

14.10 These factors have been taken into account and considered in the light of national policy and local context in developing the following proposed methodology.

Proposed Methodology

14.11 A series of factors require consideration in rigorously examining site options for growth. These can most clearly be set out in sequence as a means of filtering each site option to screen out the less desirable, to arrive at the 'best performing' shortlist. This will be an iterative process and may require return to earlier stages as it progresses.

Stage 1: Establish Evidence Base

- Define site parameters – threshold 10 dwellings +? For Housing/Employment/Safeguarded Land
- Pool of sites – SHLAA/ELAA – by settlement/area
- Local environmental capacity/urban potential/survey of underutilised land/buildings
- Housing/employment needs – local need, HMA Strategic Growth Study recommendations
- Assorted site specific information – ecology, heritage, etc.
- Green Belt Review
- Infrastructure Capacity Evidence – schools, waste water network etc.
- SA

Stage 2: Establish a pool of sites and first site sift

The pool of sites to be considered in the site selection process is drawn from the most up to date Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Availability Assessment (ELAA). This is the primary database for all sites that have been suggested for housing and employment development within the District. It provides an overarching assessment of a sites suitability, availability and achievability. A shortlist of sites for further, more detailed assessment in the site selection process can then be established. This involves sifting out any sites that:

- do not meet the thresholds for sites being considered for allocation in the Local Plan (to be determined- see questions in '**Approach to strategic and non-strategic policies and site allocations**');
- are not being actively promoted for development any longer (so are therefore not now available);
- are not considered suitable due to the majority of the site being affected by key



Table 2

**URBAN
EXTENSION/SETTLEMENT
EXTENSION/GREEN BELT SITE**



Where necessary to release Green Belt and site previously developed and/or well served by public transport assess performance against:
Contribution to Green Belt Purposes
Landscape character/sensitivity to development
Deliverable/Sustainable/Available/Achievable/Estimated Site Capacity
Key environmental constraints – AONB/ecological/heritage/agricultural/TPO/AQMA
Key capacity constraints – transport/education/services (waste management, health etc.)/flood risk/waste water/other community or social infrastructure
Key locational criteria for specific development types – e.g. near town centres or public transport nodes (affordable and other special housing needs – housing for elderly, aspirational housing etc.); accessibility to strategic road (or rail) network (employment uses); key additional factors for employment sites
Any impacts from loss of current use of land
Key locational/mitigation opportunities – for enhancement of existing green infrastructure/foot/cycle access; better revealing heritage/interpretation; enhancement of local services (bus services/health services/foot/cycle links to stations etc.) to enhance existing sustainability and mitigate impacts
Planning history of site
RAG rating/commentary

Stage 4: Evaluation Stage

- professional planning judgement/balance based on performance of site, including site visit and commentary as required
- initial recommendations as to which sites are considered most suitable for selection
- information gathered for sites recommended for selection could be used to inform a policy for each site to ensure that appropriate mitigation, infrastructure and other site specific requirements are delivered when the site is developed. At the planning application stage more detailed site assessment work could further inform these requirements.

Stage 5: Public Consultation

- Public consultation process to inform final site selection

Questions on draft methodology for site selection:

Question 72. Do you have any comments on our proposed site selection methodology?

Appendices

Appendix 1: Cannock Chase District Local Housing Needs Calculation

Local Housing Needs are calculated in line with the standard methodology for assessing housing need, set out in national planning guidance. This is a clear three step process as set out below.

Step 1 - Setting the baseline

Calculate the average household growth over a ten year period. National planning guidance states that this is done using a continuous 10 year period from the current year, using the most recent national household projections (note that the recent consultation on updates to the standard methodology stated that until 2020 projection are released, the 2014 projections should be used and the 2016 projections discounted). These projections indicate that, the number of households in Cannock Chase District is expected to increase by 2,494 over a 10 year period of 2018-2028, implying an average yearly household growth of 249 dwellings each year (an increase from 42,828 households to 45,322 households).

Step 2 – An adjustment to take account of affordability

Government guidance requires us to make an adjustment to the figure given in Step 1, using an adjustment factor which takes account of the ratio of median house prices to median workplace earnings, using the most recently published data provided by the Government (at present this is the 2017 ratios published in 2018). The greater the disparity between house prices and wages in an area, the greater the extent of the uplift. For Cannock Chase District, the local median affordability ratio is 6.23 (i.e. local house prices are around 6 times local wages within the district). Where the ratio is more than 4 (as in Cannock Chase District's case) for every 1% increase in the affordability ratio the average household growth should be increased by 0.25%. No adjustment is required where then ratio is 4 or below. Using calculations set out in the national planning guidance this gives a new requirement for 284 dwellings per annum in Cannock Chase District (a 14% uplift on the household growth from Step 1).

Step 3 – Capping the level of any increase

National planning guidance indicates that there are two instances in which uplifts to local housing need made under Step 2 can be limited. These are:

- Where the level of increase implied by Step 2 is 40% above an up-to-date local plan adopted within the last five years (this also applies where the strategic policies that are more than 5 years old have been reviewed and found not to require updating).
- Where the level of increase implied by Step 2 is 40% above the level of household growth implied by Step 1 OR above the average annual housing requirement most recently adopted (whichever is the higher of the two figures).

The level of increase is not 40% above the current Local Plan (Part 1) requirements of 241 dwellings per annum and it is not 40% above the original level of household

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Appendix 1: Cannock Chase District Local Housing Needs Calculation

growth. Therefore neither of these provisions are relevant in the case of Cannock Chase District. Consequently the district needs to plan for an annual rate of **284 dwellings per annum**, which is projected across the whole plan period (intended to be 2018-2036). This is our OAN (Objectively Assessed Need). As noted in the main consultation document, this figure will need to be recalculated when new affordability ratios are published (annually in Spring) and when new household projections are released (in Autumn 2020). Any changes to the standard methodology which may be proposed by the Government in the interim period will also need to be taken into account. At the point the Council formally submits it's Local Plan for independent examination the housing need figure is 'fixed' for two years.

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Appendix 2: Glossary

Phrase	Abbreviation	Definition
Air Quality Management Area	AQMA	An area designated by the local authority which is not meeting the national air quality objectives.
Local Air Quality Action Plan		A plan to tackle air pollution, particularly focused on AQMAs designated within a local authority.
Area Action Plan	AAP	An optional Development Plan Document. It is aimed at establishing a set of proposals and policies for the development of a specific area (such as a town centre or an area of new development).
Area of Outstanding Natural Beauty	AONB	A statutory National Landscape designation to provide special protection to defined areas of natural beauty.
Authority Monitoring Report	AMR	An annual report produced by the local authority that monitors the effectiveness of Local Plan policies e.g. number of new houses built, amount of new open spaces.
Birmingham City Council		The local Government body responsible for managing the City of Birmingham, including the Planning services.
Brownfield Land		Brownfield (also known as Previously Developed Land) is a previously developed site that is available for re-use, usually due to abandonment or under use.
Brownfield Development		Site available for re-use which has been previously developed and is abandoned or underused.
Brownfield Registers		A statutory list of previously developed sites that could be suitable for residential development.
Call for Sites		The process of collecting and collating information on potential development sites.
Community Infrastructure Levy	CIL	A charge on new developments that can be levied by local authorities (or other authorities with charging powers e.g. Mayor of London) to fund infrastructure projects. The charging rates are set locally and vary from one area to another e.g. on the types of development charged and the value of those charges. In Cannock Chase, the charges are currently £40 per sqm for residential development and £60 per sqm for out of town and all large foodstore retail development (subject to increases due to indexation).
Cannock Chase District Council	CCDC / CCC	The Local Planning Authority for Cannock, Rugeley, Hednesford, Norton Canes and neighbouring villages.

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Appendix 2: Glossary

Phrase	Abbreviation	Definition
Conservation Area		Protected areas of special architectural or historic interest.
Conservation Area Management Plans		Plans that set out how Conservation Areas should be managed to protect their historic assets and integrity.
County Council	CC	The upper tier of two-tier authorities covering a county wide area.
Density		The amount of development that a site can accommodate (often measured in dwellings per hectare for residential development)
Dwellings Per Hectare	DPH	Unit of land measurement relative to the amount of dwellings it could accommodate.
Design Supplementary Planning Document	Design SPD	A document providing additional planning information and guidance on design issues for development in Cannock Chase District.
Development Plan Document	DPD	Sets out the Local Planning Authority's policies and proposals for the development and status of land. It can include a Local Plan, Site Allocations and Area Action Plan documents amongst others.
Developer Contributions and Housing Choices SPD		A document providing additional planning information and guidance on developer contributions and housing provision within Cannock Chase District.
District Council	DC	The lower tier of two-tier authorities, responsible for local services.
Duty to Cooperate		This is a legal test that requires cooperation between local planning authorities and other public bodies to ensure Local Plan policies effectively address strategic issues e.g. infrastructure, housing. It is separate from but related to the Local Plan test of soundness.
Economic Development Needs Assessment	EDNA	An assessment of the amount and type of employment land required in the District, taking into account a range of factors including the existing and potential future economic trends in the District and several forecast models for future needs.
Employment Land Availability Assessment	ELAA	A database of sites put forward by stakeholders including the Council and land owners to be assessed for their suitability for future employment uses.
Environmental Capacity Study		A study carried out to assess future development potential within Cannock Chase District.
Greater Birmingham & Black Country Housing Market Area	GBBCHMA	A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting

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Appendix 2: Glossary

Phrase	Abbreviation	Definition
		the links between places where people live and work. This HMA is based on the wider Birmingham & Black Country (Dudley, Sandwell, Walsall, Wolverhampton) area.
Greater Birmingham and Solihull Local Enterprise Partnership	GBSLEP	The Local Enterprise Partnership (see definition below) for this area, covering a number of local authorities including Cannock Chase District.
Green Belt		A policy and land use designation used to retain areas of largely undeveloped, wild, or agricultural land surrounding or neighbouring urban areas.
Green Belt Review		A process that sets out the methodology and mechanism for potential possible alterations to the Green Belt boundaries.
Green Space Network		A network of linked green infrastructure within Cannock Chase District that links urban areas to the countryside.
Gypsy, Traveller and Travelling Showpeople	GTTS	National Planning Policy defines 'Gypsies and Travellers' as 'persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group or travelling showpeople or circus people travelling together as such'. 'Travelling Showpeople' are defined as 'members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependents' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and travellers as defined above'.
Gypsy, Traveller and Travelling Showpeople Accommodation Assessment	GTAA	An assessment of the accommodation needs of gypsy, traveller and travelling showpeople for the plan period. This is then used to identify how many new sites may be needed for such accommodation in the District.
Habitats Regulation Assessment	HRA	The Habitats Regulations Assessment is a tool to identify whether there are likely to be any harmful effects from minerals and waste policies and development proposals on internationally important nature sites. The

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Appendix 2: Glossary

Phrase	Abbreviation	Definition
		HRA considers how significant any impacts are likely to be, and identifies whether they can be reduced (mitigated) to protect these sites or whether it is not possible to offset any likely adverse effects. Internationally important nature sites include Special Areas of Conservation (SAC) which have important habitat features, Special Protection Areas (SPAs) which relate to important bird populations and Ramsar sites which are internationally important wetlands. Collectively, these are often referred to as Natura 2000 sites.
Hectare	HA	A unit of land measurement.
Housing and Planning Act 2016		An Act of Parliament that introduced changes to housing policy and the planning system.
Housing Delivery Test		An annual test (by central Government) of the extent to which a local authority is meeting its local housing requirements. Where the amount of new homes being built does not meet requirements there are different penalties dependent upon the level of under delivery.
Housing Needs Assessment		An assessment of the amount and type of housing accommodation required in the District, focused particularly upon affordable needs.
Indoor and Outdoor Sports Facilities Assessment		An assessment of the current quantity and quality of the local authority areas' facilities and an assessment of the future needs for indoor and outdoor sports provision (in quantity and quality terms), taking account of future population changes.
Infrastructure Delivery Plan	IDP	A plan to identify and aid implementation of the necessary social, physical and green infrastructure required to create sustainable communities.
Landscape Character Assessment		A detailed study that analyses and sets out different types of landscape within an area and their historical context.
Local Enterprise Partnership	LEP	A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
Local Green Space	LGS	Local Green Space designation is a way to

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Appendix 2: Glossary

Phrase	Abbreviation	Definition
		provide special protection for green areas of particular importance to local communities.
Local Nature Reserve	LNR	Local Nature Reserves (LNRs) are places with wildlife or geological features that are of special interest locally. There are over 1280 LNRs in England covering almost 40,000 ha
Local Plan		The Development Plan for a Local Planning Authority area. It can include Development Plan Documents such as Site Allocations and Area Action Plans.
Local Planning Authority	LPA	The authority responsible for planning functions within a District, County or any other type of administrative area.
Local Plan (Part 1)	LPP1	The adopted 2014 Development Plan Document that sets out the strategic planning policies and context for Cannock Chase District.
Local Plan (Part 2)	LPP2	The Development Plan Document that was intended to accompany LPP1 by providing further policy context and allocating sites for future development.
Mineral Safeguarding Areas		An area of land protected from development due to the presence of minerals within a site that could be required for future extraction.
Minerals Plan		A planning document that sets out future minerals needs within an area and protects mineral extraction sites to meet that demand.
Mitigation and Implementation Strategy		A framework that aims to provide protection against a potential threat and provide practical solutions or alternatives to solve the problem.
National Planning Policy Framework	NPPF	This document sets out the Governments planning policies for England and how they should be applied.
National Planning Policy Guidance	NPPG	The Government planning advice that accompanies the National Planning Policy Framework.
Neighbourhood Plans		A plan prepared by a Parish Council or Neighbourhood Forum for a particular designated Neighbourhood Area.
Open Space Assessment		An assessment of the current quantity and quality of the local authority areas' open spaces and an assessment of the future needs for open space provision (in quantity and quality terms), taking account of future population changes.
Parking Standards,		A document providing additional planning

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Phrase	Abbreviation	Definition
Travel Plans and Developer Contributions for Sustainable Transport SPD		information and guidance on transport related matters within Cannock Chase District.
Policy Map		A map that shows the location of planning designations, which are usually also set out in written planning policies.
Partner Authorities		The Government bodies working together as a team on a contract or project.
Retail and Leisure Study		A study on retail and leisure uses within Cannock Chase District, including existing and future capacity.
Safeguarded Land		Land that is protected for a specific future, often longer term, land use.
SAC Zone of Influence		An area within which new residential development must provide mitigation measures to avoid harm to Cannock Chase SAC.
Self Build Registers		A register of people who are interested in building their own dwelling within Cannock Chase District.
Self Build and Custom Housebuilding Act 2015		An Act of Parliament that sets out legislation on self build and custom house building.
Site Assessment Matrix		A framework for assessing whether a site is suitable for a proposed use or designation.
South Staffordshire District Council	SSDC	The Local Planning Authority for South-West Staffordshire. It covers areas including Great Wyrley, Cheslyn Hay and Huntington.
Special Area of Conservation	SAC	Special Areas of Conservation (SACs) are protected sites under the European Community Habitats Directive. They provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity.
Stafford Borough Council	SBC	The Local Planning Authority for the Stafford area. It includes the northern part of Cannock Chase AONB, Brocton and Great/Little Haywood.
Staffordshire County Council	SCC	The upper- tier in a two tier Local Authority system County wide Planning Authority for Highways, Minerals and Waste planning matters.

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Phrase	Abbreviation	Definition
Statement of Community Involvement	SCI	A statement of how Cannock Chase Council will consult the local community when preparing planning documents and consulting on planning applications.
Strategic Flood Risk Assessment and Water Cycle Study	SFRAWCS	SFRA – An assessment of flood risk across the District taking into account the most up to date data on flooding from various sources e.g. rivers and surface water. WCS- An assessment of water resources across the District to identify if there is sufficient supply to support future developments and/or what upgrades to infrastructure may be required.
Strategic Housing Land Availability Assessment	SHLAA	A database of sites put forward by stakeholders including the Council and land owners to be assessed for their suitability for future residential uses.
Strategic Housing Market Assessment		A report on the objectively assessed and evidenced development needs for housing within an area.
Stoke-on-Trent & Staffordshire Local Enterprise Partnership	SSLEP	The economic body for the Staffordshire County Council and Stoke On Trent Government areas. See LEP definition.
Supplementary Planning Document	SPD	A local development document that may cover a range of issues, thematic or site-specific, and provides further detail of policies and proposals in a 'parent' development plan document.
Sustainability Appraisal	SA	An appraisal of the economic, environmental, and social effects of a plan.
Town and Country Planning Regulations 2012		Regulatory framework
Viability Assessment		An assessment of whether or not development is likely to be financially viable, taking into account a range of relevant factors including land values and costs, development costs, financing costs and developer profit. These assessments can be undertaken at a Local Plan level (i.e. how will Local Plan policies affect the financial viability of developments in the District generally) and at a site-specific/development level.
West Midlands	WMCA	A recently constituted authority formed of

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Phrase	Abbreviation	Definition
Combined Authority		local authorities and Local Enterprise Partnerships (LEPs) chaired by the Mayor for the West Midlands. It enables the transfer of powers on decision making and funding from central Government to the West Midlands on specified areas (as set out within devolution agreements) e.g. transport, housing.