

Local Plan Review Issues & Scope consultation, summary of responses		
Rep ID No.	Respondent	Comment
Overall / general comments		
LPIS1	Birmingham City Council	Birmingham City Council welcomes the contents of the Issues and Scope Consultation Document and the opportunity for continued engagement and working with Cannock Chase through the Duty to Co-operate.
LPIS2	Canal & River Trust	Within the district there is the Trent & Mersey and Cannock Extension Canal and Cannock Chase reservoir sits adjacent to the boundary in Lichfield District. Stronger references should be made to the canal network throughout the plan – can play a key role in supporting sustainable communities and brings in benefits e.g. tourism, biodiversity, walking and cycling (leisure and commuting).
LPIS3	S Day	<p>I am horrified at the mere idea of another 241 homes per year. Services are already at breaking point- where are doctors, schools, etc. going to come from to cope with increased population. Already roads are full to capacity.</p> <p>We need to take care of the areas' history- the Old Chancel needs to have a lot of TLC and needs to be brought up to a condition where services can be help there again=- even if only for 'special' or occasional services.</p> <p>This is a complete and utter waste of the money I pay in rates. Even if all the people who lived in CCDC tell you what they wanted, you have already decided what you are going to do. All that money spent on 'flood' on the site of the old youth club- how many times has there been a flood there. A million and one better ways to spend that money- e.g. stop sacking librarians and having libraries run by volunteers. Libraries are a vital part of the community and worth every penny spent on them. If money is scarce get rid of Council staff who obviously have far too little to do if they can waste time on 'consultations' like this. How much has this cost.</p>
LPIS4	Preece, Cllr. J	<p><u>General Points</u></p> <p>These comments can be used to apply to several of the questions that have been asked throughout the Issue and Scope Consultation Document but there are specific responses to certain questions below.</p> <p>From recent experience of a planning application in Norton Canes I believe that more emphasis should be placed on ensuring that the statutory authorities such as Health Providers are made to engage as much as possible on the impacts that new developments have on the communities they sit. I understand that steps are being taken to engage health providers more in the planning system, but this should be formally recognised in the Local Plan.</p> <p>A comprehensive public transport network is crucial in ensuring the equal access of our residents to opportunities (jobs) and vital public services (such as doctors' surgeries, hospitals, schools, council facilities and shops). The local plan should recognise that developers must contribute towards ensuring this happens.</p> <p>The Local Plan should include a section looking at how technology can impact on how we live – particularly with reference to alternative forms of energy and energy use (solar panels, energy efficient homes and house design, use of former mining shafts and tunnels), electric charge points on houses, local community initiatives such as community composting facilities and use of building materials and locations.</p> <p>I would also like to see a section of the local plan dedicating to how best to manage Cannock Extension Canal SAC, along similar lines to Cannock Chase SAC. Past planning applications have already been assessed with reference to the SAC but I believe there should be a specific section to ensure the greatest possible layer of protection on this area.</p>
LPIS5	Road Haulage Association	The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles.

		<p>These companies provide essential services on which the people and businesses of the UK depend.</p> <p>We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training. The RHA wishes to draw attention to a number of aspects which cause our members concern. We are disappointed that there are only three references to freight and only one of those to road freight in the entire Local Plan Review (Issues and Scope) Consultation Document. None of these references were in the main document body. Given that all the people and businesses of Cannock Chase depend on road freight for almost all food, medical supplies and all essential products this is a fundamental oversight.</p>
LPIS6	St Modwen (Land at Watling Street Business Park) (RPS)	<p>In 2017, Cannock Chase District Council consulted on Local Plan Part 2 (issues and options). Due to changes to the national planning system, the Council has decided to produce a new Local Plan which will utilise the work carried out to date on Local Plan parts 1 and 2 and incorporate any areas which need reviewing and adopting. Until such time as the adopted Local Plan Part 1 is replaced, that document will still continue to set planning policy for the District.</p> <p>Given the work which went into the Part 2, it would have been St Modwen's preference that the Part 2 was continued with, however, the decision to abandon that plan and progress a new Local Plan is acknowledged.</p> <p>RPS is supportive of the Council's decision to review the Local Plan, in particular the decision to roll forward the time period until 2036. Given the work which was at an advanced stage in relation to Local Plan (Part 2) there is some concern that the timetable proposed, will mean that the new review plan is not in place until September 2021 at the earliest. RPS acknowledges that it is important that LPAs are realistic about timescales as all too often LDS timescales are missed. However, given it will be some 6 years on from the adoption of LP Part 1, if possible, it would be beneficial to the development sector to try and seek ways of speeding up this process.</p> <p>An additional, reason for speeding up the process, is that the Submission of the Local Plan Review would be beyond the three year period, set by Inspector Clews when reviewing the Birmingham City Development Plan and the insertion into that plan's policy base, that the City Plan would need reviewing if the overspill from Birmingham (which impacts on Cannock being in the same HMA) had not been addressed in HMA submission plans within three years (i.e. by January 2020). The review of the Cannock Local Plan will miss this timescale.</p> <p>Nonetheless, the process of continuing the work on the Local Plan is essential to ensure a Development Plan led approach as advised in the Revised NPPF (NPPF) which, at paragraph 11 states that local planning authorities should meet objectively assessed needs, with sufficient flexibility to adapt to change.</p> <p>The focus of these representations is to help inform the Council's approach to achieving the objectives of employment growth. These representations also demonstrate the suitability of St Modwen's Watling Street Business Park to assist with meeting part of the District's employment land requirements.</p> <p>RPS welcomes the preparation of the Local Plan which takes a generally positive approach in seeking to potentially allocate land to meet the outstanding employment land requirement. RPS welcomes the recognition by the Council that the evidence base relating to employment will need to be updated.</p> <p>RPS is keen to ensure that the evidence base underpinning the plan is robust, particularly when it comes to establishing the reasons for allocating sites and not allocating others. It is noted that of all the potential employment sites located in the Green Belt that Watling Street Business Park has been identified through the Green Belt Study as having the least impact on the five purposes of including land within the Green Belt.</p>

		<p>This report demonstrates that the land at Watling Street Business Park represents a highly sustainable proposal to assist the Council in meeting elements of its employment land requirements. The land is wholly within St Modwen's control and is therefore available now.</p> <p>In conclusion, the site at Watling Street Business Park can provide an additional 5.5ha within the current plan period to assist the Council in meeting its shortfall of employment land. The site is highly sustainable, does not currently make a significant contribution to the purposes of the Green Belt and is currently in demand from potential future occupiers. Therefore, as shown through this report, the removal of the site from the Green Belt and its allocation within the current plan period is well founded and provides demonstrable evidence that Exceptional Circumstances exist.</p>
LPIS7	Transport for West Midlands (transport arm of the West Midlands Combined Authority- WMCA)	<p>We welcome the opportunity to respond to your consultation as a Combined Authority non-constituent member, given the strategic importance of this document and the key role it plays in meeting future economic and housing demand, attracting and retaining investment and delivering excellent connectivity. Particularly we are pleased with the acknowledgment of the cross boundary relationships/dependencies between your district and areas of the West Midlands metropolitan area.</p> <p>We are also supportive of your aspirations to improve the opportunities for people to use sustainable transport.</p> <p>At this stage, it is also important to note that our organisation should be referred to as Transport for West Midlands (TfWM) and we should no longer be referred to as our precursors (i.e. Centro and the West Midlands ITA). These bodies are no longer in existence and should be replaced by TfWM and/or WMCA, throughout the local plan.</p> <p>As we are predominantly interested in the strategic transport issues related to the transport of people and goods between your district and the West Midlands metropolitan area, we have made efforts to restrict our comments to this area. These issues include the following:</p> <ul style="list-style-type: none"> - Ensure reference is made to TfWM and WMCA and not any other precursor names. - Reference should be made to significant regional WMCA and TfWM documents impacting on Cannock Chase. - Appreciation of how an effective transport network will support people accessing employment opportunities and the wider housing growth agenda. - Reference to rail policy including the new rail franchise and new rail schemes being proposed. - Greater consideration to the West Midlands Stations Alliance. - Greater reference to the M54 to M6/M6 (Toll) Link Road and how it could support local economic growth across Cannock. - Continue to support a partnership approach. <p>We believe that it is important for TfWM to collaborate with non-constituent WMCA members and other relevant local transport authorities (Staffordshire County Council in the case of your own district), to ensure that the necessary infrastructure and high quality transport links are in place to facilitate the movement of people and goods across our region to support local growth. In addition we believe that it is important to work together to ensure that land use planning and transport planning are well aligned; given the dependencies between the two.</p>
LPIS8	Waterworth, Kate	<p><u>Page 3 Para 4:</u> With the 'scrapping' of the current plan - will the same happen to the new/ proposed plan - resulting in a 'never ending plan'?</p> <p><u>Page 4 Para 1:</u> Why only Kingswood Lakes - surely there is enough 'activity' in that area what about the Rugeley area?</p> <p><u>Page 4 Para 3:</u> Rugeley Power Station development seems a 'long way off' - Rugeley needs development 'sooner rather than later'.</p>

Page 4 Para 4:

Grimsey Report is a good read and suggests more Community based communication/ educational/recreational/ healthy living facilities e.g. community centres to encourage participation. Transport links are essential - currently there are no buses on a Sunday - can developers assist the public?

Page 5 Para 1:

Disabled facilities are very poor in Rugeley - access to toilets/ car parking/ no buses on a Sunday/access to Town Centre - all discriminatory to a very vulnerable group.

Page 5 Para 2:

All areas are 'unique' and require, in my opinion, their own plan. Rugeley is not Cannock!

Page 5 Para 3:

Grimsey Report (see above) - to also include open spaces- Rugeley Town Park has changed very little in 20 years - is not environmentally (geese)!! / play facilities are very poor and have not been updated in many years. To improve this provision would impact significantly on the improvement of health/ education/ sport / play/ culture/ leisure and community for individuals. A Community Centre / Town Hall would also be of benefit to the public and encourage participation and a Community spirit.

Page 6 - all of it.

Grimsey Report suggests the Councils use 'unused' flats above shops in Town Centres in order to attract more people into the centres. New flats in Market Street (Rugeley) are a good example of providing new housing for disadvantaged and vulnerable people.

Page 7 Para 4:

How can the ageing population be involved in this consultation = some are unable to drive, poor bus service, unable to use online service. Local plan means local - not Cannock alone. Need to advertise this further, some residents do not use online service and do not have local papers delivered.

Page 8 Para 1:

See above (Page 4) - it is vital that the 'whole' area is developed. Has the Aelfgar site in Rugeley been considered for development?

Page 8 Para 2:

I would like this explained further. Tourism Idea: Bus facility from Rugeley Town and Trent Valley Stations to Birches Valley to attract visitors to the area.

Page 8 Para 3:

We need more buses - especially on Sundays (vulnerable groups are disadvantaged further). Roads in and out of Cannock at peak times are appalling. Why is Cannock having another development in the area (Retail) where the traffic is at its worst??

Page 9 - all of it.

See page 5 response re Grimsey Report.

Page 10 Para 1:

(See page 8 para 2) Tourism idea.

Celebrate to whole area - I do not think the council advertises the areas history sufficiently - need more heritage advertising/ celebration of key characters in our history.

Page 11: all of it.

		Disabled facilities/ public conveniences/ celebrate the towns histories/ advertise / require children and young peoples facilities e.g. parks/ youth/ community centres/ clean up the town centres/ council to liaise with landlords/ shop owners / public houses to ensure that they keep their premises in good order and clean in order to attract more visitors to the area and keep 'locals local'.
District Profile		
Question 1 Do you have any comments on the District Profile? Is there anything missing, if so what and what source of information should we use?		
LPIS9	Brereton & Ravenhill Parish Council	<p>Page 9, Paragraph 2.4 BRPC welcomes inclusion of 'Commencement of regeneration of the Rugeley Power Station site' as one of six strategic objectives. Redevelopment of previously developed land is much preferable to development on greenfield sites. The regeneration should include a country park on land in flood zone 3. The proximity of this country part may allow some increase in density above that which would be appropriate in areas that were not next to new substantial public open space. Assistance should be given to businesses that wish to move from employment areas served by roads through residential areas to employment land on the Power Station site. There must be adequate educational, medical and transport provision for new housing on it.</p> <p><u>Top of page 99</u> BRPC understands that the completion of the electrification has now been further delayed until May 2019. The work that is needed to extend all but one of the platforms from Bloxwich to Rugeley Town (inclusive) has not even started yet.</p>
LPIS10	Canal & River Trust	<p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives".</p> <p>Following consideration of the document we have the following comments to make: Within Cannock Chase District there is the Trent & Mersey and Cannock Extension Canal. In addition, whilst actually within Lichfield District, Cannock Chase reservoir also sits just adjacent to the administrative boundary. Approximately 28% of the population of Cannock Chase live within 1km of our waterways. The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. The canal network should be acknowledged as a key feature of the District. The extent of the canal network and the opportunities it provides for recreation should be clearly set out though it should be noted that the canal network can play an important role in supporting sustainable communities and bring benefits to the area from aspects such as tourism, biodiversity and walking / cycling (leisure and commuting).</p>
LPIS11	Highways England	Highways England does not have any comments on the District Profile and welcomes the inclusion of reference to provision of comprehensive transport networks which need to be better supported to help reduce social exclusion and unsuitable development impacts as an issue for the District.
LPIS12	Historic England	Good reference is made to the close relationship between historic activity and the landscape on page 96 – this is a notable heritage element of the plan area. This could be improved further by providing a dedicated section for the historic environment, identifying the types of heritage assets which are key to the area, their contribution to quality of life and other subject areas (e.g. tourism) as well as issues and opportunities facing that heritage. Useful sources of information include; the Historic Environment Record, the National List, Conservation Area Appraisals, Management Plans, local groups, local archives and the expertise of your Conservation Officer and Archaeological Advisors.
LPIS13	KGL (Estates) Ltd (J Heminsley)	The District Profile should include reference to the need for the District to contribute to housing land supply across the wider Birmingham Housing Market Area.
LPIS14	Natural England	On page 98 it is stated "The area is served by a series of major open recreational spaces e.g. Hednesford Hills, a recently

		designated SSSI, and major parks at Cannock, Hednesford and Heath Hayes.” When referring to the recently designated SSSI, it would be helpful to make it clear that the site has been included as part of the Chasewater and The Southern Staffordshire Coalfield Heaths SSSI.
LPIS15	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the identified District Profile. The acknowledgement that the housing evidence base will need updating as part of the Local Plan Review is supported, particularly to reflect the requirements of the revised National Planning Policy Framework (NPPF) and the introduction of the Standard Method to calculate housing need. However, the District Profile also identifies Cannock Chase District as having a greater employment rate than both the regional and national average. It should be recognised that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method in order to support growth within the District and to ensure a balance between jobs and homes provision to promote sustainable travel patterns and communities.</p> <p>Richborough Estates recognises Cannock Chase District Council's membership of the Greater Birmingham and Solihull Local Enterprise Partnership (LEP). However, it is felt that greater recognition should be given to the importance and ability of Cannock Chase District in meeting the unmet housing need arising from the Greater Birmingham Housing Market Area (GBHMA) and supporting the economic growth ambitions of the LEP.</p> <p>The Profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. Richborough Estates acknowledges this; however, Green Belt boundaries should not be maintained to the detriment of sustainable development. It should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development. The Profile also identifies that a Green Belt Study produced in 2016 provides an overview of the District's Green Belt and how it performs against the nationally defined purposes of the Green Belt. This Study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF. Richborough Estates has produced representations in respect of the methodology deployed within the Green Belt Study previously.</p> <p>Lastly, the Profile identifies Cannock, Hednesford and Heath Hayes as a continuous urban area, with the greatest abundance of services and facilities. Richborough Estates submits that this should be strengthened to explicitly identify Cannock, Hednesford and Heath Hayes as the most sustainable settlements within the District. Similarly, Norton Canes is identified as a sustainable settlement, with a number of local services and facilities. Nevertheless, it is also felt that the sustainable nature of Norton Canes should be strengthened within the District Profile.</p>
LPIS16	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the identified District Profile. The acknowledgement that the housing evidence base will need updating as part of the Local Plan Review is supported, particularly to reflect the requirements of the revised National Planning Policy Framework (NPPF) and the introduction of the Standard Method to calculate housing need.</p> <p>However, the District Profile also identifies Cannock Chase District as having a greater employment rate than both the regional and national average. It should be recognised that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method in order to support growth within the District and to ensure a balance between jobs and homes provision to promote sustainable travel patterns and communities.</p> <p>Richborough Estates recognises Cannock Chase District Council's membership of the Greater Birmingham and Solihull Local Enterprise Partnership (LEP). However, it is felt that greater recognition should be given to the importance and ability of Cannock Chase District in meeting the unmet housing need arising from the Greater</p>

		<p>Birmingham Housing Market Area (GBHMA) and supporting the economic growth ambitions of the LEP.</p> <p>The Profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. Richborough Estates acknowledges this; however, Green Belt boundaries should not be maintained to the detriment of sustainable development. It should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development. The Profile also identifies that a Green Belt Study produced in 2016 provides an overview of the District's Green Belt and how it performs against the nationally defined purposes of the Green Belt. This Study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF. Richborough Estates has produced representations in respect of the methodology deployed within the Green Belt Study previously.</p> <p>Lastly, the Profile identifies Cannock, Hednesford and Heath Hayes as a continuous urban area, with the greatest abundance of services and facilities. Richborough Estates submits that this should be strengthened to explicitly identify Cannock, Hednesford and Heath Hayes as the most sustainable settlements within the District. Similarly, Norton Canes is identified as a sustainable settlement, with a number of local services and facilities. Nevertheless, it is also felt that the sustainable nature of Norton Canes should be strengthened within the District Profile.</p>
LPIS17	Rugeley Town Council	<p>The district profile does not identify the economic sustainability of the towns over time. Rugeley is a market town that has been declining over a number of years. The high street is not vibrant and varied and decline in footfall and care of public realm is evident. The market hall is a shadow of its former self with the majority of unit's vacant and not enough occupancy to warrant opening 6/7 days per week.</p>
LPIS18	Taylor Wimpey (Lichfield's)	<p>Since the commencement of the LPIS consultation, the revised Framework (July 2018) and associated Practice Guidance documents have been published by the Government. Taylor Wimpey notes that there are references in the Profile to draft documents which have now been published. For example, the section on Housing on page 93 of the LPIS refers to the "draft standard housing methodology" which has now been published. In order to ensure a sound plan, the Council needs to ensure that the District Profile is based on an up to date evidence base which reflects the revised Framework (July 2018) and relevant Practice Guidance. The District Profile should be reviewed in light of the latest national planning policy and guidance issued by the Government and updated accordingly.</p>
LPIS19	St Modwen (Land at Watling Street Business Park) (RPS)	<p>The key issues include recognising that economic growth and regeneration needs have to be met and access to employment opportunities and local labour skills require improvement. The LPR also references the Council's new Corporate Plan covering the period 2018 to 2023 and the strategic objectives, including creating a positive environment in which businesses in the District can thrive; increasing the skill levels of residents and the amount of higher skilled jobs in the District, and increasing access to employment opportunities.</p> <p>A key issue for the plan (as addressed later in these representations) will be to establish an employment target which is reflective of the Council's own corporate plan aspirations, but also builds on wider employment growth aspirations including those set out in the Strategic Economic Plans for the area. The Strategic Economic Plan for Stoke-on-Trent and Staffordshire recognises that the "future prosperity of the...economy depends on growth and competitiveness within our business base" (paragraph 1.4). This would mean ensuring the plans objectives to employment provision are appropriately aspirational and set as a minimum.</p> <p>The Council should plan for high levels of employment growth in suitable locations, to enable further growth in the District and support the wider aspirations of the Greater Birmingham & Solihull Local Enterprise Partnership (GBSLEP) and the manufacturing sector in the sub-region. The Greater Birmingham Housing Market Area (HMA) Strategic Growth Study sets out that GL Hearn</p>

		conclude that “on the basis of the current evidence, provision of between 205,000 – 246,000 homes is needed across the Birmingham HMA to 2031; and provision of between 256,000 – 310,000 homes to 2036 (from a 2011 baseline) to meet the Birmingham HMA’s housing needs” (paragraph 1.13). “The analysis indicates that based on current supply assumptions, and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA” (paragraph 1.23). Paragraph 4.38 of the HMA Growth Study also recognises the shortfall of employment land in the District and therefore it is “unclear whether the evidence would justify release of employment land for residential”. As well as the provision of housing, this will need to include an uplift for employment land to ensure commuting rates are reduced.
LPIS20	Claire Walker	The evidence base says there is housing requirement of 295 dwellings required per annum from 2016 to 2036 there is currently in excess of this already being built year on year in the area.
LPIS21	Christopher Walker	The evidence base says there is housing requirement of 295 dwellings required per annum from 2016 to 2036 there is currently in excess of this already being built year on year in the area.
LPIS22	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	<p>The ‘Sub-national Context’ section of the District Profile recognises Cannock Chase District’s geographical position and interrelationship with the West Midlands conurbation and wider Staffordshire. In this regard, it is important that the District Profile also recognises Cannock Chase District’s role in the functional Birmingham Housing Market Area (HMA).</p> <p>In relation to determining an up-to-date, revised housing requirement for the District, the ‘Housing’ section of the District Profile refers the draft standardised methodology for objectively assessed housing need (OAHN), published in September 2017, which indicates a housing requirement of 295 dwellings per annum (2016-2036) for Cannock Chase District. The standardised methodology for OAHN is due to be reviewed in the autumn of 2018 and therefore the Local Plan Reviews needs to consider this when published. The use of the standardised methodology as part of a local housing need assessment, to determine the new up-to-date housing requirement for the District is supported by the NPPF, including Paragraph 60.</p> <p>Paragraph 60 is however clear that the standard methodology should be used to determine the minimum number of homes needed for an area. In addition to this the local housing need figure, must take into account the unmet needs of neighbouring areas. Given the Greater Birmingham Housing Market Area shortfall, it is essential that the Local Plan Review addresses this issue. As such, in order to produce a legally compliant and ‘sound’ plan with a positively prepared and justified strategy, it will be necessary for the revised housing requirement to take additional numbers above that identified under the standardised methodology, in order to meet unmet needs within neighbouring areas, and sufficiently meet the duty to cooperate.</p> <p>Furthermore, the ‘Employment’ section of the District Profile notes the importance of the local economy to the area and that the District’s employment rate has increased over the past few years and remains higher than both the regional and national average. A key part of the Council’s proposed Vision within the Consultation Document is to achieve a thriving local economy and sustainable economic growth, seeking to address key long standing economic structural weaknesses, as set out with the District Profile; including 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. As such, in order to support such sustainable economic growth, it is necessary for the housing strategy and associated housing requirement to reflect and integrate with the proposed economic strategy for the District, which may inherently lead to the need for additional homes. It is also important that the strategy for improving infrastructure in the District, including educational facilities, and transport options, also aligns with the proposed economic and housing strategies.</p>
Question 2 – do you have any comments identified on the key issues identified here [in the consultation document]? Are there any key issues not covered which the local		

plan review needs to consider?		
LPIS23	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The connectivity between the key issues identified needs to be understood and highlighted. For example, it is agreed that Future housing needs have to be met and that Economic growth and regeneration needs have to be met, but the latter is not achieved simply through creating employment opportunities and local labour skills, but by creating scope for additional housing beyond the currently identified need, to encourage communities to grow and become more sustainable. Similarly, the low standards of health can be addressed alongside the protection and enhancement of areas of landscape character, the protection and enhancement of which should not only take account of demands for recreation and economic activity but also for housing.
LPIS24	Church Commissioners (Barton Wilmore)	We feel that issue three should be expanded to ensure it is clear that the Council is seeking to meet both its housing need and that of the wider area, including that of the Greater Birmingham Housing Market Area. The protection of the natural/historic environment and landscape character needs to be balanced against the requirement to meet housing need. As such, issue seven needs expanding to include this point alongside the needs for recreation and economic activity.
LPIS25	Highways England	Highways England does not have any comments on the District Profile and welcomes the inclusion of reference to provision of comprehensive transport networks which need to be better supported to help reduce social exclusion and unsuitable development impacts as an issue for the District.
LPIS26	Historic England	See Question 1
LPIS27	Lichfield and Hatherton Canals Restoration Trust	We note that the restoration of the Hatherton Canal, partly on a new alignment, is mentioned in Appendix 2 and welcome and support this as a Key Issue for the District moving forward.
LPIS28	Natural England	We agree that the issues raised are still relevant.
LPIS29	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates supports the identification of housing need and economic growth as key issues. However, it should be made clear that the Council has a requirement to not only test to meet housing need arising from within the District, but also from within the wider HMA. It is also considered that the need to support existing and future services and facilities should be identified, as this plays a key part in delivering and maintaining sustainable communities.
LPIS30	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates supports the identification of housing need and economic growth as key issues. However, it should be made clear that the Council has a requirement to not only test to meet housing need arising from within the District, but also from within the wider HMA. It is also considered that the need to support existing and future services and facilities should be identified, as this plays a key part in delivering and maintaining sustainable communities.
LPIS31	Rugeley Town Council	The para refers to neighbouring authorities and partners to work with. Whilst not strategic, I am surprised that there is no mention of town and parish councils within Cannock Chase as potential partners. With cuts on CCDC and SCC funding, the support of the towns and parishes in implementing works, project management etc. would be an opportunity. The towns and parishes are a recognised tier of local government but have been overlooked.
LPIS32	Sport England	Sport England are supportive of the authority updating its indoor and outdoor sports facilities assessment in the form of an Indoor and Built Facility Strategy and Playing Pitch Strategy, in line with the requirements of NPPF para 96. The Strategies should reflect the growth proposed within the Local Plan, if the figures alter significantly then the strategies should be updated. Following the completion of the assessment the district profile should be updated to reflect its findings. The profile identifies that there are health issues and an ageing population it is therefore suggested that the below key issue should

		be identified, which also links in with the Council's Corporate Plan strategic objective For Community Wellbeing. "The natural environment and built environment (inclusive of indoor, built and outdoor sports facilities) should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community."
LPIS33	Staffs. County Council	At Paragraph 2.2, Key District Issues, it is suggested that reference should also be given to the need to ensure that there are sufficient school places available to mitigate housing development and the implications on the provision of school transport. The relevant Sources of information for securing sufficient school places are the Education Act 2011 (statutory duty to ensure that the supply of school places meets demand) and the NPPF 2018.
LPIS34	Taylor Wimpey (Lichfield's)	With regard to the third key issue of meeting future housing needs, Taylor Wimpey considers that the role of Cannock Chase District Council in helping ensure that the significant housing shortfall across the HMA is addressed should be referred to in this issue as this matter is fundamental to the preparation of policy and decisions on the amount of land which needs to be allocated for residential development.
LPIS35	Claire Walker	There have been lots of development in Hednesford that could have met the affordable housing requirements unfortunately a lot of the housing has been allowed to be that of larger property sizes not meeting the affordable property criteria. Therefore the affordable property housing requirements are obviously not as high as suggested.
LPIS36	Christopher Walker	There have been lots of development in Hednesford that could have met the affordable housing requirements unfortunately a lot of the housing has been allowed to be that of larger property sizes not meeting the affordable property criteria. Therefore the affordable property housing requirements are obviously not as high as suggested.
LPIS37	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	It is considered that the seventh identified key issue within the Consultation Document should also add the need to balance the protection and enhancement of highly valuable and sensitive natural environments, historic environments and landscape character, with meeting demands for housing, alongside the demands for recreation and economic activity, already identified under this key issue. As such it is suggested that this key issue is revised to say; "The highly valuable and sensitive natural environment, historic environment and landscape character need to be protected and enhanced whilst meeting demands for housing , recreation and economic activity".
Wider context		
Question 3 Which strategies and plans do you think our new Local Plan needs to align to and what issues should we be addressing locally to help with the delivery of these? Please provide links and further information as part of your response.		
LPIS38	Brereton & Ravenhill Parish Council	<u>Pages 10 to 12, Section 3</u> BRPC strongly supports full compliance with the duty to cooperate introduced by the Localism Act 2011 section 110. This must apply to the relationships with both Lichfield District Council and Stafford Borough Council.
LPIS39	Brindley Heath Parish Council	<u>Page 9, Paragraph 2.4</u> Brindley Heath Parish Council (BHPC) welcomes the inclusion of 'Commencement of regeneration of the Rugeley Power Station site' as one of six strategic objectives. Redevelopment of previously developed land is much preferable to development on Greenfield sites. <ol style="list-style-type: none"> 1. We also feel the regeneration should include some form of Country Park on land in flood zone 3. The proximity of this country park may allow some increase in density above that which would be appropriate in areas that were not next to the new substantial public open space. 2. Assistance should be given to businesses that wish to move from employment areas served by roads though residential

		<p>areas to employment land on the Power Station site.</p> <p>3. We would also suggest there must be adequate educational, medical and transport provision for new housing on it.</p>
LPIS40	Church Commissioners (Barton Wilmore)	<p>The LPR should be prepared in such a way that the needs of the wider housing market area are met as well as the Council's, with a specific focus on cross boundary working. The meeting of unmet housing need (both locally and regionally) is a specific issue which should be addressed. To this end, the Greater Birmingham HMA Strategic Growth Study (February 2018) should be taken into account in so far that it shows the unmet need within the Greater Birmingham HMA. This identified a housing need of 256,000 – 310,000 dwellings between 2011-2036 including 22,000 dwellings of unmet need from the Black Country authorities.</p> <p>Further to this, the Birmingham Development Plan (January 2017) identified an unmet need of 37,900 dwellings which should be taken into account.</p> <p>The Revised National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) require Councils to prepare and maintain Statements of Common Ground (Paragraph 27) to ensure an effective approach is taken for strategic matters such as housing need. There is a duty for local planning authorities to cooperate with each other on strategic matters (Paragraph 24 and Paragraph: 017 Reference ID: 12-017-20140306).</p> <p>The revised NPPF makes it clear that strategic policies should set out the overall strategy for the pattern, scale and quality of development, including housing, and that strategic policies should look ahead to a minimum timeframe of 15 years. Sufficient sites should also be allocated to deliver the strategic priorities of the area and any relevant cross-boundary issues.</p>
LPIS41	Greenlight Developments (Lichfield's)	<p>Greenlight Developments Limited ('Greenlight') support the Council's recognition within Chapter 3 of the Issues and Scope consultation document ('the Consultation Document') which focuses on how the District fits within the wider, West Midlands context. This aligns with the approach set out in the National Planning Policy Framework (NPPF, 2018) which requires that, to be effective, Local Plans should be "based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred."</p> <p>Primarily, Greenlight support the Council's commitment across paragraphs 3.3 and 3.4 that it will work with neighbouring authorities on a range of strategic issues, with Housing Growth being a key issue within this.</p> <p>In addition, Chapter 2 of the consultation document refers to the new Corporate Plan which identifies the key priorities for the District over the next five-year period, to 2023. One of the Council's key priorities is to promote prosperity, including through the strategic objective of increased housing choice. In response to question 4, the Corporate Plan is a key plan which the Council must ensure its strategies are aligned with.</p> <p>This is particularly important given that there is a significant housing shortfall across the Greater Birmingham Housing Market Area (GBHMA) which comprises 28,150 dwellings to 2031 and 60,900 to 2036. It is understood that, as of yet, there have been no commitments regarding how much of the housing shortfall each LPA should accommodate. However, the Greater Birmingham HMA Strategic Growth Study (February 2018) found that LPAs in the HMA are likely to need to seek to maximise opportunities for housing delivery, including making more efficient use of land and that Green Belt release will need to be looked at. This is particularly pertinent in Cannock Chase which is a Borough very constrained by Green Belt (Environmental Capacity Study 2013). This strategy should be used to inform development of the plan's future policies to align with duty to co-operate.</p> <p>Greenlight's site (see site plan at annex 1) is a cross boundary site, 2Ha of which is within Cannock Chase, with the remaining 10.5 Ha falling in South Staffordshire. Greenlight's response to Policies CD6 and CD1 below identifies the parcel of land within Cannock Chase (assessed under the Councils 2017 SHLAA as site C21) as a sustainable site in its own right which, if allocated by the</p>

		<p>Council in its new local plan, would assist with meeting housing need in Cannock Chase as well as the wider HMA. However, it is also relevant that, in its most recent Housing Delivery Monitor (May 2018), South Staffordshire could only demonstrate a housing land supply position of 3.42 years (https://www.sstaffs.gov.uk/doc/179539/name/Final%205%20Year%20Housing%20Land%20Supply%20Statement%20May%202018.pdf/). The wider site therefore offers the additional opportunity to assist with meeting housing needs in South Staffordshire and provide a larger contribution to shortfall across the HMA. Notwithstanding, Greenlight consider there is nothing preventing the allocation of the smaller, predominantly brownfield parcel in Cannock Chase on its own merits; a suitably designed housing scheme could be brought forward for this parcel. This would not prejudice, and could be done in advance and separately to, allocation of the wider site if this is considered to be an appropriate spatial strategy for jointly meeting housing needs under Duty to Cooperate. In sum, Greenlight support the Council's acknowledgement of the plan's role in addressing cross-boundary issues, including Housing needs. The Council must ensure its New Plan is supported by a sufficient, thorough evidence base so that it can meet this need.</p>
LPIS42	Home Builders Federation	<p>The new Cannock Chase Local Plan should be prepared on the basis of joint working on cross boundary issues such as where housing needs cannot be wholly met within individual authorities. As Cannock Chase is part of the Greater Birmingham Housing Market Area (GBHMA) the meeting of unmet housing needs in the GBHMA is a cross boundary matter. To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with the other GBHMA authorities to maximise the effectiveness of plan making. One key outcome from co-operation between the GBHMA authorities should be the meeting of Objectively Assessed Housing Needs (OAHN) in full across the GBHMA. The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031 which to date the GBHMA authorities have failed to re-distribute. The Greater Birmingham & Black Country HMA Strategic Growth Study published in February 2018 identifies an updated housing need of 256,000 – 310,000 dwellings between 2011– 2036 for the HMA. This latest assessment also identifies the potential for circa 22,000 dwellings of unmet need from the Black Country authorities by 2036.</p> <p>The National Planning Practice Guidance (NPPG) states that a key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted (ID 9-017). The meeting of unmet needs should be set out in a Statement of Common Ground (SoCG) signed by all respective GBHMA authorities (paras 24, 26 & 27 of revised National Planning Policy Framework (NPPF)). The Council should not sign any non-multilateral SoCG for contributions towards meeting unmet needs which provides no certainty that the overall combined sum of such non-multilateral agreements will meet the unmet needs in full of the GBHMA. As identified by the Stratford upon Avon Local Plan Inspector's Final Report a "holistic approach" is required.</p>
LPIS43	Inglewood Investments (SLR Consulting)	<p>The key issues relate to housing land shortfall (and employment land) and the availability of land both within the District and wider West Midlands Conurbation. It is evident that the majority of the District falls within the Green Belt and/or AONB, therefore CCDC need to take a pro-active integrated and robust approach to releasing land from the Green Belt. This should ensure that housing targets are met and avoid pressure from speculative development applications, which would be likely to result should the 'Housing Delivery Test' not be met.</p>
LPIS44	KGL (Estates) Ltd (J Heminsley)	<p>As above, the objective for housing needs to include reference to the evidence in relation to housing land supply in the GBHMA whereby some of Birmingham's housing requirements are required to be dealt with across all the other LPAs in the area.</p>
LPIS45	Natural England	<p>Cannock Chase AONB Management Plan – Recreation</p>

		<p>See – http://www.cannock-chase.co.uk/assets/downloads/74646AONBmanagementplan2014-19.pdf</p> <p>Staffordshire Minerals Local Plan (MLP) – Sand and gravel sites close to or within the AONB offer great opportunities for lowland heathland creation as part of restoration. The local plan review can refer to such opportunities at a high level, for example through NPPF coverage of e.g. net gain and ecological networks.</p> <p>MLP link here: https://www.staffordshire.gov.uk/environment/planning/policy/thedevelopmentplan/mineralslocalplan/mineralsLocalPlan.aspx</p> <p>Staffordshire Biodiversity Action Plan – The Staffordshire Wildlife Trust website provides useful info and present ecosystem action plans in recognition of the fact that BAPs are now a thing of the past and Local Nature Partnerships may be working on for example biodiversity and habitat mapping to decide where effort should be focused. SBAP link to Ecosystem action plans info here: http://sbap.org.uk/actionplan/index.php</p>
LPIS46	Paris, G (on behalf of the Trustees of the Estate of TB Follows)	Trustees acknowledge and approve that CCDC will be considering the requirement to accommodate a significant number of houses to from GBHMA and the West Midlands during the plan period, in addition to local housing requirements. We hope that the Council will consider again the various sites which were under review in the March 2017 'Housing Site Options' consultation.
LPIS47	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031 which, to date, the GBHMA authorities have failed to re-distribute. The GBHMA Strategic Growth Study published in February 2018 identifies an updated housing need of between 256,000 – 310,000 dwellings between 2011–2036 for the housing market area. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet need from the Black Country authorities by 2036.</p> <p>Richborough Estates accordingly supports the involvement of Cannock Chase District with the GBHMA and its constituent authorities. The Council will need to ensure that the Local Plan engages fully with the GBHMA authorities in respect of unmet housing need, as well as infrastructure and other cross-boundary issues, in order to satisfy the legal requirements of the Duty-to-Cooperate. This engagement should be on-going and genuine, throughout the period of the plan. There is also a requirement for the Council to align the Local Plan with the Corporate Plan and the Economic Strategy of the LEP.</p>
LPIS48	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031 which, to date, the GBHMA authorities have failed to re-distribute. The GBHMA Strategic Growth Study published in February 2018 identifies an updated housing need of between 256,000 – 310,000 dwellings between 2011–2036 for the housing market area. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet need from the Black Country authorities by 2036.</p> <p>Richborough Estates accordingly supports the involvement of Cannock Chase District with the GBHMA and its constituent authorities. The Council will need to ensure that the Local Plan engages fully with the GBHMA authorities in respect of unmet housing need, as well as infrastructure and other cross-boundary issues, in order to satisfy the legal requirements of the Duty-to-Cooperate. This engagement should be on-going and genuine, throughout the period of the plan. There is also a requirement for the Council to align the Local Plan with the Corporate Plan and the Economic Strategy of the LEP.</p>
LPIS49	Rugeley Town Council	The town and parish councils may have Neighbourhood Plans which are by their nature recognised by the local plan. However, where Neighbourhood Plans are not developed, the local plan should mention town and parish council strategies and action plans. These are often filled with projects, schemes, partnership working and economic regeneration initiatives that could support the local plan.
LPIS50	Stafford Borough	As Stafford Borough is a neighbouring authority to Cannock Chase District a number of the strategic key issues could have

	Council	<p>development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham Housing Market Area, nor the Greater Birmingham & Solihull LEP area.</p> <p>Based on 'How the District's Fits within the Wider Context' identified for Cannock Chase District, the Borough Council acknowledges the key cross boundary linkages concerning travel to and from Stafford for employment, retail and leisure continuing the broad approach of the current Local Plan. However as a point of clarification further detail should be provided on the relationship between the Rugeley Town Centre Hinterland and Stafford Borough confirming that new development will be contained wholly within the Cannock Chase area from the strategic planning context rather than rural areas of the Borough. Furthermore there should be no future development through the new Cannock Chase Local Plan which impacts on the Green Belt or Area of Outstanding Natural Beauty within Stafford Borough</p>
LPIS51	Staffs. County Council	<p>It is noted at paragraph 3.2 reference is made to infrastructure and delivery strategies citing education as an example. In this context it would be useful to draw your attention to the Staffordshire Learning Infrastructure Framework and the Education Planning Obligation Policy document (including any successor document).</p> <p>The New Local Plan will need to align with both Joint Waste Local Plan and Minerals Local Plan.</p>
LPIS52	Taylor Wimpey (Lichfield's)	<p>To ensure that the Local Plan is sound, and informed by a robust evidence base, the evidence base will need to be updated to ensure that it fully accords with the revised Framework (July 2018) and the relevant Practice Guidance including that on the Standard OAN Methodology, and Planning Obligations and Viability. In considering the release of Green Belt land, the Council will need to demonstrate that it has examined fully all other reasonable options when considering the release of land from the Green Belt in accordance with the revised Framework (July 2018) [§§135 -139]. Further evidence base work in relation to this matter will be necessary.</p> <p>The 14 authorities comprising the Greater Birmingham and Black Country Housing Market Area [GBHMA] are identified in the LPIS [§3.1] as a key partnership formed under the Duty to Cooperate. Meeting future housing needs is identified as a key issue in the LPIS [§2.2], and the ability of Cannock Chase District Council to help ensure that the significant housing shortfall across the HMA is addressed is central to this issue including the existence of exceptional circumstances as set out in the revised Framework [§137©]. Taylor Wimpey considers that any additional identified need from the GBHMA can be accommodated in part by releasing and allocating suitable Green Belt sites in Cannock Chase District for housing. The site at Wimblebury Road, Cannock is considered to be suitable to help meet the future housing need for the District, including any additional identified need from the GBHMA.</p> <p>Notwithstanding the above, Taylor Wimpey has several concerns with the evidence base produced to inform the Local Plan, in particular the Greater Birmingham and Black Country HMA Strategic Growth Study [SGS] (February 2018). We provide further details on this matter in our representations below.</p>
LPIS53	Transport for West Midlands (WMCA)	<p>The draft Local Plan clearly demonstrates a "commitment to work with bus and rail operators, Staffordshire County Council, the West midlands Combined Authority, the Local Enterprise Partnerships, local transport bodies and developers to help develop and promote sustainable transport modes". Yet there have been a number of significant regional developments that have occurred over the last year since the publication of Local Plan (Part 1) and the draft Local Plan (Part 2). Items of note include:</p> <ul style="list-style-type: none"> - Midlands Engine and Midlands Connect Strategies - WMCA's Strategic Economic Plan - WMCA's Strategic Transport Plan (Movement for Growth) - WMCA's 10 year Transport Delivery Plan - WM's HS2 Connectivity Package

		<ul style="list-style-type: none"> - Stations Alliance - Rail Investment Strategy - Government's Road Investment Strategy - WMCA's draft Park and Ride Strategy <p>Where these documents have impacts for the movement of people and goods to, from and through Cannock Chase District, this may have implications for land use planning. We therefore encourage Cannock Chase District Council to consider any additional information to be supplied within this document that clarifies how it supports Cannock Chase District's role within the context of recent developments in regional economic development and connectivity policy, strategy and planning. Further detail is provided in the appendix (response provides additional detail on how each strategy/plan may have implications for land use planning in Cannock Chase District).</p>
LPIS54	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Cannock Chase District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area (GBHMA). It is well established that there is a significant shortfall in planned provision to meet housing requirements in Birmingham. Policy PG1 of the Birmingham Development Plan (adopted January 2017) quantifies this shortfall as 37,900 dwellings (2011 – 2031) and will need to be addressed locally.</p> <p>The apportionment of housing is a matter requiring further understanding and evaluation based on the additional evidence referred to elsewhere within this representation, including:</p> <ul style="list-style-type: none"> • A review and critique of the Greater Birmingham HMA Strategic Growth Study (GL Hearn, 2018) • The Black Country and South Staffordshire Strategic Housing Market Assessment Final report Peter Brett Associates March 2017 • the impact of a standardised methodology for calculating housing need upon housing land supply • A more detailed review and evidence to assess and consider the impact of and appropriateness of a blanket 'densification' calculation • Up to date household growth projections released by the Ministry of Housing, Communities & Local Government • Birmingham Sub-Regional Housing Study – Part 2 (Barton Wilmore, 2014) • The future capacity, potential and delivery timescales for Rugeley Power Station • The impact of such additional evidence upon the scope and purpose of a revised Green Belt Review
LPIS55	Claire Walker	They need to align to environment protection and enhancement. Protection of the green spaces is important to the area.
LPIS56	Christopher Walker	They need to align to environment protection and enhancement. Protection of the green spaces is important to the area.
LPIS57	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	As noted above, it is important that Cannock Chase District Council adequately collaborate on strategic matters that cross administrative boundaries as part of the required duty to cooperate, including the delivery of housing as part of the Birmingham HMA. It is therefore necessary for the new Local Plan Review to align with strategies of authorities in the wider Birmingham HMA. The identified housing requirements and broad identified strategic delivery options set out in the Greater Birmingham HMA Strategic Growth Study (February 2018) should therefore be considered in this regard.
Question 4 – do you think there are other cross boundary issues we should be considering		
LPIS58	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The connectivity between the key issues identified needs to be understood and highlighted. For example, it is agreed that Future housing needs have to be met and that Economic growth and regeneration needs have to be met, but the latter is not achieved simply through creating employment opportunities and local labour skills, but by creating scope for additional housing beyond the currently identified need, to encourage communities to grow and become more sustainable. Similarly, the low standards of health can be addressed alongside the protection and enhancement of areas of landscape character, the protection and enhancement of

		which should not only take account of demands for recreation and economic activity but also for housing.
LPIS59	Birmingham City Council	Paragraph 3.4 correctly identified the key cross-boundary issues that will need to be taken into account in the Local Plan review.
LPIS60	Black Country Authorities	<p>Thank you for your email of 2nd July. Please accept my apologies for the time that we have taken in bringing together a response on behalf of the 4 Black Country Councils. In the meantime, of course, the Black Country Authorities have written to your authority in respect of strategic development needs, and we have received a helpful response from your Managing Director.</p> <p>Besides the wide-ranging strategic issues about the scale and location of housing, industry and other forms of development, we recognise there will be more localised issues (perhaps as a result of the implications of the strategic issues) and also cross-boundary issues especially in relation to Walsall borough. In the circumstances, we have sought to identify the issues on a 'topic' basis and to order them in a way that seems logical, at least for the moment. Thus, the matters that we think should be the subject of the Duty to Cooperate in respect of Cannock Chase District's Local Plan Review are as follows.</p> <ol style="list-style-type: none"> 1. Meeting projected housing needs - including through cooperation on the shortfalls in provision projected for Birmingham and the Black Country. 2. Meeting projected needs for gypsies and travellers there is a potential issue about the ability to meet such needs generally as well as issues regarding particular sites, such as at Lime lane near the boundary with Walsall. 3. The scale and location of development for employment (including offices) there will be a need to consider strategic issues of location and in terms of impacts on investment and access to jobs. 4. The scale and location of retail development (and other consumer services) - not least in light of Cannock Chase Council's decision to support the scheme for a designer outlet centre at Mill Green. 5. Green Belt - including the possible need to plan for sites that across local authority boundaries. 6. Green infrastructure - especially if Natural England wishes to pursue the idea of linkages between Cannock Chase and Sutton Park. 7. Green corridors - for wildlife and for people. 8. Water supply and drainage - in relation to existing issues as well as new developments and potential canal restoration. 9. Cannock Extension Canal SAC - in terms of the potential for restoration of the Hatherton Canal and effects on the SAC. 10. Cannock Chase SAC - continuing work on an up-to-date evidence base and in the context of recent EU Court judgements. 11. .Cross-boundary transport links and potential impacts - including rail and road connections and recognising the role of Staffordshire County Council. 12. The implications of mineral resources for development proposals in the area - whilst we recognise the role of Staffordshire County Council, the identification of mineral resources will have implications for potential sites across local authority boundaries (notably at Yorks Bridge). <p>I have set the issues down briefly, because the list is quite a long one, but also because I think we share mutual recognition of the issues. Some of the issues (notably housing growth and matters relating to European sites) are already included in current discussions involving a number of authorities, whilst others (including the Green Belt, green infrastructure and green corridors) are to be addressed (at least to some degree) by work towards the Black Country Core Strategy Review. I would anticipate that your authority will already have envisaged the need to consider the issues in your work.</p> <p>I, and Black Country colleagues, will be happy to discuss more detailed definitions of the matters I have listed. We will also be interested to identify who might be best placed to deal with particular issues and the mechanisms for progressing matters. For our part, we would be most interested to be advised as to how you will be working with Staffordshire County Council to address</p>

		transport and mineral resource issues.
LPIS61	Canal & River Trust	<p>Green Infrastructure should be identified as a key cross boundary issue with the canal network identified as forming part of this infrastructure. The canals span several local authority boundaries, and, in the case of Cannock, this includes a small section of the Cannock Extension Canal and its junction with the Wyrley & Essington Canal, which are within Walsall. As identified above the Cannock chase reservoir is on the administrative boundary in Lichfield, this links to the Wyrley & Essington Canal.</p> <p>In addition, there is the also the line of the proposed Hatherton Canal restoration which would connect to the wider canal network and also falls within Walsall and South Staffordshire Districts. This can present certain considerations as proposals falling within different local authority areas could have implications for the canal developments in another local authority area. It is therefore important to ensure that these are identified as key cross boundary issues and the LPAs works together and in consultation with the Trust when considering issues that may affect the canal network.</p>
LPIS62	Church Commissioners (Barton Wilmore)	See Question 3.
LPIS63	Greenlight Developments (Lichfield's)	See question 3
LPIS64	Inglewood Investments (SLR Consulting)	<p>The release of the GBHMA Strategic Growth Study requires Local Authorities to consider the housing needs of their neighbouring LPAs and their cross plan boundary market areas. The study clearly demonstrates that there is a significant shortfall within the West Midlands area, and therefore LPAs should be co-operating with each other in order to address this.</p> <p>Our Client's site is on the border of CCDC and Lichfield District Council. CCDC and all LPAs within the West Midlands region should be considering sites which can help serve the development needs of neighbouring authorities, particularly where their release would not compromise the objectives of Green Belt.</p>
LPIS65	Lichfield and Hatherton Canals Restoration Trust	The Plan should explicitly mention cross-boundary co-ordination issues to ensure a protected through route for the restored Hatherton Canal. This will require working with Walsall Council and South Staffordshire District Council.
LPIS66	Natural England	<p>Natural environment issues include:</p> <ul style="list-style-type: none"> • Air and water quality impacts under the Habitats Regulations 2017 e.g. Cannock Extension Canal SAC/SSSI. • Ecological networks including green and blue infrastructure, biodiversity net gain etc. . This theme would benefit from a strategic approach in its own right. We note that the Greater Birmingham Housing Market area dialogue emphasises the need for further cross border working. Synergies may be realised through the formulation and implementation of neighbouring LPAs' infrastructure delivery plans e.g. GI as part of transport improvements. • Existing strategic projects for European designated sites – Managing recreational pressure on Cannock Chase SAC.
LPIS67	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates agrees with the cross-boundary issues identified by Cannock Chase District Council.
LPIS68	South Staffs Council	South Staffordshire Council welcomes the opportunity to submit comments at this initial stage of the process. The Council supports

		<p>the timetable as outlined in paragraph 1.11 culminating in a proposed adoption date of September 2021. It is recognised that this is just the first stage in what will be an ongoing dialogue and South Staffordshire is confident that both authorities will be able to work cooperatively to address issues of mutual interest and concern.</p> <p>The Scoping and Issues Paper covers a broad range of topics and issues. In submitting this representation we have sought to provide our initial thoughts on those issues which we consider are the matters of joint relevance and concern, most notably in relation to housing supply issues and economic development considerations where both authorities share an inter-related geography.</p>
LPIS69	Rugeley Town Council	<p>The plan on page 12 shows clearly that the main conurbation of Cannock/Hednesford identifies with the West Midlands conurbation and links to it for economic and social development. Rugeley is divided from this by the Chase and is not close enough to other urban areas to get support/benefits. The plan clearly demonstrates that Rugeley has different needs to the rest of Cannock which are not being picked up in strategies and plans. Even with the development of the former power station site, Cannock's influence is limited as the area comes under Lichfield District. Care should be taken that Rugeley is not seen as a floating island, struggling to link to other economic areas but is brought into regeneration schemes for the district. Left to fend for itself, a market town will struggle to develop and bring itself out of a depression.</p>
LPIS70	St Modwen (Land at Watling Street Business Park) (RPS)	<p>Section 3 of the LPR recognises the complexity of the geography of the West Midlands and also sets out the new Local Plan will need to help the various organisations and partnerships to deliver their ambitions and objectives. Cross-boundary issues that the Council have identified include housing and economic growth, as well as transport and Green Belt.</p> <p>The Sustainability Appraisal (SA) Scoping Report references at footnotes 79 and 80 (on page 26), the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (March 2014) Strategic Economic Plan and the Greater Birmingham & Solihull LEP (September 2016) GBSLEP Strategic Economic Plan 2016–2030, and the vision to create a significant increase in the number of jobs as well as an increase in the size of the economy. The Stoke-on-Trent and Staffordshire Strategic Economic Plan (SEP) has a “stated aim to grow the economy by 50% and generate 50,000 new jobs in the next 10 years”.</p> <p>Paragraph 3.2 of the LPR refers to the need to ensure that the plan links to a range of strategies and plans, such as the Strategic Economic Plans; the Government's Industrial Strategy; the West Midlands Engine Growth Strategy and Midlands Connect Strategy. All of these documents should be included within Appendix 1 of the SA Scoping Report and reviewed, which should then inform the issues that the plan needs to address.</p> <p>Economic Growth is acknowledged by the Council at paragraph 3.4 of the LPR as a key cross-boundary issue. To help address these issues, the need to provide employment development site allocations and address longer term needs / safeguarding employment is appropriate. However, the plan needs to go further in terms of ensuring that any employment target is based on up-to-date data as well as ensuring that it responds to the changes that have taken place already as well as the implications of helping to meet Birmingham's overspill need. Without making sufficient employment land available, this will have a significant constraining factor on the economy of the area. The allocation of sufficient employment land should also inform the amount of housing that is needed.</p>
LPIS71	Staffs. County Council	<p>We agree that you have covered the relevant cross boundary issues by theme. As the plan evolves it will be necessary to consider the detailed impacts and relevant parties who will need to be involved in discussions.</p>
LPIS72	Upton Trust & Carney	<p>Unmet housing need is a key cross boundary issue that has been identified by Cannock Chase District Council. Cannock Chase</p>

	Brothers (Wardell Armstrong)	<p>District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area (GBHMA) It is well established that there is a significant shortfall in planned provision to meet housing requirements in Birmingham. Policy PG1 of the Birmingham Development Plan (adopted January 2017) quantifies this shortfall as 37,900 dwellings (2011 – 2031). It is proposed that this shortfall is met elsewhere in the Greater Birmingham Housing Market Area (HMA) through the Duty to Co-operate, including within Cannock Chase.</p> <p>The Rugeley Power Station site will need to be considered further as part of the site options as discussed under the section on Policy CP1. The adopted SPD for this site suggests that the preferred vision is for a cross boundary mixed use scheme, with primarily employment-led development in Cannock Chase District.</p> <p>The Lichfield Local Plan Allocations submission document 31 May 2018 contains the Rugeley Power Station Concept Statement. This Concept Statement provides further details in support of Policy R1 of the Local Plan Allocations for the Rugeley Power Station site.</p> <p>The listed strategic objectives for the site include: “To integrate the development of a minimum of 800 homes and associated facilities within a landscape setting” No housing capacity related to Rugeley Power Station is identified within the Issues and Scope consultation document and this is fully supported. The anomaly is that as illustrated above, Lichfield District are already ascribing a certain capacity to the site, which is an inconsistent planning approach.</p> <p>Even where Rugeley Power Station’s potential may be identified in the future, it cannot be robustly assessed or included as anything other than a notional housing site of limited potential, bearing in mind its de-commissioning, decontamination and practical future re-use for energy and or other commercial uses.</p>
LPIS73	Claire Walker	We should not be providing housing for other districts if this impacts on our greenbelt/green spaces as consequence.
LPIS74	Christopher Walker	We should not be providing housing for other districts if this impacts on our greenbelt/green spaces as consequence.
Vision & Objectives		
Question 5: Do you have any comments on the Vision and Objectives (including the priorities set out in Appendix 4)? What changes do you think may need to be made?		
LPIS75	Beaudesert Golf Club (FBC Manby Bowdler LLP)	<p>Vision: The emphasis on local people having pride in where they live is supported, to include the AONB and protected countryside areas; as is the concept of new development complementing and enhancing the area. A vision which includes a choice of new housing, encouraging professionals into the area with aspirational housing is also supported, as is improved accessibility to leisure facilities, all of which will facilitate sustainable economic growth.</p> <p>Objectives: The focus on:</p> <ul style="list-style-type: none"> • promoting sustainable communities to include retaining and enhancing District character (Objective 1) ; • creating healthy living opportunities, to include facilitating accessible good quality sustainably managed open space sport physical activity and leisure facilities (Objective 2); • sustainable housing provision, including aspirational housing (Objective 3); • the inclusion of walking, cycling health and leisure within the concepts of sustainable transport infrastructure (Objective 5); and • the protection, conservation and enhancement of the AONB including maximizing opportunities for access and enjoyment

		<p>promoting new development which enhances the natural and environmental assets (Objective 7) are supported.</p> <p>The Local Plan policies will need to ensure that these aspects are not considered in isolation – sustainable and well-designed housing development close to or within the Green Belt and AONB, for example particularly where brownfield land can be utilised and improved, can be used to facilitate enhancements to the AONB and provide funds to enable opportunities to provide leisure facilities and the improvement of habitat and accessibility of the existing open space assets within the District.</p>
LPIS76	Brereton & Ravenhill Parish Council	<p><u>Page 13, paragraph 4.1</u></p> <p>BRPC welcomes the vision in paragraph 4.1. It is essential that strong and prompt action is taken and seen through to the end against those who harm the Cannock Chase Area of Outstanding Natural Beauty if this vision is to be fulfilled.</p>
LPIS77	Brindley Heath Parish Council	<p><u>Page 13, Paragraph 4.1</u></p> <p>4. BHPC supports the idea in paragraph 4.1. as we feel it is essential that strong and prompt action is taken and carried out against those who harm the Cannock Chase Area of Outstanding Natural Beauty if this vision/objective is to be fulfilled/achieved.</p>
LPIS78	Canal & River Trust	<p>The canal network should be included as making a contribution to addressing key issues facing the district and this should be included in the vision (see ‘overall / general comments’ section for examples). The waterways are significant Green Infrastructure, but they also function as ‘Blue infrastructure’ which serves in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunications. They also offer opportunities for leisure, recreation and sporting activities as part of the ‘natural health service’ acting as ‘blue gyms’ and supporting physical and healthy outdoor activity. The canal network can therefore make an important contribution to addressing the key issues facing the District over the Plan period and achieving the ‘Vision’ and ‘objectives’ for the District’.</p> <p>The Trust consider that stronger references to the canal network should be included within the existing policies across the Plan. The review also offers the opportunity to incorporate a canal specific policy into the Plan and the Trust are happy to advise and work with the Authority on the wording for such a policy.</p>
LPIS79	Greenlight Developments (Lichfield’s)	<p>At Chapter 4 of the consultation document, the Council lists the objectives included in the Local Plan (Part 1) document. This includes Objective 3 which is to ‘provide for housing choice’ and within this, the intention, ‘to manage the release of sufficient land for housing in appropriate locations’. Performance against this objective forms part of the Council’s annual monitoring. Greenlight supports the premise of this objective; it is important that the Council retains a housing focused objective in its new plan in order to align with government objectives to significantly boost the supply of homes and ensure housing needs of the locality are met.</p>
LPIS80	Highways England	<p>Highways England particularly supports Objective 5 which encourages sustainable transport infrastructure. We welcome the sub-priorities set out at Appendix 4 and would like to see reference in the sub-priorities to partnership working on transport issues and modelling the impact of proposed development on the Strategic Road Network.</p>
LPIS81	Historic England	<p>The reference to enjoyment and conservation/enhancement of the historic environment in Appendix 3 is very welcome. We advise that heritage is given specific mention within the associated ‘headline text’ to ensure it is properly reflected. This section could also be further enhanced by mention of the local planning authority taking making the most of opportunities for heritage to better contribute to local quality of life through partnership working and focussing effort through local strategic priorities. In the vision generally, it would also be beneficial to make reference to the interrelationship between heritage and other subject areas, including the contribution that it makes at present and potential for enhancing this (e.g. landscape and tourism).</p> <p>With regards to the objectives, we strongly advise that the conservation and enhancement of the historic environment, and</p>

		<p>opportunities to enhance its contribution to quality of life in the area has a dedicated objective in the development Local Plan (i.e. not subsumed within other wider environmental objectives).</p> <p>We would also strongly advise that, where this has not already been done, an up-to-date evidence base is developed to provide a robust understanding of the significance of heritage assets in the area, the contribution they currently make to quality of life and other subject areas, the issues facing the historic environment, and the opportunities they represent. This information should then go on to inform areas of focus and action and policies within the local plan.</p>
LPIS82	KGL (Estates) Ltd (J Heminsley)	See Question 3
LPIS83	Natural England	In Appendix 3 page 102 under the Vision - People will lead greener more environmentally friendly lifestyles, inspired by Cannock Chase Area of Outstanding Natural Beauty paragraph there is no mention of ensuring good water quality or preventing the loss of soils.
LPIS84	Paris, G (on behalf of the Trustees of the Estate of TB Follows)	<p><u>Link: para 4.2. Trustees approve the list of Principles, Visions and Objectives.</u></p> <p>We hope that the Councils listed 'principles' can be applied so that there is an appropriate match of housing need to suitable locations, and in particular that there should be to a real attempt to provide a range of housing types, (with varied housing densities also considered), in sustainable development areas. This evaluation should not preclude considering development within the Green Belt around the conurbations, provided the AONB and the Green Belt itself are protected through proper design and other sites are proven to be less sustainable. Apart from fulfilling housing need there will be opportunity thereby to increase public access to Green Space corridors and thereby to afford some protection of the Cannock Chase SAC.</p> <p>Deliverability (in legal, planning and practical terms) of sites under consideration in the Review should be an important factor, when considering allocating sites to the Local Plan. It may be important also to reconsider whether larger sites allocated are deliverable in entirety.</p> <p>The Trustees interest is in site R33 (where there is shared ownership with Gallagher Estates) and we would be pleased to answer any questions about this representation.</p>
LPIS85	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the vision as set out at Appendix 3. However, it is considered that the vision as currently drafted is unduly long and should be shortened. In its current form, it is considered that the vision is not deliverable.</p> <p>Richborough Estates is supportive of the objectives set out within the Local Plan Review Document, insofar as they collectively promote sustainable development. In particular, Richborough Estates supports Objective 3, Providing for Housing Choice.</p> <p>Richborough Estates also supports the recognition of the economic benefits that providing for increased housing choice can bring, as well as the need to release land for housing development in appropriate locations.</p> <p>However, it is considered than an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty-to-Cooperate. This will strengthen the requirement and ensure that the Duty-to-Cooperate is fully engaged with throughout the plan period.</p> <p>It is also considered that Objective 3 can be strengthened, so as to not only provide for housing choice, but to also meet housing need. It should be clear that this relates to both local need and need arising from the wider HMA. This should be clearly identified within Appendix 4.</p>
LPIS86	Richborough Estates	Richborough Estates is generally supportive of the vision as set out at Appendix 3. However, it is considered that the vision as

	(Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>currently drafted is unduly long and should be shortened. In its current form, it is considered that the vision is not deliverable.</p> <p>Richborough Estates is supportive of the objectives set out within the Local Plan Review Document, insofar as they collectively promote sustainable development. In particular, Richborough Estates supports Objective 3, Providing for Housing Choice. Richborough Estates also supports the recognition of the economic benefits that providing for increased housing choice can bring, as well as the need to release land for housing development in appropriate locations.</p> <p>However, it is considered that an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty-to-Cooperate. This will strengthen the requirement and ensure that the Duty-to-Cooperate is fully engaged with throughout the plan period.</p> <p>It is also considered that Objective 3 can be strengthened, so as to not only provide for housing choice, but to also meet housing need. It should be clear that this relates to both local need and need arising from the wider HMA. This should be clearly identified within Appendix 4.</p>
LPIS87	Rugeley Power Ltd (Savills)	<p>Re Para 2.4 - The identification of the regeneration of Rugeley Power Station as one of the key objectives of the Local Plan Review is supported. The title should be updated to reflect the addition of Rugeley Power Station as a seventh strategic objective. This is appropriate recognition of the important contribution this site can make to the delivery of the development needs of the District over the Plan period, and is an appropriate part of the pattern, scale and quality of development at a strategic level in accordance with the guidance of NPPF para 20 – 23.</p> <p>Rugeley Power Station is a significant site which has been recognised in the draft Issues & Scope. It is a strategic brownfield redevelopment opportunity within the urban area of Rugeley and is unique in its scale and potential contribution to meeting the development needs of the District. The site as a whole, and that part just within Cannock Chase District, should be regarded as being housing led, rather than employment led. The draft Plan suggests (para 5.78) an employment led approach based upon the supplementary planning document adopted by both Cannock Chase and Lichfield District Councils. We make specific comment on that under CP8. The comments submitted by Rugeley Power Limited are directed to realising the full redevelopment potential of the Power Station site as a strategic redevelopment opportunity embracing forward thinking and partnership.</p> <p>A Statement of Common Ground has recently been agreed between Rugeley Power Limited and Lichfield District Council in respect of the planned delivery of housing led development on that part of the Power Station site in Lichfield District. The SoCG includes a commitment from both parties to work collaboratively to register a planning application for development of at least 800 dwellings in the Lichfield part of the site by 1 April 2019 and to seek to achieve an implementable planning permission by 1 October 2019. It is hoped that a similar joint objective can be agreed with Cannock Chase District in early course.</p> <p>At this stage proposals for the redevelopment of the Power Station are not fixed, but background work continues to prepare the way to bring the site forward. With the successful redevelopment of the Power Station in mind, we do not respond to all potentially relevant questions the Council has posed in the consultation document. Instead, we wish to encourage more general thinking in relation to issues concerning the delivery of the Power Station which has unique connections, scale of critical mass in terms of the potential to make new place, and challenges due to its straddling the boundary between Lichfield District and Cannock Chase District.</p> <p>The Council must plan for its own needs and those arising from the duty to cooperate with neighbouring authorities. It is noted that the requests for housing provision arising from overspill from Birmingham City in the Birmingham housing market area remain to be confirmed. It can be expected however that CCDC will be required to make some accommodation for the overspill. It is therefore</p>

		<p>important that housing provision is located where it is appropriate both to Cannock Chase District and to the needs of the Birmingham focused housing market area, which will need convenient access to Birmingham as the workplace focus for that component of the housing supply. Where sites meet these credentials they should be given priority for delivery of development.</p> <p>The appropriate focus of the Local Plan should be to continue to promote sustainable development. This should seek to make maximum use of previously developed sites, and to make maximum use of sites within the existing urban area. Where there are major previously developed sites within the urban area, it is vital that policy is supportive of development and is sufficiently flexible to respond to the opportunities and constraints that sites may have.</p> <p>The potential for new, innovative and market leading developments should be encouraged. This should not just be by the 'stick' of policy requirements for all development to comply with, but could also include policy 'carrots' where concessions are granted in certain policy requirements where an exemplar development embracing new thinking is proposed. The Local Plan needs to be sufficiently flexible to not constrain innovation in the components of a development or the configuration of development. This could include where a development will deliver new housing tenures, new forms of mixed communities, new technology for energy creation and storage, and high levels of sustainability. New forms of construction including modular and smart constructions should also be encouraged. The approach to considering community could be enhanced, and design should be encouraged to make most efficient use of land whilst contributing to sustainable communities including supporting health outcomes and later living.</p> <p>With specific regard to sites such as the Power Station which cross Council administrative boundaries, yet where comprehensive development is preferred, there is a need for a creative approach to policy to deal with issues such as different rates of affordable housing, open space, education and S106 requirements. Differential rates and requirements in all these areas, together with different CIL charges between LPAs could result in undesired consequences for how the site is planned and delivered, potentially resulting in a less than optimal outcome. Consideration should therefore be given to site specific policy for the Power Station, or more generally, to allow flexibility in the application of policy such that policy requirements are dealt with on an apportioned basis across LPA boundaries. This could also extend to CIL by having a policy that makes provision for how CIL is applied to cross border sites. Without policy exempting or importing express flexibility, CIL is necessarily applied rigidly.</p> <p>We envisage that the Power Station site is capable of being developed to create a leading sustainable new place, building on the infrastructure connections of the site and Rugeley town of which it is part. We seek a policy context which enables emerging ideas for new forms of development to be brought to fruition successfully. We would be pleased to discuss these thoughts further as the Plan progresses and as proposals for the redevelopment of the Power Station take shape.</p>
LPIS88	Rugeley Town Council	The vision and objectives are all very well-meaning but Rugeley Town Council are concerned that the structure of Cannock council is such that there is not the funding or the officer support to implement or support schemes to help bring about the objectives. Unless it is made clear what the commitment is from Cannock District Council and how it intends to develop schemes in partnership giving officer and financial support, they are just words.
LPIS89	Sport England	Sport England are supportive of the vision and objectives which are aligned to the key issues facing the Council. Sport England would seek the retention of the reference to Active Design within objective 1 though it also plays a role in objective 2. It is also viewed that Objective 5 should make reference to Active Travel.
LPIS90	St Modwen (Land at Watling Street Business Park) (RPS)	The full Vision can be viewed in Appendix 3 of the LPR and the 8 Objectives along with their respective sub-objectives can be seen in Appendix 4 of the LPR. Generally, the approach is agreed with and considered appropriate.
LPIS91	Stafford Borough	The Borough Council are generally supportive of the Vision and Objectives within the Local Plan (Part 1) to be used as the basis for

	Council	<p>the new Cannock Chase Local Plan to cover the period to 2036. It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the Cannock Chase District area. In particular the Council supports the approach to maintaining the Green Belt areas confirmed through the Green Belt Study 2016 for Cannock Chase District whilst maximising the use of brownfield land and potentially discussing with neighbouring authorities the potential to accommodate needs in nearby urban areas. However Stafford Borough Council can confirm it is not in a position to provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.</p> <p>The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council is currently consulting on a Scoping the Issues document and Settlement Assessment for the New Local Plan leading towards a future development strategy beyond the adopted Plan period of 2031. In particular Stafford Borough will continue to work with Cannock Chase District concerning the Cannock Chase Special Area of Conservation Partnership and the Cannock Chase Area of Outstanding Natural Beauty.</p>
LPIS92	Staffs. Police	<p>Staffordshire Police request that Cannock Chase District Council Local Plan Part 1 & Design SPD Designing Out Crime Policy Local Plan (Part 1) Policy CP3 are retained, Retention will assist in underpinning CCDC's statutory duty relating to Section 17 of the 'Crime and Disorder Act 1998 that places a duty on each local authority 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area' which includes anti-social behaviour, substance misuse and behaviour which adversely affects the environment and the National Planning Policy Framework that says:</p> <p>"Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion', and that "Planning policies and decisions, in turn, should aim to achieve places which promote: Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion"</p> <p>Residential developers must comply with Approved Document 'Q' Security Dwelling Building Regs 2010, in order to prevent crime and reduce the fear of crime I recommend where-ever possible that such developments attain Police Secured by Design (SBD) accreditation. There is no charge to the Council or developer for the award, and once awarded the Police SBD logo can be used on advertising material.</p> <p>Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD developments as a result of criminal activity is more than 50% less than on non SBD developments, the cost of installing SBD approved products equals 0.2% of the total build cost.</p> <p>One of the most revealing elements of research into SBD is how much 'safer' residents feel if they occupy a dwelling on an accredited development, even if they are not aware of the award status. There are few other initiatives which can deliver a measurable reduction in fear like this.</p> <p>SBD supports one of the Government's key planning objectives – the creation of safe, secure, quality places where people wish to live and work. SBD applies quality standards to a range of security measures and should be seen as a positive marketing opportunity.</p> <p>SBD can contribute towards BREEAM assessments.</p> <p>The British Parking Associations' 'Parkmark' accreditation has been shown to reduce crime on public car-parks, the award is given</p>

		<p>to car parking facilities that have demonstrated they are concerned with safety and have taken steps to ensure that they're secured and safe from crime. The Park Mark award scheme is managed by the British Parking Association and fully supported by the Home Office.</p> <p>What does a Park Mark award mean?</p> <ul style="list-style-type: none"> • A car park that has been vetted by Police to ensure it's fully secured. • Measures taken to deter anti-social behaviour and criminal activity. • The site receives expert consultation from Development Managers to help keep the security up to a high standard. • The site belongs to a nationwide scheme dedicated to combating crime and raising standards for public services. <p>Awarded by the National Police Chiefs Council, the Park Mark award scheme is dedicated to providing safer surroundings for the public, further information can be found at www.parkmark.co.uk</p>
LPIS93	Staffs. County Council	It is noted that education is not included in the current vision and objectives, but is referred to in the District Profile in relation to educational attainment. All other key issues identified in the District Profile (para 2.2) have been translated into an objective bar education. We would suggest that the objectives should now include and specifically refer to access to high quality education provision and a sufficient supply of local school places.
LPIS94	Claire Walker	Agreement to the vision, however for the district to be made up of distinct communities then green belt must be protected to prevent urban sprawl.
LPIS95	Christopher Walker	Agreement to the vision, however for the district to be made up of distinct communities then green belt must be protected to prevent urban sprawl.
LPIS96	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	<p>One of the key headlines of the identified Vision is;</p> <p>"The potential of the Districts' accessible location along major transport routes will be maximised to achieve a thriving local economy".</p> <p>We believe this should be expanded to say; "and sustainable housing growth to meet identified needs" to recognise the strategic importance of delivering a sufficient number of homes to meet the needs of present and future generations.</p> <p>In line with Chapter 5 of the NPPF, we also believe that Objective 3 should be expanded to say;</p> <p>"Provide for housing choice and deliver a sufficient supply of homes".</p>
Review of CP1: strategy		
Question 6. Do you have any comments on our current strategy? Are there new issues (not covered by other policy topics) which we should be considering?		
LPIS97	Beaudesert Golf Club (FBC Manby Bowdler LLP)	<p>It is not considered that the Policy as drafted provides sufficient scope for the use of suitable brownfield sites and underused land. The spatial strategy should take a forward thinking approach to new development, in particular in the context of Green Belt and AONB land where there are opportunities to alter the Green Belt Boundaries to facilitate the development of brownfield land. Policies which allow scope for 'enabling' residential development which facilitates the enhancement and improvement of adjacent open space to allow for both improvements to the habitat as well as improved public accessibility alongside additional leisure facilities, would support the Vision and Objectives identified, in the context of providing aspirational housing, and improved health and access to the countryside and the AONB.</p> <p>A less restrictive policy approach which specifically envisages the release of small parts of Green Belt and AONB for enabling</p>

		<p>schemes would open up opportunities which would support the vision for the District, whilst also facilitating the objectives of the wider area beyond the District.</p> <p>For example, The Beau Desert Golf Club have a particular vision for the land to the West of the existing Golf Club (allocated reference C375 in the 2017 SHLAA), which is brownfield land, over which there is limited public accessibility in that there is a bridleway that crosses the site, but the quality of the open space is limited due to the nature and extent of past tipping activities. Releasing a small area of this site close to the existing settlement, alongside Rugeley Road, for residential development, would allow the Beau Desert Golf Club to fund (i) the opening up and reinstatement to a more natural landscape and habitat of what is currently an area of poor quality open land affected by steep slopes and difficult terrain, to provide a more accessible area of managed open space for public access, between Rugeley Road and the Golf Club, which in turn would facilitate improved access to the wider AONB beyond; and (ii) a modest extension of the existing golf course with the objective of raising the competitive status of the course regionally and nationally. Further submissions will be made in the SHLAA in relation to this site which is currently (incorrectly) categorised as ‘unavailable’.</p> <p>The current strategy does not make sufficient provision to steer the review of, and amendment to Green Belt boundaries where this would allow the allocation of brownfield sites which are in the Green Belt, nor is it sufficiently forward thinking to ensure that the housing land supply requirement for the District and beyond can be accommodated for the later part of the Plan period. The vision and objectives look to achieve economic growth – this will require a strategy which allows scope for release of Green Belt sites, particularly those which would allow the re-use of previously developed land such as site C375, where the benefits to the District include not only the provision of housing that will attract residents to facilitate growth and investment, but which will itself fund localised improvements to open space, natural landscape and habitat and leisure facilities.</p>
LPIS98	Brereton & Ravenhill Parish Council	<p><u>Page 14, paragraph 5.1</u> BRPC is concerned that the housing being built on Wolseley Road immediately next to Rugeley but in Stafford district is being counted towards Stafford’s housing figures, not Cannock Chase’s. This housing very clearly contributes to the needs of the Rugeley/Brereton built-up area, not those of Stafford (or even of Colwich). Its treatment indicates a failure of the duty to cooperate and risks leading to an increase in the amount of new housing being required of the Rugeley/Brereton which is neither fair, nor justified.</p> <p><u>Page 15, Page 5.8</u> BRPC notes the statement that the “strategy for development in the District up to 2028 did not require any strategic amendments to existing Green Belt boundaries to meet growth requirements at that time”. With the unexpected additional availability of the Power Station site, in the north of the district at least there should be no need for any amendments to Green Belt boundaries (strategic or otherwise) and no need for a Green Belt boundary review</p>
LPIS99	Brindley Heath Parish Council	<p><u>Page 14, Paragraph 5.1</u> 5. BHPC is concerned that the housing being built on Wolseley Road immediately next to Rugeley but in Stafford district is being counted towards Stafford’s housing figures, not Cannock Chase’s. This housing very clearly contributes to the needs of the Rugeley, Brereton and Brindley Heath, not those of Stafford (or even of Colwich). We feel this is a failure of duty to cooperate and risks leading to an increase in the amount of new housing being required of Rugeley, Brereton and Brindley Heath, which is neither fair, nor justified.</p> <p><u>Page 15, Paragraph 5.8</u> 6. BHPC notes the statement that the ‘strategy for development in the District up to 2028 did not require any strategic amendments</p>

		to existing Green Belt boundaries to meet growth requirements at that time'. With the unexpected additional availability of the Power Station site, in the north of the district at least there should be no need for any amendments to Green Belt boundaries (strategic or otherwise) and no need for a Green Belt boundary review.
LPIS100	Church Commissioners (Barton Wilmore)	<p>The current strategy set out in Policy CP1 is unlikely to be fit for purpose moving forward given that urban capacity in the District and the wider HMA is limited (Greater Birmingham HMA Strategic Growth Study). The environmental constraints within the District further reduce capacity in potential sites (see Environmental Capacity in Cannock Chase District January 2013).</p> <p>The publication of the Standardised Methodology in the Revised NPPF, alongside the ONS 2016-based household projections to be published in September 2018 will also potentially impact on the Council's housing need and the requirement for sites to accommodate such need. We note that the Standardised Methodology is also only the minimum starting point. As such, there is a strong likelihood that the Council will need to consider sites beyond the urban area within the Green Belt. Revised NPPF Paragraph 137 sets out that local planning authorities should demonstrate that all other reasonable options have been assessed before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries.</p> <p>Due to the housing needs of the District and GBHMA, lack of urban capacity and environmental constraints covering large areas of the District we consider that the exceptional circumstances to justify Green Belt changes will likely exist and suggest that the Council amend the strategy accordingly.</p> <p>We note that large-scale sustainable urban extensions also have the benefit of providing the infrastructure required in a way smaller schemes would not. They would also have the dual benefit of, in many instances, providing and utilising existing public transport links as set out in Paragraph 138 of the Revised NPPF. The Site at Bleak House falls within this category given the existing sustainable transport links available. For these reasons we consider the strategy should support strategic housing sites on sustainable land that adjoins the urban area.</p>
LPIS101	Greenlight Developments (Lichfield's)	<p>The existing Spatial Strategy (CP1 'Strategy' Local Plan, Part 1) focuses development, investment and regeneration, mainly on the built up urban areas. The policy seeks to focus delivery of new housing growth in urban areas, to be distributed in broad proportion to the size of existing communities (including Cannock). Greenlight supports the principal of the approach and considers that Cannock should continue to be the main focus for development; however, considers this should be extended to refer to sustainable sites on the edge of existing urban areas.</p> <p>Existing policy CD1 also restricts development on sites within the Green Belt, such as Greenlight's which is located on the western edge of Cannock District, abutting the edge of Cannock built up area. To inform the future spatial strategy for Cannock Chase, Greenlight supports the Council's recognition at paragraph 5.9 of the consultation document that, as part of its work on identifying what may be appropriate development site options for the future, the Council will need to take into account the national planning policy context on Green Belt, including the possibility of reviewing the Green Belt boundary.</p> <p>Greenlight consider this approach to be reasonable, particularly given the result of the Council's Environmental Capacity Study (2013), which identifies how the District is heavily constrained by Green Belt (a non-environmental policy constraint) and some environmental constraints, with the majority of the District, not already developed, designated. Therefore, additional development outside the existing urban areas in the District would require the release of Green Belt land. At paragraph 5.13 of the Consultation Document, the Council refer to its Green Belt Study (2016). The study assesses Greenlight's site in Cannock Chase, including the portion of land in South Staffordshire and additional greenfield land extending beyond this to the west under reference 'Parcel C21'. The review concludes on a total score of 14/20, 'mid-performing', for the parcel (as shown on Figure 4.2, Overall Parcel</p>

		<p>Performance against Green Belt Purposes).</p> <p>However, Greenlight considers there is an error in the way the Council has assessed this parcel in the Green Belt Review (2016), in relation to Green Belt purpose 2 ‘to prevent neighbouring towns merging into each other’ (NPPF paragraph 134 ‘b’).</p> <p>Parcel C21 is given the highest performing score of 4/4. The justification provided in the C21 parcel assessment is that there are two settlements within close proximity to this portion of Cannock’s urban edge, the ‘small hamlet’ of Four Crosses (1.2km to the west) and the ‘village’ of Hatherton to the north west. The NPPF (2018) makes clear reference that this Green Belt purpose relates to towns rather than all forms of settlements. It is therefore clear that there is an error in the Council’s methodology relating how this green belt purpose has been assessed (see page 13). The methodology states:</p> <p>“All towns and villages within the study area and adjacent Districts are considered settlements in the assessment.”</p> <p>On this basis, Greenlight consider that the score for parcel C21 should be amended. The methodology table on page 13 states if the gap is greater than 2km between the parcel and a settlement then a score of ‘0’ should be given. The assessment for parcel C21 should therefore be amended to 10/20; this would mean that the site performs lower in Green Belt purposes that the Council has originally assessed.</p> <p>In addition, a finer grain analysis of the parcels at the stage of site allocations will inevitably provide a more graded assessment of the contribution individual sites may make to the Green Belt purposes (rather than the larger parcels they may currently sit within). The NPPF (2018) lends clear support for sites such as Greenlight’s to be removed from the Green Belt and allocation of Greenlight’s site (C121 in the SHLAA) would accord with the principles established within the NPPF. At paragraph 138 it states:</p> <p>“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 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.”</p> <p>In summary, given the heavily constrained nature of the District as well as the shortfall/growth ambitions of the wider HMA (referred to at previous points in these representations), Greenlight support CDC’s commitment to considering the option to release Green Belt Land as part of a revised spatial strategy. However, the Council needs to ensure it is correctly applying NPPF policy to ensure that, if the option of green belt release is confirmed as required, the most appropriate and sustainable sites are released to meet future housing needs.</p>
LPIS102	Inglewood Investments (SLR Consulting)	<p>The current Strategy focuses development and regeneration mainly on the built up and urban areas, whilst conserving and enhancing the landscape of the AONB, Green Belt and Green Infrastructure of the District.</p> <p>To ensure that the strategy remains ‘fit for purpose’ over the plan period, SLR would recommend that CCDC take a strategic view on the release of land, and ensure an appropriate amount of land is safeguarded within your strategy and for this to be clearly quantified. This will ensure that CCDC are not under pressure from speculative planning applications if there is a failure to meeting the ‘Housing Delivery Test’. Releasing sufficient, deliverable housing land and safeguarded land will ensure that the new Local Plan can be responsive and remain up to date throughout the plan period. This should help to avoid the need for an early plan review.</p> <p>As Green Belt Boundaries can only be formally amended during a Local Plan Review, CCDC should ensure that appropriate and</p>

		<p>suitable land within the Green Belt, which does not perform well against the NPPF purposes, is identified and released through the current review process. The Strategy, which appears to rely substantially on brownfield land is considered to be unsustainable and unachievable, particularly as the majority of the undeveloped part of the District is designated Green Belt. We consider that the plan strategy needs to be sufficiently flexible to deal with any shortfall in delivery and to cater for a reasonable time horizon, to avoid the need to trigger a subsequent review if the 'Housing Delivery Test' is not met. As set out above a failure to build in</p>
LPIS103	KGL (Estates) Ltd (J Heminsley)	<p>In relation to policy CP1 Strategy, it is considered that the current approach to distributing growth in proportion to the size of the three main settlements is unlikely to be capable of being sustained. Growth in Rugeley/Brereton is significantly constrained by the proximity of the AONB notwithstanding the potential for housing development at the Power Station. In this context it is noted that housing numbers on this site have been constrained by the decision to retain the "Borrow Pit" as open space in the adopted SPD.</p> <p>As stated in the document, the 2013 environmental capacity study noted that virtually all of the District that is not already developed is in the Green Belt. The key recent piece of evidence, the Greater Birmingham Housing Market Area Strategic Growth Study produced on behalf of the LPAs by G L Hearn/Wood in February 2018 advises that there will still be a significant shortfall in housing land supply even with density increases and limited brownfield opportunities so some release of Green Belt (GB) appears to be inevitable. As part of the "proportionate dispersal" option in this report, it is recommended that the GB in the area which includes the KGL land shown on the attached plan should be considered as part of a local GB analysis of potential for release of land for housing. The land has good public transport access including to Cannock railway station and no major environmental constraints unlike the GB east of Heath Hayes. Opportunities exist to improve public access in this area for recreation purposes as now required in the new NPPF where GB release is being proposed.</p> <p>So given constraints in other parts of the District it is considered that housing growth will need to be concentrated in the area between Cannock and Heath Hayes.</p>
LPIS104	Lawrence, Richard	<p>Low standards of health and educational attainment require improvement.</p> <p>This is a subject, particularly education, which is an endemic problem in Cannock Chase. There is a general malaise in the area, with multi-generational unemployment, that there is no work and little opportunity for such. This means that those individuals who want to advance their education will move out of the District, as an example, the Campus Building on the Green, one of the reasons that they closed originally, was that given the opportunity to complete a course either in Cannock or elsewhere, the second option was selected. Once these individuals have left Cannock, they rarely return. The infrastructure is not available to support those who wish to advance their education and employability in Cannock. This requires support services such as business mentoring (there are no innovation centres in Cannock or Stafford that offer support at the level required [including the new Innovation Hub at the old college building], support services offered by the LEP and the Chamber are focussed on Stoke). Education is not valued in Cannock as it is seen as being of no use or of a substandard quality.</p> <p>Economic growth and regeneration needs have to be met and access to employment opportunities and local labour skills require improvement.</p> <p>When Cannock is promoted, nationally, as a logistics hub, it is promoted for two reasons:</p> <ol style="list-style-type: none"> 1) The excellent transport infrastructure (positive) 2) An area where the local population will accept low wages, zero hour contracts and poor working conditions, simply so that they can get some employment (extremely poor) Another issue with the approach of logistics hubs: the buildings themselves are massive for the level of internal employment. Cannock Chase District needs to look beyond simply employment and into ensuring it is well paid, well supported and with prospects.

		<p>The town centres need to adapt and increase their competitiveness to maintain local shopping provision and contribute to regeneration</p> <p>There are many individuals and organisations who would love to start a business in the town centre, they have the drive and the ideas, what they lack (in general terms) is money! Especially in retail, but for any start-up business, the access to grants and funding support is non-existent. Established businesses can get a lot of support financially, and the Chamber offer excellent support for start-ups, but the funding goes to the established enterprises, who, in many cases, just don't need it. In this area, those who want to start businesses often have no personal capital, something is needed instead of loans Commencement of regeneration of the Rugeley Power Station site</p> <p>This is a major issue that needs to be addressed. Whilst it is understood that Rugeley Power Station (RPS) is privately owned (Rugeley Power Station Ltd is a joint venture between Engie and Mitsui) and is, therefore, private. The site is so important to the local and national infrastructure, it cannot afford to be left fallow.</p> <p>It is known that the first round of bidding was abandoned and the second round has been kept so quiet that no-one knows what is happening. Whilst it is known that Homes England withdrew from the bidding process (reason unknown) and there are rumours of another bidder, there is no public knowledge of what is happening. It is also understood that Stafford County Council have a compulsory purchase order on part of the site for the HS2 development.</p> <p>There have been several plans for the redevelopment of the site, one in particular comes to mind where high quality jobs, excellent housing, and a real community spirit was included (the organisation developing these is called Capinal Ltd), this is the sort of development the district requires, a development that will generate wealth, and attract businesses, rather than turning Cannock, Rugeley and Lichfield into a commuter belt. Losing income for the region (and thereby Commencement of regeneration of the Rugeley Power Station site.</p> <p>This is a major issue that needs to be addressed. Whilst it is understood that Rugeley Power Station (RPS) is privately owned (Rugeley Power Station Ltd is a joint venture between Engie and Mitsui) and is, therefore, private. The site is so important to the local and national infrastructure, it cannot afford to be left fallow.</p> <p>It is known that the first round of bidding was abandoned and the second round has been kept so quiet that no-one knows what is happening. Whilst it is known that Homes England withdrew from the bidding process (reason unknown) and there are rumours of another bidder, there is no public knowledge of what is happening. It is also understood that Stafford County Council have a compulsory purchase order on part of the site for the HS2 development.</p> <p>There have been several plans for the redevelopment of the site, one in particular comes to mind where high quality jobs, excellent housing, and a real community spirit was included (the organisation developing these is called Capinal Ltd), this is the sort of development the district requires, a development that will generate wealth, and attract businesses, rather than turning Cannock, Rugeley and Lichfield into a commuter belt. Losing income for the region (and thereby decimating the town centres). The regeneration of RPS is so important that it requires a development plan with vision, that will push the boundaries and create a redevelopment that will enhance the district, not simply add a pile of 'Barratt Boxes' and logistics sheds.</p> <p>The Capinal plan represents superb housing, high quality housing at all levels, innovative and novel energy systems, a green environment and so on. This is precisely the type of development this area needs.</p> <p>If you haven't already seen the outline plans, I am sure that Capinal will be happy to forward them.</p>
LPIS105	Lichfield District	Thank you for acknowledging the common ground on travel to and from Burntwood and Lichfield for employment, retail and leisure;

	Council	and movement between Cannock and Lichfield housing markets. Also, for the acknowledgement at paragraph 5.5; "One new issue of strategic significance is the brownfield site of the closed Rugeley Power Station and we will need to consider the implications and opportunities afforded by this cross boundary regeneration scheme. The 139 hectare site straddles the boundary between Cannock Chase and Lichfield Districts and the two Councils jointly adopted a development brief SPD in February 2018, for a mixed housing and employment use."
LPIS106	Little Wyrley Estate (Fisher German)	We discussed the Grove Colliery site recently and understand the Council is seeking views on the provision of employment and housing land in the district. Given the brown field status of The Grove site, in our opinion the site could be allocated for employment uses without impact on the green belt and we would be pleased to discuss proposals for the same with you in more detail. The site is well screened, has good access to the highway and situated close to other established employment uses. The council has recently old the old colliery offices, which will presumably be re-developed for employment and the area would benefit from the opportunity for investment brought about by a planning permission for a similar uses on the estate land.
LPIS107	Natural England	Natural England is conscious that the district is geographically constrained and that this will pose significant challenges in meeting new land use development objectives. We will therefore continue to work closely with Cannock Chase Distinct Council (CCDC), for example through our work with the Cannock Chase SAC Partnership but also through focused dialogue on matters within our remit in order to inform the local plan's progress
LPIS108	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>The current strategy for development in the District up to 2028 seeks to promote development within the existing urban area, encouraging the recycling and re-use of brownfield sites. The current strategy did not require any strategic amendments to existing Green Belt boundaries to meet growth requirements at the time of adoption. An Environmental Capacity Study for the District produced in 2013 noted that virtually all the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land. Development under the current strategy is therefore focused upon the existing urban areas and urban extensions.</p> <p>Whilst this practice should be continued, brownfield opportunities are finite and will not on their own deliver the level of development the District requires. There is, therefore, a need to look towards settlement edges and greenfield sites. The strategy should therefore be amended to reflect the changing context in respect of the GBHMA and the adoption of the Birmingham Development Plan. Furthermore, it is considered that the current spatial distribution of development should be reviewed in the context of a higher housing requirement for the District of 295 dwellings per annum compared to 241 dwellings per annum as defined by the standard method for calculating housing need, recognising that this only represents a starting point.</p> <p>As previously stated, the Local Plan is being reviewed in the context of significant unmet housing need arising within the GHMA. To this end, the Local Plan strategy should revisit the need to release appropriate and sustainable sites within the Green Belt for residential development, to meet needs arising both within Cannock Chase District and needs arising within the wider housing market area (see also Richborough Estates' response to Question 7).</p> <p>Cannock Chase District Council carried out a Green Belt Study in 2016, which assessed the extent to which land within the Cannock Chase Green Belt performs against the purposes of Green Belts as set out in national planning policy. The study provides evidence on the relative performance of land parcels and also identifies minor anomalies in the current Green Belt boundaries. The Local Plan Review Scoping and Issues Document indicates that the Council considers that this Study remains up to date.</p> <p>Richborough Estates submits that this Study should be revisited, particularly in light of the revisions to the National Planning Policy Framework which have been made since the publication of the Council's Green Belt Study. Furthermore, as set out in Chapter 5 of this representation, it is submitted that the 'strategic' nature of the Green Belt Study means that it fails to consider the constraints</p>

		and opportunities of smaller sites within the identified land parcels. This strategic study may have previously been appropriate when the Council was not required to release Green Belt land for development under the previous Local Plan. However, in the revised context of the unmet need of the GBHMA, it is submitted that there is a significant need to release land from the Green Belt for development. In this context, the Green Belt Study is not an appropriate tool for assessing the constraints and opportunities of individual development sites within the Green Belt. As such, a more detailed Study is required.
LPIS109	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>The current strategy for development in the District up to 2028 seeks to promote development within the existing urban area, encouraging the recycling and re-use of brownfield sites. The current strategy did not require any strategic amendments to existing Green Belt boundaries to meet growth requirements at the time of adoption. An Environmental Capacity Study for the District produced in 2013 noted that virtually all the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land. Development under the current strategy is therefore focused upon the existing urban areas and urban extensions.</p> <p>Whilst this practice should be continued, brownfield opportunities are finite and will not on their own deliver the level of development the District requires. There is, therefore, a need to look towards settlement edges and greenfield sites. The strategy should therefore be amended to reflect the changing context in respect of the GBHMA and the adoption of the Birmingham Development Plan. Furthermore, it is considered that the current spatial distribution of development should be reviewed in the context of a higher housing requirement for the District of 295 dwellings per annum compared to 241 dwellings per annum as defined by the standard method for calculating housing need, recognising that this only represents a starting point.</p> <p>As previously stated, the Local Plan is being reviewed in the context of significant unmet housing need arising within the GHMA. To this end, the Local Plan strategy should revisit the need to release appropriate and sustainable sites within the Green Belt for residential development, to meet needs arising both within Cannock Chase District and needs arising within the wider housing market area (see also Richborough Estates' response to Question 7).</p> <p>Cannock Chase District Council carried out a Green Belt Study in 2016, which assessed the extent to which land within the Cannock Chase Green Belt performs against the purposes of Green Belts as set out in national planning policy. The study provides evidence on the relative performance of land parcels and also identifies minor anomalies in the current Green Belt boundaries. The Local Plan Review Scoping and Issues Document indicates that the Council considers that this Study remains up to date.</p> <p>Richborough Estates submits that this Study should be revisited, particularly in light of the revisions to the National Planning Policy Framework which have been made since the publication of the Council's Green Belt Study. Furthermore, as set out in Chapter 5 of this representation, it is submitted that the 'strategic' nature of the Green Belt Study means that it fails to consider the constraints and opportunities of smaller sites within the identified land parcels. This strategic study may have previously been appropriate when the Council was not required to release Green Belt land for development under the previous Local Plan. However, in the revised context of the unmet need of the GBHMA, it is submitted that there is a significant need to release land from the Green Belt for development. In this context, the Green Belt Study is not an appropriate tool for assessing the constraints and opportunities of individual development sites within the Green Belt. As such, a more detailed Study is required.</p>
LPIS110	Rugeley Power Ltd (Savills)	Policy CP 1 and para 5.5. Please refer to comments on 2.4 [question 5] for the general approach to planning for the redevelopment of Rugeley Power Station.
LPIS111	Rugeley Town Council	Given the size of the power station site – it is in a unique position in that geographically it lies in Lichfield with a small section in

		Cannock but when developed, will have greatest significance on Rugeley in Cannock. The SPD for the site is high level strategic but is very general; the town council look forward to being consulted on the detailed documents to support future development.
LPIS112	St Modwen (Land at Watling Street Business Park) (RPS)	<p>It is agreed that a review of the existing Green Belt boundaries is both required and essential to ensure that sufficient and appropriate land is made available for development within the future Local Plan Period.</p> <p>In this context, the Council does not need to reinvent the wheel and much of the evidence base for Local Plan (Part 2) can be utilised. This includes the Green Belt Study (2016) which should be used as the starting point for assessing which parcels of land are potentially to be removed, and in establishing what physical features will create recognisable and permanent boundaries. In particular, the Council should consider expansion of existing employment sites within the Green Belt, as it was appropriately doing for LPP2.</p>
LPIS113	Staffs. County Council	<p>Current Local Plan Policy CP1 states that the distribution of housing is broadly in proportion to the size of the existing larger communities of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. The housing distribution in the emerging Local Plan needs to take into account existing school capacity and the requirement for the expansion of existing schools and/or the provision of new schools if necessary.</p> <p>It is acknowledged that the review picks up the significance of the closure of Rugeley power station and the need to address the redevelopment of the site. The County Council is actively involved with both Cannock and Lichfield councils on this matter and will continue to do so.</p> <p>When considering locations for new development, and potential need for more housing / higher densities, it will be important to ensure that new sites do not encroach on existing waste management infrastructure, bringing the risk of poor neighbour relations or even constraints on the operation of the sites.</p>
LPIS114	Taylor Wimpey (Lichfield's)	<p>The Council should review the current strategy in light of in the revised Framework and Practice Guidance, together with the updated District Profile as suggested above in order to help the scale and distribution of development within the District. The adopted Local Plan Part 1 (Policy CP1) identifies the existing settlements in the District as the focus of investment and regeneration and focuses the majority of development towards Cannock, Hednesford and Heath Hayes, although Cannock is not specifically identified as being at the top of the hierarchy.</p> <p>Based on its knowledge of the District, the role and function played by the settlements, and the availability of services, Taylor Wimpey considers that Cannock (including Wimblebury) should continue to be the main focus for development. It is the main strategic centre for the District and focussing development in the settlement will help to retain and strengthen its role as a strategic sub-regional centre in the West Midlands. The settlement of Cannock (including Wimblebury) should therefore be identified as the priority for development in a settlement hierarchy and the majority of new residential development should be focussed within and around the settlement.</p>
LPIS115	Claire Walker	The current strategy is excellent, especially the conservation of greenbelt and AONB.
LPIS116	Christopher Walker	The current strategy is excellent, especially the conservation of greenbelt and AONB.
LPIS117	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	As noted above, the draft standardised methodology for OAHN indicates a housing requirement of 295 dwellings per annum (2016-2036) for Cannock Chase District, which would be a significant increase in the housing requirement for the District. In addition to this local requirement, there will also need to be an uplift resulting from a positive economic strategy and contributing towards unmet needs from neighbouring areas. The strategy will therefore need to be updated to account for these additional housing

		<p>requirements, as well as the additional requirements resulting from the strategies for employment and other uses, with new strategic development sites identified and allocated within the new Local Plan.</p> <p>As paragraph 8.8 of the Consultation Document notes, the Environmental Capacity in Cannock Chase District Report (January 2013) states that ‘virtually all the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land’ (para. 5.7). The closed Rugeley Power Station site, as noted in paragraph 5.5 of the Consultation Document, provides a potential opportunity to meet some of these additional development needs; but with much of this site falling within neighbouring Lichfield District and constraints relating to its former use, and with limited other brownfield or underutilised sites within the settlements of the District; it will inevitably be necessary for the Council’s strategy to seek strategic sites outside of existing settlement boundaries to meet development needs, which will involve the need to release land from the Green Belt to meet future growth needs. Paragraph 5.8 makes reference to existing safeguarded land at ‘land east of Wimblebury Road’ and ‘land at Kingswood Lakeside’, which will need to be considered for release along with additional strategic sites to meet the significant uplift in development needs that will be required.</p> <p>Consequently, the current strategy outlined in the existing Local Plan (Part 1), which did not require any strategic amendments to existing Green Belt boundaries, will therefore require an alternative strategy for future development distribution, with land being allocated for release from the Green Belt to deliver strategic development sites, alongside any limited derivable sites within existing settlements.</p> <p>As part of the process of identifying suitable and deliverable sites to meet the District’s new development requirements, it is important to reiterate that, in line with the NPPF, the strategy must seek to deliver sustainable patterns of developments (paragraph 138 of the NPPF), contributing to the achievement of sustainable development which is first and foremost the purpose of the planning system.</p> <p>As noted under paragraph 72 of the NPPF, the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. In the context of Cannock Chase District, it is considered that strategic extensions to the District’s main settlements of Cannock, Rugeley and Hednesford would represent a reasonable alternative strategy for sustainably delivering the District’s development needs. Such sites would deliver sustainable housing and employment development to deliver sustainable strategies for housing and economic growth, which integrates with strategies for enhanced infrastructure and town centre growth within these main settlements.</p> <p>We agree with the proposed Plan period (at least 2036), but we would recommend that there is a policy commitment to reviewing the plan every 5 years if there has been any change in circumstance.</p>
<p>Question 7. What ‘reasonable alternatives’ do you think we should be considering for the spatial distribution of development across the District? Please explain why they would be ‘reasonable’.</p>		
LPIS118	Beaudesert Golf Club (FBC Manby Bowdler LLP)	See response to Q6
LPIS119	Church Commissioners (Barton Wilmore)	<p>The overall distribution of development and spatial strategy should be reviewed with the potential increased housing requirement and evidenced wider need in mind.</p> <p>Given the need for additional dwellings to be accommodated within the District and the information set out in our responses to Questions 3 and 6, we consider that a reasonable alternative is to support sustainable sites that can provide housing and</p>

		<p>associated infrastructure within the Green Belt. As set out in Paragraphs 137 and 138 of the Revised NPPF, sustainable patterns of development should be taken into account and sustainable development channelled towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt. "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".</p> <p>The Commissioner's site at Bleak House adjoins the urban area and is very well served by public transport, as demonstrated in our appended Vision Document.</p>
LPIS120	Greenlight Developments (Lichfield's)	See Question 6
LPIS121	Home Builders Federation	<p>The current spatial distribution of development should be reviewed in the context of the GBHMA including its unmet housing needs (see HBF answer to Q3) and the meeting of a higher housing requirement for the District of 295 dwellings per annum compared to 241 dwellings per annum (see HBF answer to Q24). The Council's spatial distribution of housing and settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full by providing a clear framework to ensure that policies in the new Local Plan can be effectively applied. It is important that the Council's proposed housing distribution re-considers the permitting of development adjacent to as well as within settlement boundaries which addresses the recognised difficulties facing rural communities in particular housing supply and affordability issues. The proposed distribution of housing should meet the housing needs of both urban and rural communities.</p>
LPIS122	Inglewood Investments (SLR Consulting)	<p>As discussed in the response to the previous Question, development should be spatially distributed across the District in sustainable locations, and not concentrated towards 'built up areas.'</p> <p>It is evident that the lack of available land is a common theme across most Districts in the HMA, and, particularly within built up areas. Available sites are typically brownfield land which take longer to develop, are more complex and we consider that the District will not accommodate housing requirements relying on the allocation of these sites alone. It is important to achieve balanced growth, and therefore the new Local Plan should accommodate a mixture of brownfield and greenfield/Green Belt land releases, in a sustainable location which can deliver other additional benefits including access to the open space and the countryside, through well planned strategic release.</p> <p>To summarise, CCDC should pro-actively seek and secure a range of sites within their new Local Plan, and not 'rule out' larger scale strategic sites which are typically located on the edge of settlement boundaries. These sites can be effectively managed and planned for in a sustainable and sympathetic manner, and offer sufficient land supply for the District to comfortably deliver its longer term housing requirements, without resorting to urban cramming. In addition, urban extension sites can be popular with communities, as these sites can deliver mixed-use development. This type of development can include complementary services to ensure that the increase in residential development will not cause strain on existing services.</p>
LPIS123	Natural England	See question 6
LPIS124	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>As set out in Richborough Estates' response to Question 6, the Council is required to reconsider the appropriate Spatial Strategy in order to meet additional housing need arising from within the GBHMA. The Council's spatial distribution of housing and settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full and to make and agreed contribution to meet cross-boundary needs. To this end, it is submitted that the release of land from within the Green Belt represents a 'reasonable alternative' to the existing spatial strategy in order to deliver future growth requirements.</p> <p>Paragraph 136 of the NPPF advises that, once established, Green Belt boundaries should only be altered in 'exceptional</p>

		<p>circumstances' through the preparation or review of a local plan. It is submitted that the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase Area of Outstanding Natural Beauty, constitutes such exceptional circumstances. Furthermore, it has been recognised through the recent examination of a number of Local Plans, including Lichfield and Warwick Districts, that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.</p> <p>In examining the Lichfield District Local Plan Strategy, the Inspector, at paragraph 200, wrote:</p> <p>"...I can find no justification in the Framework, in Planning Guidance or indeed in the case of I M Properties for the proposition that Green Belt land should be released only as a last resort. This would be to accept that sustainability is the servant of Green Belt designation – which it is not. On the contrary, as has already been established, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development."</p> <p>The Inspector goes on to note in terms of the demonstration of exceptional circumstances that:</p> <p>"...in my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan's urban and key centre strategy amount, in this instance, to the exceptional circumstances that justify the release of Green Belt."</p> <p>It is therefore clear that the release of Green Belt land constitutes a 'reasonable alternative' in respect of the spatial distribution of development within the District. Furthermore, it is submitted that exceptional circumstances exist to justify such release.</p> <p>Richborough Estates has produced a separate paper which sets out its position on the interpretation of the Government's Green Belt policy in the formulation of new Local Plans across the country. The paper includes an examination of the Government's Housing White Paper (February 2017), which stated that:</p> <p>"Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements" (Pg. 18).</p> <p>The term 'all other reasonable options' has been erroneously interpreted in some quarters as meaning that Green Belt release has become a last resort that should be avoided, even if the restriction of Green Belt release will lead to dire outcomes against the achievement of wider sustainability objectives. Such an approach is the antithesis of sound and robust planning, and if the housing crisis is to be tackled in a sustainable manner then it is a mindset and approach that must not be allowed to perpetuate. A full copy of the paper is included at Appendix 1 to this Representation.</p>
LPIS125	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>As set out in Richborough Estates' response to Question 6, the Council is required to reconsider the appropriate Spatial Strategy in order to meet additional housing need arising from within the GBHMA. The Council's spatial distribution of housing and settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full and to make and agreed contribution to meet cross-boundary needs. To this end, it is submitted that the release of land from within the Green Belt represents a 'reasonable alternative' to the existing spatial strategy in order to deliver future growth requirements.</p> <p>Paragraph 136 of the NPPF advises that, once established, Green Belt boundaries should only be altered in 'exceptional circumstances' through the preparation or review of a local plan. It is submitted that the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with</p>

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LPIS126	Rugeley Town Council	Once again, Rugeley Town Council would like to see commitment from Cannock council itself to development across the district. Whilst it is appreciated that CCDC is limited in bringing forward development from the private sector, there is still a feeling that Rugeley being left to the mercies of a tired private sector who show no signs of wanting to see development in the town.
LPIS127	Staffs. County Council	Consideration should be given to identification of large strategic sites and /or urban extensions. Developments of such scale afford greater opportunity to plan for and deliver any necessary infrastructure improvements.
LPIS128	Taylor Wimpey (Lichfield's)	Please see our response to Question 6 for our position of spatial distribution.
LPIS129	Transport for West	In particular the local plan makes comment on the importance of employment outside of Cannock Chase District to residents of the

	Midlands (WMCA)	<p>district. One role of an effective transport network is to ensure that people can access employment opportunities wherever they exist. We believe that in allocating housing, it is therefore important to have regard to (amongst other considerations):</p> <ul style="list-style-type: none"> - Existing employment trends in terms of travel to work; - Anticipating employment growth in the surrounding area; - Existing transport networks that can link people to jobs; and - Planned enhancement to transport networks that may present new opportunities for labour markets. <p>For this reason, in addition to consideration of regional strategies and plans (as above) TfWM encourages Cannock Chase District to have regard to residents' tendencies to access employment in the West Midlands metropolitan area and where employment growth is forecast when identifying sites for allocation for residential allocation.</p> <p>We understand that Cannock Chase District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area. Across this area, there is a significant housing shortfall of around 28,000 dwellings to 2031 and 60,900 to 2036. Under the legal Duty to Co-operate, work has been ongoing to look at ways of addressing this shortfall.</p> <p>A similar process (in terms of identifying existing trends and opportunity) should be applied to the allocation of employment sites. In particular logistics and supply chains are reliant on the effective transportation of goods both of which are important to the region and Cannock Chase district.</p> <p>TfWM is interested in the potential role of a rail freight facility at the Rugeley Power Station site and agree that the freight facilities should be protected until future development options have been identified.</p>
LPIS130	Upton Trust & Carney Brothers (Wardell Armstrong)	We note that reasonable alternatives may include the investigation of smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area as part of the other options for accommodating housing in the District. This could form a small but important contribution to meeting the pressing housing need within the District and the region and should include all sites, including those sites within the Green Belt where this becomes necessary.
LPIS131	Claire Walker	The use of neglected or little used sites should be used.
LPIS132	Christopher Walker	The use of neglected or little used sites should be used.
LPIS133	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	See response to Question 6
Question 8. Are there any potential options for the overall distribution of development which you feel would be unreasonable and if so, why?		
LPIS134	Beaudesert Golf Club (FBC Manby Bowdler LLP)	See response to Q6
LPIS135	Burntwood Town Council	There is concern that the Green Belt Barrier between Burntwood and Heath Hayes (From the A5190 from Five ways to Chase Terrace) needs to be preserved and that there should be no coalescence between the two districts (Lichfield and Cannock Chase). No doubt you will take that into account.
LPIS136	Elphick, Raymond	It has been brought to our attention the intended plan of development South of Cannock Road. Here we see a proposal for near on

		<p>600 new dwellings. The average number of cars per household, according to statistics in the area is 1.22. This would equate to an extra 732 cars, minimum, with exit points only onto the Cannock Road.</p> <p>We live on the Cannock Road and have witnessed substantial increases of traffic during the last twenty five years, especially heavy goods. This increase has provided a large amount of both noise and air pollution (A5190 at Five Ways already above national levels) Considering that in the immediate future, work is to commence on the Mill Green Shopping Complex. This in turn will generate even more traffic to a congested area. The Area in question is a Green Belt, maybe consideration should be funnelled to the Brown Belt area's.</p>
LPIS137	Hazelslade & Rawnsley community association	<p>Site option C64 has been the subject of a prior Planning Application in 1999/2000 (CH/98/0339) and was rejected on two counts by the Councils Planning Committee. There have been no subsequent planning applications, and the land has not been subject to any prior use other than grazing. The land is located alongside the Cannock Chase AONB, and overlooked by the Hednesford Hills SSI. It forms a valuable green space wedge between the communities of Hazel Slade and Rawnsley. Both communities are well served by affordable housing that already form a significant proportion of the housing stock, particularly in Rawnsley. The contours of the land are severe, resulting in high visual impact from within and outside the locality (reference previous planning application evidence). Development that has taken place in the adjacent AONB has been carefully controlled infill development that harmonises well with its location.</p> <p>The Community Association believe that the extensive areas of land that have been subject to prior (brownfield) use are more suited to meeting the Council's need to provide additional housing over the coming decade. The Communities' ambition for the site to be ultimately designated as open space remains a key feature of its long-term vision for the community as a whole. A range of other environmental constraints exist relating to the biodiversity of the northern tip of the land, and the hedgerows that define its eastern and western boundaries. The watercourse which will be the primary conduit for rain water run-off is also a habitat for protected species. The CPRE strongly objected to development of this site both on principal and from the 'massing effect of the design in relation to each other and the surrounding countryside' when consulted in 1998. Any development on this site is therefore opposed by H&RCA.</p> <p>Site option C171 is located both within the AONB and Green Belt. Any housing development on this site would be contrary to the aims of Policy CP14 of Landscape Character and Cannock Chase AONB and would have an adverse visual impact on the local environment and its wildlife. Any development on this site is therefore opposed by H&RCA.</p> <p>Any proposed development of the former Youth and Community Education Centre in Cannock Wood St. would further exacerbate the existing child safety, traffic and parking difficulties around the school particularly at school drop off and pick up times. Any development in this site is therefore opposed by H&RCA.</p>
LPIS138	Natural England	See question 6
LPIS139	Norton Canes Parish Council	<p>According to the Green Belt review of March 2016 most of Norton Canes Green Belt ranks in the top half of importance for Green Belt designation. Therefore, should the Council be minded taking anymore Green Belt out of its designation, the Green Belt in Norton Canes should not be considered first. Over the last few years green belt sites have been used for larger housing developments and there are a number with planning permissions yet to be developed. Green belt site has also been used for the large business park at Kingswood Lakeside which sits within the Norton Canes border. We feel that the countryside is a fundamental part of our village and would not wish to see any areas of green belt being taken out for further development. We appreciate the assurances that our comments regarding the last Greenbelt Review will be taken forward into this review – but we felt this is something we needed to reiterate.</p> <p>In relation to the number of houses required across the District, the Parish Council feels that Norton Canes has already met its</p>

		target by the housing developments that have already been built and those that currently have planning permission for development. We strongly feel that the District Council should not consider Norton Canes in terms of meeting their housing targets. We do not have an issue with infill developments but would strongly oppose larger developments.
LPIS140	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	In line with the response to Question 7, it is considered that it would be unreasonable for the Council to not consider the release of Green Belt land, at the detriment of achieving sustainable development.
LPIS141	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	In line with the response to Question 7, it is considered that it would be unreasonable for the Council to not consider the release of Green Belt land, at the detriment of achieving sustainable development.
LPIS142	Rugeley Town Council	Rugeley is well served with development areas but the employment at these sites is not perceived to be local employment. The town centre is unable to capture trade from the employment sites as they are on highways designed to move employees quickly away from Rugeley to the settlements of Lichfield and Stafford.
LPIS143	Staffs. County Council	A scattered approach of multiple small to medium sized sites could prove problematic in the planning, funding and subsequent delivery of infrastructure improvements required for the cumulative level of growth.
LPIS144	Taylor Wimpey (Lichfield's)	Taylor Wimpey considers that any distribution of development which does not prioritise the settlement of Cannock (including Wimblebury) as the focus for development would be unreasonable given its role as a strategic sub-regional centre and its role in providing the majority of employment opportunities for the District.
LPIS145	Upton Trust & Carney Brothers (Wardell Armstrong)	The assessment of sites and options should be undertaken as part of the Sustainability Appraisal process. As demonstrated in the recent case of the North Essex Authorities, Strategic (Section 1) Plan, and comments from the Inspector Roger Clewes, it is the role of the appraisal to determine what may be considered reasonable alternatives and then for the chosen spatial strategy to be the most appropriate one when considered against the reasonable alternatives, based on an updated evidence base, as the tests of soundness required. To discard options at an early stage would fail to meet this test of soundness.
LPIS146	Claire Walker	The use of AONB and greenbelt is unreasonable
LPIS147	Christopher Walker	The use of AONB and greenbelt is unreasonable
Question 9. Do you have any comments on the time period for the plan?		
LPIS148	Church Commissioners (Barton Wilmore)	We would agree that the proposed plan period (until 2036) is appropriate and welcome the fact it corresponds with the Greater Birmingham HMA Strategic Growth Study (the 'Strategic Growth Study') published February 2018. This period should, however, be aligned with other authorities within the Greater Birmingham Housing Market Area (HMA) in line with the guidance contained in the NPPG. Further, paragraph 22 of the Revised NPPF states that a 15-year timeline is appropriate.
LPIS149	Home Builders Federation	The timeframe of the new Local Plan should provide a period of at least 15 years after its adoption date set out in the revised NPPF (para 22). The NPPG also advises that plan dates should be co-ordinated therefore the new Local Plan timeframe should be aligned with the plan periods of other GBHMA authorities.

LPIS150	Inglewood Investments (SLR Consulting)	<p><u>Question 9: Do you have any comments on the time period for the plan?</u></p> <p>From analysing the GBHMA, we feel that the time period for the new Local Plan should cover the period up to 2036. This will align with this wider study and ensure that housing delivery targets can be measured with a consistent approach across the HMA.</p> <p>CCDC should ensure that they undertake a comprehensive Green Belt Review which enables the allocation of safeguarded land which can serve the District for at least two plan periods. Given the timeframe proposed for the Plan we consider that this would provide a robust evidence base for defending a re-drawn Green Belt boundary following this review.</p>
LPIS151	Natural England	See question 6
LPIS152	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>It is noted that the Council anticipate that the Plan would be adopted by 2021 and therefore the plan period of 2021 to 2036 would give a 15-year timeframe. This is considered appropriate and in line with the guidance contained in the NPPF at paragraph 2, which advises that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>In addition, the Plan period to 2036 would be aligned with the Greater Birmingham HMA Strategic Growth Study, published in February 2018, which considers the housing need, supply and shortfall across this wider area to the same timeframe of 2036.</p>
LPIS153	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>It is noted that the Council anticipate that the Plan would be adopted by 2021 and therefore the plan period of 2021 to 2036 would give a 15-year timeframe. This is considered appropriate and in line with the guidance contained in the NPPF at paragraph 2, which advises that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>In addition, the Plan period to 2036 would be aligned with the Greater Birmingham HMA Strategic Growth Study, published in February 2018, which considers the housing need, supply and shortfall across this wider area to the same timeframe of 2036.</p>
LPIS154	Staffs. County Council	The time period is considered appropriate.
LPIS155	Taylor Wimpey (Lichfield's)	Taylor Wimpey considers that a time period of 15 years from the adoption date of the Local Plan is appropriate. The plan period should run beyond 2036 accordingly if there is any delay to adoption beyond the December 2021 date currently envisaged. As noted in these representations sufficient safeguarded land must be provided in the Local Plan to provide enough flexibility to deal with changing circumstances and provide greater certainty over the Green Belt boundaries beyond the plan period.
<u>Question 10. Do you have any other comments on our review of Policy CP1 Strategy?</u>		
LPIS156	Natural England	See question 6
LPIS157	South Staffs Council	<p><u>Plan Strategy (CP1) and Housing Land (CP6)</u></p> <p>We welcome the discussion regarding the identified shortfall within the wider GBHMA and the acknowledgement of the work undertaken by the constituent authorities in supporting the publication of the GL Hearn Growth Study. The recognition in para 5.2 that the revised plan strategy will need to take into account the wider West Midlands including the shortfall in housing supply is supported. In addition to identifying potential strategic growth options the GL Hearn study promoted the need for small and medium sites to be identified to contribute to increasing the supply of housing within the HMA. It was considered that such sites could have a particularly significant role to play in the short to medium term prior to the release and development of the larger strategic site options. In promoting such sites the study was clear that consideration is likely to be required to releasing Green Belt sites and that this should be undertaken within the context of a finer grained Green Belt assessment. It is suggested that such a fine grained study would provide a key element in the evidence base of a future plan review and should be incorporated in the review process.</p>
LPIS158	Staffs. County Council	It is noted that as part of the examination of the Plan you will be considering the Green Belt and previously safeguarded land. In relation to the safeguarded land at Wimblebury Road, as stated in our Local Plan Part 2 consultation response, any significant housing development in this area would put significant pressure on schools in this school place planning area, and may require

		additional school places to mitigate its impact. Release of further land around Wimblebury may not be able to be accommodated in the existing school infrastructure and therefore may require the provision of a new primary school. There are also highway constraints around Five Ways Island in this location. In considering the possible release of safeguarded land and/or other land around Wimblebury careful consideration should be given to infrastructure requirements, which may influence the scale of development. Further dialogue with the County Council in this respect will be necessary.
LPIS159	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any further comments in respect of this matter at the current time.
Review of CP2: Developer Contributions for Infrastructure		
Question 11. Do you have any comments on what issues need to be addressed in relation to developer contributions and what policy options may need to be considered?		
LPIS160	Canal & River Trust	The Canal & River Trust generally seeks to maintain its assets in a “steady state”, and this is based on current usage. Where new development has the likelihood to increase usage we consider that it is reasonable to request a financial contribution from developers to mitigate this impact by addressing issues such as those set out above.
LPIS161	Church Commissioners (Barton Wilmore)	Any developer contributions need to be fully evidenced and any policy relating to contributions needs to take into account the specific circumstances that may apply to sites. This includes unforeseen remedial costs. As such, a generalised approach may not be appropriate. For example, the costs associated with greenfield sites may differ throughout the District, so sufficient flexibility will need to be built into any policy to ensure it does not stifle the delivery of much needed housing. Viability at the plan-making stage should not compromise sustainable development (Paragraph: 002 Reference ID: 10-002-20180724). Further to this, in Paragraph 5.18 the Council set out that they may need to set out what ‘exceptional circumstances’ might be in terms of viability. The updated NPPG (Paragraph: 007 Reference ID: 10-007-20180724) sets out that planning applications are expected to comply with the up-to-date policies but where particular circumstances justify the need for a viability assessment the applicant must demonstrate this. A list of potential circumstances is set out in the guidance. As such, it is considered the Council should take this into account and provide suitably flexible policies which reflect national guidance.
LPIS162	Highways England	Highways England welcomes the opportunity to comment on what issues need to be addressed in relation to developer contributions and is committed to full engagement in infrastructure planning and delivery processes in Cannock Chase District. Highways England welcomes the intention to update the Infrastructure Delivery Plan (IDP). Highways England would be happy to meet to discuss any implications of updating the IDP on the Strategic Road Network to help to add detail at this early stage.
LPIS163	Natural England	Natural England looks forward to dialogue with the Council in order to explore and develop suitable policy/ies for green and blue infrastructure. Developer contributions are very likely to form an important consideration in seeking to establish mechanisms for the delivery of such resources.
LPIS164	Rentplus UK Ltd (Tetlow King)	We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent – save – own model. This is achieved through a combination of a secure affordable rented period (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. We previously responded to the Local Plan Part 2 consultation in March 2017. In the time since then the Government has published a revised NPPF, containing within it new policies relating to the assessment of housing needs and the tenures of affordable housing that local planning authorities must assess and seek to deliver. It is important for the Council to consider how its policies will be used

		<p>in determining planning applications in the long term, assessing the need and planning for the delivery of the new, wider types of affordable housing to meet local housing needs.</p> <p>As noted in our previous representation, rent to buy affordable housing seeks to meet the needs of those households who cannot access home ownership without intervention. This model has now been fully recognised and incorporated within the definition of affordable housing set out in the revised NPPF under the new category of ‘other affordable routes to home ownership’:</p> <p>“Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and <u>rent to buy (which includes a period of intermediate rent)</u>. Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.” (Our emphasis)</p> <p>It is clear from the changes to the NPPF that the Council will need not only to reconsider its core policies, but also the Developer Contributions and Housing Choices SPD. To support that review the Council should also undertake a review of its Strategic Housing Market Assessment, to ensure that its evidence base is up to date, reflecting the new affordable housing definition. This will require a further update to the Council’s viability assessment which is now very dated.</p> <p>A new assessment of local housing need must take into account the revised NPPF definition of affordable housing as this alters the types of housing that households may be able to afford. This work may uncover additional levels of concealed housing need and point more directly to the need for tenures assisting working households into home ownership. A methodology for assessing housing need, including rent to buy has been produced by Lichfield’s and is enclosed with this representation to assist with this work. We encourage the Council to look closely at the need for all types of affordable housing as this will widen the Council’s ability to meet all housing needs over the lifetime of the new plan. In response to Question 11 we recommend that the Council review its housing need and consider the viability of its affordable housing policy, including its threshold and percentage requirement, and the way in which it seeks developer contributions to this.</p> <p>Rentplus works closely with locally active housing associations to ensure that rent-to-buy is affordable in each area, and works with individual local planning authorities to encourage allocations from the housing register, reducing the numbers waiting for appropriate housing and freeing up resources to target households with higher priority needs. The findings of those households who have already moved to completed Rentplus schemes, as shown in the enclosed ‘outcomes’ document, is useful to note here.</p> <p>The first Rentplus scheme delivered with Tamar Housing received bids from 200 households in the first 24 hours, and was subsequently 41% filled by households in Band C of the local choice based lettings scheme. 30% of scheme tenants moved from social rented housing, while a further 35% were previously living in overcrowded households, with family. The significance of existing social housing tenants moving to Rentplus properties cannot be underestimated – this outcome frees up social housing for others in need on the housing register, enabling local authorities to meet their affordable housing policy objectives by effective use of the affordable housing portfolio. By delivering rent to buy housing, the Council is able to free up existing affordable housing and to deliver more affordable housing of all tenures.</p>
LPIS165	Staffs. County Council	<p>We agree that ensuring appropriate levels of infrastructure provision to support new development is a key issue for the plan. It is acknowledged that you propose to collect evidence to demonstrate viability of sites at the Plan stage. This is supported to ensure that infrastructure and policy requirements set out at the plan stage and expected by local communities are actually delivered and not watered down at the development management stage.</p>

		<p>It is noted that Government recently consulted on potential changes to CIL legislation, in particular in relation to Regulation 123 that governs the use of CIL and operation of S106. It will be necessary to take on board what the changes to legislation actually are when made and how this may affect the operation of the developer contributions policy and what infrastructure is funded by CIL and what by S106. We would welcome working with you on the process for reviewing the CIL list as part of this Local Plan review. We would also welcome information on how and when this list will be reviewed in the shorter term as the Local Plan continues to be developed. Clarity is also sought on the decision making process and prioritisation criteria for allocation of CIL funds on infrastructure.</p> <p>Recreational pressure on Cannock Chase AONB is increasing as a result of housing development, which puts the key sensitive habitats that are integral to the designated landscape of the AONB at risk of detrimental impacts. There could be opportunities to address increasing user pressure through CIL allocations to Green Infrastructure, to support new parks, woodlands and open space, providing for recreational use away from sensitive areas and potentially outside the AONB. This objective could be supported by strengthening and cross-referencing to Policy CP14 Landscape Character and Cannock Chase AONB for conserving and enhancing the AONB and its wildlife and cultural heritage.</p>
LPIS166	Staffordshire Commissioner, Police, Fire & Rescue, Crime	<p>The Commissioner (formerly known as the PCC) has previously highlighted to you the potential impact on local policing services of the expected population increase to 101,000 people in the district area by 2028, an increase of 7,200 (or 8%) on the baselined 2006 population of 93,600. The original plan also provided for 5,300 new houses over this period. Commercial development, particularly the Mill Green Retail Village, will add significant additional pressure to policing; 8 million visitors to the retail village are anticipated every year.</p> <p>The Commissioner remains of the view that community safety and policing issues should be more clearly reflected in your proposals. Policing is a population based service and any growth in population, whether residential or visiting inevitably places significant additional demands on existing policing services. It requires additional capacity to patrol in order to provide visible policing to deter crime and anti-social behaviour and respond to, and investigate, incidents and reported crime.</p> <p>In the context of your policy CP5, safe communities are a pre-requisite to achieving sustainable communities, by encouraging community cohesion and stability, resident wellbeing and vibrancy. A degree of criminal and anti-social behaviour can be designed out of new development but design measures alone will not address community safety fully. Neighbourhood policing puts communities, their needs, their issues and their priorities at the heart of local policing. This is achieved through collaboration between police, partners and the public to reduce crime and disorder, improve quality of life and ensure communities feel safer. In respect of questions 11 and 12, we feel that this needs to be more explicit in the policy.</p> <p>There is no existing funding source from central or local taxation for the police service to meet additional infrastructure need resulting from development growth. Nor does the Commissioner receive sufficient capital funding for new development related growth. The funding allocated to Police & Crime Commissioners via Home Office grants, council tax and other specific limited grants is generally insufficient to fund additional capital expenditure. There is also a time lag before extra revenue funding based on population from new development is received.</p> <p>In 2014, we requested inclusion of policing infrastructure in the CIL and Regulation 123 list, using the following definition, which we are advised have been incorporated into similar CIL arrangements elsewhere nationally: “Staffing, infrastructure (staff and Custody provision), human resources and ‘start up’ costs which covers such items as:</p> <ul style="list-style-type: none"> • Uniform and Protective Equipment (personal issue); • Patrol Vehicles;

		<ul style="list-style-type: none"> • Recruitment costs; • Probationer Constable and PCSO training; • IT equipment (including personal issue radio and mobile data systems); • Furniture” <p>You advised that, based on legal advice you had received, you did not accept this definition as infrastructure, but would consider potential specific infrastructure projects which we might wish to put forward for possible inclusion in the R123 list in future years. In respect of question 13, we would wish to highlight the need to either a) develop a single police custody facility for the south of the county or b) expand the existing custody facility at Watling St Police Station at Gailey. This will be required in order to achieve operating efficiencies and improve the effectiveness of police custody provision with increasing demand resulting from the expansion of communities in all districts in the south of the county.</p>
LPIS167	Taylor Wimpey (Lichfield's)	<p>In accordance with the Practice Guidance [Reference ID: 10-001-20180724], the Local Plan will need to clearly set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Any policy requirements will need to be informed by evidence of infrastructure and affordable housing need. And a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Importantly for developers, policy requirements should be clear so that they can be accurately accounted for in the price paid for land. Policies will need to be realistic and ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the Local Plan.</p> <p>In formulating any policy requirements for developer contributions, the Council will need to have regard to the revised Framework (July 2018) [§56] which is clear that planning obligations must only be sought where they meet all of the following tests:</p> <ol style="list-style-type: none"> 1. necessary to make the development acceptable in planning terms; 2. directly related to the development; and 3. fairly and reasonably related in scale and kind to the development.
LPIS168	Claire Walker	It is stated that not all items can put to the developer because it can be cost prohibitive. But if it is cost prohibitive for the developer to put in the ALL the necessary contributions required then the development surely is not viable option.
LPIS169	Christopher Walker	It is stated that not all items can put to the developer because it can be cost prohibitive. But if it is cost prohibitive for the developer to put in the ALL the necessary contributions required then the development surely is not viable option.
LPIS170	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>All affordable housing types and specialist housing for the elderly or people with disabilities should be counted as a nil contribution. We would like to draw the Council's attention to a recent appeal in Coventry City (APP/U4610/W/18/3196439) which we have also enclosed within this letter which relates to contributions to health care. The proposal would provide affordable housing in an area with a latent demand for 1,949 affordable homes. The development's intended occupants would comprise those on waiting lists in the City and who are therefore already resident there. The Inspector found no substantive evidence to suggest they are not already accounted for in terms of the use of NHS services. The Inspector also found no clear evidence on why the Council was seeking a contribution to generic health infrastructure.</p> <p>Consideration should also be given to exceptions or discounts for extra care and care home developments which provide healthcare facilities on-site as these have been shown to reduce the burden on local primary healthcare facilities, reducing costs that may otherwise need to be met by the public purse.</p>

Question 12. Do you have any comments on the evidence base updates required in relation to developer contributions?		
LPIS171	Canal & River Trust	The Review offers the opportunity to reassess the mechanisms through which improvements to the canal corridors are provided and ensure the impacts of developments on the canal network are mitigated. The Trust are happy to engage further with the Authority on this.
LPIS172	Church Commissioners (Barton Wilmore)	We consider that the evidence base should be fully updated to show up-to-date costs associated with infrastructure provision taking into account the Council's CIL Charging Schedule.
LPIS173	Highways England	See Question 11
LPIS174	KGL (Estates) Ltd (J Heminsley)	In relation to policy CP2 developer contributions for infrastructure it is agreed that evidence on viability issues needs to be updated and a review of CIL should proceed in parallel with the Local Plan Review.
LPIS175	Natural England	See question 11
LPIS176	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates welcomes the production of an Economic Viability Assessment for Housing Developments, as greater clarity is required in respect of all potential developer contributions including affordable housing, Community Infrastructure Levy charges and potential site-specific requirements, prior to the submission of any planning application.</p> <p>The Infrastructure Delivery Plan (IDP) also requires updating to take into account the adoption of the Community Infrastructure Levy (CIL) Charging Schedule, which was adopted after the publication of the latest revision of the IDP. Similarly, the identified projects within the IDP need updating, as some are now completed.</p> <p>Any policy in respect of 'exceptional circumstances' and viability should reflect national guidance.</p> <p>The IDP also needs to be updated to reflect the latest guidance in respect of the 'pooling' of contributions.</p>
LPIS177	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>Richborough Estates welcomes the production of an Economic Viability Assessment for Housing Developments, as greater clarity is required in respect of all potential developer contributions including affordable housing, Community Infrastructure Levy charges and potential site-specific requirements, prior to the submission of any planning application.</p> <p>The Infrastructure Delivery Plan (IDP) also requires updating to take into account the adoption of the Community Infrastructure Levy (CIL) Charging Schedule, which was adopted after the publication of the latest revision of the IDP. Similarly, the identified projects within the IDP need updating, as some are now completed.</p> <p>Any policy in respect of 'exceptional circumstances' and viability should reflect national guidance.</p> <p>The IDP also needs to be updated to reflect the latest guidance in respect of the 'pooling' of contributions.</p>
LPIS178	Staffs. County Council	The evidence proposed to be collected seems appropriate. It is noted that included within this is the expected level of developer contributions required. It will be necessary for there to be a dialogue with Staffordshire County Council on possible infrastructure costs, in particular in relation to transport and education infrastructure.
LPIS179	Taylor Wimpey (Lichfield's)	The evidence base will need to be updated to ensure that it fully accords with the revised Framework (July 2018) and the relevant Practice Guidance including that on Planning Obligations and Viability. The Practice Guidance [Reference ID: 10-002-20180724] is clear that the role for viability assessment is primarily at the plan making stage and should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. It is therefore essential that the Council produces a robust evidence base now to ensure any policy requirements achieve this aim and ensure a sound plan. In accordance with the revised Framework (July 2018) [§57] and in order to ensure transparency, any viability assessments should

		reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.
Question 13. What elements of the Infrastructure Delivery Plan will need updating? If you are an infrastructure provider how can you help us add in the detail at this early stage so we can feed this into our viability calculations?		
LPIS180	Church Commissioners (Barton Wilmore)	We consider that the Infrastructure Delivery Plan should be updated to reflect up-to-date evidence and to reflect the Council's planned delivery of development within the District.
LPIS181	Highways England	See Question 11
LPIS182	Lichfield and Hatherton Canals Restoration Trust	The IDP needs updating in respect of the Hatherton Canal restoration project. There is a need to engage with the two adjacent local authorities and with the Lichfield & Hatherton Canals Restoration Trust to ensure proper and adequate through-route protection. It is also necessary to gain a better understanding of the funds which could be made available from or via the local authorities to enable the project to progress during the life of the present Local Plan. The IDP currently mentions boat movements as an issue likely to impact the CEC SAC, this can now be deleted. There has been progress with land acquisition since May 2014.
LPIS183	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	See response to Question 12.
LPIS184	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	See response to Question 12.
LPIS185	Rugeley Town Council	The local rail lines have recently been updated with improved rail services. Funding to support local bus trips from/to the Chase for recreation has been called for locally to get people to enjoy recreation space. Further enhanced links between the canal and the town centre are supported. The works undertaken to Horsefair have met with a less than positive local response and issues are still evident. Improvements in the footway from Rugeley Trent Valley into town should be developed. Town centre parking in Rugeley is chaos with prices being charged to deter shoppers who can travel to out of town sites and not pay a fee. The reciprocal arrangement of parking fees for CCTV is not working and this issue should be revisited. Issue over parking for blue badge holders in town and the poor enforcement of the pedestrianisation scheme in the town centre. Possible need to look at reducing pedestrianised area to just the core streets but enforcing and restricting access with bollards.
LPIS186	Sport England	An updated Built Facility and Playing Pitch Strategy, reflective of the Local Plan timescales and growth levels, will help to provide evidence to understand if facilities at Rugeley Power Station are needed to be protected, if they should be replaced and whether new facilities are needed to meet the increase in demand and if so what and where.
LPIS187	Staffs. County Council	The Transport and Education infrastructure requirements will need to be updated in the IDP. In order for us to provide detail, we need to know overall dwelling numbers, site locations and build rates for each proposed development. As discussed it will be beneficial for an on-going dialogue to be in place between County and District so that infrastructure considerations can be factored into options testing, this will help ensure an informed approach is taken and negate any potential abortive work.

LPIS188	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments in respect of the Infrastructure Delivery Plan at the current time.
Review of CP3: Design		
Question 14. Are there any issues which you think our Design policy should now be covering which are currently not included? If so, what are they and what information could we use to support this?		
LPIS189	Brindley Heath Parish Council	<u>Page 85, Policy CP14 - Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB)</u> 13. BHPC Agrees and strongly supports these policies.
LPIS190	Canal & River Trust	<p>Any development close to the network has the potential to impact on the character and setting of the canal network. In many locations and particularly in green belt locations, the canals currently enjoy picturesque rural outward views and development in such locations would have the potential to significantly alter the character of the canal network and this should be considered within the Review. Opportunities for unlocking the potential of the canal network should also be supported through the development of any sites in close proximity to the network. The provision of services for canal users, pedestrians/cyclists and boaters, could be explored within comprehensive Development Briefs. We recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored.</p> <p>Therefore, whilst references to the canal network could be included within existing Policies it is considered that the particular and specific design/ layout considerations for development adjacent / near the canal network would be more appropriately set out within a canal specific policy.</p> <p>In addition, as you will be aware, land stability is a material planning consideration and is referred to in paragraphs 170, 178 & 179 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure and the public. We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.</p> <p>The network is up to 200years old and includes water retaining earth structures which were not built to modern standards. A specialist knowledge and understanding of this network is therefore necessary to fully assess the likely impact of development upon it. Even minor development, such as householder extensions can have significant impacts on the integrity of the waterway. For example, developments, could adversely impact on embankments, cuttings or expose or introduce leakage paths which could all affect land stability.</p> <p>This adds further weight to the requirement for a Policy specifically dealing with the canal network which would highlight the considerations for developments in close proximity to the waterway and aid in ensuring the network is adequately protected.</p>
LPIS191	Church Commissioners (Barton Wilmore)	We would support the Council's approach relating to Policy CP3 and design of developments in line with the Revised NPPF (Paragraphs 122 – 123). Appropriate densities can ensure efficient use of land and can secure much needed housing when well-designed.

		<p>However, given the nature of the District and the range of sites for allocation, a policy enforcing a specific density across all sites should be avoided as it would not allow for the character of a place and its setting to be fully considered. Density within a site will also change dependant on landscape and topography meaning a 'blanket policy' has the potential to stifle good design and amenity provision. Further, the Council should consider the ability of developers to manage and design schemes taking into account factors such as viability as well as potential occupiers; flexibility is therefore needed when considering density of schemes.</p> <p>With regards to parking standards, Paragraph 105 of the Revised NPPF states that policies should take into account the accessibility, type of development, accessibility to public transport, local car ownership and the need to ensure adequate provision of charging for electric vehicles. As such, any policies should take the above into account when assessing any standards and should justify these standards accordingly. Further, maximum standards should only be set where there is a clear and compelling reason (Paragraph 106).</p>
LPIS192	KGL (Estates) Ltd (J Heminsley)	<p>In relation to policy CP3 the following comments cover responses to questions 14 to 17 –</p> <ul style="list-style-type: none"> • Policy needs to be updated to reflect the latest NPPF. • Minimum density standards should be set for specific areas taking account of existing character with more flexibility adopted for major new development sites. • Current parking and amenity space standards are considered to be generally appropriate but reduced parking standards should apply in and adjoining town centres and near to railway stations. Amenity space standards could also be relaxed where infill development is proposed in existing high density locations including in and on the edge of town centres. Stafford Borough Council has adopted a space standard between principal windows facing a 2 storey blank wall of 12 metres and the current Cannock Chase standard of 13.7 metres should be reduced to this to assist with achieving higher densities. Similarly the facing two storey principal window standard of 21 metres could be reduced across a street frontage of new developments to provide a more urban character in appropriate locations and assist with achieving higher densities.
LPIS193	Natural England	<p>Q15&16 Design - Regarding housing density – Our comments above indicate Natural England's desire to engage with the Council regarding green and blue infrastructure. Long established research has shown that even where higher density development is proposed good design can ensure that such schemes deliver effective green infrastructure assets. Reference material = Biodiversity by Design – Available from the TCPA website: http://www.tcpa.org.uk/content_files/TCPA%20biodiversity%20guide_lowres.pdf</p>
LPIS194	Rugeley Town Council	<p>The desire for good design of buildings is not being matched by planning applications coming through. The area action plan and conservation area plans are not being utilised to their full potential and it appears that the fear of planning appeals is leading to poor design and planning decisions which are eroding the historic feel in Rugeley. Design statements are there but the town council would question their strength when decisions are made.</p>
LPIS195	Sport England	<p>It is viewed that the principles of active design should be embedded into the Design SPD. The Essex Design Guide is a good example where Active Design principles are an overarching theme in the way town's, villages, neighbourhoods, buildings, streets and open spaces are designed to promote activity, health and stronger communities.</p> <p>A link to the Essex Design Guide can be viewed here: https://www.essexdesignguide.co.uk/</p>
LPIS196	Staffs. County Council	<p>As Lead Local Flood Authority we have produced a SuDS handbook, which sets out the issues that we consider to be important and the Standards that we apply to achieve multiple benefits: https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/SuDS-Handbook.pdf</p>

		<p>The handbook was consulted on as if it were an SPD and it would be helpful now to include reference to the handbook in Local Plan policy.</p> <p>It should be noted that setting minimum density standards could conflict with achieving above ground SuDS.</p> <p>In relation Parking Standards further dialogue with the County Highway officers should be undertaken. Whilst standards can be useful consideration also needs to be given to the location of parking and whether a garage counts towards a parking space. Certain types of provision e.g. rear parking courts can be undesirable and lead to street parking that detracts from the design of the development.</p>
LPIS197	Taylor Wimpey (Lichfield's)	<p>The Government is now placing increased emphasis on good design and the recent findings of the Letwin review suggests that design is a key consideration in helping to ensure that sufficient homes are brought forward.</p> <p>Any design policy in the Local Plan will need to be clear on design expectations and how these will be tested so that applicants have as much certainty as possible about what is likely to be acceptable. Visual tools such as design guides and codes will assist in the process and provide greater clarity on design expectations. However, if such tools are used, their level of detail and degree of prescription should be tailored to local circumstances and should allow a suitable degree of variety where this would be justified, in accordance with the revised Framework (July 2018) [§126] and they should not prevent or discourage appropriate innovation or change.</p>
Question 15. Should we now set minimum density standards as discussed in the section on Policy CP6 (Housing land)? If so, should these be set in strategic policy or in an updated SPD?		
LPIS198	Church Commissioners (Barton Wilmore)	See Question 14.
LPIS199	Home Builders federation	<p>The HBF is supportive of the efficient use of land. The setting of any density standards in the new Local Plan should only be undertaken in accordance with the revised NPPF (para 123) whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. However a blanket approach to a minimum density across all the District would be inappropriate and unlikely to provide a variety of typologies to meet the housing needs of different groups. The inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix and developable acreage on viability should also be carefully considered especially if future development is located in less financially viable areas.</p> <p>The setting of any minimum density standards should be specified in a strategic policy rather than in a Supplementary Planning Document (SPD). An SPD should not add to the financial burden of development so the Council should not be seeking to impose any housing standards that have not been subject to viability testing. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden. In this context the Council is referred to the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council Neutral Citation Number : [2017] EWHC 3006 (Admin) Case No. CO/2920/2017 which deals with a policy within a document that should have been issued in the form of a Development Plan Document (DPD) and not in the form of an SPD because DPDs must, if objection is taken to them, be subject to independent examination whereas SPDs are not.</p>
LPIS200	KGL (Estates) Ltd (J Heminsley)	See Question 14

LPIS201	Natural England	See question 14
LPIS202	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.</p> <p>Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.</p>
LPIS203	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.</p> <p>Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.</p>
LPIS204	Rugeley Town Council	A range of housing density should be encouraged. In Rugeley where current housing development is small scale infill development, care should be taken that the range of housing designs including 'accessible' properties close to town centre amenities, are being provided. The largest housing opportunity for Rugeley will be the power station and details of this development are awaited.
LPIS205	Staffs. County Council	See question 14
LPIS206	Taylor Wimpey (Lichfield's)	Housing density will be central to determining the amount of land that needs to be allocated for residential development and it is therefore essential that the Council applies realistic density assumptions in order to ensure that sufficient land will be delivered. In the interests of transparency, Taylor Wimpey considers that any density standards need to be considered through the Local Plan Review rather than in an updated SPD. This will help ensure that there is a clear alignment between density standards being applied and the assumptions used by the Council when determining the amount of land required to meet housing need. We provide further comments in relation to density and upon the need for housing land in our response to the section on Policy CP6 (Housing land) below.
LPIS207	West Midlands HARP (Housing Assoc. Registered Providers)	We support the Council's commitment to support development that makes efficient use of land provided that good design is also encouraged. We strongly recommend that if the minimum densities are set to be applied within the area then any optional space standard is applied across all tenures not just affordable. Applying standards to only affordable housing development can cause

	Planning Consortium (Tetlow King)	problems in terms of viability and as market schemes can be developed at higher densities where the standard is applied to affordable housing only, this has left Registered Providers in the position of being unable to compete on an equal basis with other developers for land. This will help deliver more effective density policies.
Question 16. Are there additional 'high density design criteria' which should be added to policy or guidance to ensure the attractiveness and convenience of use within such developments is maintained? Can you suggest any matters where leeway/trade off might be allowed in meeting higher densities e.g. reduced parking or amenity space? Or should other space saving options such as basement parking be considered (bearing in mind this may affect the viability of development)?		
LPIS208	KGL (Estates) Ltd (J Heminsley)	See Question 14
LPIS209	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submits that the introduction of the Nationally Described Space Standard would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The Standard should only be introduced where its application can be justified, in accordance with footnote 46 of Paragraph 127 of the NPPF.
LPIS210	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submits that the introduction of the Nationally Described Space Standard would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The Standard should only be introduced where its application can be justified, in accordance with footnote 46 of Paragraph 127 of the NPPF.
LPIS211	Rugeley Town Council	See question 15
LPIS212	Staffs. County Council	See question 14
LPIS213	Taylor Wimpey (Lichfield's)	Any high density design criteria should take into account the desirability of maintaining an area's prevailing character and setting and providing well-designed, attractive and healthy places. They should also ensure that technical matters such as the provision of suitable vehicular access, can still be adequately addressed.
Question 17. Should we consider setting minimum/maximum off-street parking standards for different types of development or locations? What would the justification for this be and how would it be evidenced?		
LPIS214	Church Commissioners (Barton Wilmore)	See Question 14.
LPIS215	Home Builders Federation	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with the revised NPPF (paras 105 & 106).
LPIS216	KGL (Estates) Ltd (J Heminsley)	See Question 14
LPIS217	Preece, Cllr. J	I believe the threshold for minimum parking levels is too low and does not reflect levels of car ownership in households. To have the level set to low is to create more issues for the wider community in the form of on-street parking. I believe house design can play a role in this by requiring houses in denser areas to have garages set below ground level or building above driveways.
LPIS218	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with the Paragraphs 105 and 106 of the NPPF, which states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the local road network. Richborough Estates nevertheless agrees with the Council that the existing Parking Standards, Travel Plans and Developer

		Contributions for Sustainable Transport SPD dating from 2005 which sets out maximum off-street parking standards for different types of developments including parking for the disabled is out-of-date and is in need of updating.
LPIS219	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with the Paragraphs 105 and 106 of the NPPF, which states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the local road network. Richborough Estates nevertheless agrees with the Council that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD dating from 2005 which sets out maximum off-street parking standards for different types of developments including parking for the disabled is out-of-date and is in need of updating.
LPIS220	Rugeley Town Council	See question 15
LPIS221	Staffs. County Council	See question 14
LPIS222	Taylor Wimpey (Lichfield's)	The revised Framework (July 2018) [§105] identifies the factors which should be taken into account in setting local parking standards. It states [§106] that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport. In considering whether to apply parking standards and formulating policy the Council will need to ensure that any standards applied are appropriately evidenced in accordance with these requirements.
Question 18. Do you have any other comments on our review of Policy CP3: Design?		
LPIS223	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submits that Policy CP3 should be amended to allow for flexibility in design, to allow for innovative designs to come forward, in accordance with Paragraph 127 of the NPPF.
LPIS224	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submits that Policy CP3 should be amended to allow for flexibility in design, to allow for innovative designs to come forward, in accordance with Paragraph 127 of the NPPF.
LPIS225	Rugeley Town Council	See question 15
LPIS226	Staffs. County Council	See question 14
LPIS227	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any further comments in respect of this matter at the current time.
Review of CP4: Neighbourhood-led planning		
Question 19. Do we still need a specific Local Plan policy on Neighbourhood Plans given that they are already extensively covered by national policy and legislation? If so, what issues should the policy be dealing with which avoids duplication?		
LPIS228	Home Builders Federation	The relationship between the new Local Plan and Neighbourhood Plans should be clearly set out in accordance with the revised NPPF (paras 13, 29 & 30 and Footnote 16).
LPIS229	KGL (Estates) Ltd (J Heminsley)	It is agreed that comprehensive coverage in the new NPPF makes Policy CP4 redundant.

LPIS230	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates considers that a Local Plan Policy in reference to Neighbourhood Plans is unnecessary as they are sufficiently considered within National Policy and Guidance.
LPIS231	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates considers that a Local Plan Policy in reference to Neighbourhood Plans is unnecessary as they are sufficiently considered within National Policy and Guidance.
LPIS232	Rugeley Town Council	Rugeley Town Council would support the continued guidance at a district level for Neighbourhood Planning. Given the voluntary work to develop the plans and the expense of them, they take a longer time to develop than district plans.
LPIS233	Taylor Wimpey (Lichfield's)	Unless the Council considers that there are matters outwith the revised Framework and the Practice Guidance which need to be addressed, Taylor Wimpey considers that a specific Local Plan policy on Neighbourhood Plans is not required.
LPIS234	Claire Walker	Yes if neighbourhood plans allocate sites for housing
LPIS235	Christopher Walker	Yes if neighbourhood plans allocate sites for housing
Review of CP5: Social Inclusion & Healthy Living		
Question 20. Do you have any comments on what issues need to be addressed in relation to healthy living and what policy options may need to be considered?		
LPIS236	Beaudesert Golf Club (FBC Manby Bowdler LLP)	Whilst the Plan provides for developer contributions to be put towards the improvement of leisure facilities and open space, schemes which take a holistic approach to such matters by utilising residential development to enable and facilitate the improvement to open spaces and golf course provision (for example) should equally be supported by the Local Plan policies. The focus in CP5 on financial contributions means that Policy CP1 and Policy CP5 do not dove-tail sufficiently to achieve the stated vision and objective in this regard.
LPIS237	Brindley Heath Parish Council	<u>Page 65/84, Policy CP5 – Policy CP13</u> 12. BHPC Agrees and strongly supports these policies.
LPIS238	Canal & River Trust	Personal wellbeing is measured by how satisfied people say they are with their life – the greater feeling of connectivity with place, the greater the feeling of wellbeing. With approximately 28% of Cannock Chase District population living within 1km of the waterway there is a substantial portion of the population who have access to this ‘free to use and enjoy’ resource on their doorstep. This presents significant opportunities to enhance personal and community wellbeing across many communities. Waterways can provide a strong sense of place and connection and help shape the way people live their lives, feel about themselves and their relationships with others in their community – all creating better outcomes in terms of individual, community and societal wellbeing. The potential to utilise waterways to increase activity levels and improve physical health inequalities and outcomes is significant. The benefits of the waterways however are not always acknowledged or considered as part of development proposals. The Policy should be amended to include specific references to the canal network within the District, acknowledging it as a key local asset.
LPIS239	Lichfield and Hatherton Canals Restoration Trust	Paragraphs 5.36 and 5.37 mention accessible open spaces and protection for them. The projected route of the towpath of the restored Hatherton Canal is an area where local improvements could be considered and supported by the Council to make more sections of the route accessible.

LPIS240	National Farmers Union West Midlands Region	<p>As stated in section 5.31 "Access to good quality healthy living opportunities from recreational footpaths and cycle-ways to informal spaces to formal sports provision can assist in improving peoples' health". We also agree that the maintenance and enhancement of the Districts open spaces and Green Space Network is a key issue.</p> <p>The health benefits of access to the countryside are well known and are currently being promoted by various bodies and organisations. As a result of this renewed promotion of the outdoors there is likely to be an uplift in user numbers using the routes. Health Authorities increasingly recognise the role of public rights of way in improving public health and wellbeing. Therefore it is very important to increase user's awareness of their responsibilities as rights of way users and for those promoting the outdoors to consider how adequate resources can be delivered to support the maintenance of the network.</p> <p>Farmers and Landowners are largely responsible for the maintenance of footpaths across their land. Therefore the impacts of new residential development on adjacent agricultural land need to be carefully thought through. Many field parcels adjacent to housing developments are unfortunately then subject to repeated trespass, fly tipping (particularly of garden waste), dog worrying and concerns about disease carried in dog faeces (such as Neosporosis)</p> <p>Therefore where new housing is proposed adequate green space must be incorporated into the development in order to relieve pressure on adjacent farmland and investment must be made (with prior consultation of local farmers) in the surrounding areas access infrastructure. This is to mitigate the impact of new urban development on the surrounding farmland. We have heard of instances where farmers on the urban fringe have had to radically change their management practices in order to accommodate such pressure which often leads to a financial penalty for farm businesses.</p> <p>Farmers and landowners must be fully engaged with discussions on Green Space as they own and manage many of the areas key Green Infrastructure assets.</p>
LPIS241	Natural England	Green and blue infrastructure are characterised by their multi-functional nature. We anticipate that our dialogue with the Council on this fundamental theme will allow further discussion and the identification of the interaction between these assets and the role they have in promoting and supporting people's mental and physical well-being.
LPIS242	Norton Canes Parish Council	With the number of houses being built in the village we are of the opinion that there should be some re-generation of the centre of the village as we are currently very poorly served by the availability of shops etc.
LPIS243	Preece C	Need to consider schools and doctors when new developments in Norton canes are being applied © know we need new houses but they need look into it.
LPIS244	Preece, Cllr. J	I would challenge the automatic placing of play equipment on any new development without first auditing the play equipment around the proposed developments. An example can be seen in Norton Canes whereby a new play area was provided by developers, despite there already being a playground with the same distance of the estate but in the other direction (and well linked by pathways within the new estate). I believe it would have been more beneficial to the council, and to residents, for the council to have asked instead for money to upgrade the existing park. By not doing this the council will ultimately now be responsible for the maintenance of 2 sets of play equipment within relatively close distance to each other.
LPIS245	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	As with Question 15, Richborough Estates considers that any open space standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable. Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.

LPIS246	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	As with Question 15, Richborough Estates considers that any open space standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable. Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.
LPIS247	Rugeley Power Ltd (Savills)	<p>CP5: Social Inclusion and Healthy Living and 5.35. It is appropriate for the Plan to seek to encourage an appropriate range and level of provision of social infrastructure, however, it is important that the social infrastructure identified in policy is relevant and is focused on what is most important. Some elements listed in CP5 currently, such as golf courses, are not necessarily required or desired by the community in general, and may not be the best use of land. It is important that CP5 or its replacement embodies flexibility to enable the range, breadth and depth of community and social infrastructure proposed by a development to be considered as a whole. Development proposals should not be required to deliver every item of infrastructure that may be desirable across the District as a whole. Instead, developments should be encouraged and facilitated to deliver those elements of social infrastructure to which they are best suited and able to make the most appropriate contribution to the greater whole.</p> <p>It is noted that NPPF para 11 in promoting the presumption in favour of sustainable development directs that local plans should be flexible to adapt to rapid change. It is also vitally important that policy requirements for social infrastructure are realistic and viable for development to deliver. NPPF para 34 makes clear that policies should not undermine the deliverability of the Plan.</p> <p>For these reasons it is important that the Plan enables flexibility in how development sites are delivered. This correlates with a policy backed approach supporting offsetting of social infrastructure requirements. Please refer to comments made under para 5.38 on the subject of off-setting.</p> <p>SPD can continue to play a role in this by being a more flexible tool for reviewing and developing material considerations, but if it is to be effective, SPD should be reviewed and updated and should not be regarded as rigid policy. In the context of strategic priorities, SPD should not lead policy. Plan policy including development control policy supporting strategic priorities, should be flexible and able to respond to changing circumstances and priorities. SPD remains a valid tool in developing thinking on sub-issues, providing it is responsive and also embodies flexibility, which can be taken into consideration in decision making.</p>
LPIS248	Rugeley Town Council	Cannock District provides the play areas within Rugeley but these are limited in their appeal and dated. Play provision is a key benefit of development and with the increasing numbers of young families living in accommodation with smaller gardens, public open space is essential. The policies re play areas to support healthy living will only be of effect if funding is there from CCDC and/or partners to develop and add to play areas ensuring that they meet the needs of the younger people.
LPIS249	Sport England	Please see comments regarding embedding Active Design in the Design SPD.
LPIS250	Staffs. County Council	<p>We agree that Health and social inclusion is something which should run through all policies and further agree that it is important that health and social inclusion matters are given specific attention.</p> <p>It is noted that existing policy CP5 makes reference to provision of appropriate infrastructure, which includes education. There may be potential through the Plan review to consider enhancing the role of schools in promoting healthy living through shared use of playing fields and sports halls. However, it should be borne in mind that schools are primarily designed for the education of children and therefore additional infrastructure may be required to facilitate community use. In relation to any new schools which may be required through the plan period appropriate community use could be designed in from the outset, but it needs to be noted that this will incur extra costs over and above what is necessary for education use only and would therefore need to be reflected in the IDP policy on developer contributions.</p>

LPIS251	Taylor Wimpey (Lichfield's)	Taylor Wimpey generally supports the development of policy which promotes healthy living and social inclusion. For the reasons set out in these representations, it is considered that any such policy should be dealt with through the application of policy within the Local Plan rather than through the use of Supplementary Planning Documents [SPD].
LPIS252	Theatres Trust	As well as focusing on the delivery of new social infrastructure, we would recommend that you include a policy protecting existing community, cultural and social facilities from loss. Such a policy should include a need to provide robust evidence that the facility is no longer required by the community and that marketing has been undertaken over a period of at least one year at a price/rent appropriate to existing use without development potential and condition.
LPIS253	Claire Walker	We need more access to health centres and preserving green spaces and not developing on them and only conserving small parts. Large green areas help with clean air
LPIS254	Christopher Walker	We need more access to health centres and preserving green spaces and not developing on them and only conserving small parts. Large green areas help with clean air
Question 21. Do you have any comments on the evidence base updates required		
LPIS255	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The SHLAA and Brownfield Register need to be reviewed and updated to ensure that Green Belt sites are not all regarded as excluded, so that a qualitative approach can be taken to brownfield sites within Green Belt and AONB areas so as to make the Development Plan better serve the community.
LPIS256	Church Commissioners (Barton Wilmore)	We believe that the evidence base should be updated to ensure it is up-to-date. Further, sufficient flexibility should be given within any policy to ensure sustainable development is not stifled and innovative solutions can be brought forwards.
LPIS257	Natural England	The Local Planning Authority may find it useful to refer to the following Natural England and DEFRA publications: Connection to Nature: evidence briefing Links between natural environments and obesity Links between natural environments and physical activity Links between natural environments and physiological health Links between natural environments and mental health Good practice in social prescribing for mental health: the role of nature-based interventions (NECR228) NECR211 – Is it nice outside? – Consulting people living with dementia and their carers about engaging with the natural environment DEFRA- Evidence Statement on the links between natural environments and human health
LPIS258	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates has previously commented upon the need to update the Infrastructure Delivery Plan.
LPIS259	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates has previously commented upon the need to update the Infrastructure Delivery Plan.
LPIS260	Rugeley Town Council	See question 20

LPIS261	Sport England	An updated Indoor and Built Facility Strategy and Playing Pitch Strategy should inform items listed within Policy CP5. It would be beneficial to identify what the open space, sport and recreational provision requirements are for the specific area within the authority and how they will be accommodated.
LPIS262	Staffs. County Council	It will be important that the evidence base updates link to the wider determinants of health. It is suggested that you liaise with colleagues in our public health department to determine what data is available to assist.
LPIS263	Taylor Wimpey (Lichfield's)	The evidence base required to address this issue will need to address the revised Framework (July 2018) and the relevant Practice Guidance including, that on Health and Wellbeing, Viability, Planning Obligations, and Open space, sports and recreation facilities, public rights of way and local green space.
Question 22. Where do you think we should be setting standards e.g. for open space provision? Should these be in the Local Plan or should they remain as supplementary policy i.e. in a revised Supplementary Planning Document?		
LPIS264	Lichfield and Hatherton Canals Restoration Trust	I feel that active work should be done to enhance and improve the open space provision and green infrastructure provision. Having such standards set in the Local Plan presumably means they come into force sooner so that would be my preference.
LPIS265	Natural England	We would advise that standards should be set in Planning policy. This subject forms another strand of the green and blue infrastructure theme (see above). You may find it useful to refer to the below document which though is now archived, still provides useful and relevant information. Natural England –Nature Nearby – Accessible Natural Greenspace Guidance (NE265)
LPIS266	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	See response to Question 20.
LPIS267	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	See response to Question 20.
LPIS268	Rugeley Town Council	See question 20
LPIS269	Sport England	<p>Sport England are supportive of no standards being set for playing pitches it instead being informed by an up to date playing pitch strategy (which should be monitored and reviewed yearly).</p> <p>For clarity Sport England would not like to see the use of standards for playing pitches as it is not always appropriate with it potentially providing single pitch sites, without ancillary facilities and in the wrong location. Therefore, the pitches are not attractive to sports teams for match play or training. Instead using that information in the updated playing pitch strategy should be used to identify whether:</p> <ol style="list-style-type: none"> There are pitches within the analysis area that already have spare capacity that can accommodate the additional demand for that pitch type; or There are pitches of that type in the area that are poor quality and improving them would create the additional capacity required; or All pitches of that type in the area are overplayed and new pitches are required. New pitches should be located on existing sites, where possible, to take advantage of ancillary facilities. Where there are a large number of pitches required as a

		<p>result of a large strategic housing allocation, for example, then a new site might be appropriate; or in some analysis areas the lack of capacity is as a result of a lack of ancillary facilities rather than pitches. In some circumstances it might be more appropriate to improve changing rooms than provide a new pitch</p> <p>As a guide a draft Sports and Recreation policy (DM6) from Cheshire West and Chester Council is provided below:</p> <p>“Developer contributions will be required to enhance existing provision of playing pitches, based on additional demand generated by the new residential development and the sufficiency of existing provision to meet current and projected need.</p> <p>The Council will have regard to Sport England’s strategic planning tools and findings of the Playing Pitch Strategy to determine an appropriate amount and type of contribution or provision with new development.</p> <p>Where it is agreed by the Council that on-site pitch provision is appropriate to meet identified demand, the applicant is required to provide the new pitch(es) and make provision for its management and maintenance in perpetuity, and clarify these arrangements within a management plan to be agreed by the Council.</p> <p>Provision of new sport and recreation facilities will be supported in line with the priorities of the Sports Facilities Strategy, subject to relevant development plan policies.”</p> <p>An Indoor and Built Facility Strategy and Playing Pitch Strategy will help to inform whether the sporting facilities at Rugeley Power Station are required to meet current and future demand.</p>
LPIS270	Staffs. County Council	It is suggested that the plan itself may be the best place for setting standards with the SPD used to provide further guidance on delivery. As supplementary planning documents (SPD) should build upon and provide more detailed advice/guidance on the policies in the Local Plan.
LPIS271	Taylor Wimpey (Lichfield’s)	Given the increased emphasis upon viability in the revised Framework (July 2018), Taylor Wimpey considers that any policies in relation to healthy living, including policies for the provision of open space and levels of open space provision should be included within the Local plan. The development of such policies at a later stage, through SPD for example, would not provide the certainty required to properly assess the viability implications, which is an essential process to ensure that a sound and deliverable plan is achieved.
LPIS272	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	We would recommend adding any open space standard provisions in a policy within the Local Plan to ensure that the policy is viability tested and subject to rigorous testing to ensure that the standards don’t make developments (especially affordable housing developments) unviable.
Question 23. How might we be able to demonstrate ‘offsetting’ and ‘net gain’ in a way which is meaningful and measurable? Do you have any examples of good practice which you could share?		
LPIS273	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The proposed allocation of a small part of SHLAA site C375 for residential use, to facilitate the improvement of the open space and leisure facilities within that site, would be a prime example of providing net gain within a single site allocation – allowing the opening up of a previously inaccessible area of countryside to provide opportunities for recreation as envisaged by at para 5.38 of the Local Plan Review (Issues and Scope) Consultation document.

LPIS274	Lichfield and Hatherton Canals Restoration Trust	I feel that net gain in terms of footpath provision needs to reflect additional lengths of footpath which are made accessible and which are connected at both ends so that they become useful and used additional open space. We in the LHCRT supported by our colleagues in the Inland Waterways Association can provide many examples of sections of former canal towpath which have been opened and added to local open space networks. We would support similar work to enable access to the Hatherton Canal towpath.
LPIS275	Natural England	<p>Is the LPA looking at delivering biodiversity net gain outcomes or would it like to secure wider ecosystem service/natural capital outcomes? Currently metrics used for calculating biodiversity net gain cannot calculate or capture ecosystem service or natural capital value. To maximise the achievement of such outcomes alongside the biodiversity net gain outcomes will likely require the provision of additional advice and expertise, for example from the relevant LNP for the local area.</p> <p>Biodiversity net gain can be sought in a proportionate manner for most types of development and should be a consideration at each step in the mitigation hierarchy. Requirements for net gain include good ecological baseline data (i.e. Phase 1 habitat survey data) and metric for calculating net gain/loss. Metrics exist for calculating the amount of biodiversity required to achieve net gain. The most commonly used are variants of the Defra metric which calculates the biodiversity units required to achieve biodiversity net gain. Natural Capital is currently more challenging to measure.</p> <p>We have attached an Environment Bank document which provides examples of policy wording in approved Local Plans and Core Strategies, which you may find helpful.</p>
LPIS276	Rugeley Power Ltd	<p>The principle of offsetting is supported, whereby a policy requirement in one area is offset in recognition of a contribution a development makes in making available to the public an amenity or element of infrastructure which was not previously available to them either in the same policy area or in a different policy area.</p> <p>Policy should reflect the contribution that sites can make in this regard. In order to embody the flexibility that the NPPF calls for, policy should refer to the fact that such recognition will be applied and considered as and when planning applications are brought forward. It may be appropriate for the policy to identify the types of infrastructure and facilities it is envisaged offsetting could be applied to and whether any specific metrics apply, or whether the degree of offset is a qualitative judgement. Policy should not be overly prescriptive on the items that can be taken into consideration in order to retain flexibility.</p> <p>Such policy should include recognition for existing sports and recreational facilities which are not currently accessible to the public but could be made so, and areas of land with potential amenity value not currently accessible to the public but which could be made accessible.</p>
LPIS277	Rugeley Town Council	See question 20
LPIS278	Staffs. County Council	<p>Offsetting is usually used to provide biodiversity gains in compensation where habitat is unavoidably lost (avoid, mitigate, compensate hierarchy). Therefore, it should not be used to provide land where the primary purpose is sport or recreation. We would welcome biodiversity offsetting in itself (see comments referring to net gain applies). Where recreation is desired then the best means might be through provision of SANGS using SAC funding. SANGS could also provide space for offsetting, provided habitats were not compromised by damage / disturbance from recreation, which could be designed out).</p> <p>In terms of measurability this could be demonstrated by the use of a metric*, such as the one devised by Warwickshire County Council. Staffordshire Ecological Record plans to devise a similar Staffordshire metric and DEFRA is in the process of updating their metric. The Plan might therefore just refer to metrics in general and allow future adoption of the most suitable system. We have examples of good practice we can share, for example Lichfield District has a net gain for biodiversity policy which requires a 20% measurable net gain. *In short a metric calculates the habitats present on say, a development site, taking into account condition and quality. Likely loss to habitats is then factored in, plus whatever additional new or restored habitat within the site is taken into</p>

		account. If a net loss (or net gain lower than 20%) is then predicted, offsetting is required, and the metric indicates what level of offsetting is necessary. (Metrics may also be known as biodiversity calculators)
LPIS279	Taylor Wimpey (Lichfield's)	The revised Framework (July 2018) [§138] advises that plans should 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. Whilst Taylor Wimpey is not aware of any specific examples of good practice, it is noted that the wording of the guidance suggests that such offsetting would not need to be based in the immediate vicinity of the land to be removed. It provides the potential to improve the quality of other parts of the Green Belt in the wider area where the benefits may be more widely felt. The Council will need to explore ways in which such offsetting can be provided, including through financial contributions towards the improvements of other parts of the Green Belt within the wider District where such offsetting may be of most benefit. In terms of the improvements which could be sought, those falling within the category of environmental quality could include schemes such as landscape enhancement, and those relating to accessibility could include recreation enhancement schemes such as improvements to pedestrian and cycle routes. 8.6 Any approach to compensatory improvement needs to be considered in the context of viability and will need to be fully considered in any viability evidence base work undertaken to inform the Local Plan.
Review of CP6: Housing Land		
Question 24. Do you have any comments on what issues in relation to housing requirements and land supply need to be addressed and what policy options may need to be considered?		
LPIS280	Beaudesert Golf Club (FBC Manby Bowdler LLP)	A review of Green Belt Boundaries to allow allocation of suitable, particularly for brownfield, sites that offer natural capital (such as site C375)
LPIS281	Birmingham City Council	<p>We are pleased to see that the document recognises that Cannock District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area (GBHMA) where there is a significant housing shortfall of 28,150 dwellings to 2031 and 60,900 to 2036 as established by the Strategic Growth Locations Study undertaken by GL Hearn/ Wood Plc.</p> <p>The study identified 24 areas of search for large scale strategic growth (new settlements and large urban extensions) were narrowed down by the study to a short list of 11 areas, none of which are located in Cannock.</p> <p>We also welcome the reference to the investigation of smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area to the south-east of the District as recommended in the Strategic Growth Locations Study. We support the approach of "consider these 'in the round' with other options for accommodating housing in the District" as stated in Paragraph 5.6.</p> <p>On densities, evidence from The Greater Birmingham HMA Strategic Growth Study indicates that if the Cannock were to require a minimum density of 30-40 dwellings per hectare that could generate an additional 75-200 dwellings (from sites that are currently considered suitable for development but do not yet have planning permission, which are expected to deliver around 1,000 dwellings at present).</p> <p>This is consistent with the revised National Planning Policy Framework which emphasises making avoiding homes being built at low densities, optimising the potential of each site and setting minimum housing density standards for city and town centres and other locations well served by public transport, where there is an existing or anticipated shortage of land for meeting identified housing needs.</p> <p>We would therefore encourage Cannock to consider setting minimum housing density standards. We appreciate that lower densities</p>

		may be needed to reflect the Districts' rural areas but a flexibly written policy could allow for this. We also support the intention to undertake further work on brownfield capacity and potential underused assets.
LPIS282	Church Commissioners (Barton Wilmore)	Given the stage the LPR is at, and the provisions within Annex 1 of the Revised NPPF, we consider the standardised methodology (including ONS 2016-based household projections to be published in September 2018) should be used as a starting point for assessing housing need. This is likely to raise the housing requirement set out in the Part 1 Local Plan. This is, also, only a starting point and any additional need or growth aspirations will have to be included as well. This includes the provision of affordable housing as a direct benefit of housing provision. The national aim of boosting housing supply and the needs of the wider region should also be considered.
LPIS283	Greenlight Developments (Lichfield's)	<p>The NPPF (2018, para 60) requires the Council to determine the minimum number of homes needed, on the basis of local housing need assessment, conducted using the standard methodology. As it stands this gives a figure of 295 dwellings per year for Cannock Chase compared to the current Local Plan (Part 1) requirement of 241 dwellings per annum (for the period 2006-2028). The Council might therefore expect to see an increase in housing requirement which its future plan must ensure it is equipped to accommodate. However, this standard figure could be subject to change in September with the release of new household projections, whilst Government have signalled that further guidance on the standard method will be forthcoming later in 2018 which may alter the formula. At this stage, Greenlight do not therefore wish to comment further on the housing requirement figure in advance of the anticipated future changes. Notwithstanding this, it is clear that there exists a significant housing shortfall across the Greater Birmingham HMA (GMHMA, Growth Study February 2018). There is a recognised shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036. It is understood that, although the technical evidence undertaken so far as part of the Duty to Co-operate does not set out how much each Local Authority should take, it is likely that under Duty to Co-operate Cannock Chase District will be required to accommodate a portion of this need.</p> <p>Greenlight also support the Council's recognition at paragraph 5.41 of the consultation document that "Acceleration of housing delivery is also a key aim of the West Midlands Combined Authority which is producing a Strategic Investment and Delivery Plan". The Council will need to be mindful of this as it prepares the new plan.</p> <p>Given the growth ambitions of the wider area and significant shortfall in the HMA, it is therefore likely that the District will need to plan to deliver an increased number of homes to what is currently required, in the future. The Council must therefore ensure its evidence base sufficiently assesses all reasonable options to supply this land for housing.</p>
LPIS284	Highways England	Highways England is not in a position to indicate alternative locations for housing development or comment in detail on specific sites. However, the transport implications of potential sites must be properly assessed in considering them for an allocation and should be key criteria for screening out sites for development. Reference should be made in the emerging plan as it evolves to appropriate transport assessments to be undertaken by the developers of sites and the benefits of early liaison with Highways England where there are potential impacts on the SRN. Highways England would expect to comment on the spatial distribution of development in relation to the SRN once determined.
LPIS285	Home Builders Federation	<p>By the time of the submission of the new Cannock Chase Local Plan for Examination the Government's standard methodology for the calculation of OAHN will have been implemented. The Government's proposed methodology is summarised as :-</p> <ul style="list-style-type: none"> • Demographic baseline based on annual average household growth over a 10 year period ; • Workplace-based median house price to median earnings ratio ; • Adjustment factor = <u>Local affordability ratio</u> – 4 x 0.25 ;

		<p>• Local Housing Need = (1 + adjustment factor) x projected household growth.</p> <p>Using this standardised methodology the OAHN for Cannock Chase is 295 dwellings per annum (based on 2014 data) which is more than the adopted Local Plan housing requirement of 241 dwellings per annum. It should also be remembered that the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to this figure. The Government's objective of significantly boosting the supply of homes remains. It is important that future housing needs are not under-estimated.</p>
LPIS286	Inglewood Investments (SLR Consulting)	<p>CCDC need to adopt the latest Government standards in terms of housing delivery targets. Critically, housing requirements need to be informed by;</p> <ul style="list-style-type: none"> • the Standard Methodology, • will need to have due regard to the Housing Delivery Test and its implications should targets not be met; and • should take a proactive approach to ensuring that the wider HMA requirements are positively addressed. <p>Please refer to the main body of this letter which addresses this topic also.</p>
LPIS287	KGL (Estates) Ltd (J Heminsley)	<p>In relation to Policy CP6 the recent evidence in the GL Hearn study referred to above and the new methodology for calculating housing need, together with the limited brownfield opportunities within the urban area of Cannock/Hednesford/Heath Hayes indicate that green Belt release based on the proportionate dispersal principle will be required. The land south of the A5190 Heath Hayes has the fewest constraints and best access to public transport of all possible GB locations and is therefore should be considered as a key location for housing development. In relation to question 26, the issues have been covered in the response above relating to Policy CP3.</p>
LPIS288	Lichfield District Council	<p>In paragraph 5.55, it is stated that; "Whilst there was general support for the use of urban, brownfield sites some responses also suggested there could be difficulties in developing such sites (e.g. demolition and land remediation) which would mean they could not meet all of the Districts' growth requirements. Clearly, the Rugeley Power Station site will need to be considered further as part of the site options (as discussed under the section on Policy CP1)." Lichfield District Council looks forward to ongoing cooperation on this issue. Generally, Lichfield District Council welcomes continuous engagement within the Greater Birmingham and Black Country HMA, in accordance with the Revised NPPF:-</p> <p>https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Local-plan.aspx</p> <p>[Question 3]</p> <p>Lichfield District Council recognizes the, shared, constraints in Cannock Chase, and welcomes that your Council, within the context of these policy constraints, is seeking to help meet the needs of the GBBCHMA; "the areas of search which we will need to investigate relate to smaller scale 'proportionate dispersal'... in the area to the south-east of the District." [5.46]</p>
LPIS289	National Farmers Union West Midlands Region	<p>Livestock units and residential development</p> <p>We have not made a detailed examination of all the locations outlined as site allocations for employment or housing development. However, where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses.</p>
LPIS290	Natural England	<p>Q24 & 25 – The Cannock Chase SAC Partnership project is actively addressing the need for suitable evidence to inform the council's decision-making on this important matter. Please refer to our response to Q48.</p>

LPIS291	Preece, Cllr. J	I have already made a submission to the previous Greenbelt review that I understand is to be taken forward with this piece of work. I would like to add, however, that I do not believe that any new housing should be even considered in Norton Canes until there has been a substantial investment in the health and education infrastructure of the village.
LPIS292	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>The current Local Plan identifies a housing requirement of 5,300 new homes between 2008 and 2028, at a rate of 241 dwellings per annum. The Local Plan Review is taking place in the context of the Government's standard methodology for the calculation of objectively assessed housing need (OAHN). Using this standardised methodology, the OAHN for Cannock Chase District is 295 dwellings per annum which is significantly more than the adopted Local Plan housing requirement of 241 dwellings per annum. It should also be stressed that the standard methodology is only a minimum starting point, which does not consider increased housing demand through economic growth or cross-boundary needs. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere within the GBHMA are to be provided for in addition to this figure. It is therefore important that future housing needs are not under-estimated, and that sufficient housing supply is provided over and above this figure in order to provide flexibility and competition within the market.</p> <p>As set out elsewhere within this Representation, it is submitted by Richborough Estates that exceptional circumstances exist to justify the release of Green Belt land in appropriate and sustainable locations in order to assist in meeting housing need.</p>
LPIS293	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>The current Local Plan identifies a housing requirement of 5,300 new homes between 2008 and 2028, at a rate of 241 dwellings per annum. The Local Plan Review is taking place in the context of the Government's standard methodology for the calculation of objectively assessed housing need (OAHN). Using this standardised methodology, the OAHN for Cannock Chase District is 295 dwellings per annum which is significantly more than the adopted Local Plan housing requirement of 241 dwellings per annum. It should also be stressed that the standard methodology is only a minimum starting point, which does not consider increased housing demand through economic growth or cross-boundary needs. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere within the GBHMA are to be provided for in addition to this figure. It is therefore important that future housing needs are not under-estimated, and that sufficient housing supply is provided over and above this figure in order to provide flexibility and competition within the market.</p> <p>As set out elsewhere within this Representation, it is submitted by Richborough Estates that exceptional circumstances exist to justify the release of Green Belt land in appropriate and sustainable locations in order to assist in meeting housing need.</p>
LPIS294	Rugeley Power Ltd (Savills)	<p>Housing delivery is a priority of national policy and should be a priority of Local Plan policy. The housing policy should be based upon the new standardised methodology as and when that approach becomes fixed. The Plan should also make provision for an appropriate contribution to the shortfall in the Birmingham housing market area. Housing provision should be focused in the urban area of the principal towns where it can contribute to urban regeneration and maximise the principles of sustainable development. Given the focus of at least part of the housing provision will be to meet the needs of Birmingham as an economic centre, the housing to meet that need should be sustainably located with convenient access to Birmingham. The electrification of the Birmingham to Rugeley railway line due to complete soon, will enhance the accessibility of Rugeley to and from a number of locations on the line.</p> <p>Cross boundary co-operation between Cannock Chase District and neighbouring authorities including Lichfield District should continue to be a feature of the Plan. The contribution of development in Lichfield to meet the needs of Cannock, and vice versa should be considered and included within the Plan as appropriate. Policies connected with social infrastructure and affordable housing should recognise the issues involved with cross local authority boundary provision, and should propose solutions for how such provision should be planned in a cross boundary context, with appropriate agreement on such policy approach with neighbouring authorities. If it is most appropriate for the provision of social infrastructure to be located in one local authority area,</p>

		and / or for such provision to be focused towards the needs of one or other authority, then policy should enable that. Cross boundary housing provision therefore needs to consider objectives and issues wider than just the provision of the headline housing number.
LPIS295	Staffs. County Council	<p>It will be essential to understand early what level of housing the plan will be looking to deliver in order to fully understand and plan for the infrastructure requirements. This includes both Cannock Chase's local need (OAN) and how much of the Greater Birmingham Housing Market Area shortfall may need to be accommodated. It is noted that in relation to the latter the Plan will investigate 'proportional dispersal' in the area to the south-east of the District. It will be important to ensure that the scale of any proposed extension to existing settlements is considered against current infrastructure capacity and any opportunities to provide new infrastructure if required. Further engagement with the County Council on this matter will assist in informed decision making.</p> <p>The Countryside and Rights of Way Act (2000) requires that Planning Authorities have regard to the purpose of conservation and enhancement of the landscape and scenic beauty of AONBs. This is supported by Revised National Planning Policy Framework (NPPF) July 2018, which in Paragraph 172 requires 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." Allocation of housing sites where development might affect Cannock Chase AONB and its setting will need to be mindful of these requirements. Whether a proposal is 'major development' remains a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p> <p>The Plan could consider defining 'major development' in relation to potential impacts on the AONB and its setting, with reference to different scales and types of development. This process could be supported by evidence in the recent Review of Landscape Character for Cannock Chase District (2016), which includes a desk-based assessment of inherent sensitivity and visual sensitivity. Inherent sensitivity is 'based upon the assumption that a landscape with a clearly defined and strongly unified character will be more sensitive to change by virtue of the fact that such landscapes are less able to accommodate 'alien' features that do not conform to the existing pattern' (Review of Landscape Character for Cannock Chase District (2016)), and therefore could provide support for a decision to scope out potential allocation sites. A cautionary approach should be used in interpreting the visual sensitivity data provided in the Review, as the assessment does not consider a particular development type, size or the specific nature and constraints of the land cover parcel. To be robust, the Authority would be advised to consider commissioning area or site specific Landscape Sensitivity Studies to assess potential sensitivity of development types and areas where development would potentially impact on the AONB or on the setting of the AONB.</p>
LPIS296	St. Modwen (RPS)	<p>RPS Planning and Development (RPS) is instructed by St Modwen Properties Plc (St Modwen) to submit these comments relating to Land West of Pye Green Road (the Site). These comments are structured to provide a site description, an overview of the current policy position and recommended alterations to the policy wording. RPS is supportive of the Council's decision to review the Local Plan, in particular the decision to roll forward the time period until 2036.</p> <p>Given the work which was at an advanced stage in relation to Local Plan (Part 2) there is some concern that the timetable proposed, will mean that the new review plan is not in place until September 2021 at the earliest. RPS acknowledges that it is important that LPAs are realistic about timescales as all too often LDS timescales are missed. However, given it will be some 6 years on from the adoption of LP Part 1, if possible, it would be beneficial to the development sector to try and seek ways of speeding up this process.</p> <p>An additional, reason for speeding up the process, is that the Submission of the Local Plan Review would be beyond the three year</p>

period, set by Inspector Clews when reviewing the Birmingham City Development Plan and the insertion into that plan's policy base, that it would need reviewing if the overspill from Birmingham (which impacts on Cannock being in the same HMA) had not been addressed in HMA submission plans within three years (i.e. by January 2020). The review of the Cannock Local Plan will miss this timescale.

Housing Requirements

In light of the comments raised above, we note that the LP is appropriately intending to address the GBSLEP issues (paragraph 5.52) and potential 60,900 dwelling shortfall to 2036. In this regard, we urge the Council to re-consider the findings of the GL Hearn GBSLEP report and the 60,900 is to be regarded as a minimum figure and there are significant uncertainties about the basis on which that figure was reached, which in RPS view requires testing at Examination and the likelihood of the figure increasing. The Local Plan Review should therefore treat this as a minimum baseline figure in terms of assessments of its future housing requirement.

Additionally, it is noted at paragraph 5.41, the standardised OAN methodology indicates an increased housing requirement for Cannock from 241 dpa to 295 dpa. However, as the document has acknowledged, even though NPPF2 has recently been published, the Government's advice on the standardised OAN is that the approach to the assessment may well change, particularly in light of the imminent 2016 household projections coming out in September 2018. This is likely to illustrate that utilising the standardised approach the Government will fall short in terms of delivering 300,000 dwellings annually across the country and is likely to result in a change to the methodology that could see an increase for Cannock. This will require addressing in relation to the future Issues and Options Consultation.

Land West of Pye Green Road

As indicated above, St Modwen has controlling land interests in relation to the Land West of Pye Green Road. St Modwen has worked very closely and collaboratively over the years to secure a suitable and agreeable position in respect of the site.

We note that the Local Plan is indicating under Policy CP6 the following wording:

The policy sets out how the housing will be distributed proportionate to the size of the existing communities, and identifies strategic development areas including urban extensions to each main urban area (with a Strategic Housing Site allocated for up to 900 homes at Land West of Pye Green Road).

We are supportive of the Local Plan Review's continued identification of the whole site. As the Council is aware, the site measures over 60ha and is allocated as a Strategic Housing Site under Policy CP6 – Housing Land within the current Local Plan (Part 1) 2014. The Site is recognised in contributing to delivering 5,300 new homes in the District over the plan period and the policy states:

“A strategic site allocated for an urban extension on land west of Pye Green Road for 750 new houses to be delivered as identified in the housing trajectory (identified on the Policies Map and Key Diagram and elaborated in an adopted development brief). In addition there is potential for the site's capacity to increase to 900 dwellings, consistent with the site's strategic allocation.”

Currently on the Site c.338 dwellings have been committed/pending construction and the development of a further 481 dwellings have been submitted for approval of reserved matters under CH/18/080. As the Council is aware the phasing agreement as part of the original outline permission CH/11/0395 was revised. There remain areas of the site, that are still subject to future development proposals. Until such time as the development process has been completed on the site, uncertainty exists over the true capacity for the site. In light of this, it is proposed that the policy should be re-worded to state the Site's capacity is approximately 900 dwellings, “...for approximately 900 new houses to be delivered...”

		<p>By simply stating the Site will deliver approximately 900 new houses it provides appropriate flexibility in the policy to ensure that the site's maximum non-Green Belt potential can be delivered and not causing a ceiling or cap to future (more limited) growth to come forward should, ultimately that prove possible to secure. As currently worded the policy indicates that 900 dwellings is an absolute ceiling to growth on the site. Whilst it might be that figure is correct, it might also be that there is some potential for a slightly higher capacity to come forward and the policy wording should not prevent that from happening. Such wording is also reflective of how Planning Inspector's view allocations on strategic sites and RPS would recommend this is carried forward into a revised Policy CP6.</p> <p>This flexibility will benefit the Council by not being held to an absolute limit of 900 new dwellings whilst also allowing the capacity to address any increase in annual housing delivery and contribute towards the Greater Birmingham Housing Market Area. Also, by delivering additional homes on this allocated site, it also alleviates pressure to develop Green Belt land.</p>
LPIS297	Taylor Wimpey (Lichfield's)	<p><u>Housing Need</u></p> <p>Following the publication of the revised Framework a new standardised methodology for calculating housing needs has been formally introduced:</p> <p>"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." [§60]</p> <p>At the time of writing, the Planning Practice Guidance has not been updated to reflect the new Framework. The Government has, however, inserted an additional page to the Planning Practice Guidance relating to housing and economic development needs assessments. This states that:</p> <p>"Planning Practice Guidance will, where necessary, be updated in due course to reflect changes to the National Planning Policy Framework...Where plans are being prepared under the transitional arrangements set out in Annex 1 to the revised National Planning Policy Framework, the policies in the previous version of the framework published in 2012 will continue to apply, as will any previous guidance which has been superseded since the new framework was published in July 2018."</p> <p>Given that the Council is likely to submit its new Local Plan to the SoS in December 2020, the transitional arrangements set out in §214 of the revised Framework will not apply. As such, CCDC is correct to state in §5.41 that it will need to use the figure provided by the new standardised methodology to inform its local housing need once this methodology is finalised.</p> <p>To accompany the new Framework, MHCLG released a short methodological note on how to calculate the standard method (MHCLG (July 2018): How is a minimum annual local housing need figure calculated using the standard method?), setting out the three-stage process used to calculate a minimum annual local housing need figure. This starts with the average annual household growth (using the latest national household growth projections) over a 10-year period, with the current year being the first year. The projected annual household figure should then be adjusted based on the affordability of the area (using the most recent median workplace-based affordability ratios).</p> <p>For each 1% increase in the ratio of house prices to earnings, where the ratio is above 4, the average household growth should be increased by a quarter of a percent. The final stage applies a cap, which limits the increase in the minimum annual housing need figure an individual local authority can face (capped at 40% above the average annual housing requirement figure set out in the existing policies, is adopted within the last 5 years).</p> <p>For Cannock Chase District Council, the figure using the September 2017 standardised methodology is 295 dwellings per annum</p>

[dpa] as CDDC correctly states in paragraph 5.41, although Taylor Wimpey notes that this figure is defined as the 'minimum' annual local housing need figure for an area – there is clearly scope for an authority to go above and beyond this.

Furthermore, this standard figure could be expected to be subject to change in September with the release of new household projections. At this stage, Taylor Wimpey does not therefore wish to comment on the housing requirement figure.

Notwithstanding this, there is a clear requirement to go for a higher housing need figure where needs cannot be met within neighbouring areas. This is particularly relevant for CCDC, as Cannock Chase District is one of 14 local authority areas which fall within the Greater Birmingham Housing Market Area [GBHMA]. Whilst the Issues and Options report notes in paragraph 5.42 that there is a “significant housing shortfall of 28,150 dwellings to 2031 and 60,900 to 2036” across the GBHMA, no attempt has been made to identify how Cannock Chase District might contribute to this very substantial shortfall.

Whilst this is partly due to the fact that the SGS does not apportion additional housing need to each individual authority in the HMA, this does not obviate CCDC from its likely requirement to increase its local housing need figure above and beyond the minimum figure derived from the standardised methodology to meet some of the GBHMA shortfall. Taylor Wimpey strongly requests that subsequent iterations of the Cannock Chase Local Plan make suitable provision for this shortfall in its uplifted housing requirement.

In relation to the standard methodology, Taylor Wimpey also notes the Government’s response to the draft revised NPPF consultation [pages 26-27] which notes that the methodology may be adjusted after the household projections are released in September: “A number of responses to this question provided comment on the proposed local housing need method. The Government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically, it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September.

In the Housing White Paper, the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September. We will consult on the specific details of any change at that time. It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020’s”.

The above factors will therefore need to be taken into consideration in identifying the housing need for the District and the timing of when this assessment is undertaken.

Taylor Wimpey understands that a review of the SGS will also be undertaken as part of this process but that this will be delayed until the 2016-based Sub-National Household Projections are released by ONS in September 2018. We reserve the right to comment on this updated document at a subsequent stage in the plan preparation process.

Taylor Wimpey supports the Council’s recognition at paragraph 5.41 of the LPIS that “Acceleration of housing delivery is also a key aim of the West Midlands Combined Authority which is producing a Strategic Investment and Delivery Plan”. The Council will need to be mindful of this as it prepares the new plan.

Given the growth ambitions of the wider area and significant shortfall in the HMA, it is therefore likely that the district will need to plan to deliver an increased number of homes to what is currently required, in the future. The Council must therefore ensure its evidence base sufficiently assesses all reasonable alternative options to supply this land for housing.

		<p><u>Land Supply</u></p> <p>The LPIS [§5.48] notes that it is not possible for the Council to confirm at present how much growth it might be possible to accommodate as further evidence is required on capacity and the assessment of other impacts. However, it does note that site options which lie within the Green Belt may need to be considered.</p> <p>The adopted Cannock Chase Local Plan (2014) Policies Map identifies the south western portion of the Wimblebury Road site as Safeguarded Land for possible development post 2028. The northern and eastern portions of the site are identified as Green Belt. Taylor Wimpey is seeking the release of all of the site from the Green Belt/safeguarded land and its allocation for residential development. For the reasons set out in these representations, Green Belt part of the Wimblebury Road site is considered to be suitable for release from the Green Belt and, in combination with the safeguarded land, should be allocated for residential development.</p> <p>The revised Framework (July 2018) [§123] advises that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. Taylor Wimpey notes that all authorities in the Greater Birmingham HMA have been recommended to introduce minimum standards to help address the housing shortfall and reduce the need for Greenfield/Green Belt release. In the SGS, GL Hearn considers that increasing densities to a minimum of 40 dph to available site evidence of allocations and additional urban supply in Birmingham and the Black Country would yield an additional supply of around 4,700 homes. Applying a 35 dpa minimum threshold to all other areas in the HMA is assumed to yield an additional supply of around 8,400 homes. Rounded to 13,000, GL Hearn considers that this reduces the residual minimum shortfall from 28,150 to 15,150 2011-31, and from 60,855 to 47,855 2011-36.</p> <p>Whilst increasing densities is very clearly a Government policy objective, applying this approach on such a broad-brush level to the Greater Birmingham HMA in order to reduce the extent of the shortfall is flawed without more detailed, and site-specific, analysis. In particular, there is no consideration as to whether imposing higher density levels would make the sites less attractive for some of the volume housebuilders delivering the larger allocations, and who may be seeking to provide larger family/executive housing at necessarily lower densities. In practice, the reduction in housing shortfall is not therefore likely to be as great as GL Hearn envisages in the SGS.</p> <p>The LPIS notes that the approach suggested in the SGS could potentially generate a 20% increase in capacity but recognises [§5.50] that there are variations between the District's suburban areas, with some delivering below 30 dwellings per hectare and with densities below 30 dwellings per hectare also being delivered in the Districts rural areas. Taylor Wimpey therefore considers that the potential for housing land need to be absorbed by higher density development in Cannock Chase District is not likely to be as great as the SGS currently envisages and the Council will need to find land to accommodate this additional need.</p> <p><u>Meeting Longer Term Needs</u></p> <p>The revised Framework [§139] sets out how local authorities should identify safeguarded Green Belt land in order to meet development needs stretching well beyond the plan period. Therefore, sufficient safeguarded land must be provided in the Local Plan to provide enough flexibility to deal with changing circumstances. Taylor Wimpey supports the allocation of safeguarded land in general as it will provide greater certainty over the Green Belt boundaries beyond the plan period.</p>
LPIS298	Upton Trust & Carney Brothers (Wardell Armstrong)	The Greater Birmingham HMA Strategic Growth Study (GL Hearn, 2018) was commissioned to consider strategic development options to meet housing need across the area. This included a strategic review of existing housing land supply across the HMA. The review of existing housing land supply throughout the HMA indicated potential capacity to reduce the minimum shortfall to 28,150

(2011 – 2031). However, it is considered that the Greater Birmingham HMA Growth Study significantly underestimates unmet housing need.

The calculated HMA housing land supply baseline is based on the assumption that objectively assessed housing need will remain constant throughout the Local Plan period (until 2031). As such base evidence has been projected into the future with no consideration for contextual situations which may impact growth. This does not take into consideration that each local authority will undertake a Local Plan review, as part of the Duty to Cooperate. It is notable that the Peter Brett Associates (2017) study has increased objectively assessed need (OAN) by 133 dwellings per annum across Dudley, Sandwell, Walsall, Wolverhampton and South Staffordshire (Black Country and South Staffordshire Strategic Housing Market Assessment Final report Peter Brett Associates March 2017). This increase to OAN excludes unmet housing need from Birmingham.

On a similar note, the impact of a standardised methodology for calculating housing need upon housing land supply will need to be considered. This is notwithstanding the effects of more up to date household growth projections released by the Ministry of Housing, Communities & Local Government (see below). The Greater Birmingham HMA Strategic Growth Study provides a snapshot, which is now outdated.

A 'densification' calculation has been applied to the revised baseline for HMA housing land supply which has been demonstrated to be inaccurate and unrepresentative. The increase in housing delivery is therefore flawed. Indeed, it is also accepted that: "In applying the density standards sets out, consideration should be given to site characteristics and the local context, as well as Councils' evidence base on need of different types/sizes of homes ..." (Paragraph 6.56 of the Greater Birmingham HMA Strategic Growth Study)

The appropriateness of a blanket 'densification' calculation is highly questionable given that it does not take into consideration contextual site characteristics that affect all sites within the HMA. Moreover the calculation seeks to quantify the potential contribution which increasing development densities could have, by assuming a minimum density of 35 dph. This figure is the average density achieved across the HMA from 1996-2011.

GL Hearn considers that it is unlikely that the market would support densities of 50+ dph across the board given the nature of commercial demand and the need to provide a range of housing types and sizes. It is also notable that this average density (35dph) is less than the density reached in more recent years in Cannock Chase District (41dph in 2004-07 and 43 dph in 2008-11). The reduced shortfall outlined in Greater Birmingham HMA Strategic Growth Study is not representative and should therefore be discounted from consideration as an effective and reliable measure. It is therefore contended that the Birmingham Development Plan figure for unmet need, as endorsed by an Independent Planning Inspector, is the starting point for any consideration of Cannock's objectively assessed housing need and not the subsequently 'capped' figure which appears at para 5.42 of the Issues and Scope Consultation.

As promoted within the consultation document for standardised housing need methodology (Planning for the right homes in the right places: consultation proposals (DCLG, 2017) higher levels of OAN will no doubt need to be agreed under the Duty to Cooperate to meet unmet need.

As indicated in the Report on the Examination of the Birmingham Development Plan, at paragraph 71, "...evidence at this examination demonstrates that around 51,000 is the maximum that can be provided in the city over the Plan period..." Therefore, the 37,900 housing delivery shortfall outlined within the Birmingham Development Plan is a minimum shortfall.

Paragraph 71 goes onto to state that the capacity for housing delivery within Birmingham may change. As Birmingham may not achieve the 51,000 housing delivery target it is necessary to plan for a larger shortfall.

The Department of Communities and Local Government (2016) Housing Statistical Release indicates higher levels of annual growth across England when the most recent 2014-based household projections are compared to the 2012-based household projections. As such, there is a principle of an upward trend in annual growth.

The 2014-based household projections have not been subject to sensitivity analysis i.e. indexed method or full return method. However, it is widely acknowledged that that standard household projections are heavily affected by the last recession and are consequently too low. Furthermore we would also draw our attention to the fact that the Birmingham Development Plan considers housing need until 2031. The Cannock Chase District Local Plan Review suggests an adoption date of 2021 and whilst not specifically stated, would be expected to follow the NPPF advice and look forward to a minimum 15-year period. It is necessary to consider unmet need arising from Birmingham during the additional 5 years period not covered by the Birmingham Development Plan.

Apportionment of unmet housing need was not considered to be a material matter at the time of the examination of the Birmingham Development Plan. As yet, formal agreements have not been reached regarding the apportionment of Birmingham's unmet housing need across the HMA. The most recent study on apportionment of unmet housing need within the Greater Birmingham HMA is contained within the Birmingham Sub-Regional Housing Study – Part 2 (Barton Willmore, 2014). The table below outlines the share of the unmet need each of the local authorities the Greater Birmingham HMA should take.

Local Authority	Weight Share (%)
Solihull	16
Bromsgrove	6
North Warwickshire	4
Stratford-on-Avon	7
Lichfield	5
Tamworth	3
Redditch	3
Cannock Chase	3
South Staffordshire	2
<i>Black Country</i>	
Sandwell	18
Dudley	12
Walsall	12
Wolverhampton	9

The Table above indicates at least 3% of the housing need across the HMA should be apportioned to Cannock Chase. Assuming this apportionment, based on the minimum this would mean that Cannock Chase would need to deliver a minimum 1,137 further dwellings in addition to its own objectively assessed need.

LPIS299	Claire Walker	There should be no review of greenbelt; land should come from existing urban areas, in particular industrial sites that are not fully used.
LPIS300	Christopher Walker	There should be no review of greenbelt; land should come from existing urban areas, in particular industrial sites that are not fully used.

LPIS301	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>We support the Council's intention to deliver 5,300 new homes between 2006 to 2028. However we would recommend the inclusion of the word 'minimum' before the 5,300 figure or any subsequent figure as this is the minimum that the Council should be seeking to deliver. This is particularly pertinent as the Greater Birmingham HMA Strategic Growth Study (February 2018) identified a minimum shortfall of 28,150 dwellings across the Birmingham housing market area between up to 2031.</p> <p>Should the Council introduce a policy approach towards self- and custom-build housing, any requirement should not be in place of traditional affordable housing requirements. Self- and custom build have complex requirements for funding and as such is out of the reach of most households who seek affordable housing, nor is this included within the NPPF affordable housing definition. Any policy requirement should be fully viability tested when assessed alongside all other policy requirements to ensure that any requirement will not result in affordable housing being reduced on viability grounds.</p>
LPIS302	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	<p>As noted above, the draft standardised methodology for OAHN, which is due for review in Autumn 2018, indicates a housing requirement of 295 dwellings per annum for Cannock Chase District from 2016 to 2036, which ties up with the proposed revised plan period of this new Local Plan, as set out under Policy CP1. Consequently, in line with paragraph 60 of the NPPF, there is a minimum housing requirement of 295 dwellings per annum across the plan period. This would represent a minimum uplift of 54 dwellings per annum or a minimum addition of 1080 dwellings across the new plan period, when compared to the 241 dwellings per annum (5300 new houses in total) across the 2006 – 2028 plan period of the existing Local Plan (Part 1). Sufficient land will therefore need to be identified to meet this additional minimum housing requirement.</p> <p>Furthermore, as already noted, paragraph 60 also states that “in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. In this regard, in line with the NPPF and Localism Act, local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries, which includes meeting the discussed unmet housing need of the Birmingham HMA.</p> <p>In order for the new Local Plan to pass the tests of 'soundness' set out under paragraph 35 of the NPPF, it will therefore be necessary for the District to accommodate additional development needs over and above the minimum requirements outlined above. This additional need, plus any necessary uplifts in housing numbers required to support a positive economic strategy for the District, will result in the need for further land to be identified for housing.</p> <p>In terms of future development, as noted above, there are very few suitable and available sites outside of the West Midlands Green Belt. Whilst the closed Rugeley Power Station does provide an opportunity for redevelopment clearly this will be a complicated site to bring forward, with housing delivery rates likely to be slow. Green Belt release is therefore considered necessary and therefore it will be necessary for the Council to provide an up-to-date Green Belt Review Study as part of the Local Plan Review process to explore the most sustainable locations to meet growth needs. We strongly believe that land at Upper Birches Farm should be removed from the Green Belt to allow for a sustainable urban extension to Rugeley.</p> <p>In order to achieve sustainable patterns of development, in line with the NPPF, we believe it will be necessary to release the necessary Green Belt land on the edge of the District's most sustainable settlements, which will integrate with proposed strategies for infrastructure and employment, and this would tie with paragraph 72 of the NPPF.</p> <p>It is considered that Rugeley will play a key role in accommodating the growth needs of the District. Given its sustainability credentials, the settlement should play a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified local needs for affordable homes and smaller properties. The potential employment growth options for Rugeley including the Towers Business Park as an identified strategic high-quality employment site highlights the key role that Rugeley will play in accommodating the growth needs of the District. However, with the existing Green Belt drawn tightly around the</p>

		<p>existing urban area, and lying on the edge of neighbouring authority boundaries to the north and east, Rugeley is clearly constrained. It will therefore be necessary to release land from the Green Belt in sustainable locations on the edge of Rugeley to ensure future needs can be met, and the vitality of services and facilities can be maximised in the longer term.</p> <p>Opportunities to meet needs within Cannock Chase District should be explored first before seeking other neighbouring authority areas to take identified needs, particularly when other neighbouring authority areas already have their own constraints and development growth pressures.</p>
Question 25. Do you have any comments on the evidence base required, including housing growth requirements and housing site options?		
LPIS303	Church Commissioners (Barton Wilmore)	<p>The evidence base relating to urban capacity should be updated to give an up-to-date view of what capacity there is within the urban areas of the District. The Council should also undertake an update of its housing needs in line with the Revised NPPF (and include for the unmet needs of the GBHMA and Black Country).</p> <p>Given the concerns we raised with regard to the Green Belt Review Revised Method Statement in May 2015 (enclosed at appendix 3), we consider the Green Belt Study March 2016 should be updated taking account of the changes we proposed. In summary we consider that there is significant redefinition needed to Broad Area 4 to achieve smaller parcels of land, which would deliver a more exact and well-defined Green Belt Review in respect of our client's land.</p>
LPIS304	Greenlight Developments (Lichfield's)	See Question 24
LPIS305	Highways England	See Question 24
LPIS306	Home Builders Federation	As set out in the revised NPPF (para 60) the housing requirement should be based on the standard methodology (see HBF answer to Q24) and account for unmet housing needs in the GBHMA (see HBF answer to Q3). The preparation and review of housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (revised NPPF para 31). The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (revised NPPF paras 61 & 62).
LPIS307	Inglewood Investments (SLR Consulting)	<p>It is noted that CCDC's last formal Green Belt review was 1997, where land was removed from the Green Belt. The Green Belt Review Study 2016 should therefore be reviewed and firm conclusions made about the release of sites. CCDC should hold a formal Green Belt Review Consultation, and any sites within the Green Belt which are considered to perform less well against the Green Belt Review objectives should be considered for release within your new Local Plan.</p> <p>As part of this process any other benefits which can be delivered should weigh in the balance when assessing sites under consideration; as should whether the key objectives of the Green Belt are still served by land retained in open use following development, particularly where public access and ecological enhancements can be combined. This will necessitate landowners demonstrating why their land is preferable through the provision of technical studies which enable your Authority to compare sites based on a robust evidence base.</p>
LPIS308	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS309	National Farmers Union West Midlands Region	See Question 24
LPIS310	Natural England	See question 24

LPIS311	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	As set out elsewhere within this Representation, it is submitted that the 2016 Green Belt Study is not sufficient for the identification of specific sites for development due to its 'strategic' nature. As such, the Study should either be updated, or a further study commissioned, which assesses the ability of Green Belt sites to come forward for development, including an assessment of their suitability against the purposes of the Green Belt as set out within the NPPF.
LPIS312	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	As set out elsewhere within this Representation, it is submitted that the 2016 Green Belt Study is not sufficient for the identification of specific sites for development due to its 'strategic' nature. As such, the Study should either be updated, or a further study commissioned, which assesses the ability of Green Belt sites to come forward for development, including an assessment of their suitability against the purposes of the Green Belt as set out within the NPPF.
LPIS313	Rugeley Town Council	Housing development is the most contentious development. Rugeley recognises that at present housing is focussed on infill development and the future power station site. The town council do not wish to see the erosion of the green belt adjacent to the Chase. The power station site has issues being close to the river and should not be seen as an opportunity to breach the green belt to the east of the town.
LPIS314	Staffs. County Council	At paragraph 5.48 the plan sets out evidence will be required in relation to infrastructure capacity and other impacts, listing a number of examples including transport and education. It is agreed that evidence on infrastructure capacity will be required and we would welcome further opportunity to discuss with you what this may entail, particularly where it relates to infrastructure for which Staffordshire County Council is a provider.
LPIS315	Taylor Wimpey (Lichfield's)	<p>The revised Framework sets out the national policies which the Council will need to consider in ensuring that its Local Plan evidence base is robust. The revised Framework and the accompanying updated Practice Guidance including that in relation to the standard methodology on the calculation of the housing requirement (and any subsequent updates to this methodology), and on viability, will need to be considered. The Council, when formulating the Local Plan, will need to take account of this policy and its implications for the Local Plan.</p> <p>In order to accord with the revised Framework, it is imperative that the Local Plan is supported by the appropriate viability evidence. In accordance with the Practice Guidance [Reference ID: 10-001-20180724], policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106</p> <p><u>Green Belt Evidence</u></p> <p>The LPIS [§5.48] notes that the Council may need to consider site options that lie within the Green Belt but this would also require a range of evidence base work to be utilised e.g. information on potential capacity from non-Green Belt land and the District Green Belt Study (2016). The LPIS [§5.13] suggests that the evidence in the Green Belt Study is still up to date. 9.24 With regard to the release of Green Belt land, the Council will need to demonstrate that it has examined fully all other reasonable options when considering the release of land from the Green Belt in accordance with the revised Framework (July 2018) [§§135 -139]. Further evidence base work in relation to this matter will be necessary.</p> <p>Turning to the existing evidence base, Taylor Wimpey acknowledges the methodology set out in the Green Belt Study and reserves the right to provide further responses on this matter as the Local Plan progresses. However, in relation to land to the east of Wimblebury Road, Taylor Wimpey considers that the Council has incorrectly applied its methodology in scoring the site (parcel reference C14) against two of the Green Belt purposes.</p>

In relation to purpose 2 (preventing neighbouring towns merging into one another) the Green Belt study measures the narrowest point between each Green Belt parcel and the nearest neighbouring settlement. The Green Belt Study identifies that Prospect Village is the nearest settlement to 'this portion' of Cannock's urban edge and is around 1.6km away. On this basis, the site is scored 2 against this purpose according to the methodology. However, Taylor Wimpey has concerns over this approach for two reasons:

1. The scoring of the parcel appears to be based on the separation distance between the existing settlement of Cannock and Prospect Village (1.6km) rather than, as set out in the methodology, the distance from the edge of the Green Belt parcel to Prospect Village (1.3km); and,
2. The methodology fails to consider the existing separation distances between two settlements. In this case, Prospect Village is no nearer to the eastern edge of the parcel than it is to the closest part of Wimblebury (both approximately 1.35km). Prospect Village is also considerably closer (800m separation distance) to the nearest part of the Cannock/Hednesford/Heath Hayes built up area. Therefore, the development of this site would not result in reduced separation distance between Cannock and Prospect Village. The Development Statement accompanying these representations provides further details on the second point.

Taylor Wimpey also has concerns over the treatment of the site in relation to purpose 3 (assisting in the safeguarding of the countryside from encroachment) and more specifically 3b relating to the significance of boundaries/features to contain development and prevent encroachment. The Green Belt Study scores the site 2 for purpose 3b. According to the methodology, a score of 2 should be given if 'no' significant boundary is present. The Wimblebury Road site is substantially contained by built development or other strong physical boundaries to the north, south, east and west and therefore should be scored zero.

On this basis, Taylor Wimpey considers that the site (parcel reference C14) has been scored too highly overall and should therefore have a lower overall score and be higher up in the hierarchy of parcels (in terms of overall score) set out at Appendix 2 of the Green Belt Study. More fundamentally however, the above points call into question the robustness of the methodology and how it has been applied to all parcels in the District.

Taylor Wimpey also considers that the Strategic Green Belt Review in the SGS is fundamentally flawed. The SGS approach is a high level one and uses permanent boundaries in a consistent fashion – specifically Motorways/Trunk Roads, A-Roads and railway lines to identify some 120 parcels. However, whilst there is logic to this, the failure to use strong boundaries from other physical features results in very large sites that are appraised as a whole. As a result, certain sites may have been erroneously discounted; if they had been broken down into smaller units for appraisal, part of the site may not have fulfilled the five purposes of the Green Belt and could have been put forward for release.

The Green Belt review also applies a somewhat arbitrary process of selection and boundary setting, and therefore does not fully assess the viability and sustainability of releasing certain areas of land from the Green Belt. Many of the identified areas do not seem to be logically formed and are not well defined or enclosed by strong boundaries.

Furthermore, there appear to be serious inconsistencies regarding how the Potential Areas of Search have been identified. In particular, several of the Areas of Search, notably NS2, NS4 and NS6 are clearly areas that (according to GL Hearn's analysis) make a Principal Contribution to the Green Belt purposes, yet these are preferred to other areas that only make a Supporting Contribution.

The revised Framework also clearly states that when reviewing Green Belt boundaries, "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-

		<p>developed and/or is well-served by public transport" [§138]. It is unclear whether the Green Belt Review has undertaken this on a thorough and transparent basis, as many of the areas identified are clearly unsustainable, located many miles away from rail stations and comprise greenfield land. Indeed, the SGS states that no significant areas of PDL were identified at all.</p> <p>In general, the methodology for site selection going forward is currently unclear. It is therefore difficult to understand exactly how the removal of sites from the Green Belt, and their subsequent allocation, would be determined.</p> <p>The fundamental failing with the Green Belt Review undertaken to date is that it is at such a large scale many suitable small and medium-sized development sites have not been properly assessed at a fine-grain level, a point recognised by GL Hearn [§8.84].</p> <p>Taylor Wimpey requests the Council to reconsider the contribution of the Wimblebury Road site to the Green Belt and score it appropriately in accordance with the Green Belt Study methodology. Taylor Wimpey reserves the right to provide a further response on these points at the next stage of consultation on the Local Plan if this request is not addressed.</p>
LPIS316	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>The response to Question 24 highlights the current evidence base relating to housing requirements in the wider area. The Strategic Housing Market Assessment for the C3 Housing Market Area of the West Midlands dates from 2008. There will need to be an updated SHMA to reflect the revised evidence base.</p> <p>The clear housing needs for the local area also suggest a need to consider site options that lie within the Green Belt and potentially areas within the AONB and in our view will require the Green Belt Study to be entirely reconsidered.</p>
LPIS317	Claire Walker	The choice of greenbelt land is cost based because it cheaper to build on green belt for houses that other types of land. Greenbelt should never be chosen because it's the cheaper option!
LPIS318	Christopher Walker	The choice of greenbelt land is cost based because it cheaper to build on green belt for houses that other types of land. Greenbelt should never be chosen because it's the cheaper option!
LPIS319	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	See response to Question 24
Question 26. In what type of locations would it be appropriate to increase housing densities? Can you suggest any ideas for how this could be done while retaining space for soft planting, car parking etc.?		
LPIS320	Church Commissioners (Barton Wilmore)	Town centre locations would be appropriate to increase densities of development given their existing character. Higher densities should, however, not be sought over well-designed schemes. Locations on the edge of existing settlements and in more rural areas should be designed based on the character of the existing area and landscape.
LPIS321	Highways England	See Question 24
LPIS322	Home Builders Federation	The appropriate types of location for increased housing densities are identified in the HBF answers to Q15 and Q17.
LPIS323	Inglewood Investments (SLR Consulting)	<p>CCDC should consider housing densities on a site by site basis. As discussed in Question 7, the District should appropriately accommodate a range of housing needs, and therefore high density development is only appropriate in certain locations, typically central urban areas. By enabling the release of appropriate Green Belt land, this will allow sites to be developed on a strategic scale, and offer a mixture and range of high quality housing for the District.</p> <p>To summarise, although CCDC may prefer to opt to deliver high density developments due to the pressure on housing delivery, we urge you to take a strategic view, and assess each site based on its own merits.</p>

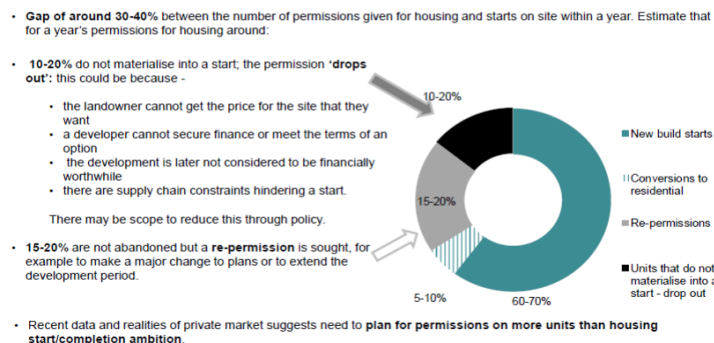
LPIS324	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS325	Natural England	Q26 – Please see our response to Q15&16.
LPIS326	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates' response in respect of development density is considered at Question 15.
LPIS327	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates' response in respect of development density is considered at Question 15.
LPIS328	Rugeley Power Ltd (Savills)	<p>Density of housing development should be flexible. Higher densities should be encouraged in urban areas and more sustainable locations, whilst lower densities may be appropriate and should be allowed where appropriate. That does not necessarily mean simply lower density in rural areas, because there should be an overall efficiency in the use of land for housing. Simply because land is in the countryside or in smaller settlements does not mean it should be used any less efficiently or sustainably. The appropriateness of density should take account of the site as a whole and the various components of the development proposal and the context in which it is being delivered. This should allow for a range of densities across a site, including where development is to be delivered on a phased basis.</p> <p>Self-build provision can be a valid component of housing delivery if proportionate with the level of need identified. Policy should enable flexibility for how any element of self-build provision may be delivered. There are likely to be differing levels of knowledge and skills amongst the community interested in self-build projects. There is more than one way in which flexibility for the consumer to design and procure a house can be achieved. Policy should be receptive to a range of possible solutions and delivery methods.</p>
LPIS329	Rugeley Town Council	See question 25
LPIS330	Staffs. County Council	As you start to consider what locations may be suitable for increased housing densities we would welcome a dialogue on the 'how' in relation to parking and SuDS.
LPIS331	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments on this matter at the current time.
LPIS332	Mr H Thornton	The Sustainability Appraisal Scoping Report (pages 27 and 30) shows that 82% of work-related travel in the Cannock Chase District is by people using their own transport compared with the national average of 64%, therefore if housing density in the District is increased further it would lead to an unacceptable level of parking on the narrow and already congested roads of new housing areas, causing more annoyance and frustration to residents and visitors, and create a more dangerous and unwelcoming street scene. Already drivers of delivery vehicles often have difficulty in accessing new housing areas.
Question 27. How can the Council ensure that it has considered all the potential brownfield site opportunities, as far as possible? Are there any sites you can suggest which may be underused?		
LPIS333	Beaudesert Golf Club (FBC Manby Bowdler LLP)	SHLAA Site C375 has been submitted as a brownfield site but which does not currently appear on the Brownfield register as such and which is currently (incorrectly) identified as not 'available' – on the contrary, it is available, and the present sieving approach is discouraging its allocation. It is a site of a former sand and gravel quarry as well as extensive tipping activity where there remains clear evidence of the former development, Earlier proposals to provide additional holes as a separate golfing entity were not subsequently pursued. As such it is an unnatural feature in the landscape.

		The active management of this area would mean that the landscape could be reinstated to a more natural Forest Heathland appropriate to its location; the habitat and biodiversity improved and the public access improved, in accordance with the 2016 'Review of Landscape Character Assessment for Cannock Chase District', thus enhancing the AONB. This requires funding, and the proposal would therefore include the use of a small proportion of the site along Rugeley Road, between the existing settlement boundary and the existing brownfield development at Fallow Parkas enabling development to facilitate this improvement.
LPIS334	Church Commissioners (Barton Wilmore)	The Council should ensure that a pragmatic approach is taken when considering development on brownfield sites and whether these sites can provide for the quantity of housing required and within an appropriate time frame. Development on brownfield land generally takes longer to deliver and can be more expensive. This may inhibit the delivery of affordable housing if viable developments cannot be found. Therefore, this should be taken into account when allocating sites to meet the identified housing need and sufficient flexibility should be included (i.e. sites with more certainty of delivery).
LPIS335	Greenlight Developments (Lichfield's)	<p>It has been assessed above that the new plan is likely to need to plan for more homes than is currently required. Relating to this, Greenlight notes the Council's stated intention at paragraph 5.51 of the consultation document and that it may be useful to undertake further work on brownfield capacity and potential underused assets.</p> <p>In response to questions 27 and 28, Greenlight's site (see site plan at annex 1), which is located off Wellington Drive in Cannock Chase, represents a brownfield site which is currently underused. The site comprises a disused car auction site of 2Ha on the edge of Cannock Chase settlement and is also a cross boundary site, with the remaining 10.5 Ha falling within South Staffordshire District Council.</p> <p>Given the site's location on the edge of a main settlement, it has high sustainability credentials in terms of proximity to existing shops and services, relation to existing settlements and access to existing transport routes and infrastructure. The site should be considered, in its own right, a reasonable option for future housing land supply for the delivery of c. 55 – 70 homes through allocation in Cannock Chase District. The wider site provides the opportunity for a larger allocation of a total of c.250 homes across Cannock Chase and South Staffordshire.</p> <p>Greenlight is aware that CDC has assessed the site (the parcel within Cannock Chase District) in both its 2016 and 2017 SHLAA documents under reference C121 'land to the rear of Longford House, Watling Street, Cannock'. The site was also included in the Council's Issues and Options Part 2 Local Plan at Appendix 1 as a potential site option for allocation to be assessed in line with options in the plan; albeit noting that as a Green Belt site it falls within the category of restricted sites. Greenlight supports the Council's recognition here that the site could provide a reasonable option for housing provision. It should be considered both suitable and available.</p> <p>The HMA Growth Study is clear that in order to accommodate future housing requirement from the HMA, Councils should look at further options for allocations on non-green belt land, maximise capacity on brownfield land and that Green Belt release will need to be looked at (para. 5.45 of the consultation document). It is understood that it is not an option for Cannock Chase to identify further supply on other non-green belt sites on a strategic scale due to Green Belt and other environmental constraints.</p> <p>Given these recommendations and previous assessments, Greenlight's site should be continued to be assessed through the forthcoming plan stages and supporting evidence documents as a reasonable option for housing delivery on a currently underutilised brownfield site. This is particularly so given requirements of the new NPPF (2018, para. 138) which states:</p> <p>"...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."</p>

LPIS336	Highways England	See Question 24
LPIS337	Home Builders Federation	The Council should make as much use as possible of previously developed land known as brownfield land (revised NPPF para 117). However there are associated risks with an over reliance on brownfield sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites and it may inhibit the delivery of affordable housing.
LPIS338	Inglewood Investments (SLR Consulting)	It is a requirement under Regulation 3 of the Town and Country Planning (Brownfield Land Register Regulations 2017) for LPAs to prepare, maintain and publish a Brownfield Land Register of previously developed land, and review these sites yearly. CCDC should therefore provide up to date and publically available information on brownfield land that is suitable for housing, as this will encourage investment, and also advocate a 'brownfield first' approach which the NPPF favours. It is understood that the site options suggested as part of the Local Plan (Part 2) Issues and Options Consultation will be brought forward and used as a starting point for the latest SHLAA. In addition to the Brownfield Land Register, it is important for the CCDC to consider other options as a fall-back position; we therefore support CCDC's approach in terms of utilising the previous evidence base, provided that this is refreshed and updated.
LPIS339	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS340	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submits that maintaining an up to date Strategic Housing Land Availability Assessment (SHLAA) in conjunction with a Brownfield Land Register is a sufficient evidence base to identify all brownfield land opportunities.
LPIS341	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submits that maintaining an up to date Strategic Housing Land Availability Assessment (SHLAA) in conjunction with a Brownfield Land Register is a sufficient evidence base to identify all brownfield land opportunities.
LPIS342	Rugeley Town Council	See question 25
LPIS343	Staffs. County Council	The proposals put forward in paragraphs 5.51 – 5.53 are supported.
LPIS344	Taylor Wimpey (Lichfield's)	Taylor Wimpey considers that the most effective method of identifying brownfield site opportunities will be through the SHLAA and the 'call for sites' process. As required by the revised Framework [§67], the supply of sites, identified will need to take into account their availability, suitability and likely economic viability to ensure that they are genuinely deliverable or developable.
LPIS345	Claire Walker	Unused industrial sites at cross keys, industrial land behind Sainsbury's (lakeside), Town centre unusable multi-storey carpark. Disused office buildings etc. etc.
LPIS346	Christopher Walker	Unused industrial sites at cross keys, industrial land behind Sainsbury's (lakeside), Town centre unusable multi-storey carpark. Disused office buildings etc. etc.
Question 28. What key locations or sites within the District, or cross boundary sites, should be considered reasonable options for future housing land supply?		
LPIS347	Beaudesert Golf Club (FBC Manby Bowdler LLP)	SHLAA Site C375 – the allocation of a small part of which for housing presents an opportunity to facilitate improvements to the remainder of that site in terms of landscape character, habitat, public accessibility and provision of leisure facilities.

LPIS348	Church Commissioners (Barton Wilmore)	The site at 'Bleak House' previously promoted, with details appended to this representation in the form of a Vision Document, should be considered by the Council as a suitable and sustainable site for housing development, which is deliverable and available for development now. The site can accommodate around 1,000 dwellings, can be delivered in phases and provide new readily recognisable Green Belt boundaries using physical features.
LPIS349	Greenlight Developments (Lichfield's)	See question 27
LPIS350	Highways England	See Question 24
LPIS351	Home Builders Federation	<p>The strategic policies of the new Local Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period including planning for and allocating sufficient sites to deliver strategic priorities (revised NPPF para 23). The Council should have a clear understanding of land availability in the District by preparing a strategic housing land availability assessment which should be used to identify sufficient supply and mix of sites taking account of availability, suitability and economic viability. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (revised NPPF para 67). The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The new Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74).</p> <p>For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increasing housing supply is increasing the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations. Large strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin's interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. Therefore, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the new Local Plan Examination any of the Council's assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound then any proposed contingency would be eroded. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) which illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests "the need to plan for permissions on more units than the housing start / completions ambition".</p>

In recent years there has been a 30-40% gap between permissions and housing starts



Extract from slide presentation "DCLG Planning Update" by Ruth Stanier Director of Planning – HBF Planning Conference Sept 2015

LPIS352	Inglewood Investments (SLR Consulting)	<p>Rugeley is considered a Town Centre as defined under your current Policy CP11. Rugeley is also subject to a Town Centre Area Action Plan which was adopted as part of the Local Plan Part 1 Document. It is therefore evident that Rugeley is a key growth area within the District and is a strategic development location; we therefore consider that Rugeley should be prioritised as a preferable location for future growth, particularly given its location and its potential to deliver cross boundary benefits.</p> <p>Our Client's site adjoins the southern edge of Rugeley and is suitable, available and achievable, as demonstrated within our Site Promotional Document which we urge you to re-visit. Inglewood intend to continue the promotion of this site and are currently preparing a concept masterplan to demonstrate how an appropriate development can be delivered.</p>
LPIS353	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS354	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>As set out elsewhere within the Representation, development should be considered in the most sustainable locations, including sites located within the Green Belt and those which fall across multiple boundaries.</p> <p>The Local Plan should identify sufficient housing sites to bring forward at a rate necessary in order to maintain at least a five-year supply of housing land, in accordance with the NPPF. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15, in accordance with Paragraph 67 of the NPPF.</p> <p>The Council should maximize housing supply through identifying a wide range of sites in terms size and location to allow for house builders of all types and sizes to contribute towards the delivery of housing.</p>
LPIS355	Richborough Estates (Land South of Cannock Rd Heath)	<p>As set out elsewhere within the Representation, development should be considered in the most sustainable locations, including sites located within the Green Belt and those which fall across multiple boundaries.</p> <p>The Local Plan should identify sufficient housing sites to bring forward at a rate necessary in order to maintain at least a five-year</p>

	Hayes) (Pegasus Group)	<p>supply of housing land, in accordance with the NPPF. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15, in accordance with Paragraph 67 of the NPPF.</p> <p>The Council should maximize housing supply through identifying a wide range of sites in terms size and location to allow for house builders of all types and sizes to contribute towards the delivery of housing.</p>
LPIS356	Rugeley Town Council	See question 25
LPIS357	Staffs. County Council	As sites/location for development are being considered it will be useful to have an early dialogue with the County Council so we can provide information and commentary on potential infrastructure issues that may need to be considered.
LPIS358	Taylor Wimpey (Lichfield's)	<p>Taylor Wimpey considers that land to the east of Wimblebury Road, Cannock should be allocated for residential development. The adopted Cannock Chase Local Plan (2014) Policies Map identifies the south western portion of the Wimblebury Road site as Safeguarded Land for possible development post 2028. The northern and eastern portions of the site are identified as Green Belt. Taylor Wimpey is seeking the release of all of the site from the Green Belt/safeguarded land and its allocation for residential development.</p> <p>The Development Statement that accompanies these representations promotes the allocation of land at Wimblebury Road, Cannock for residential development. Its purpose is to explain why the site is appropriate for development, demonstrate that the Green Belt part of the site no longer fulfils the Green Belt purposes and provide an analysis of the physical and technical limitations of the site.</p> <p>In relation to Green Belt release, the LPIS [§5.46] states that the areas of search which will need to be investigated relate to smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area to the south-east of the District (considered 'in the round' with other options for accommodating housing in the District). Taylor Wimpey considers that the allocation of land to the east of Wimblebury Road for housing development would help meet the identified need for housing and falls within this part of the district.</p> <p>Whilst the content of the Development Statement is not repeated here, Taylor Wimpey wishes to highlight that the site is within the control of a major housebuilder with a strong track record of delivery in the region, and Cannock Chase District specifically. The Development Statement demonstrates that the land at Wimblebury Road, Cannock represents an ideal opportunity to create a sustainable, distinctive and attractive development which will help meet the needs of the community for housing in the short term.</p> <p>The removal of the land at Wimblebury Road, Cannock from the Green Belt will not compromise the five purposes of the Green Belt. In particular:</p> <ol style="list-style-type: none"> 1. The site is well contained on all sides, the boundaries of the site are strong and defensible and will have permanence beyond the plan period. 2. The removal of the site from the Green Belt will not result in unrestricted sprawl of Cannock but will remove a site that is well contained and well related to the residential built up area of Cannock. 3. The development of the site will provide an opportunity to establish a strong landscaped boundary to Cannock and will not result in the merging of neighbouring settlements. 4. The site does not fulfil any strategic Green Belt function and its loss will not lead to any issues of coalescence. <p>It is evident that the removal of the site from the Green Belt and its allocation for housing will not harm any of the five purposes of the Green Belt set out in the Framework [§80].</p>

		<p>The principle of residential development at Wimblebury Road and its release from the Green Belt should be supported because:</p> <ol style="list-style-type: none"> 1. The site is a sustainable location for development; 2. There are 'exceptional circumstances' to justify its release from the Green Belt and its development would not harm Green Belt objectives in this location; 3. Aside from Green Belt, the land is not subject to any policy constraints, ecological, environmental or landscape designations; 4. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing; 5. The proposed development offers significant economic, social and environmental benefits and meets the Government's objectives for the creation of sustainable development; and, 6. The site could be brought forward for development within the first five years of the plan period.
LPIS359	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Options for allowing the development of more edge of settlements as part of a wider strategy of allowing greater densities in more central areas would have to be considered as a reasonable alternative when considering the chosen spatial strategy as part of an objective and evidenced Sustainability Appraisal process.</p> <p>This may include, where exceptional circumstances exist, sites within the Green Belt. The Council will need to consider the most sustainable and deliverable options for ensuring that the required housing supply for the plan period is identified. The plan will have to recognise that Green Belt and AONB sites will need to be considered in relation to longer term needs and any additional housing requirement which arise (The Greater Birmingham factor).</p>
LPIS360	Claire Walker	See question 27 response.
LPIS361	Christopher Walker	See question 27 response.
Question 29. Can you suggest specific criteria for screening out sites which are not reasonable options for development at an early stage? How might this be justified?		
LPIS362	Church Commissioners (Barton Wilmore)	<p>Footnote 6 of the Revised NPPF should be used as a starting point for screening sites and their suitability for development. However, we feel that the Green Belt should be removed from this list in recognising the likely need for development beyond the urban area to meet housing need. The Council should also have regard to the provisions of Paragraph 138 of the Revised NPPF when considering sites and their suitability: a full range of criteria should be used to ensure the site is sustainable.</p> <p>We would advocate to you the approach of Cheshire East Council in selecting sites for residential allocation. Cheshire East, like Cannock Chase District, is significantly constrained by the Green Belt and as a result has limited urban capacity. Cheshire East have gone through three stages of Plan examination which has resulted in the refinement of their site selection methodology. Cheshire East use a 'traffic light' criteria to assess Availability, Achievability, Suitability and compatibility with the Vision and Strategic Priorities, and this included the release of Green Belt sites.</p>
LPIS363	Highways England	See Question 24
LPIS364	Inglewood Investments (SLR Consulting)	Any sites within the AONB or sites which are subject to European and national designations relating to ecological or heritage value should not be considered appropriate for development. We suggest that when screening out sites, this should be positioned at forefront of the criteria, and it will help CCDC narrow down the options being considered. Given that these are national and international designations which are afforded other legislative protection; this would provide a robust baseline which aligns with this legislative position.

LPIS365	Lichfield District Council	With reference to; “may be appropriate to scope out sites before this comprehensive assessment stage using a defined set of criteria e.g. some responses suggested all sites that lie within the AONB should be scoped out from any further consideration for development at an earlier stage in the process. We would welcome your views on what criteria could be used to scope out sites at an early stage in the process (i.e. discounting sites that are not ‘reasonable options’)[5.57]; although some areas are sensitive, Lichfield District Council would be concerned about scoping sites out simply because the AONB exists. Instead Lichfield District Council suggest that you undertake a thorough assessment which examines the scope to deliver sensitive development within and adjoining the AONB.
LPIS366	Natural England	When considering specific criteria for screening out sites, the LPA could use information available on SSSI risk zones and best and most versatile land. See below for more information. Protected sites and SSSI Impact Risk Zones Natural England published the SSSI Impact Risk Zones (IRZs) on MAGIC and as a downloadable GIS dataset, so that as Local Planning Authorities (LPAs) you can use them on your own systems. The published IRZs are designed to be used in the planning application validation process to help planners consider if a proposed development is likely to affect a SSSI and decide whether they will need to consult Natural England for advice. However they may also be helpful during the site allocations phase of local plans. Best and most versatile land (BMV) Strategic provisional agricultural land classification data and post 1988 agricultural land classification can be found in MAGIC under Landscape classification along with general mapped information on soil types available as ‘Soilscapes’. The LandIS website contains more information about obtaining soil data.
LPIS367	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submit that sites should be considered ‘in the round’ and on their own merits, rather than screened using pre-defined criteria. The Green Belt should not be used to screen out sites. Sites that are remote from sustainable settlements should be screened in the first instance.
LPIS368	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submit that sites should be considered ‘in the round’ and on their own merits, rather than screened using pre-defined criteria. The Green Belt should not be used to screen out sites. Sites that are remote from sustainable settlements should be screened in the first instance.
LPIS369	Rugeley Town Council	See question 25
LPIS370	Sport England	An updated Indoor and Built Facility Strategy and Playing Pitch Strategy will help to inform sites that should be protected unless replacement provision is made in line with NPPF para 97 and Sport England Playing Field Policy (https://www.sportengland.org/media/12940/final-playing-fields-policy-and-guidance-document.pdf). It should be noted that if a playing pitch is currently underutilised it still might be required to meet future demand, again this will be informed by the updated strategy.
LPIS371	Staffs. County Council	Any criteria for screening out potential housing sites not suitable to go forward should include waste related factors to safeguard existing infrastructure. We would be happy to contribute to their development.
LPIS372	Taylor Wimpey (Lichfield’s)	Taylor Wimpey does not have specific comments on how sites may be screened out at an early stage but wishes to comment on the overall approach to identifying suitable sites for residential development. In order to ensure consistency of approach when identifying which sites are suitable for allocation and Green Belt release, the Council will need to apply a transparent methodology and the use of a site assessment matrix may be appropriate for this purpose.

		<p>The weight given to criteria applied and a clear scoring mechanism will need to be established in the methodology. For example, the weight to be applied to a sites Green Belt status against other sustainability criteria needs to be clearly identified. Site deliverability should be clearly identified within any assessment as it is important to identify those sites which could come forward for development in years 1-5, 5-10, and 10-15.</p> <p>This will help to ensure that the Council’s site identification process stands up to scrutiny by stakeholders and that a sound plan is delivered.</p>
LPIS373	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Planning Practice Guidance explains that reasonable alternatives comprise “the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable” (ID: 11-018-20140306).</p> <p>All reasonable alternatives must be assessed in the same level of detail. This is important to allow the assessment arising from the Sustainability Appraisal to outline the reason why a preferred approach has been selected in light of the alternatives not taken forward as well as documenting the overall sustainability of all the different alternatives identified.</p> <p>Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach (when developing alternatives, paragraph 152 of the National Planning Policy Framework should be referred to). Paragraph: 017 Reference ID: 11-017-20140306.</p> <p>The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).</p> <p>Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.</p> <p>The NPPF defines the meaning of deliverable being</p> <ul style="list-style-type: none"> • sites for housing should be available now, • offer a suitable location for development now, and • be achievable with a realistic prospect that housing will be delivered on the site within five years. <p>Whilst para 172 confirms that “Great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues”, it continues: The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development (55) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</p> <ol style="list-style-type: none"> a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. <p>Footnote 55 clarifies that for the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p>

		<p>Thus, whilst the designation of AONB is a constraint to major development the NPPF considers that there may be circumstances in which such an alternative may be necessary, reasonable and indeed justified.</p> <p>To screen out such options at an early stage would directly conflict with the advice within the PPG, excluding potentially reasonable alternatives that may perform well against other sustainability criteria.</p> <p>We note the recent letter of 08 June 2018 to North Essex Authorities in relation to their Strategic (Section 1 Plan by Roger Clewes (Inspector) and the need to demonstrate, in particular, the objectivity of the assessment of the chosen spatial strategy and the alternatives to it.</p> <p>Options for allowing the development of more edge of settlements as part of a wider strategy of allowing greater densities in more central areas would have to be considered as a reasonable alternative when considering the chosen spatial strategy as part of an objective and evidenced Sustainability Appraisal process.</p>
LPIS374	Claire Walker	All Greenbelt and AONB.
LPIS375	Christopher Walker	All Greenbelt and AONB.
Review of CP7: Housing Choice		
Question 30. Do you have any comments on what issues in relation to housing needs need to be addressed and what policy options may need to be considered, taking account of key local issues including affordable housing needs and an ageing population?		
LPIS376	Church Commissioners (Barton Wilmore)	The LPR should take account of the full range of housing need by different groups and should allocate a range of sites which will deliver this need. As set out in Question 27, if there is an overreliance on brownfield sites the supply may be reduced by viability issues.
LPIS377	Greenlight Developments (Lichfield's)	The District Corporate Plan identifies 'Promoting Prosperity' as one of its two corporate priorities for 2018-2023. One of its strategic objectives is increased housing choice. Greenlight support this the principle of this objective as well as the Council's statement at paragraph 5.65 of the consultation document that this will be based on up to date evidence base with the production of a housing needs assessment (including affordable housing needs) and an economic viability assessment for housing developments. The Council will need to take into account the requirements of the revised Framework (July 2018) and changes to the Practice Guidance.
LPIS378	Highways England	See Question 24
LPIS379	Home Builders Federation	<p>The new Local Plan should deliver housing to meet the full range of local needs including affordable housing and specialist housing. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. Indeed, the housing needs of older people is a diverse sector so the new Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.</p> <p>The Written Ministerial Statement dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". If the Council wishes to adopt the higher optional standards for accessible/adaptable homes the Council should only do so by applying the criteria set out in the NPPG. All new homes are built to Building Regulation Part M standards. So it is incumbent on the Council to provide a local assessment evidencing the specific case for Cannock Chase which justifies the inclusion of optional higher standards for accessible / adaptable homes and the quantum thereof. The District's</p>

		ageing population is not unusual and is not a phenomenon specific to Cannock Chase. If it had been the Government's intention that generic statements about an ageing population justified adoption of higher optional accessible/adaptable standards then the logical solution would have been to incorporate the standard as mandatory via the Building Regulations which the Government has not done. The optional higher standards should only be introduced on a "need to have" rather than "nice to have" basis. The Council should also consider the potential unintended consequence of encouraging the under-occupation of its housing stock by discouraging older households from moving.
LPIS380	Inglewood Investments (SLR Consulting)	<p>The District should deliver a mix of housing choice options to meet the needs of the District, including:</p> <ul style="list-style-type: none"> • Intermediate housing; • Private Rented Sector housing; • Open market housing; • Share Ownership housing; • Social Rented housing; • Supported and Assisted living; • Retirement housing; and • Care home provision. <p>We consider that there should be an explicit recognition of the importance of intermediate housing comprising of discounted products (in perpetuity) which are not managed through the Registered Provider process, which provide access to 'mortgageable' property for a wider range of people. This form of housing can help to provide real affordability for those not meeting the criteria for social housing, and can help to make marginal sites more viable and deliverable, while still providing more affordable housing options.</p>
LPIS381	Jukes, June	Having helped with a local food bank affordable housing should be a priority. Many families on low incomes cannot afford huge commercial rents.
LPIS382	KGL (Estates) Ltd (J Heminsley)	In relation to Policy CP7 it is agreed that the evidence on the full range of housing need including affordable and housing an ageing population needs to be updated with a new housing needs study.
LPIS383	National Farmers Union West Midlands Region	<p>The document does not include any reference to rural or agricultural workers dwellings. This is a significant omission and could be detrimental to the development of agricultural businesses.</p> <p>The revised NPPF states that the needs of groups with specific housing requirements be addressed. It also outlines an exemption allowing a new dwelling for new entrants taking on a farm and measures to accommodate additional worker homes on farms.</p> <p>Therefore it is critical that the Council addresses this omission and sets out a policy to take into consideration the housing needs of people employed in agriculture and rural businesses, particularly when those businesses are located within the green belt.</p>
LPIS384	Rentplus UK Ltd (Tetlow King)	In response to Questions 30 and 31 we agree, as per our earlier comments, that the Council's evidence base would benefit from an update and for this to include an assessment against the revised NPPF definition of affordable housing. For a change in delivery of affordable housing to take place, encouraging a much greater supply, policy needs to be robust in seeking the most ambitious level of affordable housing, from as wide an array of developments as possible. We ask that the Council engage directly with local providers of affordable housing, including Rentplus, to discuss the most useful policy approaches to encouraging this delivery and in reducing the barriers to development coming forward more quickly to meet needs.

LPIS385	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met affordable need from within the GBHMA. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
LPIS386	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met affordable need from within the GBHMA. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
LPIS387	Rugeley Power Ltd (Savills)	Provision of a mix of housing types, sizes and tenures is supported. Consistent with our other comments on the Plan, flexibility is key and should be enabled through policy. Strategic objectives and viability are important considerations to achieving a balanced mixed development. The overriding pre-requisite however, is that to be achieved, development must be viable. Policy aspirations for type, size and tenure should therefore take account of cross local authority boundary issues, by seeking to achieve the policy objective for balanced communities across sites as a whole. Viability should also be considered across sites as a whole, including across local authority boundaries, taking account of the benefits of achieving sustainable new development in general terms and weighing that in the balance with more specific policy requirements.
LPIS388	Rugeley Town Council	Accessible housing for an ageing population would be encouraged near to the town centre or on good transport links. Elderly residents that are unable to get out need to be part of the community rather than on the edge in order to feel included and have the opportunity to link in to local support services and groups.
LPIS389	Staffs. County Council	<p>In relation to the ageing population issue the County Council is in the process of undertaking a countywide project to provide an insight and intelligence around the need for and supply of specialist housing for older people across Staffordshire up to 2037. The 'Next Generation Care' project is directed at helping potential suppliers and developers of specialist accommodation to make informed business decisions around future development opportunities in Staffordshire but the evidence base and assessment is relevant to plan making.</p> <p>One of our key reports, the 'Staffordshire-wide evidence base: Extra Care and Care Homes,' provides evidence on the current and future extra care and care home needs of the people in Staffordshire, and provides the outcomes of modelling based on current and predicted needs and gaps or pressure points. This report could be useful in helping break determine the proportion of specialist accommodation for older people needed for the District and plan for that accordingly.</p> <p>In addition to the evidence base, we are developing a series of district focused Locality Analysis reports. These will provide information on the current supply and location of all specialist accommodation for older people, including any major developments which have planning approval, in the main towns and conurbations. They also explore accessibility by foot and public transport of the main services and amenities that are important for supporting an independent living model, using reasonable walking distance calculations for an older person.</p> <p>The evidence base and locality analysis, can be found at https://www.staffordshire.gov.uk/health/Information-for-providers/Information-for-providers.aspx</p> <p>In addition to the above documents officers at the County are available to discuss options and considerations for mainstream housing suitable for older person with lower or no care needs such as adaptable housing, bungalows etc. This may include providing data to support use of enhanced buildings regulations part M.</p>

LPIS390	Taylor Wimpey (Lichfield's)	The Council needs to base its approach to affordable housing delivery on the proposals set out in the revised Framework (July 2018) and the Practice Guidance on housing and economic development needs assessments. To provide certainty on viability, affordable housing requirements should be expressed as a single figure rather than a range, as recommended in the Practice Guidance [Reference ID: 10-001-20180724]. It will be important to ensure that local market housing needs are met in full as well as the need for other housing tenures including affordable.
LPIS391	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>Policy CP7 We agree that Policy CP7 needs to be updated. This needs to take account not only of more recent evidence of housing needs, but also the updates to the affordable housing definition set out in the new NPPF. This retains social and affordable rented but expands the definitions of other types of housing considered by the Government to fall within the affordable category. The Council should consider through its review of need, to what extent those types of affordable housing will directly meet needs across Cannock Chase and in meeting neighbouring authorities' needs.</p> <p>Affordable Housing As set out in Section 5 of this consultation document, the Greater Birmingham Housing Market Area Strategic Growth Study evidenced a significant increase in need for all housing tenures, of all sizes. In translating these needs into suitable policies, the Council should look to involve Housing Associations as far as possible in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan policies.</p> <p>Affordable Housing in perpetuity We would like to remind the Council that the Government guidance states that affordable housing may be secured for future eligible households, however the requirement for affordable housing to be retained in perpetuity in planning policies is only raised in relation to housing delivered on rural exception sites. The term has a clear legal meaning which is recognised within the NPPF (2012). This principle is appropriate and supported by our members on rural exception sites as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.</p> <p>Securing affordable housing in perpetuity more widely is not supported for a number of reasons, foremost of which is that it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As the availability of public grant funding has been significantly restricted in recent years, the ability of Registered Providers to obtain private finance for the development of new affordable housing should not be further restricted by unnecessary Section 106 clauses.</p> <p>As well as restricting future ability to recycle housing stock where necessary to respond to local circumstances, and when used in a rigid fashion also prevents tenants from being able to staircase to full home ownership in intermediate affordable housing. This latter point is particularly critical as inability to staircase to full home ownership depresses interest in such housing, as potential purchasers look instead to Help to Buy products. This is unhelpful and restricts Registered Providers' ability to fund development over the long term; as receipts from the sales of shared ownership properties are funnelled directly back into delivering more affordable housing it is perverse to prevent staircasing. We ask that the Council reconsider this approach and look to other mechanisms where necessary, allowing Registered Providers to recycle public subsidy to reinvest in new stock. Securing affordable housing through conditions and Section 106 Agreements can be achieved without further restricting development potential. We have enclosed a Proposed Standard Mortgagee Exclusion Clause wording for your information.</p>

		<p>Ageing Population</p> <p>We welcome the Council seeking to address housing choice across the council area including the ageing population. We are of the opinion that a separate policy is needed to fully represent the needs of housing and care for older people. An example of positive policy wording is set out below.</p> <p>“The Council will, through the identification of sites and/or granting of planning consents, provide for the development of residential care homes, nursing homes, close care, extra care and assisted care housing, and Continuing Care Retirement Communities which encompass an integrated range of such provision.</p> <p>In identifying sites and/or determining planning applications, regard will be had to:</p> <ul style="list-style-type: none"> • Commission for Social Care Inspection and other operational requirements; • Locational sustainability. Suitable sites at defined settlements will be prioritised, but where such sites are not available, regard will be had to the availability of public transport and the potential for developments to be self-contained, thereby reducing travel requirements; • The potential to co-locate a nursing/residential care home and other care related accommodation on the site where there are demonstrated needs.”
Question 31. Do you have any comments on the evidence base updates required?		
LPIS392	Church Commissioners (Barton Wilmore)	We agree with the proposed evidence to be updated. Any updated evidence should take into account the Revised NPPF, the Standardised Methodology, the housing needs of Greater Birmingham and the Black Country and the requirement to prepare and maintain Statements of Common Ground.
LPIS393	Greenlight Developments (Lichfield's)	See Question 30
LPIS394	Hargreaves M	As well as updating the Gypsy and Traveller Accommodation Needs Assessment (GTANA) on the basis of the 2015 Gypsy & Traveller definition, the Council is required to assess needs for caravan & houseboat accommodation.
		Many of those the GTANA determines do not meet the 2015 definition will require caravan accommodation, and the GTANA should be designed so as to also identify such needs from Gypsies & Travellers.
LPIS395	Highways England	See Question 24
LPIS396	Home Builders Federation	The supporting evidence should be renewed and updated. Any updating of evidence should be undertaken in accordance with the revised NPPF including the preparation of Statements of Common Ground, the standardised methodology for the calculation of housing needs, the housing delivery test and whole plan viability assessment (see HBF answers to Q3, Q24 & Q25). The Council's supporting evidence should also align with the proposed new Local Plan timeframe of 2020 – 2036 (see HBF answer to Q9).
LPIS397	KGL (Estates) Ltd (J Heminsley)	See Question 30
LPIS398	Rentplus UK Ltd (Tetlow King)	See Question 30
LPIS399	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submit that housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the 15-year Plan Period. This ensures that housing mix is reflective of market-driven need.

LPIS400	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submit that housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the 15-year Plan Period. This ensures that housing mix is reflective of market-driven need.
LPIS401	Rugeley Town Council	See question 30
LPIS402	Staffs. County Council	The two evidence studies proposed to be produced are deemed to be appropriate. The Housing needs assessment can be informed in part by the work discussed above. In relation to the Economic Viability Assessment for housing developments it is acknowledged that this will take into account S106 and CIL charges. We are mindful that government has proposed to amend legislation around operation of CIL, in particular Regulation 123, and how S106 operates alongside. It will be important to have regard to these changes in the assessment and how infrastructure requirements will be funded.
LPIS403	Taylor Wimpey (Lichfield's)	The Council will need to take into account the requirements of the revised Framework (July 2018) and changes to the Practice Guidance, including that on housing and economic development needs assessments to account for updates in national policy since the Council undertook its Strategic Housing Market Assessment in 2012.
Question 32. Do you have any suggestions for appropriate areas of search/additional sites that could be considered for Gypsy, Traveller and Travelling Showpeople provision?		
LPIS404	Hargreaves M	<p>In practice there will be considerable overlap between the accommodation required for Gypsies and Travellers who meet the 2015 Gypsy & Traveller definition, & those who fall outside it. It will often be the case that some households within an extended family will meet the definition & others will not (& their Article 8 human rights may be engaged if accommodation is approved for some but not others). Sites should be allocated as suitable for both groups of Travellers.</p> <p>A range of factors including high land values with hope value mean it is increasingly difficult for Gypsies & Travellers to acquire land. As well as the A5 area of search Traveller sites should be supported in appropriate locations across the District.</p> <p>Given the failure to approve sites, the policy framework should require the provision of sites through the largest housing development sites. Much of the demand from Gypsies & Travellers is for small – up to the equivalent of 5 or 6 pitch extended family sites. Many would be interested in pitches provided with services which they could develop themselves.</p>
LPIS405	Highways England	See Question 24
LPIS406	Rugeley Town Council	See question 30
LPIS407	Staffs. Police	<p>Staffordshire Police acknowledges and supports the need for additional pitches; however, this provision should not be met simply by increasing the size of existing sites by adding additional pitches, but by increasing the number of sites themselves.</p> <p>Consultation in other areas with the Gypsy and Traveller community along with other consultation documents supports the view that the size of sites should be small (five to ten pitches) and, where possible occupied by one extended family group (Menter Briefing Paper, John Day, April 2007).</p> <p>Transit sites do not affect the large majority of Gypsies and Travellers. There should be a transit site for those who have been moved from unauthorised encampments, however, any transit site should not be situated near existing Gypsy and Traveller sites. There is a need on occasions for transit sites to be available for those sections of the community passing through who may wish to temporarily stop for a short period of time whilst working in the area or travelling through the area such as show people, a transit site would assist with preventing the unauthorised encampments that occur within the locality and would alleviate some of the costs incurred by the Force and other public services policing such encampments and evicting illegal campers, as well as costs incurred from cleaning up an area after an encampment has left.</p>

LPIS408	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments in respect of sites to meet the requirements of Gypsy, Traveller and Travelling Showpeople.
Question 33. Can you suggest specific criteria for screening out sites which are not reasonable options for development at an early stage? How might this be justified?		
LPIS409	Highways England	See Question 24
LPIS410	Natural England	Q33 – Please see our response to Q29 with reference to SSSI impact risk zones.
LPIS411	Rugeley Town Council	See question 30
LPIS412	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments in respect of sites to meet the requirements of Gypsy, Traveller and Travelling Showpeople.
Review of CP8: Employment Land		
Question 34. Do you have any comments on what issues in relation to employment land supply need to be addressed and what policy options may need to be considered?		
LPIS413	Digibits Ltd (Marcus Clay)	With regards to employment land, with specific reference to Rugeley, we would hope that, in order to encourage growth in the SAME economy, at least part of the decommissioned Power site was allocated to small business and industrial units. In this way the local authority can encourage both the growth of existing small businesses and the establishment of new ones. Much recent use of land has tended to favour larger businesses from those at the very upper SME size, to multi-national corporations. To support businesses in all areas of the Local Authority, it is vital that the issue of overnight and long term HGV parking is addressed. At present, large numbers of HGV's are parking on industrial estate roads, often for days at a time, waiting for return loads or undertaking their mandatory weekly/fortnightly drivers breaks. On Wheelhouse Road, there are now sometimes as many as eight, articulated lorries parked astern. Many are blocking junctions and, when challenged on this issue, their standard response is they can park anywhere where there are no double-yellow lines. This situation is out of control, it makes it very difficult and dangerous not only for employees but also for HGV's with legitimate business on the estate to gain access, especially at peak times. On many days, there is nowhere for any vehicle to wait for an appointed visit or loading/unloading time at any of the businesses because all available parking is occupied.
LPIS414	Highways England	Highways England is not in a position to indicate alternative locations for employment development or comment in detail on specific sites. However, the transport implications of potential sites must be properly assessed in considering them for an allocation and should be key criteria for screening out sites for development. Reference should be made in the emerging plan to appropriate transport assessments to be undertaken by the developers of sites and the benefits of early liaison with Highways England where there are potential impacts on the SRN. Highways England would expect to comment on the spatial distribution of employment development in relation to the SRN once determined.
LPIS415	KGL (Estates) Ltd (J Heminsley)	There is already an acknowledged shortfall in employment land supply, some of which can be met on the former Rugeley Power Station site. However in the south of the District the existing infrastructure at Kingswood Lakes suggests that this is the most appropriate location to provide additional supply and could be brought forward as part of a comprehensive approach with the housing location referred to above.
LPIS416	Natural England	See answer to question 29.
LPIS417	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Cannock Chase District Council should ensure that a balance between the provision of jobs and homes is achieved to ensure the delivery of sustainable communities. Similarly, jobs should be disseminated throughout the District to promote sustainable travel patterns.

LPIS418	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Cannock Chase District Council should ensure that a balance between the provision of jobs and homes is achieved to ensure the delivery of sustainable communities. Similarly, jobs should be disseminated throughout the District to promote sustainable travel patterns.
LPIS419	Rugeley Power Ltd (Savills)	<p>CP8: Employment Land & 5.78. Planned provision for employment land is supported, and the provision of employment uses should be encouraged on suitable sites where appropriate and sustainable. Employment development of B classes and other forms of development which generate employment but which fall within other use classes should also be recognised for the contribution they make to sustainable communities and economic prosperity. Other employment generating uses should be encouraged on appropriate sites either alongside or instead of B class uses where such employment can contribute to regeneration and the creation of sustainable communities.</p> <p>It is relevant to recognise the contribution to employment that regeneration brings indirectly, through attracting both increased workforce and increased consumers and through raising perceptions of investment in an area. Housing led regeneration in one area of a settlement, can therefore encourage employment regeneration of another area of the same settlement.</p> <p>At 5.78 the Plan refers to adopted SPG stating that the SPG suggests primarily employment led development of the Rugeley Power Station site in Cannock. This statement in the Plan appears to be in deference to the SPD. This is the wrong way around. The Plan should take the lead on the policy and the SPD must be subordinate to the plan. This is absolutely necessary in respect of a Strategic policy. Comments made in respect of 2.4 explain the approach of Rugeley power Limited to achieving housing led regeneration of the Power Station site. The policy of the Local Plan should promote housing led rather than employment led, regeneration of the Power Station.</p> <p>Consistent with our comments to CP5 and 5.35, SPD should not lead policy and certainly not strategic policy. The appropriate development mix for the Rugeley Power Station site remains to be defined, taking account of market factors, the physical requirements of the site and the needs for different forms of development. It is important that flexibility is retained, to enable proposals to respond to these factors and to be able to respond to change rapidly as advocated by the NPPF. The thoughts which were expressed in the Rugeley Power Station SPD at the time it was prepared, may no longer reflect priorities of need, economics or the market. The employment policy should not therefore impose a specific level of employment provision on the Rugeley Power Station site, but should be supportive of the site accommodating employment provision in a range of formats as may be appropriate to a new sustainable community.</p>
LPIS420	Rugeley Town Council	The largest employment potential for Rugeley is the power station site. The concern is that as this is the far side of the bypass, employees will primarily come in from outside areas and bypass Rugeley services. The need to create links from the power station site to the town centre will be essential in order to see the growth of the retail sector in the town centre. The town council welcomes the opportunity to be consulted on the development of the site to ensure that it forms part of the community rather than a remote development area.
LPIS421	St Modwen (Land at Watling Street Business Park) (RPS)	<p>The District Corporate Plan, which identifies 'Promoting Prosperity' as one of its two corporate priorities for 2018-2023 is referenced in paragraph 5.72 of the LPR Issues and Options document. This plan should also be reviewed within the SA Scoping Report at Appendix 1. In relation to employment land provision, it is recommended that the LPR addresses the following:</p> <p><u>Employment Land Requirements</u></p> <p>RPS welcomes the Council's recognition at paragraph 5.82 of the LPR Issues & Options report that there is a need to update both</p>

the assessment of future employment land requirements for the plan period (taking account of the latest economic trends and forecasts) as well as assessing existing employment areas. Labour supply analysis is also affected by population and household forecasts within the district. The Council will need to test different scenarios in terms of how they will meet any unmet need including that from the wider Birmingham Housing Market Area (HMA).

Employment Land Portfolio

An assessment into the type of employment land that is available needs to be undertaken to ensure opportunities to balance out the employment land portfolio can be undertaken. It is recommended that the site assessment for employment land considers the likely type of development that would be expected on a site and seeks to ensure that this is balanced across all B-classes. The Council recognises that there is the need to retain a varied supply of employment land. LPP1 seeks “to ensure that not just the right amount, but the **right type** of employment land in the right locations” (para 4.57 RPS emphasis).

Employment Land Shortfall

It will also be essential that the Council accurately assesses what the shortfall is in terms of employment land. The relative merits of the Watling Street Business Park have been set out in the previously submitted Vision Document that demonstrated the site provides a genuine, deliverable development that would assist the Council in meeting its land requirement. When taken with the Green Belt Review, it is also clear that the site at Watling Street Business Park would have the least impact upon the Green Belt. Sufficient sites should be allocated to ensure that the Plan passes the test of being positive prepared and being effective. To rely on windfalls to make up a shortfall would be not appropriate plan making.

Policy CP8 seeks to address a number of other issues which the Council considers remain locally relevant (and elaborates upon related national planning policy). These are:

- Redevelopment and modernisation of existing employment sites for continued employment use, including those within the Green Belt (as there remain a number of existing in-use employment sites within the Green Belt in our District with recent demand for redevelopment schemes);
- Considering the loss of employment land to non-employment uses (given that there are a number of employment sites being suggested for residential redevelopment in the District and that there is currently a small shortfall in employment land supply against requirements).

Whilst RPS supports the Council’s acknowledgement that there is a shortfall in employment land supply, in RPS’ view there exists a significantly larger shortfall in employment land.

Employment Land Infrastructure

Whilst supporting this approach, the Council must also take account of options to extend sites that are currently located within the Green Belt. The extension of current sites which exist within the Green Belt would be far more sustainable, due partly to existing links and established uses in the area, compared with releasing Green Belt land for wholly new employment sites. A new employment site in the Green Belt would be more likely to impact heavily on the surrounding countryside due to the new infrastructure requirements. Extension of existing employment sites would enable the economies of scale for existing infrastructure along with enabling expansion of existing businesses.

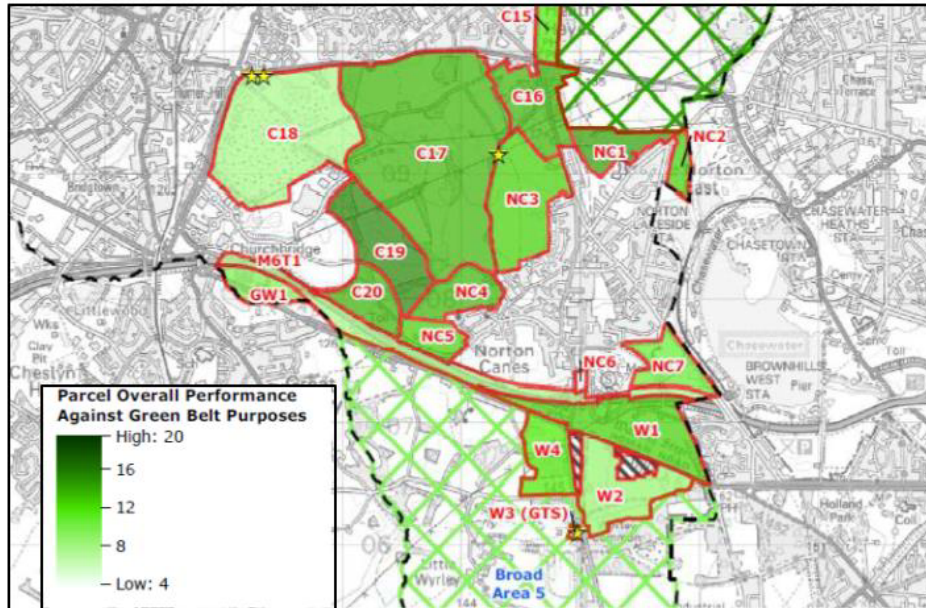
Employment Land Availability

The Council must also ensure that sufficient land is allocated. It is noted that the most recent Employment Land Availability Assessment (ELAA) published in October 2017 states (on page 11) that some sites which had been previously considered ‘available’ were now not available and also that some sites had come forward for residential development resulting in the loss of

	<p>sites along the A5 Corridor in particular from the employment land supply. Table 3 Employment Land Supply in the ELAA also showed that there was only a shortfall of 3ha in providing for the Local Plan target, which demonstrates that on the Council’s own evidence there exists virtually no available supply of employment land, which is not a viable position. Paragraph 11 of the Revised NPPF (July 2018) makes it clear that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.</p> <p>The information relating to outstanding sources of supply will also need to be robustly assessed by the Council to ensure that the supply figure is realistic. This will include ensuring that any sites which are wholly for retail are excluded from the figure. It should also exclude:</p> <ul style="list-style-type: none"> • Un-started sites which are due to expire within the next few months; • sites which have historically not come forward over a long period of time and are therefore not considered likely to come forward; and • sites where there are discrepancies between the site area (as assessed in the ELAA) and proposals within planning consents. <p>The land at Watling Street Business Park is within the wider A5 corridor and is identified within LPP1 Policy CP8 as an existing employment location where “development is encouraged and supported”. This demonstrates that expansion of the Business Park to assist the Council in meeting its current requirements is in accordance with the established strategy.</p> <p><u>Commentary on Rugeley Power Station</u></p> <p>Whilst the Rugeley Power Station may provide a long-term opportunity to provide a mixed-use development, the Council should not be over-optimistic in appraising the likely time frame for such development to come forward. Despite initial work commencing on masterplanning for the site, there is considerable ground investigation, demolition and remediation works that will need to be undertaken – particularly on the half of the site that is within Cannock Chase District. This could potentially take a significant amount of time to complete and could result in much of the potential allocated uses not been completed within the period of the plan. Whilst it is appropriate to monitor the development of the site, given the size and scale of the site any proposals for the site would significantly alter the strategy for the District.</p>
LPIS422	<p>RPS welcomes the preparation of the Local Plan which takes a generally positive approach in seeking to potentially allocate land to meet the outstanding employment land requirement. RPS welcomes the recognition by the Council that the evidence base relating to employment will need to be updated.</p> <p>RPS is keen to ensure that the evidence base underpinning the plan is robust, particularly when it comes to establishing the reasons for allocating sites and not allocating others. It is noted that of all the potential employment sites located in the Green Belt that Watling Street Business Park has been identified through the Green Belt Study as having the least impact on the five purposes of including land within the Green Belt.</p> <p>This report demonstrates that the land at Watling Street Business Park represents a highly sustainable proposal to assist the Council in meeting elements of its employment land requirements. The land is wholly within St Modwen’s control and is therefore available now.</p> <p>In conclusion, the site at Watling Street Business Park can provide an additional 5.5ha within the current plan period to assist the Council in meeting its shortfall of employment land. The site is highly sustainable, does not currently make a significant contribution to the purposes of the Green Belt and is currently in demand from potential future occupiers. Therefore, as shown through this report, the removal of the site from the Green Belt and its allocation within the current plan period is well founded and provides demonstrable evidence that Exceptional Circumstances exist.</p>

LPIS423	Staffs. County Council	<p>We agree that up to date evidence on employment land is required and following a similar approach as previously is sensible. The only additional issue we would suggest it is worth considering is what industrial sectors have grown / contracted in recent years compared against previous forecasts. In many (if not all) parts of the county, economic forecasts have predicted contractions in the manufacturing sectors but the opposite has actually been seen. This type of issue is therefore a useful consideration in determining the need for land by use class.</p> <p>At this stage we will not make specific comments on specific sites and locations as the need for certain types of site and land will clearly be dependent on the employment land requirement evidence. However whilst it is noted that there is some degree of, “Support for the retention and redevelopment of existing lower quality employment areas,” we believe that this would need to be based on an assessment of the viability of these sites. If these sites are unviable for employment uses then we believe that other uses. In this regard the assessment of such sites will be important, and we’d suggest that the criteria for assessment should be similar to those used by other areas (such as those proposed by Stafford Borough Council in their recent Strategic Housing and Economic Land Availability Assessment Draft Methodology – Consultation).</p> <p>As per Q28 as sites begin to emerge it will be useful to have a dialogue with the County council on infrastructure requirements</p>
LPIS424	Mr H Thornton	<p>As the Review is aiming to extend the Local Plan to year 2036, it is important that a very large proportion of the unused Power Station land is allocated for employment use, especially as the proportion of workers commuting from the Rugeley area to other places is already unacceptably high and getting worse due to the large number of new houses built in the locality over the past 6 years with no increase in the already minimal amount of local employment land.</p> <p>It also important that new employment land should not be fragmented, as at present, and create good quality jobs few of which now exist in the Rugeley area. An example of the urgent need for good quality jobs on land that is not fragmented is that ‘JCB Cab Systems’ which currently employs some 400 skilled workers is relocating elsewhere in 2019 to a site where it can double its production - the Express and Star newspaper of 30-6-2018 reporting this, added “JCB said in 2013 that it had outgrown its Riverway site and the firm had tried unsuccessfully to find a suitable replacement plot in the Rugeley area”.</p> <p>The M.P. for Cannock Chase, Amanda Milling, is also known for expressing her desire to see the Power Station site used for good quality jobs.</p> <p>Regarding para. 5.80, because of the lack of jobs in the Rugeley area it is important that any redevelopment of low quality employment sites in the area for housing should be replaced by equivalent employment sites <u>in the same area</u>, not “in the District” as mentioned.</p>
LPIS425	Claire Walker	Enough land has already been allocated and is left dormant and vacated within the area.
LPIS426	Christopher Walker	Enough land has already been allocated and is left dormant and vacated within the area.
LPIS427	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>In the drafting of any employment policies we would encourage the Council to consider the wording of paragraph 22 of the NPPF which asserts that:</p> <p>“Planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p>

		Employment land has not been designated in perpetuity so if suitable and more practical uses are available we suggest that the Council takes this into consideration, via policy which gives the same flexibility as is set out under paragraph 22 of the NPPF; this will ensure that the Local Plan Review is in accordance with national policy and therefore passes the tests it will be assessed against in order to be found 'sound' at the eventual examination.
Question 35. Do you have any comments on the evidence base updates required in relation to identifying appropriate employment land requirements and employment land supply?		
LPIS428	Highways England	See Question 34
LPIS429	Natural England	See answer to question 29.
LPIS430	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	The evidence base in respect of employment land should be updated so as to reflect the aspirations of the LEP.
LPIS431	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	The evidence base in respect of employment land should be updated so as to reflect the aspirations of the LEP.
LPIS432	Rugeley Town Council	See question 34
LPIS433	South Staffs Council	Work undertaken as part of the Local Plan review in South Staffordshire has indicated that Cannock Chase and South Staffordshire are within a shared Function Economic Market Area along with Dudley, Walsall and Wolverhampton. This is recognition of the strong economic inter-relationships which exist between the authorities and suggests that consideration needs to be given towards collaborative working to identify and address those issues which arise within this sub-regional market area geography.
LPIS434	Staffs. County Council	See question 34
Question 36. How can the Council ensure that it has considered all the potential brownfield site opportunities, as far as possible? Are there any sites you can suggest which may be underused?		
LPIS435	Highways England	See Question 34
LPIS436	Natural England	See answer to question 29.
LPIS437	Rugeley Town Council	See question 34
LPIS438	Staffs. County Council	See question 34
Question 37. What key locations or sites within the District, or cross boundary sites, should be considered reasonable options for future employment land supply?		
LPIS439	Highways England	See Question 34
LPIS440	Natural England	See answer to question 29.
LPIS441	Rugeley Town Council	See question 34
LPIS442	St Modwen (Watling Street Business Park) (RPS)	When taken with the Green Belt Review, it is also clear that the site at Watling Street Business Park would have the least impact upon the Green Belt. As illustrated in the extract of the Green Belt scoring summary within the Green Belt Study (below), the parcels containing the extensions to Kingswood Lakeside score notably higher (i.e. have a greater contribution to the Green Belt) than the parcel at Watling Street Business Park.



The expansion area of Watling Street Business Park is included within parcel W2 in the Green Belt Review. This parcel is shown to provide a low contribution to the Green Belt and is given an overall scoring of 9 out of 20. In this context, Table 1 below summarises the Green Belt Study scores for all of the parcels that were being considered as options for employment land within LPP2. On the basis that the Council recognises that the LPR will utilise the work to be carried out to date on LP Parts 1 and 2, this information is still considered relevant.

Table 1: Results of Green Belt Study – LPP2 Employment Options

LPP2 Ref	GBS Ref	Location	P1	P2	P3	P4	P5	Total
CE18	C19	Kingswood Lakeside 2 (north)	4	4	4	0	4	16
CE17	C20	Kingswood Lakeside 1 (south)	3	4	3	0	4	14
CE56	C16	Wider parcel including land at junction	3	4	3	0	4	14
NE5	W1	Land Parcel including Turf Field	2	4	3	0	4	13
CE19	GW1	Land between A5 and M6 Toll	1	4	1	0	4	10
RE25	R9	Land south of "The Levels" Industrial Estate, Rugeley	2	0	3	0	4	9
CE20	W2	Land at Watling Street Business Park	2	0	3	0	4	9

		<p>It is clear from the above table that the site making the least contribution to the Green Belt is the land at Watling Street. Further, the parcels that make up other potential employment sites including Kingswood Lakeside have a higher score in the GBS and so are of greater importance for the contribution they provide to the Green Belt. These include Kingswood Lakeside parcels; C19 which scored 16 out of 20 and C20 scored 14 out of 20. These parcels generally scored more highly than the land adjacent to Watling Street Business Park due to the crucial role they provide in preventing the coalescence of Cannock and Norton Canes urban areas. It is also noted that Sites NE8, NE10 and NE11 which were being considered for allocation were not included for detailed Green Belt assessment as they are within the “Broad Areas Assessment”. This omission of a detailed assessment highlights the remote nature of these sites specifically.</p> <p>From the scores given in the Green Belt review it is clear that the parcel including Watling Street Business Park (Site W2) provides the least contribution to the purposes of the Green Belt of all the employment sites being considered and has no impact on the coalescence of Cannock and Norton Canes.</p> <p>The Council must assess all available and deliverable parcels of land for employment allocation to ensure that the Council meet the NPPF requirements for plan making. To rely on windfalls to make up a shortfall is not appropriate plan making and not in accordance with the NPPF; it would not pass the test of being positively prepared and would not be effective. The proposed extension to Watling Street Business Park is deliverable, the site would help to balance the employment land portfolio going forward and would have the least impact upon the Green Belt compared to the other available and sustainable sites that are currently being promoted. Therefore, the land is suitable for allocation.</p> <p>The Council rightly references that it is only through a Local Plan Review that Green Belt boundaries can be altered. The allocation of additional land for employment use will require Green Belt boundaries to be amended, which must be informed in terms of both current and longer term needs for employment land. The Green Belt Study (LUC) concludes that the site at Watling Street Business Park does not currently make a significant contribution towards the Green Belt and therefore its release would have the least impact upon the Green Belt compared to other potential employment allocations, particularly those at Kingswood Lakeside. The site would be the most appropriate to be released for future development based on the Green Belt considerations alone.</p> <p>Existing sites must be able to improve or being modernised in the future, including existing employment sites within the Green Belt. The policy provisions currently in LPP1 and the Design SPD (2016) encourage modernisation and development at the existing Green Belt employment sites. Until such time as the Council allocates additional land for development at Watling Street Business Park, the policy provision is likely to be sufficient. It is recommended that any future expansion at Watling Street Business Park is encouraged to come forward in a flexible manner, primarily matching the design principles of the existing Business Park and minimising, as far as possible, visual or landscape impacts upon the wider area.</p> <p>Watling Street Business Park is a long-established, popular business park with the opportunity to expand on the surrounding field parcels. The Green Belt Study demonstrates that the developable land would not have a significant impact upon the Green Belt.</p>
LPIS443	Staffs. County Council	See question 34
Question 38. Can you suggest specific criteria for screening out sites which are not reasonable options for development at an early stage? How might this be justified?		
LPIS444	Highways England	See Question 34
LPIS445	Natural England	See answer to question 29.
LPIS446	Rugeley Town Council	See question 34
LPIS447	Staffs. County Council	See question 34

Review of CP9: A Balanced Economy

Question 39. Do you have any comments on what issues in relation to economic growth need to be addressed and what policy options may need to be considered, taking account of key local issues such as local skill levels and improving access to higher skilled job opportunities?

LPIS448	Canal & River Trust	As identified in the current policy the canal network and use of it can result in significant economic benefits for the local community. The Policy seeks to maximise the potential of the canal network particularly in relation to links between the Trent & Mersey Canal and Rugeley town centre. The Trust supports proposals that will help to improve access to and use of the canal by the local community and also strengthen the visitor economy. To further support the visitor economy on the canal network, it is also important to support improvements to visitor moorings and facilities for boaters. The Lichfield and Hatherton Canals Restoration Trust (LHCRT) is working towards the restoration of the former Hatherton Canal to navigable status and although we do not own the route of the former canal, it will ultimately connect to the existing canal network that we manage. Canal restoration projects have a number of benefits for a local community and can be a catalyst for redevelopment and regeneration. In addition to environmental benefits canal restoration can also have positive economic and social impacts and therefore aid in achieving other key objectives of the Plan. We are supportive of the work of the LHCRT in restoring the canal. The existing Plan includes details of the indicative route in support of the Hatherton restoration. The Review however provides an opportunity to strengthen this protection and the Policy should be amended to ensure developments are required to consider it in their proposals and ensure the route is safeguard from development which may sever the line or prevent its restoration.
LPIS449	Lichfield and Hatherton Canals Restoration Trust	I wish to record some disappointment that the progress towards effective through-route protection for the restored Hatherton Canal in the Part 2 document has been slowed by the decision to review the present Local Plan Part 1 document. We note that paragraph 5.89 of the present document mentions 'consider' which is a step backwards. The next step should be to write the necessary policies and then adopt them to give effective and explicit route protection throughout, aligning with progress made by Walsall Council and South Staffordshire District Council.
LPIS450	National Farmers Union West Midlands Region	As stated in our response to the previous consultation, Cannock Chase District is home to many agricultural, food and rural based businesses. However there is no other mention of farms and rural businesses within the paper or within Policy CP9. The NFU would like to see a considerable strengthening of the support shown for the rural economy in this document and a reference to rural business in CP9. We are concerned that many thriving agricultural businesses in the area will be disadvantaged by the lack of specific support for the continued development of the rural economy in the current draft. Bearing the above in mind the NFU would appreciate the opportunity to become involved in the formation of guidance on agricultural or horticultural developments in order to ensure that it is fit for purpose. The industry needs are evolving and therefore some future proofing should be built into the policy in order to ensure that it keeps pace with developments in the industry. This is particularly important for those businesses located within the green belt.
LPIS451	Rugeley Town Council	Rugeley town centre is struggling to be a destination location and will need to be seen as a unique market town with independent shops rather than a location for high street chains. This regeneration will take time but requires direction and support. If local developments can improve the links to the town centre and create a market for the retailers, the stronger the town centre can become. Recent jobs fairs and the weekly jobs club in Rugeley identify the need to local jobs for local people.
LPIS452	St Modwen (Land at Watling Street Business Park) (RPS)	As outlined in the previous chapter, the District Corporate Plan identifies 'Promoting Prosperity' as one of its two corporate priorities for 2018-2023. This has an immediate vision for continued business growth, attracting higher skilled employment and raising skill levels (as well as other elements).

		The clear merits of the Watling Street Business Park 5.5ha were set out in the previously submitted Vision Document that demonstrated the site provides a genuine, deliverable development that would assist the Council in meeting its land requirement. The Council's own evidence (in the ELAA) outlines the importance of retaining a balanced supply of type of employment land, as well as considering the quantity of floorspace provided; there will also be a need to consider qualitative provision. The expansion of Watling Street Business Park offers an excellent opportunity to provide a market specific provision which would help to meet the demonstrable demand for unit formats where demand is strong and assist the Council with closing the existing supply gap.
LPIS453	Staffs. County Council	See question 34
LPIS454	Claire Walker	If the town centre is improved then people may actually visit and shop there.
LPIS455	Christopher Walker	If the town centre is improved then people may actually visit and shop there.
Question 40. Do you have any comments on the evidence base updates required, or the evidence and strategies of other organisations that need to be taken into account?		
LPIS456	Canal & River Trust	<p>There is currently a reference within the Policy that requires the restoration proposal to demonstrate that additional boat movements along the Cannock Extension Canal SAC can be prevented. This should be removed from the Policy.</p> <p>The Cannock Extension Canal, and navigation along it, is the responsibility of the Canal & River Trust and it is not considered appropriate for a planning policy to specifically restrict boat movements. As you are aware the SAC is designated for its Floating water-plantain, Luronium natans and the population of these in the Cannock Extension Canal is dependent upon a balanced level of boat traffic. Whilst future detailed restoration proposals may be required to assess the impact of any additional boat movements Policy CP9, as currently worded, seeks to prevent additional boat movements. This presupposes the likely impact of any additional boat movements as having a negative impact on the SAC. There is however no current data available on the number of boats using the Cannock Extension Canal, there is a lack of evidence as to what an acceptable level of boat movements along the Cannock Extension would be and critically a lack of evidence as to whether more or less boats would be beneficial to the SAC.</p> <p>If future evidence suggests that there will be an increase in boat movements and that these could have a negative impact on the SAC, there are also other means to mitigate any harm to the SAC which would need to be considered, such as restricting the speed of boats, type of boats (the hull type impacts on the level of disturbance created from the boat movement), tree management, control of invasive species, management of activities on adjacent land and control of land drainage to the canal. The Trust are not aware of any consideration or assessment of these alternative means that has been undertaken to support the current Policy and the restriction on boat movements. There are currently no restrictions on boat movements on the Cannock Extension Canal and it is unclear to the Trust how the LPA could restrict boat movements. In summary therefore, whilst the Trust is supportive of a Policy which seeks to protect the line of the Hatherton canal, the current Policy is not supported by evidence that demonstrates prevention of further boat movements is necessary and this restriction may itself have a negative impact on the SAC designation. The Policy should not presume the outcomes of any subsequent appropriate assessment to be undertaken at detailed design stage. As identified in Paragraph 5.89 this issue was raised as part of the Examination Hearings of the Walsall SAD and their Policy subsequently amended to reflect the above and remove reference to boat restrictions from the Policy. Policy CP9 should therefore also similarly be amended and the review provides the opportunity to have a separate specific policy relating to the restoration of canals.</p>
LPIS457	Inland Waterways Association (Lichfield)	The Inland Waterways Association (Lichfield Branch) regrets the decision to stop work on the Local Plan Part 2 in favour of a review of the whole Local Plan, in so far as this will delay the effective safeguarding of the route of the Hatherton Canal restoration.

	branch)	<p>The indicative safeguarded route in the 1997 Local Plan was altered by construction of the M6 Toll and later by the decision to link it to the Lords Hayes Branch of the Wyrley & Essington Canal rather than to the Cannock Extension Canal to avoid the SSSI and SAC.</p> <p>The Hatherton Canal route crosses the boundary between Cannock Chase DC and South Staffordshire DC in several places, and now also has a short section in Walsall MBC, requiring co-operation between the Councils to ensure continuity and consistency of policies and maps.</p> <p>The route as identified by the Lichfield & Hatherton Canals Restoration Trust (LHCRT) is shown in detail on Policies Map, Inset Plan 50 and safeguarded in Policy SAD8 of the South Staffordshire Site Allocations document, which has now been examined and found Sound.</p> <p>The Walsall Site Allocations document, Policy SAD4 safeguards the Hatherton Canal route and has also been examined and modifications agreed. Cannock Chase Local Plan (Part 1) 2014 undertakes in Policy CP9 to identify and safeguard a firm route on the Policies Map via the Local Plan Part 2, subject to certain conditions. However, that will not now happen, leaving important parts of the route unprotected and with no detailed mapping to guide applicants in avoiding any prejudicial impacts from their development proposals.</p> <p>It is vital therefore that the necessary safeguarding of the route is implemented through the reviewed Local Plan, and IWA is pleased that this is recognised in paragraph 5.89.</p> <p>Of the conditions referenced in Policy CP9, those concerning water supply (a) and ecology (c) are accepted in principle, but the reference to boat movements on the Cannock Extension Canal (b) is both unnecessary and undeliverable, and should be removed, as has been a similar provision from the Walsall SAD by agreement with Natural England during the Examination.</p> <p>An 'Appropriate Assessment' of the Cannock Extension Canal SAC is not required at the safeguarding stage although it may need to be considered as part of a planning application (in accordance with the Sustainability Appraisal Scoping Report table A2.1, SA Objective 1). IWA therefore looks forward to working with the Council and LHCRT to define suitable policy wording and sufficiently detailed mapping to complete the safeguarding of the Hatherton Canal restoration route throughout in a consistent manner.</p>
LPIS458	Lichfield and Hatherton Canals Restoration Trust	The key 'other organisations' regarding the Hatherton Canal restoration project are the Lichfield & Hatherton Canals Restoration Trust, the Inland Waterways Association and the Canal and River Trust.
LPIS459	Rugeley Town Council	See question 39
LPIS460	Staffs. County Council	See question 34
Review of CP10: Sustainable Transport		
Question 41. Which elements of the policy now need updating (e.g. to reflect changes in delivery or new partnership arrangements) or to address issues not currently covered? Please provide details and links where appropriate		
LPIS461	Brereton & Ravenhill Parish Council	<p><u>Page 43, paragraph 5.93</u></p> <p>BRPC welcomed the July 2012 decision to electrify the Chase Line between Rugeley and Walsall and, despite concern about the delay in the project in recent years, strongly supports it. The lack of late evening services remains a serious problem. In this respect, a comparison may be made with the reopened Borders Line between Tweedbank and Edinburgh, which has an otherwise similar level of service, but much better late evening services. The provision for disabled people at the Rugeley stations is dire with no means of crossing the tracks so that two of Rugeley Trent Valley's three platforms are inaccessible to many disabled people and disabled people wishing to travel to and from Rugeley Town station may have to travel to Rugeley Trent Valley and back. The equivalent Lichfield stations have much better provision for disabled people.</p>

		BRPC is greatly concerned about the decline in and the high price of bus services. Developers of the Power Station site and of any land whose development is facilitated by the flood defence works in Rugeley should be expected to make a contribution to such services.
LPIS462	Brindley Heath Parish Council	<p>Page 43, Paragraph 5.93</p> <p>7. The lack of late evening services remains a serious problem. The provision for disabled people at the Rugeley stations is very poor with no means of crossing the tracks so that two of Rugeley Trent Valley's three platforms are inaccessible to many disabled people and disabled people wishing to travel to and from Rugeley Town station may have to travel to Rugeley Trent Valley and back. The equivalent Lichfield stations have much better provision for disabled people.</p> <p>8. BHPC is greatly concerned about the decline in and the high price of bus services. Developers of the Power Station site and of any land whose development is helped by the flood defence works in Rugeley should be expected to make a contribution to such services. Stafford Brook Road (Brindley Heath) now has no service at all.</p>
LPIS463	Canal & River Trust	The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers. The towpath also aids in providing a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. Opportunities for utilising, enhancing and linking in to this existing infrastructure should be fully considered. Future developments should be encouraged to consider this at an early stage in the development process and to aid this the potential of the canal network should be clearly referenced within the revised Policies. The existing Policies require Applications to assess the impact of the proposed development on the capacity of the highway infrastructure. It should be ensured that this includes the capacity of any existing canal crossings to accommodate additional traffic. In addition, modelling or assessment of pedestrian, cycling and recreational use of the towpath should be required within the Policy. This should assess the impact of the proposed development and the extent of the impact, beyond the development site, that the towpath / canal infrastructure will realise from increased usage. Applications should also be required to detail any necessary mitigation measures.
LPIS464	Highways England	Highways England welcomes the opportunity to comment on what elements of the Sustainable Transport policy need updating. We would reiterate that which has already been expressed in the consultation on Stage 2: that emphasis is needed on more partnership working on transport issues with Highways England and the need to consider and model the impact on the Strategic Road Network. Once the spatial distribution of residential and employment development has been determined, further engagement will be needed with Highways England in order to determine the technical analysis required to understand the impacts on the SRN and any necessary mitigation. We note that Highways England are not specifically referred to in the current Policy CP10 and would welcome being included in the list of partners if set out in the revised policy.
LPIS465	Jukes, June	Yet again public transport is being reduced. Encouraging people to use public transport could help reduce pollution but if buses are not available then cars and taxis have to be used for individual journeys.
LPIS466	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates acknowledges that Policy CP10 should be updated to reflect the latest position in respect of transport infrastructure projects and their delivery.
LPIS467	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates acknowledges that Policy CP10 should be updated to reflect the latest position in respect of transport infrastructure projects and their delivery.

LPIS468	Road haulage association	<p>Reliable and consistent journey times are key for road users. It is vital that clear and correctly placed signage is provided to guide freight vehicles to logistics parks and via the most suitable route. This is vital where height and weight restrictions exist. We ask that Lorry Parking is given a high priority. The National Survey of Lorry Parking, published by the Department for Transport in May 2018 identifies a Serious shortage of overnight lorry parking facilities in the West Midlands area.</p> <p>It is estimated that there is a national deficit, each night, of between 9000 and 11000 spaces. 2500 of these being in the West Midlands. Lay-by's must be retained and maintained for HGV drivers to stop and take mandatory rest breaks. Provision must also be made for HGV's to park in the vicinity of town centres, so that drivers can take mandatory 45 minute breaks, or wait prior and after delivering goods to town centres.</p> <p>When Logistics Parks, Regional Distribution Centres, or warehousing developments are being built, or developed, then Paragraph 107 National Planning Policy Framework, published in July 2018 must be considered. This ensures that lorry parking provision is mandated in planning applications. Parking provision should be considered within the curtilage of logistics parks where possible. S.106 Planning agreements can provide a solution in providing proper lorry parking facilities.</p> <p>Air quality is a concern for everyone, the council must ensure that any policies seeking to address air quality take account of the need for people and businesses to be able to move the goods they need. The RHA welcomes the opportunity to become involved as a key stakeholder in developing systems and processes to manage freight movements.</p>
LPIS469	St Modwen (Watling Street Business Park) (RPS)	<p>Paragraph 5.91 which supports policy CP10 acknowledges that the Council will need to ensure that the policy wording is brought up to date to reflect the most current situation and partnerships (for example Transport for the West Midlands / West Midlands Combined Authority and Midlands Connect as a Sub-National Transport body) and will need to update its evidence particularly with regard to the impacts of growth upon the road and rail network and any infrastructure upgrades and investment which would be necessary to enable delivery.</p> <p>As set out in paragraph 3.8 of the Sustainability Appraisal Scoping Report (June 2018), key links to the east and west are provided by a number of A roads, including the A5. Staffordshire County Council have produced the Cannock Chase District Integrated Transport Strategy 2013-2028, which was published in November 2013. The Strategy references in paragraph 4.1 and under the heading of Economic Prosperity that the Strategy will guide the Local Enterprise Partnership's Strategic Economic Plan, specifically in terms of supporting access to economic opportunities both inside and outside the District, including particularly along the A5 (T) corridor.</p>
LPIS470	Staffs. County Council	<p>It is noted that paragraph 5.91 mentions the need to reflect new and current partnerships, we will happily review with you those suggested in due course. It is acknowledged that Paragraphs 5.93 and 5.94 mention the declining delivery and sustainability of public bus services which reflects the current circumstance.</p>
LPIS471	Transport for West Midlands (WMCA)	<p>Rail Policy</p> <p>Demand for rail travel across the TfWM area is continuing to increase with this area witnessing more than a 70% increase in rail travel over the last 10 years. The new rail franchise, which was awarded to West Midlands Trains will provide better local rail services, including better quality facilities for passengers, more seats and longer trains. It is therefore important that the following rail schemes are fully referenced and that the local plan includes the following:</p> <ul style="list-style-type: none"> - Promotion of the new electric rail services and through trains to/from Birmingham International and London that will be introduced in May 2019 - Delivery of the major redevelopment of Cannock Station, supporting the development of the Mill Green Designer Outlet Village - Support in the delivery of station and accessibility improvements at Hednesford and Rugeley Town stations

		<ul style="list-style-type: none"> - Improvements at Rugeley Trent Valley station and connections into the Crewe – Rugeley TV – London Euston train service - Promotion of the extension of Chase Line services beyond Rugeley Trent Valley post HS2 Phase 2A - Support the development of plans to improve connections into HS2 - Promotion of improved bus and rail integration at Hednesford, Cannock and Rugeley Town stations - Promotion of initiatives to develop rail freight, and in particular support the development of the Mid-Cannock site as a multi-modal freight terminal <p>West Midlands Stations Alliance</p> <p>The West Midlands Station Alliance has also been developed which sees industry partners working together to create a shared vision. In particular, creating quality gateways between communities and the railways, supporting the changing needs of passengers, residents and visitors and developing station master plans.</p> <p>Cannock station is one of the station master planning pilots selected by West Midlands Station Alliance partners and local authorities to improve station facilities, community opportunities, the urban realm and local roads and station parking issues. It is vital that the local plan makes reference to the West Midlands Station Alliance and the community opportunities which may result.</p> <p>M6/M54/M6 Toll</p> <p>A new link road from the M54 to the M6 and the M6 Toll has been referenced in the local plan and will support local economic growth for Cannock by improving traffic flow and enhancing the east-west and north-south routes across the region. Current routes such as the A460 and A449/A5 suffer significant congestion, high accident rates and air quality issues due to large traffic volumes and poor journey time reliability. The importance of this scheme should therefore play a greater role in the local plan.</p> <p>Finally, TfWM notes the existing infrastructure delivery plan. We like to further reiterate our support for a partnership approach in addressing the strategic needs of the plan and the wider area and we would welcome further dialogue with Cannock Chase District Council and Staffordshire County Council as this plan develops.</p>
LPIS472	Claire Walker	Very little has been done for the very poor train transport in the area and whilst we have M6 and M6 toll very little has been done about in town road infrastructure.
LPIS473	Christopher Walker	Very little has been done for the very poor train transport in the area and whilst we have M6 and M6 toll very little has been done about in town road infrastructure.
Question 42. What evidence do we need to help us decide what options for growth are feasible, sustainable, realistic and deliverable? Is there already any up to date evidence which we can use to help us and if so, what?		
LPIS474	Highways England	See Question 41
LPIS475	Sport England	Support the identification of Active Travel which is supported and highlighted within the West Midlands Combined Authority Physical Activity Strategy 2017-2030
LPIS476	Staffs. County Council	<p>The evidence base work set out in paragraph 5.100 seems appropriate. It will be necessary to maintain a close dialogue with the County Council on transport related evidence as the Plan progresses.</p> <p>There may be some potential to use the Midlands Region Transport Model, which is a Highways England model and appears to cover the strategic road network in the Cannock area to more fully understand the traffic impacts of potential development proposals/locations. Highways England will need to clarify and confirm. New evidence may be developed as the plan progresses as you indicate and we will work with the District Council on this through the process.</p>

Review of CP11: Centres Hierarchy		
Question 43. Do you have any comments on what issues need to be addressed in relation to centres?		
LPIS477	Brereton & Ravenhill Parish Council	<u>Page 46, Existing policy CP11</u> The inclusion of Brereton in the list of local centres continues to be appropriate.
LPIS478	Brindley Heath Parish Council	<u>Page 46, Existing policy CP11: Centres Hierarchy</u> 9. Regeneration and maximising appropriate tourism as a gateway to the Cannock Chase AONB should be given careful consideration and inappropriate use of such sites should be avoided.
LPIS479	Rugeley Power Ltd (Savills)	It is appropriate that Rugeley continues to be identified as a high order centre in the hierarchy and supported in policy terms as such. Consideration should be given to the potential for development of the Rugeley Power Station site to contribute to the vitality and viability of the town as a whole, through increasing the catchment population within an easy walk of the town centre. It may be appropriate for the Rugeley Power Station site to include some small scale town centre uses to support a new sustainable community on the edge of the town centre, as a complement to the functions of the town centre. The imposition of a requirement for testing impact at a floorspace level below the 2,500sqm nationally set threshold may be unhelpful in this context. Policy should enable appropriate scale town centre uses below the national impact test threshold as part of residential led mixed use proposals.
LPIS480	Rugeley Town Council	Area Action Plans are only of use if they are supported by planning decisions. In Rugeley there is decreasing confidence in the planning decisions being made which are undermining the AAP and the Conservation Areas.
LPIS481	Staffs. County Council	It is considered that the Plan broadly identifies the main issues that need to be addressed in relation to centres.
LPIS482	Mr H Thornton	My view is that the Rugeley Town Action Plan needs to be reassessed with regard to the proposed replacement of the run-down indoor Market Hall and its surroundings with a high quality shopping mall. Such a large and expensive redevelopment is no longer viable given the current state of the retail sector. The closing of many town centre shops, mainly as a result of out-of-town and on-line shopping, is now irreversible.
LPIS483	Claire Walker	The town centre needs clearing up and we need a stronger Police presence to deal with petty crime and drug use.
LPIS484	Christopher Walker	The town centre needs clearing up and we need a stronger Police presence to deal with petty crime and drug use.
Question 44. Do you have any comments on the evidence base updates required, or any existing evidence or information of which you think we should be aware?		
LPIS485	Rugeley Town Council	See question 43
LPIS486	Staffs. Police	Staffordshire Police request that H.M. Gov's Prevent and Crowded Places documents are utilised when making changes or re-developing town centres, we request that emphasis be given to preventing vehicles being able to drive through pedestrian areas and that town centre CCTV systems are retained.
Question 45. Are Area Action Plans the most appropriate way of regenerating town centres, or do you think we should be considering other approaches? If so, what options should we be considering? Do you have any examples of good practice which might be helpful and relevant to this District?		
LPIS487	Rugeley Town Council	See question 43
LPIS488	Mr H Thornton	My opinion is that the Town Centre Action plans should remain as separate documents to enable the Policies and related information to be seen in one package and more easily understood and monitored.

Review of CP12: Biodiversity & Geodiversity		
Question 46. Do you have any comments on what issues need to be addressed in terms of biodiversity and geodiversity and what policy options may need to be considered, taking account of key local issues and features e.g. the range of designations covering the District?		
LPIS489	Canal & River Trust	The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The Cannock Extension Canal is a designated SSSI and SAC for its Floating water-plantain, <i>Luronium natans</i> . It is important to ensure that any increased recreational use of the canal and towpath and any development proposals in the vicinity of the canal take full account of its status as a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and ensure adequate protection of the biodiversity importance of the canal.
LPIS490	National Farmers Union West Midlands Region	Farmers and landowners must be fully engaged with discussions on biodiversity and geodiversity as they own and manage many of the districts key natural capital assets. For the majority of farmers environmental management is a core business activity, but this is not acknowledged by the document. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride and it does them a disservice to not have this aspect of land management recognised by this paper. The work of the Campaign for the Farmed Environment (www.cfeonline.org.uk) has demonstrated how farmers use a range of voluntary techniques to enhance the environment and that this management is funded by farm businesses.
LPIS491	Natural England	The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. New development should incorporate opportunities to enhance biodiversity, wherever possible.
LPIS492	Rugeley Town Council	The Chase, Canal and River are key areas of recreational space, natural biodiversity and physical boundaries to urban sprawl. Rugeley Town Council wish to see protected spaces remain with interpretation of the environment support development in tourism – local, regional and national.
LPIS493	Staffs. County Council	Whilst Policy CP12 is broadly reasonable and well thought out a move should now be made to a measurable net gain in biodiversity, in line with NPPF 2018 170 (d) & 174 (b). Lichfield has an established 20% net gain policy, and there is no reason why this could not be adopted in Cannock Chase District; indeed neighbouring districts with similar policies would be reinforcing each other. It is important to give a quantified net gain because otherwise the tendency is for developers etc. to produce a very minor / insignificant net gain (e.g. 0.05%). In relation to Paragraph 5.114, although the Green Flag Award is a good aspiration for sites with a high degree of public access, it is not the best indication of biodiversity quality. There is a three tier system in place in the county; the aim should be where possible to get Biodiversity Alert Sites up to Local Wildlife Site status, and to get Local Wildlife Sites up to Site of Special Scientific Interest (SSSI) quality (even if SSSI designation does not follow). Cannock Chase District has an excellent track record with Hednesford Hills. With regards to Paragraph 5.115 the NPPF (2018) 175(c) makes clear that irreplaceable habitats should be given special consideration in the planning system, with ancient woodland and veteran trees cited as examples. Cannock Chase District does have veteran trees outside ancient woodlands, which will need specific consideration as isolated veteran trees are often vulnerable. Additional guidance beyond the Local Plan as SPD or advice notes might go on to outline good practice when

		<p>dealing with these trees, such as preservation of fallen or lopped wood. Our Ecologist is happy to provide further advice on this matter.</p> <p>Para 5.117 states that: 'The Council is a member of the Staffordshire Wildlife Trust Partnership and therefore has access to a significant resource of existing information on locally designated sites, priority habitats and species via the Staffordshire Ecological Record.' This is slightly incorrect and should read: 'The Council is a member of the Staffordshire Ecological Record Partnership, hosted by Staffordshire Wildlife Trust, and therefore has access to a significant resource of existing information on locally designated sites, priority habitats and species.'</p> <p>At 5.118 it is noted that the Council is likely to supplement this existing evidence with any further survey work that may be needed e.g. potentially an Extended Phase 1 Biodiversity Study similar to that undertaken for Local Plan (Part 1) for the District and any site specific survey work required (the need for which can be identified via continued joint working with other agencies and site landowners/promoters). This would be an excellent initiative and would provide vital evidence for a strategic approach. We would welcome the opportunity to be involved in devising this study.</p>
Question 47. Do you have any comments on the evidence base updates required, including any site specific information that may be required?		
LPIS494	Natural England	The Conservation objectives for each European site are now available and explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.
LPIS495	Rugeley Town Council	See question 46
LPIS496	South Staffs Council	National policy promotes the mapping of ecological networks including the hierarchy of designated sites and the identification of areas for habitat management, enhancement, restoration or creation. Collaboration and sharing of information in respect of the mapping of such networks has possible mutual benefits given the potential that such ecological networks will have cross boundary linkages.
LPIS497	Staffs. County Council	<p><u>Site specific</u></p> <p>At least a basic assessment for any likely biodiversity issues, including habitats, protected and key species should be undertaken on any sites likely to be allocated for development. This is because any constraints need to be identified early and may reduce the area of developable land within a site. NPPF makes clear that the first priority is to avoid harm (avoid, mitigate compensate hierarchy.) In some cases the basic assessment might only involve confirming existing information, and in other areas such as ploughed land aerial photographs may provide sufficient information.</p> <p>Where owners / developers are bringing forward land for inclusion the onus might be on them to provide this information in the form of a Preliminary Ecological Appraisal (PEA.) If this is the case it is important to note (and make clear to the developer) that this work will likely have to be re-done at development stage because surveys such as PEA are only valid for two years.</p> <p>Ecological networks and opportunity mapping NPPF makes several references to ecological networks including (171)</p> <p>171. Plans should:... ..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</p> <p>The most recent county strategy for biodiversity is the Staffordshire Biodiversity Action Plan (BAP)(3rd edition, 2001) which is probably at too broad a scale and rather out of date, although providing a starting point (http://sbap.org.uk/actionplan/index.php). Further work is needed to devise a detailed strategy for Cannock Chase District, ideally in cooperation with neighbouring districts, and by using ecological modelling methods. Staffordshire Ecological Record holds suitable data and expertise for this process,</p>

		<p>although further survey work may be needed.</p> <p>It is probable that timescales will not allow for a network / opportunity strategy to be developed within the Local Plan timescale. It would be helpful if a Policy were incorporated that recognises that a strategy will emerge during the plan period.</p> <p>Policy CP12 currently recognises BAP targets; however it does not set out a strategy for the water environment. Cannock Chase District contains the headwaters of several important tributaries (Saredon Brook and Penk to the west for example.) This makes it important to achieve good water quality within the district (NPPF, 170 e) so as to provide good water quality downstream. New (NPPF, 165) and retrofitted SUDS, buffering waterside habitat and removal of artificial barriers such as weirs and culverts may all form part of a strategy for achieving this. These may also help with flood management (NPPF, 157c refers).</p>
Review of CP13: Cannock Chase Special Area of Conservation		
Question 48. Do you have any comments on our review of Policy CP13: Cannock Chase Special Area Of Conservation (SAC)?		
LPIS498	Brindley Heath Parish Council	<p><u>Page 65/84, Policy CP5 – Policy CP13</u></p> <p>12. BHPC Agrees and strongly supports these policies.</p>
LPIS499	Natural England	<p>We note that as a result of the review additional growth is expected which cannot be accommodated within the existing mitigation. As a member of the Cannock Chase Special Area of Conservation (SAC) Partnership the Council is involved in active discussions to ensure the project's evidence base is up to date and able to inform decisions regarding any changes to the mitigation package. Examples of related work include last year's Evidence Base Review report (Footprint Ecology) and the current repeat visitor survey work which is due for completion in the autumn. We will continue to provide support on this matter via the Cannock Chase SAC partnership and at further stages of the Plan.</p>
LPIS500	Rugeley Town Council	<p>Rugeley is surrounded by the Chase, Canal and River - all of which proved physical boundaries to development. The town council do not wish to see any adjustment to the green belt surrounding the town as this would erode significant natural landscape features.</p>
LPIS501	Staffs. County Council	<p>It is important to keep the policy in place in order to mitigate the effects on Cannock Chase SAC, and the implicit intention to do so in the consultation is welcomed, as is the intention to take on board new evidence by producing a modified policy.</p>
Review of CP14: Landscape Character & Cannock Chase AONB		
Question 49. Do you have any comments on landscape issues facing the District and the need for any updates to evidence or policy?		
LPIS502	Beaudesert Golf Club (FBC Manby Bowdler LLP)	<p>Within the AONB, policy provision should be made, exceptionally, for new development on brownfield land which enables, supports and enhances local distinctiveness in the AONB and/or the management objectives for the AONB.</p>
LPIS503	Brereton & Ravenhill Parish Council	<p><u>Page 52, Existing Policy CP14</u></p> <p>BRPC agrees with the statement that the District's landscape character will be protected, conserved and enhanced. This must involve strong enforcement action, including the collection of fines and requiring full reinstatement of land in the AONB that has been harmed by criminal behaviour.</p>
LPIS504	Brindley Heath Parish Council	<p><u>Page 52, Existing Policy CP14: Landscape Character and Cannock Chase AONB</u></p> <p>10. BHPC agrees with the statement that the District's landscape character will be protected, conserved and enhanced. This must involve strong enforcement action, including the collection of fines and requiring full reinstatement of land in the AONB that has been harmed by misuse or criminal behaviour.</p>
LPIS505	Historic England	<p>As identified within the district context, there is a strong relationship between landscape and heritage in the Cannock Chase area, including notable Scheduled Monuments and their long-distance settings. It will be advisable to appropriately reflect this within any</p>

		new policy regarding landscape character and the Cannock Chase AONB. As you will be aware, the Cannock Chase AONB is currently undertaking a Management Plan review. Historic England is contributing advice to this process, and as this work develops it will identify useful areas for focus relevant to policy CP14 (and CP15) with respect to the historic environment.
LPIS506	Inglewood Investments (SLR Consulting)	<p>As discussed within the letter and in our responses to previous questions, housing pressure is increasing, and despite the NPPF requiring Local Authorities to protect the Green Belt as much as possible, CCDC need to take a pro-active and sensible view to tackle this need. As the majority of your District is Green Belt or AONB, it would be impractical and unachievable for all site allocations to be delivered outside of these current designations, particularly to cover a Plan period to 2036 and a successive review. It is imperative that a robust review and release of appropriate Green Belt land is undertaken at this time with some early evidence provided on the quantity of land which might need to be released.</p> <p>Green Belt land can be developed sensitively through the implementation of high quality design and the incorporation of ecological and biodiversity mitigation strategies. This is something that SLR specialises in and is considering in the concept masterplan which is currently being prepared for the Inglewood land holding discussed above. Opening up and utilising parts of the Green Belt to improve local access will help to deliver a number of benefits to the District, and also ensure that released sites are appropriately managed and maximised to their full potential.</p>
LPIS507	Jukes, June	As a member of Friends of Cannock Chase my concern is with the environment. The protection of Cannock Chase to preserve habitats is essential the area of lowland heath is of national and international importance. Some work has already been carried out to create a heathland corridor so that species are able to move freely between habitats to avoid isolation. This fact needs to be considered when releasing land for development. While not part of the AONB, Hednesford Hills is an important habitat and recreational facility for local people and can be used to help promote outdoor walking and special interest events.
LPIS508	National Farmers Union West Midlands Region	It is disappointing that the comments made about the challenges faced by farming businesses in the Green Belt have not been included in the current draft. Policy CP14 should make a specific reference to the need for agricultural and diversified businesses to develop within the Green Belt. Agricultural business located within Green Belt have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those businesses located in other areas of the county. They may also need to diversify their businesses, perhaps by supplying local produce through farm shops or by developing a tourism offer. Other Authorities have recognised the need for new small-scale economic development in the rural economy and for farm diversification schemes. Even if the support for businesses in these areas is implied elsewhere within the document, it ought to be more stridently expressed within this section of the plan. We would like to see a can do attitude to development that recognises that farming businesses have an essential role in maintaining the high quality local landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes.
LPIS509	Natural England	We have no comments to make at this stage.
LPIS510	Staffs. County Council	Issues relating to potential sites for new development are made under Policy CP6, Q24. As stated under Q24 further evidence for decision making, could be provided through site specific Landscape Sensitivity Studies to assess potential sensitivity of development types and areas/sites where development would potentially impact on the AONB or on the setting of the AONB. Suggestions for potentially maximising wider benefits for the Green Belt outside the AONB are made in the response to Q11.
LPIS511	Taylor Wimpey (Lichfield's)	For the reasons set out in this representation, Taylor Wimpey considers that the Green Belt evidence base should be reviewed as the methodology has not been properly applied to the Wimblebury Road site. As a general comment, in identifying land for release from the Green Belt and allocation, Taylor Wimpey considers that development should be steered towards sustainable sites which are not designated for any landscape or ecological reason (and accord with other policy in terms of settlement hierarchy and distribution).

LPIS512	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>This Local Plan review needs to consider what the Council's growth requirements are for the plan period (discussed under sections Policy CP6, CP8 and CP1).</p> <p>Para 5.57 suggests that the Local Plan (Part 2) consultation suggested that it may be appropriate to scope out sites before this comprehensive assessment stage using a defined set of criteria e.g. some responses suggested all sites that lie within the AONB should be scoped out from any further consideration for development at an earlier stage in the process.</p> <p>Options for allowing the development of more edge of settlements as part of a wider strategy of allowing greater densities in more central areas would have to be considered as a reasonable alternative when considering the chosen spatial strategy as part of an objective and evidenced Sustainability Appraisal process. To screen out such options at an early stage would directly conflict with the advice within the PPG, excluding potentially reasonable alternatives that may perform well against other sustainability criteria.</p> <p>As stated within the NPPF (para. 138) 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.</p> <p>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. Such improvements could therefore arise from compensatory landscaping and ecological enhancements to sustainable locations where these can be secured and delivered.</p>
Review of CP15: Historic Environment		
Question 50. How might the existing policy be expanded to embrace the historic environment as a catalyst for positive regeneration?		
LPIS513	Brindley Heath Parish Council	<p><u>Page 54, Existing policy CP15: Historic Environment</u></p> <p>11. It is important to recognise that protection of historic assets requires a willingness to use statutory powers in respect of deteriorating buildings including the use of section 215 notices and a willingness to acquire land compulsorily.</p>
LPIS514	Canal & River Trust	<p>The Trent & Mersey Canal corridor is a designated conservation area though the canals (and associated infrastructure) within the District are themselves non-designated heritage assets in their own right. It is important for development to build on, and respond appropriately, to the historic significance of the canals whilst protecting their character and historical integrity and specific reference to the designated and non-designated status of the canal network should be included within this Policy. The canal network has the potential to offer a variety of opportunities for a historic environment focus. The canal network is a valuable reminder of the industrial heritage of the area and is a multi-functional resource which can play a wide range of roles in supporting and helping to deliver new development which can bring a variety of benefits which can enhance overall prosperity within the District. As a 200-year-old network, the canals represent a working heritage asset which can provide an attractive and positive setting for new development as well as being an important leisure and recreational resource for both visitors and the local community and can thus help to support social and economic regeneration schemes.</p>
LPIS515	Historic England	<p>It will be important to ensure that the Local Plan provides a positive and proactive strategy for conserving and enhancing heritage assets (including any contribution made by their setting) in a locally sensitive way, while making the most of the opportunities they pose and addressing the challenges they face. More information on the contribution of heritage assets to quality of life, the economy and other areas can be found on our 'Heritage Counts' webpages here: https://historicengland.org.uk/research/heritage-counts/.</p> <p>We note that the heritage policy should not be 'stand alone', and should be considered in light of the interaction with other subject areas. Page 4 of our guidance note on Local Plans (see here: https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/) poses some useful questions to help aid this thinking process. Similarly any policies relating to specific areas or sites should very carefully consider the historic environment in line with our guidance documents (see link at the top of this letter).</p>

		The references to heritage-led regeneration are welcome, and the 'Heritage Works' publication should be of use to you in developing policies around this subject: https://historicengland.org.uk/images-books/publications/heritage-works/ . The will to develop a Heritage Interpretation Strategy is also very welcome and can be closely tied with this work.
LPIS516	Rugeley Town Council	The town centre of Rugeley is covered by 4 conservation areas. There is concern that planning decisions are undermining these areas leading to an erosion of their integrity as areas with outstanding architectural features and retaining views in and around Rugeley. The conservation area plans are only of use if planning decisions cease to undermine their principals.
LPIS517	Staffs. County Council	We welcome the recognition of the Historic Environment Character Area (HECA) and the two Extensive Urban Surveys to supporting the aims of policy CP15. The incorporation of these documents into the Local Plan (Part 1) was previously strongly supported. It is noted that these documents are now nearly a decade old and it is acknowledge that a degree of review of them is advised to ensure that they continue to be relevant to the aims of the District Council in protecting and enhancing all types of heritage asset. As discussed at our last meeting the Chase through time project may need to be included. (500 new sites found)
LPIS518	Claire Walker	It is a mining area with evidence of mining dating back to medieval times with bell pits etc. These could be added to the historic points of interest for investigation. Be proud of the history.
LPIS519	Christopher Walker	It is a mining area with evidence of mining dating back to medieval times with bell pits etc. These could be added to the historic points of interest for investigation. Be proud of the history.
Question 51. What might a Heritage Interpretation Strategy for the District cover?		
LPIS520	Historic England	See Question 50
LPIS521	Lichfield and Hatherton Canals Restoration Trust	We would support the provision of Heritage Interpretation Boards at suitable locations on the projected through-route for the Hatherton Canal and mentioning the work being done and the work proposed to restore the Hatherton Canal.
LPIS522	Rugeley Town Council	See Question 50
LPIS523	Staffs. County Council	See Question 50
Question 52. Do you have any further comments on how the historic environment might help the regeneration of the District?		
LPIS524	Historic England	See Question 50
LPIS525	Brereton & Ravenhill Parish Council	<u>Page 54, Existing policy CP15</u> It is important to recognise that protection of historic assets requires a willingness to use statutory powers in respect of deteriorating buildings including the use of section 215 notices and a willingness to acquire land compulsorily
LPIS526	Rugeley Town Council	See Question 50
LPIS527	Staffs. County Council	See Question 50
Question 53. Do you have any other comments on our review of Policy CP15: Historic Environment?		
LPIS528	Brereton & Ravenhill Parish Council	<u>Page 54, paragraph 5.131</u> Any consideration of "Brereton Colliery as regeneration/leisure" opportunity should reflect its location in the Area of Outstanding Beauty and the Green Belt and, as such, should be of limited development only (e.g. a small and strictly controlled number of log cabins for tourism).
LPIS529	Historic England	See Question 50

LPIS530	Jukes, June	Historic sites should be preserved, they are part of our local heritage
LPIS531	Lichfield and Hatherton Canals Restoration Trust	We strongly support steps being taken, working with neighbouring authorities and with the Lichfield & Hatherton Canals Restoration Trust and the Canal & River Trust to ensure a protected through-route for the Hatherton Canal from a junction with the Wyrley and Essington Canal near Fishley in Walsall Council area through to the Staffordshire and Worcestershire Canal near Hatherton.
LPIS532	Rugeley Town Council	See Question 50
LPIS533	Staffs. County Council	See Question 50
Review of CP16: Climate Change & Sustainable Resource Use		
Question 54. Do you have any comments on what issues need to be addressed in terms of climate change and sustainable resource use and what policy options may need to be considered, taking account of key local issues such as air quality and mineral sterilisation?		
LPIS534	Canal & River Trust	The Trust wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as at allocated sites. As a least cost energy source, utilising the heat from the canal could help with building resilience with other low carbon technologies such as CHP (combined heat and power) plants. If an energy centre is proposed, then utilising heat pump technology could supply building such as civic, educational or health care facilities where heat load demands are high. The Policy should be amended to include reference to the potential of the canal network to contribute to low carbon technologies. In addition, the Trust also wish to highlight the potential for surface water drainage to the canal which could also be referenced in revised Policies. Any surface water discharge to the canal would require prior consent from the Canal & River Trust. Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there was no adverse impact to the biodiversity of the waterway, water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted they will usually be subject to completion of a commercial agreement.
LPIS535	Coal Authority	As you are aware Cannock Chase area has significant coal mining legacy including; approximately 201 mine entries, recorded and likely coal workings at shallow depth and surface mining activity. The area is also identified as containing Surface Coal Resource. The Coal Authority is therefore pleased to see that coal mining legacy is identified as a Key Issues within the Scoping Report. We note that Policy CP16, criterion f, of the adopted Cannock Chase Local Plan (Part 1) requires development proposals to have regard to stability issues arising from coal mining legacy and the need for site-specific safeguarding of minerals. As the national policy framework in relation to these issues has not changed we would expect to see the existing criterion (f) included in any revisions to Policy CP16 made for the new Local Plan.
LPIS536	Environment Agency	<u>Water Framework Directive</u> A large part of the Environment Agency's work now is to implement the Water Framework Directive (WFD), a European Directive which aims to protect and improve the water environment. It applies to surface waters and groundwater. Successful implementation of the Water Framework Directive will help to protect all elements of the water cycle and enhance the quality of our groundwaters, rivers, lakes, estuaries and seas. We would expect therefore for WFD to be integrated into your Local Plan, and reflected in many of the policies your draft which relate to flooding, drainage, rivers, ecology and contaminated land. The Water Framework Directive (WFD) looks at the ecological health of surface water bodies (defined as a slight variation from undisturbed natural conditions), as well as achieving traditional chemical standards. In particular it will help deal with diffuse pollution which remains a big issue after we have improved most point source discharges. The Environment Agency has published River Basin Management Plans (RBMPs) that identify measures that will achieve WFD requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(England & Wales) Regulations 2003 places a duty on each public body including local planning authorities to 'have regard to' RBMPs.

When undertaking the development of a site, or the proposed development of a site, an assessment should be made to:

- identify when there might be impacts on water bodies;
- seek options that reduce impacts on water bodies;
- assess the risk of deterioration or failing to improve water bodies;
- require all practicable mitigation;
- prevent deterioration of current water body status;
- take listed measures in RBMPs into account;
- consider alternative development options that would avoid or reduce impacts on water bodies;
- seek opportunities to improve water bodies; and
- consider objectives in RBMPs for protected areas.

We recommend the following guidance, which provides advice on how Local Authorities can fulfil their duties in implementing this directive. Please pass on to any other colleagues you feel may benefit from this (including those outside planning). A list is included within the document stating which LPA roles may have a role to play with regards to this.

http://www.sustainabilitywestmidlands.org.uk//media/resources/Final_Executive_Summary_June_2012.pdf

The RBMP relevant to your Authority boundary is the Humber River Basin Management Plan which can be found here:

<https://www.gov.uk/government/collections/river-basin-management-plans-2015>

The following issues all fall under the banner of WFD-implementation in some way and should therefore be addressed within your policies and growth proposals.

Foul Drainage

Evidence supporting your Local Plan Review should demonstrate that the necessary foul drainage infrastructure is in place or viable for your allocated sites. Some areas may drain to the foul main sewer system to be treated by Severn Trent Water, but the transmission infrastructure or treatment facility may not be sufficient to handle the additional load created from growth and may in turn cause a pollution of the water environment. Conversely, where the main sewer is not available it must be ensured that the water environment has the ability to accommodate discharges from packaged treatment plants and other non-mains solutions.

Where growth will be putting additional pressure on the Severn Trent Water foul mains, it must be demonstrated there will be no significant deterioration in current spill frequency/volume from storm related discharges (CSOs, storm tanks, pumping stations) as a result of any growth. This will require hydraulic modelling from Severn Trent Water (STWL) to demonstrate no risk of deterioration.

The Environment Agency cannot make any statement on whether there is hydraulic capacity within a sewer network to accommodate the additional flow. Only STWL can do this. We can however advise on areas of concern with regards to 'permitted' capacity. In other words, sewage works that currently have headroom in their permits and acceptance of the additional flow would not trigger a permit alteration STWL should therefore be consulted on whether they have a preference for the location of the developments. If there are various parcels of land that could be developed then they may prefer certain areas draining to certain STWs or avoiding known pinch-points within a sewer network.

At the point where we know where the growth is projected and which STWs it will drain to we can carry out a quick assessment to produce a RAG assessment of permitted capacity. A initial check of flow figures suggests that Rugeley and Cannock STWs have significant permitted flow headroom. It is our understanding these are the two STWs that serve the district council area, however

this should be clarified.

Water Availability

Evidence will also need to be provided to demonstrate that adequate water can be made available to support the level and distribution of growth proposed. As part of the Water Resources Management Plan 2019 South Staffs Water are implementing various policies to reduce demand. These should be taken into consideration for any development in the area, especially the Building Regulations &c. (Amendment) Regulations 2015. We therefore recommend that any development considers water resource availability and implements water efficiency measures.

Drought and non-drought events can put customer water supply at risk, these challenges combined with increased levels of development in the area should be considered as part of the whole in the assessment of whether a sustainable supply of water is available to support the plan.

River Channels

Green/blue corridors provide multiple benefits to residential areas by providing services such as flood management provision, green space and ecological function and some amenity. Consequently they then need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.

Deculverting of watercourses should be a standard policy primarily because it reduces flood risk and creates new ecological habitat. This will also allow more space to be freed up by for development because new development over culverts is not allowed and reduce future management implications of the culvert in the long-term. The new watercourse can be diverted to increase total length around the edge of developments which can provide extra flood event capacity and improve development layout.

If greenspaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential. These can also be incorporated into the surface water management of the site.

The Saredon Brook is classified as a Heavily Modified Waterbody and is failing to reach Good Ecological Status due to water quality issues from a range of urban sources so any opportunities to improve the water quality should be implemented. The de-culverting of watercourses is a major objective under WFD in order to reduce artificial modifications.

Groundwater Protection

Please note these comments relate solely to the protection of 'Controlled Waters'.

Reference to the 1:50,000 scale geological map indicates that the area is covered partly by the bedrock of the Kidderminster Sandstone Formation, which is designated a 'Principle Aquifer' by the Environment Agency, and partly by the Pennine Middle Coal Measure Formation, designated as a Secondary A Aquifer. Some areas of superficial deposits are also indicated, in the form of River Terrace deposits. These deposits are likely to be associated with the River Trent, which flows through part of the area designated by the Local Plan. Other areas of Glacial Till superficial deposits are also designated for part of the Local Plan. Several Source Protection Zones are identified in the area covered by the Local Plan. These are designated for public water supply boreholes for South Staffordshire Water.

Reference to Environment Agency databases indicate that several historic landfills are located within the area identified in the neighbourhood plan. We recommend that you contact the Local Authority, as lead regulator for these sites, for further information.

There is potential for contamination to be present which may currently be impacting 'Controlled Waters' receptors of groundwater in the underlying Principal Aquifer and Source Protection Zones. Furthermore there is potential for re-mobilisation of any contaminants during site development.

Should any sites identified for future development currently or formerly have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then the plan should be able to demonstrate that risks associated with this can be managed through the planning process. Planning applications must be supported by a Preliminary Risk Assessment to demonstrate that the risks posed to 'Controlled Waters' by any contamination are understood by the applicant and can be safely managed.

Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that 'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'.

The plan proposals should be in line with the position statements in our 'Groundwater Protection: Principles and Practice' (GP3) document, available from our website at www.environment-agency.gov.uk. This document sets out our position on a wide range of activities and developments, including:

- Storage of pollutants and hazardous substances
- Solid waste management
- Discharge of liquid effluents into the ground (including site drainage)
- Management of groundwater resources
- Land contamination
- Ground source heat pumps

It should be noted that certain high risk activities (e.g. underground and sub-water table storage of fuel) may not be appropriate within high risk areas such as Source Protection Zones.

Flood Risk

Flood risk is a key local issue as well as a cross-boundary issue and as such should be addressed by the inclusion of a specific flood risk policy to cover all sources of flooding, in addition to an up to date Level 1 Strategic Flood Risk Assessment (SFRA) and Level 2 SFRA where sites are allocated within the mapped floodplain to demonstrate that the site proposals can be delivered safely. Site allocations at risk of flooding should be supported by evidence to demonstrate that the Sequential Test and Exception Test have been passed. We recommend that funds are set aside at this early stage to commission consultants to undertake a detailed Level 2 SFRA if necessary.

Your Authority area covers the headwaters of both the Ridings Brook and Rising Brook and as such it is important that any new development does not increase or exacerbate flood risk downstream both within your Authority area or in other council areas. Other main rivers within the area include Wash Brook, Wyrley Brook (southern boundary) and the River Trent (northern boundary). Parts of Cannock and Rugeley are covered by the Environment Agency's flood warning service.

Surface Water

The CCDC area has historically experienced a high number of flooding incidents caused by surface water. In June 2016 areas around Cannock were affected by flash flooding from intense rainfall and thunderstorms which impacted on homes, businesses and roads. Improvements in surface water management is required over much of the area. Staffordshire County Council, as Lead Local Flood Authority, should be consulted regarding surface water issues and suitable measures to deal with surface water arising from development proposals required to minimise the impact to and from new development. Staffordshire County Council has also published a SuDS Handbook which includes their requirements for managing surface water on new developments:

<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx>

Flood Defences

There are Environment Agency maintained defences in Cannock which include Mill Green balancing reservoir and dam as well as flood walls and embankments and a flood relief channel and culvert under the A5. These reduce flood risk to around 240 homes and businesses whilst protecting key habitats and providing an enhanced recreational facility in the area.

In Rugeley, the Environment Agency has recently completed a £5.2 million flood alleviation scheme which reduces the risk of flooding to more than 270 properties in the town, and crucially takes the town centre out of the functional floodplain, allowing redevelopment. It includes a flood storage area on Hagley playing fields which will store water from Rising Brook during times of heavy rainfall and then slowly release it back into the brook when levels no longer pose a flood risk. New flood mapping to reflect this should be available in Autumn 2018.

In order to ensure that the appropriate level of protection these defences provide is maintained in future, we need to ensure we can safely access these areas in order to inspect and carry out works. It is therefore important that any proposed development is set back at least 8 metres from any flood defence for this purpose. Consideration should be given to using CIL charging to contribute towards the costs of maintaining these defences for any new development that will benefit from the presence of the defences. It should be noted that even in defended areas there will always still be a degree of residual risk if these defences are overtopped or breached by a flood event greater than that for which the defences were designed. For this reason proposed development in areas benefitting from the presence of the defences will be required to incorporate raised floor levels.

Investment programme

There is a proposed scheme in our investment programme to carry out a capital maintenance scheme on the culverted section of the Rising Brook through Rugeley town centre. This culvert requires works to improve its condition due to structural defects and siltation. Work is currently planned to commence in 2025/26.

There are currently no other schemes in this area identified in our investment programme. However, other flooding problems may arise in future which will require flood alleviation measures subject to technical, economic and environmental viability. Consideration should be given to using CIL charging to secure funding for flood risk schemes that are unlikely to be wholly funded through central or local government.

Strategic Flood Risk Assessment

A SFRA (Level 1) was originally produced in 2008 by CCDC and a Level 2 SFRA was produced for Rugeley Town Centre in 2009. The original SFRA was subsequently updated in 2014 to take into account new model data. We have not undertaken any new modelling since then apart from some associated with the design of the now completed Rugeley flood alleviation scheme. However, the current SFRA (2014) does not take account of the revised climate change guidance issued in 2016 as it has used an increase of 20% in peak flows to determine future flood risk. Given the strategic nature of Level 1 SFRAs, we would now expect LPAs to consider as a minimum, the potential impacts from climate change under the central (20%), higher central (30%) and upper end (50%) allowances for the 2080s epoch to be included as part of the evidence base for the revised plan.

In addition, other relevant documents published since 2014 such as the Staffordshire Local Flood Risk Management Strategy 2015, Staffordshire SuDS Handbook 2017 and the Humber Flood Risk Management Plan 2016 [Sub Area 'Staffordshire Trent Valley'] should be taken into consideration as part of any SFRA review.

The SFRA (Level 1) should be used to apply the Sequential Test and assess all proposed site allocations to determine whether they are located outside of flood risk areas from all sources of flooding without the application of the Exception Test. It should include the definition of Flood Zone 3b to establish areas where water needs to flood or be stored in times of flood. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. If an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often. Appropriate policies should be included in the plan to ensure these areas are safeguarded for this purpose.

If the Level 1 SFRA shows that land outside flood risk areas cannot accommodate all the required development, a Level 2 SFRA will be required in order to provide the information necessary for application of the Exception Test for those sites. This should include an assessment of the extent, duration, velocity, depth and rate of onset of flooding, as well as identification of affected properties, infrastructure and communities. It should also assess the risk of flood defences failing, for example could defences be breached or overtopped. The likelihood of flood defences failing will change over time, for example because of limitations on maintenance funding and/or degradation. You should also consider what would happen if the flood defences failed. We therefore advise that the SFRA (Level 1) should be updated to incorporate the latest climate change guidance as well as any other relevant issues and be used to apply the Sequential Test for proposed site allocations. It should also identify any cross-boundary flood risk.

A SFRA (Level 2) will need to be produced to support application of the Exception Test where required, and demonstrate deliverability of the plan proposals.

The conclusions of the SFRA Levels 1 and 2 should be reflected in the revised local plan.

The current SFRA (2014) advises that a policy for flood risk management is essential in order to ensure a consistent approach and ensure that the objectives of national policy are embedded within the local plan. It also includes a number of policy recommendations for integration into the Local Plan.

We recommended that the revised plan includes a specific policy on flood risk. Appendix 1 provides further details on this issues this should look to address.

Regulated Sites

The general issue of safeguarding regulated activity (such as AD plants, landfill, composting and other waste processing facilities) from proposed new sensitive receptors using a buffer zone is becoming an increasing concern. Issues can involve both housing development increasingly close to an operating waste facility, with inevitable complaints over amenity, with pressure on the Environment Agency (as the regulatory body) to act. This can result in pressure to demand that a facility closes and relocates, however a facility may be providing local or even national waste management capacity, identified in adopted waste plans.

‘Safeguarding’ can also refer specifically to providing for appropriate future expansion of existing infrastructure, by preventing conflicting developments. We are seeing increasing pressure on waste facilities especially in urban areas, largely due to housing developments which result in an increase in complaints to ourselves as the regulator of those facilities. Changes to planning system now allow commercial properties to be converted to residential use, such as offices on industrial estates.

It should be made clear that the Environmental Permitting Regulation does not demand ‘zero impact’, so conflict situations become inevitable.

		<p>The updated NPPF now makes reference to placing obligations onto the “Agent of Change” (i.e. the developers/applicants,) requiring them to ensure appropriate mitigations are put in place to protect neighbouring users from impacts:</p> <ul style="list-style-type: none"> • 182. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed. <p>As such, the Local Plan should look to identify issues where this may be an issue and consider carefully the allocation of sites which are located within close proximity to permitted waste facilities. Failure to do so can result in unacceptable levels of noise, odour, vibration, dust, smoke, flies, etc. Your local plan policies should identify these high risk facilities, steer development away from such areas and ensure that if development is proposed in close proximity it is such that it is not of a ‘sensitive’ nature to such nuisances. Close liaison with the waste planning authority and the Environment Agency should be maintained to ensure the plan reflects joined-up working.</p>
LPIS537	Lichfield and Hatherton Canals Restoration Trust	<p>We feel that the restoration of the Hatherton Canal could offer useful opportunities for flood risk mitigation. We note that the lead flood risk authority for the area is Staffordshire County Council but we are not aware that they have any work in progress yet to investigate what opportunities exist in this direction. We would be pleased to work with them on this.</p>
LPIS538	National Farmers Union West Midlands Region	<p>Large new developments in urban areas have the potential to cause downstream impacts, even when new SUDs techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the area’s watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.</p> <p>The proposals for growth outlined in the document will lead to large new housing and employment developments in the urban area but despite the reference to the importance of flooding, scant information is provided on the downstream impacts.</p> <p>The document does not include details of the SUDS (Sustainable Urban Drainage) requirements that would apply to new development or how surface water runoff could be captured and managed to reduce flood risk. Therefore the document needs to investigate the wider impacts of water management to ensure that drainage capacity is available to cope with the new demands placed on the county’s natural infrastructure.</p> <p>The paper does not examine the additional demands that will be placed upon water abstraction or sewerage treatment capacity in the area. Again these are areas that may impact upon adjacent farm businesses and we would welcome more information on how potential impacts will be mitigated.</p>
LPIS539	Natural England	<p>Q54 & Q55 - Green and blue infrastructure are characterised by their multi-functional and cross-cutting nature. We anticipate that our dialogue with the Council on this fundamental theme will allow further discussion and the identification of the interaction between these assets and the role they have in mitigating and promoting adaptation to the effects of climate change. We will seek to identify suitable reference material as part of our dialogue.</p>
LPIS540	Severn Trent Water Ltd	<p>Thank you for the opportunity to comment on your consultation. We currently have no specific comments to make, but please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.</p>

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

		<p><u>Water Efficiency</u></p> <p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres or less. • Water butts for external use in properties with gardens. <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website</p> <p>https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day. We hope this information has been useful to you and we look forward in hearing from you in the near future.</p>
LPIS541	Staffs. County Council	<p>This is an early stage consultation, and in general, the new Plan seems to be evolving in a way which should not cause any difficulties for the Minerals and Waste Planning Authority. However, as the pressure grows to find more land for development, we can expect an accompanying increase in demand for minerals to build more houses, factories and roads, and more demand for facilities to manage the waste that they will inevitably produce. The potential for conflict between land uses will increase, but it should still be possible to find satisfactory solutions. Cannock Chase Council will need to remember that the Minerals Local Plan for Staffordshire and the Staffordshire and Stoke-on-Trent Joint Waste Local Plan form part of their Development Plan, and it is important that the emerging new Local Plan is in conformity with those plans. Effective safeguarding of both mineral and waste site will be particularly important.</p>
LPIS542	Claire Walker	<p>With the expected influx of 3000 visitors due to Mill Green it is important to keep all green spaces in order to preserve air quality for those residents actually living in this area.</p>
LPIS543	Christopher Walker	<p>With the expected influx of 3000 visitors due to Mill Green it is important to keep all green spaces in order to preserve air quality for those residents actually living in this area.</p>
Question 55. Do you have any comments on the evidence base updates required, including any site specific information that may be required?		
LPIS544	Natural England	See question 54
LPIS545	Severn Trent Water Ltd	See question 54
LPIS546	Staffs. County Council	<p>The Evidence base updates are broadly acceptable. We welcome the reference to Minerals Safeguarding, but safeguarding essential waste infrastructure and sites is also important and should be included.</p>

Question 56. Do you have any comments on what, if any, sustainable construction standards should be considered within future policy options?		
LPIS547	Staffs. County Council	As mentioned previously SuDS could feature here and the LLFA SuDS handbook.
Questions on other issues which need to be covered and the scope of the new plan		
Question 57. Have we missed anything else not covered via our policy review which should be in the new Local Plan? What have we missed, and can you supply further details or evidence to help us with this?		
LPIS548	Canal & River Trust	Consider a separate canal-specific policy (see previous comments)
LPIS549	Lichfield District Council	Lichfield District Council would welcome further engagement on revisions of the Rugeley Power Station SPD (where necessary) and further updates through co-operation.
LPIS550	Natural England	<p><u>Soils</u></p> <p>The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 112 to safeguard 'best and most versatile' agricultural land.</p> <p>See our response to Question 29 for information on evidence.</p>
LPIS551	Norton Canes Parish Council	The Parish Council have noticed in the Green Belt review that there are several plots of land being pushed that lie close to the Cannock Extension Canal SAC. We feel there should be a specific chapter in the local plan dedicated to protecting and enhancing this designated area along the same lines as Cannock Chase SAC.
LPIS552	Staffs. County Council	We have nothing further to add at this stage and we look forward to continuing to work closely with you as the Plan progresses. Should any additional issues arise following the preparation of revised/new evidence we can address them in cooperation.
LPIS553	Staffs. Fire & Rescue	<p>On behalf of Staffordshire Fire and Rescue Service I would like to acknowledge receipt of the Cannock Chase District Local Plan Review and associated documents. The Service supports the documents in principle and would welcome the opportunity to continue to work with the District Council in the planning process across the locality.</p> <p>We would request that the requirement for sprinklers in domestic, commercial and public buildings be considered as part any planning process within the district.</p>
Question 58. Overall, what are the key strategic issues which should be specifically addressed by strategic local plan policies?		
LPIS554	Inglewood Investments (SLR Consulting)	<p>To summarise, the key strategic issues that the new Local Plan needs to address, are as follows:</p> <ul style="list-style-type: none"> • Housing availability, delivery and housing choice; • Safeguarding land for future plan periods; • Releasing suitable, less sensitive Green Belt land through a full Green Belt review consultation exercise; • Identify sites which will help tackle cross-boundary issues; and • Ensuring a range of high quality and visually attractive development is delivered, which promotes sustainable, healthy and safe communities.
LPIS555	Natural England	Natural England advises that the Plan's vision and emerging development strategy should address impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. In accordance with NPPF 170d and 174b, the plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity

		considering opportunities for enhancement and improving connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Nature Improvement Area, Local Nature Partnership, Area of Outstanding Natural Beauty Management Plan, Rights of Way Improvement Plan and Green Infrastructure Strategies.
LPIS556	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	As set out within this Representation, a key strategic issue which must be addressed is un-met housing need arising from within the GBHMA. The Local Plan should address this issue in full throughout the plan period, through the Duty-to-Cooperate. It is submitted that the un-met need can only be met through the release of Green Belt land for housing.
LPIS557	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	As set out within this Representation, a key strategic issue which must be addressed is un-met housing need arising from within the GBHMA. The Local Plan should address this issue in full throughout the plan period, through the Duty-to-Cooperate. It is submitted that the un-met need can only be met through the release of Green Belt land for housing.
Question 59. Are there any issues which you think could be better dealt with by supporting documents instead? If so, what are these and can you explain why they would		
LPIS558	Natural England	No.
Question 60. Finally – do you have any other comments which cannot be addressed elsewhere?		
LPIS559	Brereton & Ravenhill Parish Council	Page 101, 2nd indent BRPC welcomes the aspiration to see progress towards enhancement of the district’s Conservation Areas in Brereton and elsewhere and to safeguard of other heritage assets across the District. This will need a willingness to use appropriate statutory powers including compulsory acquisition and section 215 notices.
LPIS560	Cannock Chase Labour Party (A. Bate)	<u>Bleak House</u> The Integrated Impact assessment used when Bleak House wasn’t allocated as a proposal in the Local Plan (which was only completed in January 2017) is identified as C264 (a,b,c,d, & e) in the document , indicates: -Significant negative effect on the sustainability appraisal for bio-diversity and geodiversity. -Significant negative effect on the sustainability appraisal for pollution. -Significant negative effect on the sustainability appraisal for previously developed land. -Significant negative effect on the sustainability appraisal for Landscape and Townscape. There have been no changes to the land in the last 16 months, so there would be no different an outcome for the Land to become suddenly suitable for development. Coal Authority reports also indicate areas of land that are “high risk” for development around the areas of land 264 (d and e) near Chetwyn Park estate, and gives locations of closed mining shafts. There are no reasons why this should be allocated as a proposal in the local plan on this occasion, simply for the fact nothing has changed. There is no benefit to taking the area out of the Greenbelt. From election canvassing, it was also clear that most residents are not in favour of any development in this area or to be taken out of the Greenbelt. The Labour party would be vocally opposed to removing this area of land from the Greenbelt and support local resident views that it should not be allocated as a proposal in the local plan.
LPIS561	Inglewood Investments (SLR Consulting)	<u>Previous Representations - Land at Springs Farm, Brereton, Rugeley</u> As you will be aware from our Site Specific Submission on behalf of Inglewood and our subsequent meeting on Thursday 26th April 2018, with Clare Eggington and Sarah Jones, in relation to the Cannock Chase Development Plan Review Part 2 Issues and Options

Consultation, Inglewood has an interest in land adjoining the southern edge of Brereton, Rugeley. In this context, Inglewood is promoting this site for residential development, with associated open space and enhancements to public access to those areas of the Green Belt which would be retained and reinforced. The previous submission demonstrates the availability, suitability and deliverability of this site. SLR is currently preparing a concept masterplan to communicate Inglewood's 'Vision' for how the site could be developed recognising Cannock Chase District Council's (CCDC) desire to see landscape and ecological assets retained and protected as an integral part of any future development.

The purpose of this representation letter is to summarise our thoughts regarding the Issues and Scope Document, with specific reference to Inglewood's proposals, where appropriate.

Scoping and Issues Document

It is evident from reviewing the Scoping and Issues Document that a number of changes have occurred and subsequent updates are required since the adoption of the Local Plan (Part 1) in 2014.

These updates particularly relate to the District's profile and objectives, housing numbers and the availability of housing land. This representation addresses the most important themes contained within the Document as they relate to our Client's interests in the District, particularly in terms of the benefits which the release of this land can secure in meeting the objectives of the emerging new Local Plan.

This letter has also addressed relevant key questions which the Issues and Scope Document poses. These questions and responses are contained within the Appendix 1. Thereafter at Appendix 2 we provide a plan of our Client's land interests for completeness. These representations will be supplemented shortly with the submission of the masterplan work which is currently being prepared following our meeting in April.

Cannock Chase District Council Local Plan Update

It is understood that Cannock Chase District Council (CCDC) are replacing the adopted Local Plan Part 1 and previously commenced Local Plan Part 2 Document with a new Local Plan. This document will set the context for delivering growth, alongside detailing;

- the spatial strategy;
- strategic and detailed planning policies to manage change;
- land allocations and safeguard land for development; and
- a monitoring framework.

The adoption target for the new Local Plan is September 2021, and this Consultation is the first step in Local Plan preparation to establish the Issues and Scope which the Plan will need to cover. We also understand that this consultation is a high-level, general consultation at this point, and that you are not looking at individual sites at this early stage in the process, although questions about sites are included in the document. A new call for sites will follow as part of your Issues and Options Consultation in February 2019.

Issues and Options Consultation 2017

Although you are now essentially starting again with a new Local Plan, we consider it important to highlight that SLR submitted a representation on behalf of Inglewood as part of your Local Plan Part 2 Issues and Options Consultation (as outlined above). This consultation ran for 8 weeks from Monday 30th January to Monday 27th March 2017. We understand that the new Local Plan will replace the previous initial work undertaken as part of the Local Plan (Part 2) consultation; however your website states that 'this work will be carried forward as part of the Local Plan Review', therefore we consider it timely to provide a brief update on our progress, highlighting our previous representations.

The previous Consultation included consideration of possible Site Allocations and Planning Standards, and we submitted a promotional document which set out the case for the allocation of 'Land at Springs Farm, Brereton, Rugeley'. Given work undertaken on behalf of our Client to date, as well as reviewing the current Issues and Scope Document, we would like to take this opportunity to continue to promote our Client's Site, and the benefits it could offer for the District, particularly given the early stage that you are at in the development plan process. Our Client is very keen to contribute positively to CCDC's plan making process through a pro-active approach, which would help to contribute to the delivery of housing land for the District.

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Land at Springs Farm, Rugeley

The Site submitted during your Local Plan (Part 2) Issues and Options Consultation was assessed against a full range of technical considerations and against a Green Belt methodology, providing an integrated and holistic approach to site consideration and delivery. The Site is located on the southern side of Rugeley, approximately 1.7 miles from Rugeley town centre, and 11.9 miles south-east of Stafford, 16 miles south-west of Wolverhampton and 6.5 miles north-west of Lichfield. Please refer to the Appendix 2 which provides a plan of the Site.

To summarise, the Site would offer the following benefits to the District:

- Delivery of accessibly located land to meet the identified future housing requirements;
- Release of Green Belt land which has already been the subject of erosion in terms of function, outside of the AONB;
- Opportunity to identify safeguarded land to avoid successive Green Belt reviews, which would run contrary to the NPPF;
- Potential to open up land for increased public access;
- Opportunity to enhance the wider setting of the adjacent AONB;
- Potential to enhance biodiversity and implement a native planting scheme to complement the new development, open space provision and ecological connectivity;
- Delivery of a site which can be readily linked into the wider existing cycle network, coupled with good bus connections;
- Increase in residents to support existing local services in the location; and
- Provide assistance to the GBHMA in delivering their housing requirements.

In addition to the promotional document, SLR's landscape and masterplanning team are currently producing a masterplan for the Site. This would support the promotional document and presents the Site and its potential opportunities in further detail, demonstrating the deliverability of the above benefits.

This work will be ancillary to this representation and will be submitted to the Council following the close of this Consultation for your consideration, in advance of the Call for Sites.

Housing Delivery in the context of the West Midlands Metropolitan Green Belt

As set out within Policy CP1 of the Local Plan Part 1 Document, 60% of land within the District is designated Green Belt land, and it is evident from the Issues and Scope Document, that CCDC may potentially include some Green Belt land in the new Plan to help accommodate the District's housing need. We are concerned however that this is not at this stage an explicit commitment given the level of housing need during this plan period and beyond. In this regard, at an early stage we consider that the CCDC should provide evidence of the level of Green Belt land release required to robustly plan for housing delivering for the next two plan periods at least.

In this context, we consider that the release of some Green Belt land will be essential around Rugeley in order to deliver balanced growth, particularly taking into account the fact that the Town is physically constrained and notwithstanding proposal for Rugeley Power Station. The eastern edge of Rugeley is constrained by the River Trent (and its floodplain), additionally proposals to the east of the town beyond the A51 and railway, (which is not Green Belt) would deliver illogical and poorly connected development in terms of settlement pattern.

Moreover, much of the available land outside of the Green Belt is already committed or developed, as a result of policies to convert such sites which have been delivering brownfield development in more appropriate proportions since the early 2000's as a result of positive policy to this end. Given this constrained position we consider that a comprehensive review of the Green Belt is required to ensure that the emerging plan is sound and that it allocates sufficient levels of land to deliver for the needs of the District and a proportion of the wider housing market area requirement. CCDC undertook an assessment of Cannock Chase's Green Belt in 2016 to assess the extent

to which various land parcels performed against the wider objectives of the Green Belt as set out within the NPPF. The Assessment considered 'Site R28' which is almost identical to our Client's Site (please refer to Appendix 2 for a comparison between Site R28's boundary and Inglewood's ownership boundary). It was concluded that Site R28 did not perform/score particularly well against the five purposes of the Green Belt, and therefore did not necessarily contribute to its wider designation. However, no land was recommended for removal from Green Belt as a result of this review.

Given that you are now at the start of the preparation of a new Plan, we consider that this is an appropriate time to review Green Belt boundaries, particularly given the new methodology for assessing housing requirements contained in the recent NPPF and the pressing needs of the wider housing market area, which continues to be under delivered. The last review of boundaries was over 20 years ago and therefore a proportionate review at this time would not be premature and would respond appropriately to current housing pressure.

In considering our Client's Site in our previous submission, SLR reviewed your 2016 Green Belt Study, and assessed this land taking account of all technical considerations. We concluded that it represents land that is both suitable and deliverable for new development. The Site is not designated for its landscape value and there were no technical constraints to its delivery for a sustainable urban extension. Furthermore, development would not result in coalescence of settlements.

We consider that there is a real opportunity to deliver development on appropriate land in the right location through the redrawing and release of some current Green Belt. This can be achieved whilst also improving adjacent retained Green Belt land through ecological, landscape and visual enhancements, and providing opportunities for public use. We conclude that further work should be undertaken on the review of the Green Belt to inform the current Plan process and to ensure that the evidence base is robust and housing/safeguarded land provision is commensurate with demand/need. Given the level of housing pressure, we consider that this is particularly important to ensure that the Plan can be responsive to any potential under delivery, for instance where brownfield land does not come forward quickly enough for unforeseen technical reasons. This is now particularly pertinent given the 'Housing Deliver Test' and the potential implications if under-delivery is established.

Housing Delivery

CCDC's current housing requirement figure is 5,300 new homes between 2006 and 2028; an average of 241 per year. As discussed in the Issues and Scope Document, the Government has changed the way housing requirements are calculated. Revisions in the form of the 'Standard Housing Methodology' and the introduction of the 'Housing Delivery Test' will require Local Authorities to ensure they have sufficient land supply throughout their plan period, and should also be encouraging Authorities to secure a sensible amount of land for safeguarding. Consequently CCDC's housing requirement figure will need to be revised in line with this approach; with the likelihood that housing requirement will increase.

In addition, the Greater Birmingham Housing Market Area Strategic Growth Study (GBHMA), which combines fourteen local authority areas, including Cannock Chase District, has identified a significant housing shortfall of 28,150 dwellings to 2031, and 60,900 to 2036. It is recognised that this requirement will need to be distributed around the authority areas and therefore it is likely that some difficult decisions will need to be made in all administrative areas. Taking a proactive approach to this process and releasing the least sensitive parts of Green Belt for development should negate the need for a more 'top down' approach later if this shortfall is not addressed.

In order to increase delivery, the GBHMA has suggested that authorities consider and apply the following minimum density rates:

- Rural areas: 30 dwellings per hectare;
- Suburban locations: 40 dwellings per hectare;
- Town and District Centres: 50 dwellings per hectare.

		<p>This will help to increase delivery. However the GBHMA recognises that Green Belt release is unavoidable. Therefore with the majority of the Cannock District being constrained by Green Belt and AONB designations, CCDC will benefit from taking a pro-active approach.</p> <p>With the introduction of the 'Housing Delivery Test' and 'Standard Methodology' the Government has sent a clear message that under-delivery will not be acceptable. Therefore, identifying a range of suitable sites across the District is a key priority going forward, which we consider the Issues and Scope Document recognises in principle. However, the emerging Plan needs to be explicit about the requirement for a comprehensive Green Belt Review; and particularly the need for this in order to avoid 'unchecked speculative development' if housing targets are not met later in the Plan period.</p> <p>We consider that our Client's land interest provides an opportunity to deliver some of this requirement. To illustrate the level of housing which this might sensibly deliver, Site R28, which as described earlier is comparable with our Client's Site, is approximately 13 hectares, and therefore has the potential to deliver over 520 houses (based on GBHMA recommended density for a suburban location). This potential housing site could also deliver other benefits including, for example, the integration of appropriate open space and green infrastructure corridors, as well as ensuring a scheme for ecological enhancements and a biodiversity net gain.</p> <p>In summary, it is evident that you are at an early stage in the plan making process. Therefore there is an opportunity to address key issues and priorities for the District early in order to ensure that the Plan has the best opportunity to be found 'sound'.</p> <p>Given the 'Housing Delivery Test' and its implications if under-delivery occurs; coupled with the new 'Standard Methodology'; and the housing pressure from the wider HMA, the evidence base and strategy for housing delivery will be under particular scrutiny as the Plan goes through its various consultation stages and is considered at Examination. This Issues and Scoping stage is therefore welcomed as an opportunity to ensure that these issues can be fully considered and robustly provided for and we trust our comments above and responses to questions are helpful.</p>
LPIS562	National Grid	<p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p><u>Further Advice</u></p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>
LPIS563	Natural England	<p><u>Green Infrastructure (GI)</u></p> <p>The current Local Plan includes green infrastructure under Biodiversity and Geodiversity, the LPA may want to consider creating a separate policy for GI, in which we would encourage the LPA to include policy points that show the council expects GI to be central to the planning process right from the beginning. GI policy points should ideally be reiterated throughout all sections of the planning document, not just isolated in the GI policy. This shows that the LPA wants to see GI considered in all aspects of development.</p> <p>The following points should be considered to be included in such a policy:</p> <ul style="list-style-type: none"> • Requirements on what development proposals must include, while allowing for flexibility and innovation in implementation.

		<p>Some examples include; a site % of GI and what ecosystem services that GI should provide and a recommended level of tree canopy cover in an urban space. Specifically excluding private gardens is a good strategy, although we recognise that they can provide some GI benefits.</p> <ul style="list-style-type: none"> • Requiring the on-going management and maintenance of GI assets in perpetuity (or a suitably long time). • Including a funding mechanism. For example, use of planning obligations (S106), Community Infrastructure Levy or, Infrastructure Delivery Plans or Reference to inclusion of GI in lower tier plans e.g. Area Action Plans / supplementary guidance. • Including a mechanism for securing GI (e.g. planning obligations) and protecting it from future development (e.g. conservation covenant agreement, LNR declaration, Fields in Trust designation, green space designation in neighbourhood plans or Town and Village Green registration . • Including the requirement for monitoring and evaluation of new GI especially in the case of habitat creation. Ensuring GI is a benefit not only to people and nature but also the local economy where possible.
LPIS564	Norton Canes Parish Council	<p>The Parish Council would like to see measures to avoid developers ‘landbanking’ to prevent delays in building once planning permission has been granted. We would suggest that when outline and full planning permission is granted that there should be a deadline date of 2 /3years before submitting a final application or commencement of the development. This would avoid assessments provided by statutory organisations being out of date at the time of building.</p> <p>Better communication processes regarding planning applications should be addressed. We need to increase the physical threshold to which the District Council uses to notify nearby residents as to planning applications. This should include both signages on lampposts and direct mail to residents.</p> <p>We would encourage a wider communication with residents who will be affected by any development whether it be a large or small development.</p> <p>We question what processes the District Council have to ensure that they receive feedback from statutory organisations about what they are spending their allocation of funding on re infrastructure. We would also ask that these statutory organisations engage at a local level, i.e. Headteachers, GP’s, County Council Highways regarding their responses re planning applications. This information needs to be communicated to Parish Councils.</p> <p>It is suggested that a better planning portal is developed as we do not now receive paper copies of any planning applications which does not assist us any decision making. The current planning portal is extremely difficult to navigate. Each document within it is not sufficiently labelled to enable to make informed decisions.</p>
LPIS565	Preece, Cllr. J	<p>I would also like to concur with the points raised by Norton Canes Parish Council, especially regarding how the planning process, council notification and consultation policies should be amended to increase awareness of new application that have gone in.</p> <p>I also believe that this review should also be used in conjunction with an upgrade to the planning portal, which I believe to be a confusing, clumsy and difficult to navigate system.</p>
LPIS566	Claire Walker	<p>We should not use Green belt or AONB green spaces for building of houses or industrial use they should be left as nature intended for the health of current and future generations.</p>
LPIS567	Christopher Walker	<p>We should not use Green belt or AONB green spaces for building of houses or industrial use they should be left as nature intended for the health of current and future generations.</p>