

<b>Report of:</b>	<b>Head of Economic Development</b>
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<b>Portfolio Leader:</b>	<b>Economic Development and Planning</b>
<b>Key Decision:</b>	<b>Yes</b>
<b>Report Track:</b>	<b>Cabinet: 24/08/17</b>

## CABINET

24 AUGUST 2017

### LOCAL PLAN PART 2 AND CANNOCK TOWN CENTRE AREA ACTION PLAN ISSUES AND OPTIONS CONSULTATION FEEDBACK AND NEXT STEPS

#### 1 Purpose of Report

- 1.1 To provide feedback on the Cannock Chase Local Plan Part 2 and Cannock Town Centre Area Action Plan Issues and Options consultation exercise and to set out the next steps in line with the requirements set out in the Statement of Community Involvement for taking these plans forward.

#### 2 Recommendations

That:

- 2.1 Cabinet notes the feedback on the Cannock Chase Local Plan Part 2 Issues and Options consultation (**Appendix A**); the Cannock Town Centre Area Action Plan Issues and Options consultation (**Appendix B**); and the summary of the different consultation methods utilised (**Appendix C**).
- 2.2 Cabinet endorses the Officer feedback on the responses to the issues raised.
- 2.3 Cabinet notes the next steps as set out in section 5.14 of the report for taking the documents forward.

#### 3 Key Issues and Reasons for Recommendation

- 3.1 Local Plan Part 2 (LPP2) and the Cannock Town Centre Area Action Plan (the AAP) follow on from Local Plan Part 1 which was adopted by the Council in 2014. Part 1 sets out the strategic context for the scale and distribution of development, balanced with environmental protection and enhancement.

- 3.2 The role of LPP2 and the AAP is to deliver Part 1. LPP2 needs to allocate sites to deliver the required amount of development in the right locations, and where necessary can also provide further policy elaboration provided that it links directly back to Part 1 and can be clearly justified by robust evidence. The AAP provides a similar role but is focused specifically upon ensuring the vitality of Cannock Town Centre.
- 3.3 Issues and Options is the first stage in plan preparation. It sets out the issues which the plan needs to address and a range of possible options for dealing with these, inviting comment and further information. The document (along with the accompanying Sustainability Appraisal) has to be publically consulted upon for six weeks and representations made will then be used in shaping the next iteration of the Plan before it is submitted to the Secretary of State for examination. The consultation has to be undertaken in line with the Council's Statement of Community Involvement which was adopted in 2014.
- 3.4 Both plans and accompanying documentation were consulted on between 30th January and 27th March 2017. This report contains a summary of the different issues which were raised by respondents, categorising them by theme and providing a response as to how the issues will be dealt with. The summary reports are contained at Appendix A (in relation to LPP2) and Appendix B (in relation to the AAP). More detailed summary reports (which provide a summary of each respondent's comments) can be found online at [www.cannockchasedc.gov.uk/planningpolicy](http://www.cannockchasedc.gov.uk/planningpolicy). This report also contains a summary of the different consultation methods utilised (Appendix C). This information will be collated into a report to be published on the Council's website in line with the requirements of the SCI.

<b>4 Relationship to Corporate Priorities</b>
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- 4.1 The Local Plan (which includes LPP2 and the AAP) supports the Council's Corporate Priorities as follows:
- (i) **Better Jobs and Skills:** economic growth is at the heart of the national planning agenda. Local Plan Part 2 will allocate sites for employment uses, expanding on the policies established through Local Plan Part 1. The AAP is focused upon ensuring the economic vitality of Cannock Town Centre.
  - (ii) **More and better housing:** progression of LPP2 and the AAP will enable sites to be allocated in sustainable locations to ensure that housing delivery meets our local targets and ensures local needs are met.
  - (iii) **Cleaner and safer environments:** environmental protection and enhancement, including crime reduction through safer design is a key aim of the Local Plan.
  - (iv) **Better health outcomes:** the Local Plan seeks to allocate sites in the most sustainable locations which will encourage people to walk and cycle and have access to a range of services and facilities (including open space,

employment and good quality housing which meets their needs) which will contribute both to physical and mental wellbeing.

## **5 Report Detail**

### **Legal issues and context**

- 5.1 The Planning and Compulsory Purchase Act 2004 (as amended) remains the basis of the forward planning system and was modified by the Localism Act 2011. This includes the need to comply with the Duty to Co-operate, and Councils need to work together constructively, actively and on an ongoing basis in fulfilment of this Duty when preparing their plans.
- 5.2 Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out that, at the outset of Local Plan preparation, a Local Planning authority must consult on the subject of a Local Plan and seek representations on what the Plan should therefore contain in relation to that subject. The Issues and Options documents were prepared in fulfilment of this regulation.
- 5.3 Section 19(5) of The Planning and Compulsory Purchase Act 2004 (as amended) requires that a Sustainability Appraisal is undertaken of the proposals and the Environmental Assessment of Plans and Programmes Regulations 2004( as amended) requires that the resulting Environmental Report is made available for the purposes of consultation. The Sustainability Appraisal assesses policy and site allocation options against a series of objectives related to economic, social and environmental issues. The results of the assessment provide a steer on the most sustainable options to take forward in the next stage of the plan. The SA for LPP2 also incorporates an Equalities Impact Assessment and Health Impact Assessment.
- 5.4 Section 19(3) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that regard must be had to the Statement of Community Involvement (SCI): for this Council this was adopted by Cabinet on 20<sup>th</sup> March 2014 and sets out the consultation requirements for each type of plan and the stage it has reached. Once the consultation has ended, the SCI requires that a report is produced summarising the consultation methods, representations made and Council responses and is to be published on the council's website before proceeding to the next stage of the Plan. This report will compile the information contained in the main body of this Cabinet report together with the information in Appendices A, B and C alongside the more detailed report of all responses to be found online via the link in paragraph 3.3.

### **Consultation**

- 5.5 Consultation on both documents was undertaken between 30<sup>th</sup> January and 27<sup>th</sup> March 2017. Whilst the statutory requirement is to consult for six weeks it was felt that given the complexity of the documents being consulted on an eight week consultation period would be preferable as this would give the community more time to respond.

- 5.6 Hard copies of the consultation documents and supporting literature (eg a non technical summary, Frequently Asked Questions) were placed in the venues specified in the SCI. Publicity for the consultation (and events) was via the Planning Policy team's website and consultation database which contains over 1000 entries (email and letter), via advertisement in the press, via press releases and social media. Officers were also proactive in contacting stakeholders, Parish Councils and community groups and gave presentations at a number of events as a result. A series of drop in events were held around the district, with exhibition materials and documents on display and officers available to answer any queries.
- 5.7 The drop-in consultation events were held in local libraries as these were felt to be easily accessible and could pick up additional passing footfall. They were, where possible, timed to coincide with other events such as market days to encourage more people to visit: a specific event on the AAP was also held in the unit by the market hall in Cannock where the consultants producing the AAP (White Young Green - WYG) were available to answer any questions. The timing of the drop in sessions was varied to suit people at different times of day for example some were in the mornings, some in the late afternoon / early evenings, making the most of library later opening hours. All events contained the same materials and it was made clear that people could attend any session, whichever venue / time was most convenient. The events were well attended (see Appendix C) and officers from other parts of the council had to be drafted in at short notice to assist to ensure that the events were adequately staffed and that officers had sufficient capacity to deal with questions people were raising.
- 5.8 Notwithstanding the good response to the consultation and attendance at events, there was some criticism which will be considered and, where possible, addressed (where resources and team capacity allow) moving forward. In the case of the drop in sessions, it was clear that larger meeting rooms / drop in space is needed as the sessions became rather crowded on occasions. In terms of timings, a number of people commented that the sessions ended too early and did not cater for commuters. Some of the sessions did end at 6.30 (to allow for the 7pm library later closing hours) but this could be looked at in future. Whilst previous experience has shown such events to be poorly attended this should not necessarily always be assumed to be the case. Others suggested that the Council could have run drop in sessions in supermarkets, and at weekends. Again this has been tried in the past and generally has attracted little interest but could be considered again subject to the resources and capacity of the team which is greatly reduced in size since consultation on Local Plan Part 1 was undertaken.
- 5.9 Focusing primarily on the libraries for such events was successful overall (subject to the comments above) but it became clear in the event of Cannock Wood that – due to the amount of options being put forward in the area (by landowners / agents) - it would be helpful to hold a bespoke session in the community. Officers therefore engaged with the Parish Council who agreed it would be helpful to give a presentation to the community at their meeting so this was added in to the programme and was well attended (estimated over 130 attendees).

- 5.10 Communication was the other key area which attracted criticism. The main issue was the use of the Chronicle, as, despite this being the paper with most extensive coverage it was clear that this does not reach certain parts of the district and delivery cannot be guaranteed. Some people commented that letters should go out to every household and could be incorporated into other Council literature. This is not always practical and likely to be extremely costly at a time when resources are so thinly stretched but will be investigated further. Some comments were made that posters should have been placed in community centres and supermarkets. Others commented that they had only heard by word of mouth including others' sharing on social media. However, the social media campaign via Facebook and Twitter was shown to be very effective for example the 'reach' via Facebook and Twitter was over 90,000 people. Over 4000 visits were made to the relevant web pages throughout the consultation period. Notwithstanding this however, officers will continue to seek to improve methods of consultation taking into account comments made, and indeed made adaptations in response to comments as the process was underway (such as adding links to different areas of the website etc.).
- 5.11 A summary of the consultation methods can be seen at Appendix C.
- 5.12 The consultation yielded around 500 formal responses (returned comments forms, letters, emails) from the community and various organisations in relation to LPP2, representing a range of interests. This is the highest level of response to any planning policy consultation in Cannock Chase district under the current planning system. The responses are then 'split' depending on the issue or issues being commented on, into a series of individual 'representations'. The responses are summarised (by theme) in Appendix A which also contains comment in terms of how the issues will be addressed. A much lower response rate was received to the AAP however (19 responses), which reflects the more restricted and specialised nature of that document, see Appendix B. More detailed summaries, with comments made by each organisation / individual can be viewed online at [www.cannockchasedc.gov.uk/planningpolicy](http://www.cannockchasedc.gov.uk/planningpolicy)
- 5.13 Overall, the largest volume of comment was in relation to objections to particular sites, primarily those options which lay in the Green Belt and / or the AONB. Others raised concerns with aspects of the evidence base which will need to be considered in terms of whether further evidence is required. Another area which generated a lot of response was the issue over the housing shortfall in the Greater Birmingham Housing Market Area and whether or not it could be dealt with via LPP2 or whether it should be considered via a Local Plan review. Similarly the issue over Safeguarding land attracted a lot of comment with varying views on the most appropriate way of dealing with the matter. These are all issues (alongside others raised) which will need to be considered moving forward.

### **Next Steps**

- 5.14 In terms of the next steps, for LPP2 officers will need to consider what further evidence is required for this stage of the plan, based on the issues raised (see Appendices 1 and 2 and the list of comments on the website for more detail on this). This work is underway and discussions are being had with the relevant

parties where applicable. The comments submitted by all respondents will be taken into account in assessing the options to be taken forward for allocation as well as informing any further policy elaboration. This work will need to be done before the Proposed Submission document can be produced for consultation (anticipated to be reported to Cabinet later in 2017). Following this the plan will be submitted for examination in 2018. A similar process will need to be undertaken for the AAP and officers will be working with consultants WYG to produce the next iteration of the plan (the Preferred Options plan).

- 5.15 The timetable for production of these documents has slipped from that in the current published Local Development Scheme (LDS) (published in 2016) due to the team having not been at full capacity for 18 months. This will be updated early Autumn and a new LDS produced for Cabinet / Council approval.

## **6 Implications**

### **6.1 Financial**

Any costs associated with the Local Plan will need to be contained within existing approved budgets. The budget for 2017-18 includes specific provision of £100,000 per annum to fund external professional and technical support in respect of the Local Plan

There are no further direct financial implications for the Council as a result of this report; however a number of elements within the report do have a financial impact on the Council for example the housing requirement for the District during the plan period will affect the level of New Homes Bonus receivable by the Council.

These elements will form the basis of future Capital and Revenue reports which will be submitted for Members' consideration and will include detailed financial implications as and when required.

### **6.2 Legal**

Legal matters are set out through the report.

### **6.3 Human Resources**

None.

### **6.4 Section 17 (Crime Prevention)**

None.

### **6.5 Human Rights Act**

The extensive consultation procedures provided for by the Planning & Compulsory Purchase Act 2004 cover human rights matters in terms of the Development Plan.

## 6.6 Data Protection

Evidence which informs the development of the Local Plan can only be used as such if it is in the public domain. Representations on the Local Plan are required to be made public and attributed to the individual or body making them and anonymous representations cannot be accepted. Personal details held on the consultation database for the purposes of information sharing are confidential.

## 6.7 Risk Management

A risk assessment has been undertaken. The main risks relate to the plans not being found sound and to potential legal challenge to the plan. These risks can be minimised by ensuring that the plan and its accompanying documents are legally compliant; that legal support is employed where necessary; that all interested parties are actively informed and engaged throughout the plan's preparation; that the plan is based on sound, robust evidence; and that – as a Part 2 Local Plan / Area Action Plan – it is focused specifically upon delivering Local Plan Part 1.

## 6.8 Equality & Diversity

The Local Plan will be subject to Equality Impact Assessment.

## 6.9 Best Value

There are no Best Value implications arising directly as a consequence of this report.

<b>7 Appendices to the Report</b>
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Appendix A:	Local Plan Part 2 consultation response summary.
Appendix B:	Cannock Town Centre Area Action Plan consultation response summary.
Appendix C:	Consultation methodology.

<b>Previous Consideration</b>
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Local Plan Part 2 Issues and Options Consultation	Cabinet	15 December, 2016
Cannock Town Centre Area Action Plan Issues and Options Consultation	Cabinet	22 September, 2016
Local Development Scheme:	Cabinet	24 March, 2016

**Background Papers**

Planning and Compulsory Purchase Act 2004.

Localism Act 2011.

The Town and Country Planning (Local Planning) (England) Regulations 2012.

The Environmental Assessment of Plans and Programmes Regulations 2004.

The National Planning Policy Framework 2012.

Local Plan Part 1 (adopted June 2014).

Local Development Scheme 2016.

Statement of Community Involvement 2014.

**Local Plan Part 2 Issues and Options Consultation****Feedback**

Local Plan Part 2, along with the Sustainability Appraisal and scoping report for the Habitats Regulations Assessment were consulted on between 30th January and 27th March 2017.

At the same time, the Issues and Options consultation for Cannock Town Centre Area Action Plan (AAP) and the Sustainability Appraisal were undertaken.

The consultation was extensively publicised on the Council's website, via the press and social media, and via direct correspondence (email / letter) to those on the Planning Policy team's consultation database. A number of drop in events were held around the district, and officers also attended a range of Parish Council and other local group meetings to talk through the plan and discuss issues.

Around 500 responses (completed consultation forms, letters / emails) were received to the consultation and this is a report which sets out the key themes contained in those representations and issues which the Council will need to consider and address moving forward.

For ease of reference it is set out in tabular format, setting out the issue being consulted on and a brief explanation of this, the responses made and officer comments in terms of how the matter will be addressed. Only those sections of the plan which attracted comment are included in this summary.

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Overall comments</b>	
These comments were of a more general nature relating to the plan overall rather than being attributable to a particular section.	
<b>Issue</b>	<b>Response</b>
<p><b>Evidence base</b> A number of issues were raised in relation to updates which are needed to the evidence base, or areas of the evidence base which require further exploration. These include: evidence relating to flood risk and land allocations, the impact of the plan on the Strategic Road Network, other issues relating to transport, air quality, other infrastructure evidence (e.g. education, health, waste water) evidence on biodiversity, impact on the Cannock Chase SAC, evidence on sport and playing fields.</p>	These issues have been noted and officers are working with the parties concerned to understand and, where necessary, address the issues.
<p><b>Areas needing strengthening</b> Some issues were highlighted under the various themes of the plan and hence are picked up there. However, some general comments were made in relation to the approach of the plan. It was felt that more account of the AONB and its setting should be considered, that the number of vacant sites in urban areas should be looked at more closely, that broadband provision should be supported and strengthened (including further planning guidance), that there should be further guidance and mitigation measures in relation to air pollution and air quality, that coal resources should not needlessly be sterilised by new development, that crime and disorder prevention measures should be integrated into the plan, that ancient woodlands should be included and protected in the site assessment process, that there should be more emphasis upon sustainable resources (including renewable energy) and that transport links across the wider West Midlands are important.</p>	These issues are all being considered as the next stage of the plan is developed.
<p><b>Green Belt and AONB</b> Several responses were submitted objecting to the inclusion of Green Belt and AONB options in the list of sites and options being appraised and stating that these areas should be protected. There were concerns about the number of sites which had been included in the plan. Concerns were raised about the potential for merging communities.</p>	While there are far more sites in the 'long list' than will be required, it is important that all options and 'reasonable alternatives' are assessed before narrowing down to a final set of proposed allocations. Local Part 1 provides the context for this assessment in terms of the need to consider Green Belt options.
<p><b>Consultation process</b> Several comments were received in relation to the consultation process. Concerns were in relation to the timing and location of the drop in sessions and, that there was insufficient publicity about the events.</p>	These comments will be considered in detail: the Council is keen to improve its consultation processes and will learn from the feedback provided and will make changes where it is practical to do so and resources allow.

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 1, Introduction</b>	
The introduction set out the suggested approach and scope of the plan, including the issues it might cover, inviting comment on these. It was suggesting that the aim of Local Plan Part 2 should be to deliver the amount and distribution of development set out in the adopted Local Plan Part 1 (5,300 homes, sites for Gypsy, Traveller and Travelling Showpeople needs, and 88 hectares of employment land between 2006-2028), whether land should be 'safeguarded' from the Green Belt to help with needs beyond the plan period, whether any further policy elaboration was needed over and above Local Plan Part 1, and to test whether or not the plan could deliver a further 1000 homes over and above the target set out in Local Plan Part 1 to help with the shortfall of housing across the wider Greater Birmingham Housing Market Area (GBHMA).	
<b>Issue</b>	<b>Response</b>
<p><b>Focus of the plan</b></p> <p>There was broad agreement that the focus of the plan should be on site allocations.</p> <p>Some respondents felt that the plan should now focus on delivering the intentions of the Housing White Paper and that it should review its evidence accordingly at this stage including utilising the standard methodology for housing requirement, issues relating to affordable housing / starter homes / affordable rent, and bringing the employment land evidence up to date. Others agreed with the suggestion of the plan that further evidence would only be needed to enable site allocations to be made.</p> <p>Other comments were also made concerning the need for up to date evidence (e.g. in relation to sport and playing fields) and to ensure that consideration of wider infrastructure issues are brought up to date such as those relating to transport and the work of the West Midlands Combined Authority (WMCA).</p> <p>In some cases the Green Belt review was supported but then others objected to the principles of including Green Belt options within the scope of the plan. Some comments were received (to this chapter) that there was no evidence to support the testing of the figure of an extra 1000 homes and that this figure is not high enough.</p>	<p>These are all issues which will be considered as the plan moves forward to its next stage.</p> <p>The focus is upon delivering Local Plan Part 2 within the context set by Part 1 so it is felt that some of the more strategic issues would be more appropriately dealt with via a review but this matter will be given further consideration. Where applicable discussions are ongoing with those parties who raised issues over the evidence base to explore how best to deal with the matter in an appropriate and proportionate manner.</p> <p>In terms of the Green Belt review, the approach to dealing with Green Belt options through Local Plan Part 2 will need further consideration.</p> <p>In terms of testing the figure for 1000 homes, this was shown to be the amount of the wider HMA shortfall which arose from Cannock Chase District (Strategic Housing Needs Study Stage 3 Report produced August 2015 for the GBSLEP and Black Country Authorities) and it was agreed to test this figure at Cabinet on 24<sup>th</sup> March 2016. However it is acknowledged that the situation has now moved on and that a further study is now being produced by GL Hearn to identify Areas of Search and that the Council's approach to LPP2 will need to be mindful of the ongoing work across the Greater Birmingham Housing Market Area to address the shortfall.</p>
<b>Chapter 2: Links between Local Plan Part 1 and Local Plan Part 2</b>	
This chapter set out the policies contained within Local Plan Part 1 and showed how Part would either elaborate on / or deliver these or where it was felt that no further elaboration or detail was needed. Comment was invited on this.	
<b>Issue</b>	<b>Response</b>
<p><b>Overall approach</b></p> <p>Generally the approach was supported overall although it was also felt that this would need to be kept under review as the plan progressed.</p>	Noted

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<p><b>Evidence</b> In some cases it was felt that the evidence needed updating in particular employment land, and sport and playing field provision. It was also commented that should the Council wish to bring in the Nationally Described Space Standard or optional technical standards then robust evidence would be needed.</p>	<p>Noted – and discussions ongoing with relevant parties in relation to evidence base issues.</p>
<p><b>Policy – CP12</b> It was felt that Local Plan part 1 Policy CP12 (biodiversity) should be reviewed to incorporate the importance of trees and woodland. Reference made to the Housing White Paper intention to give strengthened protection to ancient woodland.</p>	<p>Noted, this will be looked at further.</p>
<p><b>Policy CP14</b> It was felt that this policy provided the reason for justifying the objections to Green Belt options.</p>	<p>Noted, however Local Plan Part 1 does state that Green Belt options will need to be considered (Safeguarding) and also that the issue of addressing a wider housing shortfall will need to be considered.</p>
<b>Chapter 3: Approach to Allocations and Standards</b>	
<p>This chapter set out the process for deciding which sites would / would not require assessment and for those sites requiring assessment the process for appraising these (including a draft assessment matrix) and the issues which would need to be considered. Feedback on this was sought.</p>	
<b>Issue</b>	<b>Response</b>
<p><b>General approach</b> Many broadly supported the approach. Comments were made that the 2016 SHLAA was a robust starting point for identifying options. Some commented that the matrix approach was a useful tool. Some felt it was rather simplistic albeit supported by a narrative – style approach and felt that numerical scoring should not be used for ranking purposes and that assessment should be supported by a robust evidence base (expressing concerns with some areas of evidence and / or suggesting alternative methodology such as a ‘traffic light’ approach).</p> <p>Some felt there was not enough detail to comment and that examples should have been provided. Some references and terminology were felt to be unclear e.g. in terms of ‘stringent policy constraints’ or ‘sites for which for various reasons are restricted’. Links between the Sustainability Appraisal and Green Belt review were considered to be imprecise and could not therefore result in a fully informed judgement, with the approach being ‘superficial and subjective’.</p>	<p>Noted; the appraisal mechanisms will be refined to take account of the issues raised where applicable and further clarification provided where necessary.</p> <p>It is clear there are differing views on the approach suggested and that the Council will need to be transparent and clear in terms of showing how the appraisal is undertaken and providing clear justification for the approach used and the conclusions reached.</p>

<p><b>Local Plan Part 2 Issues and Options consultation feedback</b></p>	
<p>One representation stated that the matrix was illogical and that Green Belt should not restrict the options for assessment, they should be selected on the basis of sustainability without prejudice to their Green Belt status.</p> <p>It was also commented that there should be another assessment stage before proceeding to Proposed Submission.</p>	<p>A Site Selection paper will be prepared to accompany the proposed submission document which will set out the process each site has gone through to determine whether it should or should not be allocated.</p> <p>At this point it is not considered that a further assessment stage (i.e. Preferred Options) is likely to be required however this will be reviewed as the work on the plan progresses.</p>
<p><b>Further detail for inclusion in assessment process</b></p> <p>Comments were received in terms of further specifics which respondents felt should be included in the appraisal i.e. the AONB; the potential for Compulsory Purchase (unwillingness to make land available should not be a 'showstopper'); heritage and setting, ground conditions and land stability (coal mining legacy) ; potential sterilisation of mineral resources; high priority given to brownfield sites; capacity issues in infrastructure; access; formal sport; flood risk; public rights of way (protecting these); in terms of employment the likely development which would be expected on a site.</p>	<p>These are noted and will be considered further as to the most appropriate approach.</p>
<p><b>Chapter 4: Green Belt Issues</b></p>	
<p>This chapter explained the Green Belt review and how it assessed parcels of land to see how well they were performing in terms of the five functions of Green Belt as set out in the National Planning Policy Framework. It then explained the need to consider Green Belt options for development in terms of safeguarding (reserving for possible development needs beyond the plan period i.e. beyond 2028) and in terms of whether it could potentially assist with addressing the shortfall in housing across the GBHMA. It also set out the possibility of making some minor boundary adjustments to address anomalies.</p>	
<p>This chapter attracted a lot of comment, much of which was aimed at specific sites (either in terms of objections or from those promoting development).Detail in relation to site specific matters can be seen in the more detailed summary report at <a href="http://www.cannockchasedc.gov.uk/planningpolicy">www.cannockchasedc.gov.uk/planningpolicy</a>.</p>	

**Local Plan Part 2 Issues and Options consultation feedback**
**Objections to the approach**

There were several objections, mainly from local residents and those representing them, and local organisations (e.g. Parish Councils) in terms of the overall principle of releasing Green Belt land although some of these did also state that they understood the need to accommodate housing growth. In objecting, concerns were raised about the following: impact on the AONB; that sites fulfilled the Green Belt tests; the negative impact on wildlife and the environment; the negative impact on cycling and walking including the Heritage Trail; the impact on the landscape / historic landscape; the size and scale of some of the developments being promoted; the potential for communities to merge; the creation of 'sprawl'; government commitments to protect Green Belt (including references to the NPPF and the Housing White Paper); the need to utilise all brownfield options first (including the Power Station site); loss of agricultural land; the potential to increase flooding by building on green areas; impact on air pollution; Green Belt being a cheaper option than brownfield hence easier; the impact upon the openness of areas and destroying village character (and possible effects on future neighbourhood plan); impacts on infrastructure; the Council's target not needing Green Belt land; no exceptional circumstances for justifying Green Belt release; examples of case law setting a precedent in terms of showing that exceptional / very special circumstances do not exist; exceptional circumstances not exist; banking the 1000 homes for the next plan period as there is no need to build them now; proposals disregard the Vision.

These concerns are all noted and will be addressed as the detail of the site assessment process is underway along with addressing issues in relation to the evidence base which is ongoing.

An updated Strategic Housing Land Availability Assessment (SHLAA- anticipated September 2017) will provide an up to date evidence base on sites available for residential development. Subject to this and other evidence demonstrating sufficient supply on sites outside of the Green Belt (as envisaged in the Issues and Options consultation) and in view of comments received in relation to safeguarding and the Greater Birmingham Housing Market shortfall, the preliminary view is that Green Belt review of land for housing may be more appropriate to consider via an immediate Local Plan review, following the adoption of Local Plan Part 2. However, this position will be kept under consideration in light of emerging evidence base and assessment work. An updated Employment Land Availability Assessment (ELAA- anticipated September) will provide an up to date evidence base on sites available for employment development. As recognised in the Issues and Options consultation, subject to a shortfall in supply remaining there may still be a need to consider Green Belt land options, although it may be appropriate to consider the use of Green Belt sites for employment in tandem with housing via a Local Plan review. However, this will also be kept under consideration in light of emerging evidence base and assessment work.

**Objections – evidence base**

Whilst most of the objections were from residents / those representing communities, a number of comments were also received expressing concern with / objecting to the evidence base methodology. These were mainly from the development industry. Comments were received that the land parcels were too large, and smaller parcels would score differently (and more favourably); the approach being too simplistic (e.g. measuring distance – topography / landscape should be factored in); the methodology should be revised; there is nothing to say (in the NPPF) that all purposes of the Green Belt carry equal weight; land parcels should be considered on a case by case basis; the process is too subjective (and representations contain an alternative analysis).

The methodology for the Green Belt review was consulted on in 2015 and has been designed to be as precise and consistent as possible, using a particular approach utilised by the consultants who undertook the work. There are no proposals to change the methodology nor adjust the review itself which stands as a piece of evidence to be looked at in conjunction with other evidence before coming to a judgement.

It is noted that other information may need to come into play including more detailed factors (e.g. topography, landscape, parcel size) and comments made will be taken into account accordingly as the appraisal process moves forward. It is also noted that other assessments may use different methodologies: this is not an exact science but it is felt that the approach employed by the Council is robust and consistent.

**Local Plan Part 2 Issues and Options consultation feedback****Support for the approach**

A number of representations were received in support of the evidence base and in relation to Green Belt release: these were primarily from those promoting sites and setting out detail in relation to these. In particular, areas of support included comments that looking at Green Belt release in the light of other evidence is important; that releasing Green Belt sites for development can be sustainable; that development can set new permanent Green Belt boundaries; that Green Belt release and safeguarding is needed for development needs; that Green Belt land outside of the AONB should be prioritised; exceptional circumstances for Green Belt release exist now.

These comments are noted and will be taken into account as the assessment process moves forward.

An updated Strategic Housing Land Availability Assessment (SHLAA- anticipated September 2017) will provide an up to date evidence base on sites available for residential development. Subject to this and other evidence demonstrating sufficient supply on sites outside of the Green Belt (as envisaged in the Issues and Options consultation) and in view of comments received in relation to safeguarding and the Greater Birmingham Housing Market shortfall, the preliminary view is that Green Belt review of land for housing may be more appropriate to consider via an immediate Local Plan review, following the adoption of Local Plan Part 2. However, this position will be kept under consideration in light of emerging evidence base and assessment work. An updated Employment Land Availability Assessment (ELAA- anticipated September) will provide an up to date evidence base on sites available for employment development. As recognised in the Issues and Options consultation, subject to a shortfall in supply remaining there may still be a need to consider Green Belt land options, although it may be appropriate to consider the use of Green Belt sites for employment in tandem with housing via a Local Plan review. However, this will also be kept under consideration in light of emerging evidence base and assessment work.

**Other Comments**

A number of other comments were made in relation to the approach and the evidence base. Some of these are issues of clarity, e.g. questioning the role and significance of the Landscape Character assessment in relation to the Green Belt Review and / or how the review will be used in conjunction with other evidence including evidence submitted by developers / landowners; one requested more clarity on the shortfall; comments (picked up under other sections) about the suggested 5% for safeguarding being 'arbitrary' ; comments about the need to have regard to preserving setting and special character of historic towns'.

These comments are noted and will be taken into account as the assessment process moves forward.

**Local Plan Part 2 Issues and Options consultation feedback****Minor boundary adjustments**

Some comments were received in relation to specific plots of land including requests for readjustment, and in the case of schools comments that no changes should be made to allow schools to adapt to future needs. There was some concern that small changes might lead to loss of Green Belt to development and thus loss of wildlife corridors especially along the M6 Toll where stretches of Green Belt link to other sites being promoted for development.

These comments are noted and will be taken into account as the assessment process moves forward.

**Chapter 5: Housing: Issue H1 / Options H1a and H1b**

This section looked at housing supply issues and how sites could be selected for taking forward for assessment to decide whether they should, or should not be allocated for housing.

Option H1a suggested assessing all developable and deliverable sites with a capacity for 10 or more dwellings in the Council's Strategic Housing Land Availability Assessment (SHLAA) – but sites without having the benefit of planning permission already, and also assessing AONB, Restricted and Excluded Sites (i.e. those with particular constraints, mainly Green Belt),.

Option H1b suggested the above, but also assessing large sites (30 dwellings or over) which already have planning consent.

Opportunity was also given for suggesting other options.

**Preferred options**

A range of responses were received; some supported H1a, some preferred H1b and others suggested a combination of the two (e.g. including any large sites with lapsed planning consent). Others did not support either: one developer stated that Green Belt development should not be left to the next plan period and should not therefore be categorised as 'excluded' and too much reliance was placed on urban sites. Others (mainly residents and those representing local communities) objected to the consideration of Green Belt / AONB options at all and commented that there is already enough supply via urban and urban extension sites and that the Council should not be looking to accommodate further growth (referencing the 1000 homes to be tested as part of the GBHMA shortfall) which would need Green Belt land, some commented that it should only absorb this figure if it used brownfield sites. Others commented that Local Plan Part 2 should purely deliver the numbers and spatial distribution as set out in Part 1.

These comments are noted and will be taken into account as the assessment process moves forward and some will need to be considered in terms of what the appropriate role of LPP2 is and what can be dealt with now and what might be more appropriate for a local plan review.

An updated Strategic Housing Land Availability Assessment (SHLAA- anticipated September 2017) will provide an up to date evidence base on sites available for residential development. Subject to this and other evidence demonstrating sufficient supply on sites outside of the Green Belt (as envisaged in the Issues and Options consultation) and in view of comments received in relation to safeguarding and the Greater Birmingham Housing Market shortfall, the preliminary view is that Green Belt review of land for housing may be more appropriate to consider via an immediate Local Plan review, following the adoption of Local Plan Part 2. However, this position will be kept under consideration in light of emerging evidence base and assessment work

Local Plan Part 2 Issues and Options consultation feedback	
<p><b>Site specific issues</b></p> <p>Some comments were received in relation to specific sites, suggesting that some (with recent planning permission) are added to the map. A number of comments were received supporting the suggestion by the Council that no supply capacity can be assumed from Rugeley Power Station (in Cannock Chase District) at this time as more information is needed. It was pointed out however that Lichfield DC have identified capacity and that the approach is therefore inconsistent. Other comments were received either objecting to or promoting specific sites (covered in the site specific section and in the more detailed document on the website).</p> <p>Other representations listed a range of further site options which could be explored.</p>	<p>In terms of the further sites to be added to the map, this will be looked into. In terms of Rugeley Power station, CCDC has not attributed any figures to the proportion of the site in its own area as this part of the site contains the highest level of heavy infrastructure and therefore there are too many ‘unknowns’ at present to have any confidence in any figure to be realistically attributed although this may change as progress on the site moves forward.</p> <p>Further site suggestions will be looked at, and site specific comments will be taken into account through the assessment process and via the updated SHLAA.</p>
<p><b>Supply</b></p> <p>Comments were also made about the sites which were categorised in the SHLAA as ‘developable’ as there is no guarantee of delivery in the plan period, many have been in the SHLAA for a long time, and that the surplus of 750 dwellings over and above the requirement should be viewed with caution. There is an opportunity therefore to provide ‘uplift’ in numbers over and above the requirement set out in Local Plan Part 1 (i.e. over and above 5,300 homes in the plan period). The surplus of around 11% is not enough it should be 20% as suggested for reserve sites by the Local Plans Expert Group (LPEG). Others (albeit not developers) suggested that the buffer provided by H1b would be sufficient and would provide flexibility.</p> <p>It was also commented that a range of sites by size and market location should be selected so that house builders of all types and sizes have access to suitable land to offer the widest range of products: the number of sales outlets is key as is the ability to meet the widest range of demand.</p>	<p>These issues will be considered further as assessment takes place via the updated SHLAA. It should be noted that the Local Plans Expert Group recommendations are not government policy.</p>
<p><b>Plan period</b></p> <p>It should be made clear that less than 15 years remain in the plan period.</p>	<p>Noted: this is to deliver Local Plan Part 2 so should be consistent with the time period set by Part 1.</p>

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 5: Housing Issue H2 / Options H2a and H2b</b>	
This section asked whether site specific standards should be adopted to help guide the development of allocated sites. Option H2a suggested that existing policy set out in Local Plan Part 1 would be sufficient whereby H2b proposed that standards could be developed where necessary.	
Responses were mixed (including those from the development industry) with some respondents feeling that that already-established policy and guidance was sufficient and others feeling that more specific guidance in some cases would help to provide certainty. Examples included master planning, and guidance relating to landscape and environmental designations. Evidence would be needed if the Nationally Described Space Standard or optional technical standards under the Building Regulations was to be introduced. It was also suggested that standards for maintenance and management should be introduced, particularly in relation to open spaces and unadopted roads (suggested a management company could take on this responsibility) and in relation to design issues (e.g. type of road surfacing, access issues, bin storage, Sustainable Drainage Systems).	These issues will be considered further as part of the ongoing work to progress the plan. In general, the preliminary view is that most sites will not require site specific policies and that these policies will only be developed where absolutely necessary e.g. in relation to large or complex sites. As an alternative to site specific policies, the Local Plan Part 2 could still highlight key issues to be addressed on sites where necessary for instance in an Appendix to the main document.  In some cases it may be more appropriate to update SPDs but this will be given further consideration.
<b>Chapter 5: Housing issue H3 / Options H3a and H3b</b>	
This section asked for views on supporting small and ‘windfall’ developments (the latter being sites coming up through the plan period which are not specified in the plan). Option H3a suggested that existing policies in Local Plan Part 1 might be sufficient, Option H3b suggested further policy to support such sites.	
Responses were mixed (including those from the development industry) with some feeling that policy was sufficient and others feeling it could be bolstered. One representation commented that there would be an objection should the Council decide to impose a proportion of self build plots on larger allocated sites.	This will be given further consideration in the light of the responses received. However, in light of the current levels of demand on the self build register the Council is unlikely to impose a requirement upon larger sites at this time.
<b>Chapter 5: Housing issue H4 / Options H4a and H4b</b>	
This section asked how longer term needs should be catered for and how safeguarding should be considered (i.e. removal of land from the Green Belt to help with development needs beyond the plan period i.e. 2028). Option H4a suggested an allowance of 5% of the overall requirement (amounting to 265 dwellings) being safeguarded, with the Green Belt site options being narrowed down through site assessment to determine the best location; Option H4b suggested that the existing currently safeguarded site east of Wimblebury Road in Heath Hayes could help to address this need and should be assessed as first priority to establish capacity only moving to the assessment of other sites should this not be able to meet the suggested 5% provision for safeguarding.	
<b>General approach</b> In broad terms, representations from those promoting sites in the district agreed that safeguarding was appropriate in addressing longer term needs, and it was commented by one representor that if not enough land is safeguarded then this means that Green Belt boundaries may not endure.	This will be given further consideration and will need to be looked at in the light of the comments on the evidence base and the ongoing work in relation to the GBHMA by consultants GL Hearn.  An updated Strategic Housing Land Availability Assessment (SHLAA- anticipated September 2017) will provide an up to date evidence base on sites available for

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<p>A range of concerns were raised to the principle of safeguarding, mainly by residents' these included: the long term needs of the area are not known (including the impacts of Brexit); is the safeguarded amount over and above the 1000 identified as being needed for the housing shortfall across the GBHMA; who will make the final decision on this; what is the role of smaller infill sites; the surplus of sites in urban areas and the power station site can help meet this need without the need to rely on the Green Belt.</p>	<p>residential development. Subject to this and other evidence demonstrating sufficient supply on sites outside of the Green Belt (as envisaged in the Issues and Options consultation) and in view of comments received in relation to safeguarding and the Greater Birmingham Housing Market shortfall, the preliminary view is that Green Belt review of land for housing may be more appropriate to consider via an immediate Local Plan review, following the adoption of Local Plan Part 2. However, this position will be kept under consideration in light of emerging evidence base and assessment work.</p>
<p><b>Quantum</b>  Representations from the development industry questioned the evidence for the figure of 5% in some cases stating that no evidence exists for this and that the figure, even when combined with the 11% oversupply and the potential at Rugeley Power Station is too low. Reference was made to the LPEG review which stated that a 20% reserve of developable sites should be utilised. Sites in the SHLAA cannot wholly be relied upon. One representation suggested that the approach by South Staffordshire Council should be employed – safeguarding over a 10 year period following the apportionment of the spatial strategy. Another commented that at least 15% should be safeguarded and another that enough should be provided to cover two local plan review periods. Others stated that the amount should be based on long term needs in the context of future levels of housing, employment, cross boundary pressures and the approach of neighbouring authorities.</p> <p>One representor disagreed with the reference at para. 5,26 that identifying a significant supply of additional sites could prejudice options for a local plan review: this work could avoid the need for a review.</p>	<p>LPP2 set out the justification for the quantum for potential safeguarding. Comments are noted and further consideration will be given to the matter. It should be pointed out however that the White paper and the LPEG review are not policy, however the situation will be kept under review.</p> <p>An updated Strategic Housing Land Availability Assessment (SHLAA- anticipated September 2017) will provide an up to date evidence base on sites available for residential development. Subject to this and other evidence demonstrating sufficient supply on sites outside of the Green Belt (as envisaged in the Issues and Options consultation) and in view of comments received in relation to safeguarding and the Greater Birmingham Housing Market shortfall, the preliminary view is that Green Belt review of land for housing may be more appropriate to consider via an immediate Local Plan review, following the adoption of Local Plan Part 2. However, this position will be kept under consideration in light of emerging evidence base and assessment work</p>
<p><b>Preferences for options</b>  Very few comments set out the preference for one option or another as the quantum became the main issue, as well as the need / principle of safeguarding at all (see above comments). In terms of the few who did state a preference, views were split between the two options.</p>	<p>Noted – see above.</p>

Local Plan Part 2 Issues and Options consultation feedback	
<p><b>Evidence base</b></p> <p>Natural England commented that longer term needs should take account of the Sustainability Appraisal criteria including the outcome of the current evidence base review in relation to the Cannock Chase Special Area of Conservation (SAC) and progress on work relating to the GBHMA.</p> <p>Staffordshire County Council advised that further transport work would be needed to inform the impacts of the options as well as potentially other evidence (e.g. environmental).</p>	<p>Noted, and discussions on the evidence base are ongoing.</p>
Chapter 5: Housing Issue H5 / Options H5a, H5b and H5c	
<p>This section asked how housing supply shortfall issues across the Greater Birmingham Housing Market Area (HMA) could be addressed. Option H5a suggested the potential for delivering a further 1000 homes could be tested through Local Plan Part 2; option H5b suggested this could be more appropriate for a local plan review; option H5c suggested a combination of the above options with Part 2 delivering a proportion of the extra growth.</p>	
<p><b>Quantum and timescale</b></p> <p>Responses to the issue were varied. In general terms representations mainly (but not exclusively) from the development industry argued that the figure of 1000 is not evidenced, is 'arbitrary', 'unqualified', 'unsound' and one commented that an example of a 'fair and equitable' additional figure should be 5,500 further homes. Some commented that the shortfall should be dealt with now rather than through a review. One commented that it should be dealt with via review but to deal with the timeframe 2011 – 2031 to align with the Birmingham plan. Some welcomed the reference to cross boundary evidence but then concern was expressed that there was no specific reference to the recently commissioned further study work being undertaken in the GBHMA. Some questioned the different approaches being taken and cited inconsistencies in approach between local authorities across the HMA. Some respondents flagged Policy TP48 of the Birmingham Plan which requires a 'relevant council' to submit a replacement or revised local plan within 3 years of the adoption of the Birmingham Plan (i.e. from 10<sup>th</sup> January 2017).</p> <p>Conversely, there was support (from local authorities and others) for dealing with the issue either through a review (alongside the review of other evidence to link housing, employment and infrastructure) or a split approach between addressing some of the shortfall now (subject to testing what could be</p>	<p>In terms of the justification for the 1000 homes figure this is explained earlier in this report, however as also stated it is acknowledged that things have moved on and the situation is being kept under review in the light of the ongoing work across the GBHMA as is the most appropriate mechanism for dealing with this. There is no specific reference to the GL Hearn work in the LPP2 Issues and Options document for the simple reason that at the point of writing it had not been commissioned.</p> <p>In terms of the different approaches, this does rather reflect the planning system as a whole, the absence of a higher level spatial strategy crossing local authority boundaries, and the fact that all Local Authority plans are at different stages of plan preparation. However under the Duty to Co-operate all authorities across the GBHMA are working together to try and address the issue in as consistent a manner as possible.</p>

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<p>accommodated) and addressing the rest through a review. Some made similar comments that there was, at this stage no evidence to determine whether the 1000 figure was an appropriate one to test.</p> <p>References were made (by a variety of representors) to the ongoing work of the GBHMA partnership to address the shortfall collectively and Cannock's role in this was supported.</p>	
<p><b>Principle of addressing the shortfall</b></p> <p>Comments from residents generally expressed concern about the need to take any of the shortfall, citing pressures on infrastructure and loading too much development on to a community which could be disproportionate to the adopted strategy. Some suggested sites which should not be utilised for accommodating the shortfall, others were concerned about the overall impact on the Green Belt and advised that Birmingham should utilise its own Green Belt. The suggestion was made that the use of Compulsory Purchase should be made to ensure all brownfield options are utilised before take up of Green Belt land could be pursued.</p>	<p>Comments are noted and the ongoing work across the wider housing market area will define areas of search in order to address the issue and the outcomes of this will need to be considered as the plan progresses.</p> <p>In terms of maximising the use of brownfield sites the Council acknowledges this and work is ongoing in this respect: all Councils will have to publish a Brownfield Sites Register by December 31<sup>st</sup> 2017. An updated SHLAA incorporating new sites received to the Local Plan Part 2 consultation and any additional information on potentially available brownfield sites will feed into this process.</p> <p>Birmingham's Plan was found sound by a planning inspector and has already factored in Green Belt release for development. The City Council are working with partners across the HMA to address the shortfall.</p> <p>Other comments in relation to this section (including the suggestion of CPO) would need to be explored further.</p>
<p><b>Evidence</b></p> <p>A number of representations were received about the need for further evidence before it can be determined whether the extra development can be absorbed by Local Plan Part 2. In particular responses to this issue related to transport (raised by Staffordshire Country Council and Highways England) ; education, sport and playing field provision, impacts (and mitigation) in relation to the Cannock Chase SAC.</p>	<p>Discussions are ongoing with the relevant parties in relation to this matter.</p>

<p><b>Local Plan Part 2 Issues and Options consultation feedback</b></p> <p><b>Chapter 5: Housing Choice Issue AH1 / options AH1a and AH1b</b></p>	
<p>This section looked at issues surrounding recent changes affecting the nature of affordable housing delivery. It advised that some changes (e.g. national changes to thresholds) could be responded to via updated Developer Contributions Supplementary Planning Document (SPD) but other changes such as those relating to starter homes might require a different approach depending on further detail awaited nationally. Option AH1a suggested devising interim policy for Local Plan Part 2 to make broad reference to the new duties with further detail via SPD and Local Plan review. Option AH1b suggested awaiting the local plan review to address the issues in more detail following further guidance.</p>	
<p><b>Preferred Option</b></p> <p>Responses were mixed although most (if expressing a preference) favoured Option AH1a which allowed for an interim and flexible approach (including changes to the SPD) which could take account of the issues in the Housing White paper, updated local evidence to take account of changing housing needs and any other changes which might be made – some advised that this could then be carried forward into a review.</p> <p>One comment was made that Option AH1b was appropriate as a revised SPD could still be produced.</p> <p>Others commented that a combination of the options would be preferable, and one commented that neither was appropriate as the options were based on the Government’s previous plan for a mandatory requirement of 20% starter homes on residential developments of 10 or more homes.</p>	<p>These comments are noted and will be considered further as the plan progresses. The preliminary view is that any adjustments to the affordable housing policy would be more appropriately dealt with via a Local Plan review. This is particularly in light of the ongoing uncertainty in relation to the definition of affordable housing following the recent Housing White Paper consultation. The view that an updated SPD could still be produced in the interim (in line with existing Local Plan Part 1 policy) should the position become clearer is noted.</p>
<p><b>Changing context / definition</b></p> <p>A number of representations cited the Housing White paper and its proposals to deliver starter homes as part of a mixed package of affordable housing alongside other affordable home ownership and rented tenures, with appropriate level of ownership being determined by the Council in agreement with developers.</p> <p>Comments were received setting out the benefits of affordable rent (‘rent to buy’ model) and advised that revised policy should include a wider definition of affordable housing which should include rent to buy.</p> <p>The need for an updated evidence base was mentioned by a number of respondents, to take account of the ongoing changes and to understand local needs.</p>	<p>These comments are noted and will be considered further as the plan progresses.</p> <p>The preliminary view is that any adjustments to the affordable housing policy would be more appropriately dealt with via a Local Plan review. This is particularly in light of the ongoing uncertainty in relation to the definition of affordable housing following the recent Housing White Paper consultation. The view that an updated SPD could still be produced in the interim (in line with existing Local Plan Part 1 policy) should the position become clearer is noted.</p>

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<p><b>Other comments</b></p> <p>One respondent felt that a higher proportion of affordable housing should be required from developments, another felt that there should be an older age limit (45) for starter homes. One commented that self build plots should be provided for young people which could lead to ‘a community and not a soulless estate’, and that such homes should be of good size with good insulation and low running costs.</p>	<p>Comments are noted: much depends upon the stance of Government which currently is awaiting clarification (at the time of writing). . The preliminary view is that any adjustments to the affordable housing policy would be more appropriately dealt with via a Local Plan review. This is particularly in light of the ongoing uncertainty in relation to the definition of affordable housing following the recent Housing White Paper consultation. The view that an updated SPD could still be produced in the interim (in line with existing Local Plan Part 1 policy) should the position become clearer is noted.</p> <p>Issues relation to self build are noted and will be considered further.</p>
<b>Chapter 5 Housing Choice issue GTTS1 / Options GTTS1a and GTTS1b</b>	
<p>This section set out the need to find sites for the District’s Gypsy, Traveller and travelling Showpeople needs. Option GTTS1a suggested that sites could be allocated from options put forward primarily in the ‘area of search’ (to the south of the district close to the A5 corridor, this area was defined by Local Plan Part 1). Option GTTS1b suggested that alternative sites could be sought beyond the area of search.</p>	
<p>Comments were varied although many related to particular sites which are covered in more detail in the site specific section.</p> <p>There was some support for the first option and a number of respondents felt that the area of search should be widened with the current area of search being too restrictive. It was commented that lawful traveller sites should be allocated (and another commented that even if not currently lawful, sites should be considered for allocation) that plots along the A5 might be more appropriate as transit sites and that it may be appropriate to expect some provision to come from ‘windfall’ opportunities.</p> <p>Some expressed concern that communities must not be marginalised and should be inclusive.</p>	<p>Comments are noted – the Area of Search was set by Local Plan Part 1 which had been found sound by a Planning Inspector however it is felt that the search needs to be widened across the district and this work will be undertaken. In terms of site detail this will be considered further as assessment work progresses.</p>
<b>Chapter 5 Housing Choice Issue GTTS2 / Options GTTS2a and GTTS2b</b>	
<p>This section asked how Green Belt sites might contribute towards providing for Gypsy, Traveller and Travelling Showpeople needs to accord with national policy (bearing in mind that the Area of Search lies within the Green Belt. Options GTTS2a suggests that any sites for allocation should be removed from the Green Belt purely for Gypsy and traveller purposes. Option GTTS2b suggested that sites should not be removed from the Green belt and asked for further justification for this.</p>	
<p>Two respondents commented on this: one supported option GTTS2b but did not offer further elaboration and one supported GTTS2a stating that the area of search would restrict options to the Green Belt, with reference in terms of procedure / Inspector’s approach being made to the Solihull Gypsy and Traveller site Allocations document.</p>	<p>Comments are noted and will be given further consideration (and see response to GTTS1 above). It is likely that option GTTS2a will be taken forward where this necessary.</p>

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 5: Housing Choice Issue GTTS3 / Options GTTS3 and GTTS3b</b>	
This asked whether or not there should be site specific standards to help guide the development of new / extended Gypsy, Traveller and Travelling Showpeople sites. Options GTTS3a suggested that existing policies in Local plan Part 1 plus the guidance in the Design SPD might be sufficient. Option GTTS3b suggested that site specific standards could be developed where necessary and asked for examples.	
Comments were made that in some instances specific standards might be helpful and therefore policy should be flexible. Smaller sites are preferable. and should in any case not extend to more than 15 pitches. Location is important including proximity to transport and local services. The environment should be safe. Air quality should be considered for those sites close to the A5. Staffordshire Police provided links to good practice and recommended that sites should be a maximum of 10 pitches.	Noted – comments will be considered as the plan progresses.
<b>Chapter 5: Housing issues overall</b>	
A number of more generalised comments were made in terms of housing overall: these are summarised as follows.	
<b>Scale / Location of development proposals</b> Objections were raised in terms of the potential for development in a variety of areas around the District including (in particular) Slitting Mill / Rugeley, Cannock Wood / Prospect Village, Heath Hayes, Norton Canes. There was particular concern over loss of Green Belt and impacts on the AONB, impacts on wildlife, impacts on established communities, flooding, impact on the Heritage Trail, loss of agricultural land for food production, pressure on infrastructure (including schools, health, levels of traffic) and several commented that brownfield sites should be maximised including the site of Rugeley Power Station.	Comments noted – these issues will be taken into consideration as site assessment work is undertaken. Updates to the Infrastructure Delivery Plan (IDP); refinement of the site assessment matrix; updates to specific evidence base documents (or accessing existing additional information), including the SHLAA will all help to address the issues raised.
<b>Detailed matters</b> A range of comments were made in terms of the detailed delivery of developments including adequate parking and open space, better and more varied / innovative design of houses, the need to consider compulsory purchase for non Green Belt / non AONB land, the need to develop a Brownfield First policy, look at ways of bringing brownfield sites forward faster (including penalties for not delivering quickly and options for incentivising delivery), review all sites with permission which have not been developed, full review of all council owned sites, review the SHMA, add in new windfall sites. Unused properties should be put back into use. Density requirements should be established to maximise the use of land and on green field sites densities should be set. The Council should be proactive in site assembly and installing	Comments noted – in terms of site specific matters these issues will be taken into consideration as site assessment work is undertaken. In some cases issues may be more appropriately addressed through the review of via SPD or through other approaches by the Council or its partners – there are some interesting ideas and opportunities here which will need to be given further consideration, especially in the light of brownfield land (and the forthcoming Brownfield Land register) and approaches to self build / custom build.

<p><b>Local Plan Part 2 Issues and Options consultation feedback</b></p>	
<p>infrastructure then selling plots on to self builders – the self build register should be actively promoted. More use should be made of small sites. New sites have been put forward and should be assessed.</p>	
<p><b>Evidence</b>  Historic England commented that assessment needed where there may be an impact to heritage assets / setting  Natural England advised that transport-related aerial emissions and their impacts of European Designated sites needs consideration (in-combination effects). ‘Best and most versatile land’ – need to analyse the relative proportions of grade 3a and 3b land.  Staffordshire County Council – Mineral Safeguarding area should be accounted for when allocating. Impacts on waste management facilities should be considered. Biodiversity impacts need more consideration also raised by others). Impact on AONB needs more analysis. Impact on education needs assessing.</p> <p>Transport for West Midlands (WMCA) – need to consider employment patterns and residents’ tendencies to access jobs in the West Midlands Metropolitan Area.</p> <p>Sport England – evidence base needs updating</p>	<p>Noted – where applicable discussions are underway in terms of understanding the requirements and role of the evidence base, ensuring that it its robust and proportionate to the role of Local Plan Part 2.</p> <p>Updates to the Infrastructure Delivery Plan (IDP); refinement of the site assessment matrix; updates to specific evidence base documents (or accessing existing additional information), including the SHLAA will all help to address the issues raised.</p>
<p><b>Chapter 6: Employment – Issue E1 / option E1a</b></p>	
<p>This section asked which sites should be considered for allocation for employment developments to meet current requirements. Option E1a suggested the assessment of all ‘available’ sites in the Councils’ ELAA (Employment Land Availability Assessment - database of employment sites including those being promoted for possible inclusion)</p>	
<p>Comments received related to support for the Towers Business Park and part of the former Power Station. If housing is permitted on employment land (Rugeley / Brereton) then there should be help to relocate displaced businesses within the District. Compulsory Purchase should be considered to avoid having to use Green Belt sites. One representor commented that the site they were promoting in the Green Belt could help meet current requirements. Another commented that the evidence base should be updated to take account of the latest Experian forecasts. The same respondent supported the potential removal of Mill Green from the employment land supply.</p>	<p>Noted – comments will be considered as the plan progresses. In terms of evidence see comments above. An updated Employment Land Availability Assessment (ELAA- anticipated September) will provide an up to date evidence base on sites available for employment development. As recognised in the Issues and Options consultation, subject to a shortfall in supply remaining there may still be a need to consider Green Belt land options, although it may be appropriate to consider the use of Green Belt sites for employment in tandem with housing via a Local Plan review. However, this will also be kept under consideration in light of emerging evidence base and assessment work.</p>

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 6: Employment Issue E2 / Options E2a, E2b and E2c</b>	
<p>This section asked how the shortfall in meeting current development needs should be addressed and a supply of high quality employment land be ensured. Option E2a suggested the potential for urban sites should be assessed and rely on windfall sites in the short term – no Green Belt release. Option E2b suggested that the potential for urban sites could be assessed first then consider the potential for the release of Green belt sites should urban sites not yield sufficient provision and in areas where little high quality employment land remains – focusing on site options around Kingswood lakeside. Option E2c suggested assessing urban sites and providing additional high quality land in the first instance, then considering releasing Green belt site release where the shortfall cannot be addressed by alternative means including options outside Kingswood lakeside.</p>	
<p>Some respondents commented that green belt release should be avoided and one commented that Compulsory Purchase should be considered to enable urban sites to come forward. Others promoting sites felt that E2b and c were more appropriate options. It was also commented that the shortfall of 3ha was too small and information was submitted which suggested this should be 13ha. Others commented that the employment evidence base needs updating. It was also commented that the shortfall could be accommodated by other areas beyond the district within the functional economic market area.</p>	<p>Comments noted and will be considered as the plan progresses. Local Plan Part 2 is focused upon delivering Part 1 so it is felt at this point that a refresh of the evidence base for employment is a strategic matter which would be more appropriate to inform a Local Plan Review. An updated Employment Land Availability Assessment (ELAA- anticipated September) will provide an up to date evidence base on sites available for employment development. As recognised in the Issues and Options consultation, subject to a shortfall in supply remaining there may still be a need to consider Green Belt land options, although it may be appropriate to consider the use of Green Belt sites for employment in tandem with housing via a Local Plan review. However, this will also be kept under consideration in light of emerging evidence base and assessment work.</p>
<b>Chapter 6: Employment – Issue E3 / Option E3a</b>	
<p>This asked if the Council should seek to protect existing key employment areas. Option 3a suggested that Kingswood lakeside and Towers Business park should be assessed for potential allocation as high quality strategic employment sites (as defined by Local Plan part 1 Policy CP8)</p>	
<p>One respondent objected on the basis that lower quality employment areas make an important contribution to employment land supply and should be safeguarded. Another commented that key employment areas in all parts of the district should be protected. Another commented that para 22 of the NPPF should be taken into account so that other uses should not be precluded and that sites should not be designated in perpetuity.</p>	<p>These comments will be considered further as the plan progresses. The preliminary view is that Option E3a remains appropriate in the context of Local Plan Part 1 policies and national planning policy.</p>

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 6: Employment – Issue E4 Options E4a / E4b</b>	
This section asked if site specific standards should be employed to help guide the development of allocated sites. Option E4a suggested that existing policies and Design SPD guidance might be sufficient. Option E4b suggested that site specific standards or requirements might be appropriate and asked for policy wording.	
It was commented that employers investing in the district should have a strategy in place for the recruitment of local people (employment and skills plans). Depending on the nature of the use proposed, lorry parking with associated facilities may be required if there are no appropriate facilities nearby.	These comments will be considered further as the plan progresses. In general, the preliminary view is that most sites will not require site specific policies and that these policies will only be developed where absolutely necessary e.g. in relation to large or complex sites. As an alternative to site specific policies, the Local Plan Part 2 could still highlight key issues to be addressed on sites where necessary for instance in an Appendix to the main document.
<b>Chapter 6: Employment - Issue E5 - Employment Options E5a and E5b</b>	
This asked to what extent should the district cater for longer term employment needs and how should these be met. Option E5a suggested safeguarding land from the Green Belt for up to 5% of the requirement (i.e. about 4.4ha) with the focus being on options at Kingswood Lakeside as per Local plan part 1. Option E5b suggested similar but to include other sites beyond Kingswood Lakeside.	
Responses varied. One respondent commented that no Green Belt should be necessary as the 5% could be met through Kingswood Lakeside and Towers Business park / Rugeley Power Station, another supported E5a but felt that Rugeley Power station could avert any need to require Green belt land. Others supported E5b, offering up a variety of Green Belt options for consideration.	These comments will be considered further as the plan progresses.
<b>Chapter 6: Employment - Issue E6 - Employment Options E6a and E6b</b>	
This section asked whether there should be any further policy provisions made for existing employment sites within the Green Belt. Option E6a suggested that no further provision was necessary and Local Plan Part 1 / Design SPD guidance should be sufficient and addressing Watling Street Business park proposals via the site assessment process (the site being promoted by the owners for an extension). Option E6b suggested developing further policy provisions for existing employment sites in the Green Belt.	
One respondent supported E6a. Those promoting Watling St Business Park supported E6a feeling current provision sufficient for the existing development but that further expansion (should this be allocated ) could be supported by further policy to encourage it to come forward in a flexible manner minimising visual / landscape impacts and matching design principles of the existing park. Another respondent supported E6b suggesting policy wording ‘potential employment sites that are designated Green Belt but no longer fulfil and Green belt function due to their situation and surrounding land uses should be brought forward for future employment land supply’.	These comments are noted and will be considered further as the plan progresses and assessment work is undertaken. An updated Employment Land Availability Assessment (ELAA- anticipated September) will provide an up to date evidence base on sites available for employment development. As recognised in the Issues and Options consultation, subject to a shortfall in supply remaining there may still be a need to consider Green Belt land options, although it may be appropriate to consider the use of Green Belt sites for employment in tandem with housing via a Local Plan review. However, this will also be kept under consideration in light of emerging evidence base and assessment work.

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 6: Employment Issue BE1 / Options BE1a</b>	
This chapter linked to Policy CP9 (Balanced Economy) of Local plan part 1 and asked how the Council could support different sectors of the local economy further. Option BE1a suggested that submitted sites could be assessed for a range of proposals (recreation / leisure / tourism)	
Tourism was a key issue raised in responses , relating to the need to safeguard the route for a restored Hatherton canal and to ensure clear cross boundary linkages.	These comments will be considered further as the plan progresses. The proposed approach to the Hatherton Branch canal will be refined – the Council will seek to identify a safeguarded route on the Policies Map with accompanying policy.
<b>Chapter 6: Employment issues overall</b>	
A number of more general comments were made in terms of employment issues. Coalescence of communities should be avoided (concern over Green Belt allocations). Proximity to other uses to prevent conflict should be considered, there should be good connections to residential development (e.g. walking and cycling routes), high skill / pay jobs should be encouraged, renewable energy sector should be promoted (especially opportunities at Rugeley), there may be more opportunities at Rugeley including the power station and more could be done to consider the needs of Rugeley through this plan (improving footfall, shopping, recreation, heritage and links to the environment). Out of town retail should not be considered. The impact on heritage / setting should be assessed. Links to the West Midlands conurbation (especially logistics and supply chains) should be considered when allocating sites.	These comments will be considered further as the plan progresses and assessment work is undertaken  Updates to the Infrastructure Delivery Plan (IDP); refinement of the site assessment matrix; updates to specific evidence base documents (or accessing existing additional information), including the ELAA will all help to address the issues raised.
<b>Chapter 7: Rugeley Power Station Issue RPS1</b>	
This section was concerned with the site of the recently closed Rugeley power station which straddles the boundary between Cannock Chase and Lichfield Districts, that it was being promoted by the owners for residential-led mixed use development and that Cannock Chase Council was working together with Lichfield District Council and other partners to secure an appropriate future for the site.	
<b>Policy and timescale</b> Engie / Mitsui and Co (site owners) commented that the site would be consistent with the strategy, supported joint working and that the quantum of development would most likely be over and above that contained in Local Plan Part 1 unless other allocations did not come forward. However Local Plan Part 2 should contain a permissive policy (over and above that contained in Policy CP6 of Local Plan Part 1 which allows for the positive consideration of windfall sites not previously identified) to support the redevelopment of this brownfield site. Precise development numbers cannot be firmly identified at this point but could contribute to the GBHMA shortfall. Policy should be clear on the types of	Comments are noted and will be taken into account as assessment work progresses. The ongoing joint work on the Rugeley Power Station SPD will provide further context for this matter. The SPD is being consulted on between 24 <sup>th</sup> July to 4 <sup>th</sup> September 2017.

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<p>uses that would be acceptable including, for example, shopping policies to enable the provision of a local centre to support development (and so as not to conflict with the retail thresholds being proposed). Full redevelopment likely to stretch into the next plan period.</p> <p>Respondents for other parts of the development industry commented that development should not be included within the current plan period and that considerable work would be needed in terms of ground investigation and remediation work especially on that part of the site within Cannock Chase District.</p>	
<p><b>Joint working</b></p> <p>Lichfield District Council emphasised the importance of the Duty to Co-operate, that its own allocations plan identifies a minimum of 800 homes to be delivered by 2029 and that weight should be attached to the emerging Rugeley Power Station SPD.</p>	Comments noted
<p><b>Principles</b></p> <p>One respondent commented that the proposals were acceptable and could provide good local opportunities including a village style location, micro power generation, local facilities and open spaces and a rail link. Another commented that the search for industrial use should be national / international, a time limit could be placed on this so if there was no interest it could be used for housing. Another felt that it could offer higher quality employment than warehousing.</p>	<p>Comments noted</p> <p>These issues will be explored in the Rugeley Power Station SPD consultation (see above).</p>
<p><b>Sports facilities</b></p> <p>Sport England commented that Local plan Part 2 should recognise and identify solutions to both the need to protect or re-provide sports facilities within the site and the Sports Strategy should be refreshed.</p>	Noted and work ongoing
<b>Chapter 7: Rugeley Power Station Issue RPS2</b>	
This section suggested that the existing rail freight facility should be protected until more detail is known about the proposals for the site	
<p>There was support for this principle (including from the site owners, Network Rail and transport for West Midlands) as this gave more flexibility for development options until more is known. Two respondents commented that development should not be permitted where it would prevent rail freight usage.</p>	Noted. These issues will be explored in the Rugeley Power Station SPD consultation (see above).

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 8: Town Centres – Issue TC1 Option TC1a, TC1b</b>	
This section looked at the issue of Main Town centre uses lying outside of town centre boundaries and whether or not local thresholds should be set for requiring an Impact Test. Option TC1a suggested that no thresholds be set, deferring instead to the national threshold of 2,500 sq. m for requiring an Impact test. Option TC1b suggested a tiered system of thresholds proportionate to the type / size of centre.	
<b>Threshold</b> Few comments were made: Walsall MBC supported the thresholds at TC1b subject to evidence and welcomed the inclusion of class B1(a) in town centre uses but noted Appendix 1 contained several out of centre sites where B1 (a) uses have planning permission or where such is considered to be appropriate.	Noted. In relation to B1(a) uses the approach to specific sites is to be applied in line with Policy CP8 and CP11 of Local Plan Part 1.
<b>Other town centre issues</b> The Theatres Trust wished to see further policy wording to support new cultural and community facilities in town centres or major developments to support cultural activity including the temporary use of vacant buildings / sites. Others commented that district town centres are impressive and should be protected, that Rugeley Town Centre should be opened up for disabled parking.	Noted and will be considered as work on the plan progresses
<b>Mill Green</b> Walsall MBC commented that Mill Green should be specifically allocated and policies introduced to control the future development of the site.	Noted and will be considered as work on the plan progresses and in conjunction the Cannock Town Centre Area Action Plan.
<b>Chapter 9: Green Space – Issue GS1 / Option GS1a</b>	
This section asked whether Local Plan part 2 should revise the Green Space Network and if so what sites should be considered. Option GS1a suggested site options as per the schedule be assessed and that land at Rawnsley Road / Rugeley Road should be assessed both for Local Green Space designation and as Green Space Network (can only be one or the other).	
<b>Rawnsley Road / Rugeley Road site</b> There was one objection to the inclusion of the Rawnsley Road / Rugeley Road site as potential Local Green Space citing lack of evidence to demonstrate that national criteria have been met. There was support from other respondents citing the importance of this site as green space in the local community.	Noted and will be considered as work on the plan progresses and assessment work is undertaken
<b>New site suggestions</b> A number of other options were also put forward for consideration as either Greenspace Network or local Green Space including land at Pye Green Valley and sites in Brereton and Ravenhill and Norton Canes as well as the request to include small greens in communities. Others commented more generally about the benefits of green space to the community.	Noted and will be considered as work on the plan progresses and assessment work is undertaken

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<p><b>Site removal</b> One respondent requested an area of green space network be removed to correct an anomaly.</p>	Noted and will be considered as work on the plan progresses
<p><b>Assessment process / evidence issues</b> Natural England welcomed the identification of local Green Space but questioned how the sites in question had been identified and what the relationship was with any relevant components of Local Plan Part 1 Policy CP12 e.g. Biodiversity Action Plan or Local Biodiversity Opportunity Mapping. Would need further discussion.</p> <p>Sport England commented that a further review of green space provision is needed including consideration of Cannock Stadium for sports use and that this should be looked at in conjunction with a fresh sport and playing pitch strategy.</p>	Noted : discussions ongoing in relation to assessment and the evidence base.
<b>Chapter 9: Green Space – Issue GS2 / Options GS2a and GS2b</b>	
This section asked how the site options for Green Space Network and Local Green Space should be assessed. Option GS2a suggested the use of proposed assessment matrices, option GS2b asked for any alternative assessment approach to be put forward.	
<p>Natural England commented that the matrix seemed satisfactory although could be improved as per the response to GS1a.</p> <p>Staffordshire County Council commented that the assessment matrix in Appendix 3 should include a criterion to allow the assessment of the role of a local green space in the ecological network to accord with the NPPF – should be considered at the site level.</p>	Noted : discussions ongoing in relation to assessment and the evidence base. Green Space assessment matrix to be reconsidered as suggested.
<b>Chapter 10: Historic Environment – Issue HE1 / Options HE1a / HE1b and HE1c</b>	
This section asked how the historic environment could act as a catalyst to encourage the positive regeneration of the district. Option HE1a placed focus upon town centres; HE1b added to this by including canals and collieries and HE1c also included mineral lines.	
<p>There was support for all options subject to appropriate use and detail especially in relation to b and c. Any proposals relating to the extension Canal and towpath must take account of the Canal SAC and SSSI. More potential could be made of the restored route of the Hatherton canal. Potential is offered by the Historic England Heritage Action Zone initiative. There could be improved linkages between the canal and cycle network. Support for the proposals for Rugeley Town Centre and for consideration of Conservation Area status for Grove Colliery. Improvements to the role of the heritage trail supported and creation of a Local List supported. Neighbourhood plans can play a role.</p>	Noted – these issues will be considered further as the plan progresses. The proposed approach to the Hatherton Branch canal will be refined – the Council will seek to identify a safeguarded route on the Policies Map with accompanying policy.

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
<b>Chapter 10: Historic Environment – Issue HE2 Options HE2a and HE2b</b>	
This section asked whether sustainable management of change in the historic environment, including the historic landscape should be further promoted and encouraged in Local Plan Part 2. Option HE2a suggested current policy could be sufficient, Option HE2b suggested historic environment guidelines could be introduced for managing change at appropriate allocated sites.	
The creation of a Local List (referenced in HE2a) was supported. Historic England advised that it was for the Council to consider whether current policy was adequate – but supported policy for change management and specific guidelines where applicable.	Noted. A Local list is a commitment of local plan part 1
<b>Chapter 10: Historic Environment – Issue HE2 Options HE3a and HE3b</b>	
This section asked whether the wider role for the interpretation of the historic environment should be maximised, and how. Option HE3a suggested no further elaboration of existing policy with interpretation pursued on an ad hoc basis. Option HE3b suggested that interpretation could be a requirement at relevant key historic areas.	
There was broad support for developing a strategic approach to interpretation including preparation of a district wide interpretation strategy as a suggestion. Some commented on areas of specific historic significance including the need to take account of the Trent and Mersey Canal Conservation area in any nearby allocation, and the importance of the history of Cannock Park.	Noted – these issues will be considered further as the plan progresses
<b>Chapter 10: Historic Environment general comments</b>	
A number of more generalised comments were also received to this section.	
Historic England welcomed the focus of this chapter and requested further dialogue on the approach to assessing allocation sites. Staffordshire County Council commented that in terms of the Historic Environment Character Assessment (HECA), the zones investigated in the addendum to the evidence were low to moderate scoring and historic environment concerns could be dealt with via the planning process.	Noted – discussions ongoing with Historic England
<b>Site specific comments / maps</b>	
Site specific comments were numerous and varied. As might be expected those options being proposed in terms of Green Belt sites and those sites within the AONB attracted high levels of objection. All of the comments will be taken into account as the site assessment work progresses. A detailed summary of all of the representations received can be seen at <a href="http://www.cannockchasedc.gov.uk/planningpolicy">www.cannockchasedc.gov.uk/planningpolicy</a>	Noted – these issues will be considered further as the plan progresses An updated Strategic Housing Land Availability Assessment (SHLAA- anticipated September 2017) will provide an up to date evidence base on sites available for residential development. Subject to this and other evidence demonstrating sufficient supply on sites outside of the Green Belt (as envisaged in the Issues and Options consultation) and in view of comments received in relation to safeguarding and the Greater Birmingham Housing Market shortfall, the preliminary view is that Green Belt review of land for housing may be more

<b>Local Plan Part 2 Issues and Options consultation feedback</b>	
	<p>appropriate to consider via an immediate Local Plan review, following the adoption of Local Plan Part 2. However, this position will be kept under consideration in light of emerging evidence base and assessment work. An updated Employment Land Availability Assessment (ELAA- anticipated September) will provide an up to date evidence base on sites available for employment development. As recognised in the Issues and Options consultation, subject to a shortfall in supply remaining there may still be a need to consider Green Belt land options, although it may be appropriate to consider the use of Green Belt sites for employment in tandem with housing via a Local Plan review. However, this will also be kept under consideration in light of emerging evidence base and assessment work.</p>
<b>Infrastructure Delivery Plan (IDP)</b>	
<p>Various comments were made in relation to updates needing to be made. These included: the need to address potholes / road maintenance; updating the position on the flood scheme in Rugeley; a range of matters which have now been delivered so the plan needs updating; the need for improved broadband provision; not realistic to expect a Staffordshire university presence in the district; provision of an enterprise centre is unlikely but there is now a different approach (skills academy / training plans linked to large sites); sports evidence needs updating; need for electric charging points; better cycling and walking provision and linkages; school expansion needs; impact of the Strategic Road network; health provision; updated information on the Hatherton canal; pre application advice should include impact on railways; more allotments; more tree planting; more partnership working on transport looking to the wider West Midlands. For a more detailed summary see <a href="http://www.cannockchasedc.gov.uk/planningpolicy">www.cannockchasedc.gov.uk/planningpolicy</a></p>	<p>Discussions are ongoing with infrastructure providers to ensure the IDP reflects the latest position</p>
<b>Sustainability Appraisal / Habitats Regulations Scoping Report</b>	
<p>A range of comments were received regarding the Sustainability Appraisal from matters of process and technical detail, further information for clarification, queries and comments over scoring and methodology. For a more detailed summary see <a href="http://www.cannockchasedc.gov.uk/planningpolicy">www.cannockchasedc.gov.uk/planningpolicy</a></p>	<p>The response to the issues raised can be found on the more detailed summary on the website</p>

**Local Plan Part 2 Issues and Options consultation feedback****Green Belt Study**

Whilst the evidence base itself did not form part of the package of consultation documents, the Green Belt review did attract some specific comment submitted as a separate issue rather than being submitted as part of the comments relating to the green Belt options. Comments specifically related to the scoring of particular sites and parcels.

Noted – these issues will be considered as part of the assessment process. The methodology for the Green Belt review was consulted on in 2015 and has been designed to be as precise and consistent as possible , using a particular approach utilised by the consultants who undertook the work. There are no proposals to change the methodology nor adjust the review itself which stands as a piece of evidence to be looked at in conjunction with other evidence before coming to a judgement.

It is noted that other information may need to come into play including more detailed factors (eg topography, landscape, parcel size) and comments made will be taken into account accordingly as the appraisal process moves forward. It is also noted that other assessments may use different methodologies: this is not an exact science but it is felt that the approach employed by the Council is robust and consistent.

**Cannock Town Centre Area Action Plan Issues and Options Consultation****Feedback Summary**

Cannock Town Centre Area Action Plan along with the Sustainability Appraisal were consulted on between 30<sup>th</sup> January and 27<sup>th</sup> March 2017.

The consultation was extensively publicised on the Council's website, via the press and social media, and via direct correspondence (email / letter) to those on the Planning Policy team's consultation database. A number of drop in events were held around the district, and officers also attended a range of Parish Council and other local group meetings to talk through the plan and discuss issues.

This is a report which sets out the key themes contained in those representations and issues which the Council will need to consider and address moving forward.

For ease of reference it is set out in tabular format, setting out the issue being consulted on and a brief explanation of this, the responses made and officer comments in terms of how the matter will be addressed. Only those sections of the plan which attracted comment are included in this summary.

A more detailed summary of the representations can be seen at [www.cannockchasedc.gov.uk/planningpolicy](http://www.cannockchasedc.gov.uk/planningpolicy)

<b>Cannock Town Centre AAP Issues and Options consultation feedback</b>	
<b>Overall comments</b>	
These comments were of a more general nature relating to the plan overall rather than being attributable to a particular section.	
<b>Issue</b>	<b>Response</b>
<b>Scope</b> There was overall support for the production of the AAP. The need for flexibility was commented on by one respondent however, and it was commented that the plan does not seem to go far enough, being too restrictive and the role of out of town provision should also be acknowledged. The AAP should be more flexible.	The AAP is being produced within the context set by Local Plan Part 1 and is being produced to encourage investment in the town centre which is flexible and responsive to market conditions (supported by a prospectus) without undermining the economic regeneration of other parts of the district and beyond.
<b>Evidence</b> It was commented that there should be a simple biodiversity plan for the AAP area – the plan only touches on trees and green spaces but makes no reference to wildlife, biodiversity, nature or ecology.	Noted – this will be considered further and in the context of other work which is ongoing in relation to Local Plan Part 2
<b>Best practice</b> Examples of best practice in terms of reducing / designing out crime and the need to consider issues concerning crowded places are highlighted and should be utilised moving forward.	These issues are noted and will be considered further as the AAP is refined.
<b>Chapter 2: Background</b>	
This chapter set out the context for the AAP including the policy context set by the adopted Local Plan Part 1 (which included an AAP for Rugeley), the evidence base, the history of the town centre (including conservation and heritage), and the changing role of town centres and their need to adapt.	
<b>Heritage</b> The historic context was welcomed.	Noted – a Local List is due to be prepared as per Local Plan Part 1 CP15.
<b>Comparison Goods Capacity and Mill Green Designer Outlet Village (MGDOV)</b> One respondent commented that town centres can be improved by new retail demand outside town centre boundaries and therefore c(MGDOV) largely fulfilled the need to deliver 35,000 sq. m comparison goods floor space as set out in Local Plan Part 1 policy CP11. However another respondent held the opposite view and supported the statement.	Comments are noted: the AAP is being produced in the context of Local Plan Part 1 and the consent for the MGDOV.
<b>Retail rents</b> It was commented that it is important to provide attractive retail space at affordable rents and other property occupancy costs which would attract entrepreneurs, owner managed business and good traders.	Noted: rates and rents are beyond the scope of the planning system however the AAP seeks to deliver attractive retail / leisure space to meet modern needs and within the context of local Plan Part 1.

<b>Cannock Town Centre AAP Issues and Options consultation feedback</b>	
<b>Chapter 3: Town Centre Profile</b>	
This chapter set out the geographical context (including retail), population profile, an overview of the town centre, reviews of its character and environment, heritage and conservation and provided a summary of the town's strengths and opportunities.	
<b>Cannock Park</b> It was commented that Cannock Park should be more specifically referenced due to its historic and current significance	While the park lies beyond the AAP boundaries references and linkages could be strengthened, this will be looked at further.
<b>Retail context not positive enough</b> It was felt by one respondent that the AAP did not fully recognise the positive context of the NPPF. The AAP should also consider a Wider Context Plan given the proximity of other competing centres in the area. The level of growth could be higher than assumed.	The AAP is being prepared to positively respond to the challenges faced by Cannock in line with the NPPF, and in a sustainable manner so as to complement and not undermine other areas: the context for this has been established by the adopted Local Plan Part 1. However further detail will be provided in the next iteration of the plan.
<b>Links with MGDOV</b> The need to encourage support and strengthen links (transport, including walking and cycling) between the town centre, the station and MGDOV was referenced by a number of respondents to ensure that MGDOV supports and complements the town centre and does not undermine it.	Noted and will be considered further within the scope of the AAP and the work underway in relation to the planning permission for MGDOV.
<b>Transport</b> Comments were received in terms of the aspiration to improve the station and provide a well connected hub. More work could be undertaken to encourage modal shift. Car parking provision could be improved.	Noted and will be explored further. A car parking strategy for the AAP has been commissioned.
<b>Heritage</b> The historic connections and references to policies are welcomed. The provision of a Local List is supported.	Noted – this will be explored further to strengthen the heritage aspects of the plan.
<b>Chapter 4: Vision and Objectives</b>	
This section contained a proposed Vision for the town centre along with ten suggested objectives, asking people for their views and which their highest priorities were.	
<b>Vision</b> There was broad support for the Vision; references were welcomed to the inclusion of MGDOV, to cultural industries, to heritage. One respondent commented that it could be strengthened by being written in the present tense in the context of a 3-5 year view (i.e. to 2022) as well as to 2028, that there should be specific performance indicators and that change will need to be quickly accelerated to respond to recent events (eg MGDOV, Brexit etc.).	Noted – for further consideration. Monitoring is vital

<b>Cannock Town Centre AAP Issues and Options consultation feedback</b>	
<p><b>Objectives</b></p> <p>The objectives were supported, with priorities varying between those who made comment with references made to prioritising: An Accessible Centre, A Sustainable Centre, A Digital Centre, the right mix of uses, encouraging growth (Business rate retention was specifically cited). Others commented that issues they would like addressing relate to block paving, lower rents, fewer charity shops, car parking and the run down market hall / car park as being priorities.</p> <p>One respondent felt there should be another objective focused on encouraging and supporting robust local leadership and management vehicles to deliver the vision.</p>	<p>The variety of the comments is noted and these will be considered further as the plan is progressed. Some issues (eg rents and nature of retail occupants) are beyond the scope of the planning system however.</p>
<b>Chapter 5: Policies and Priorities</b>	
<p>This section considered the scope of the AAP and what it should focus on. This included suggestions for dividing the town into six 'sub areas' with their own characteristics, potential policies for land use including opportunity sites, suggested a range of supporting actions such as environmental enhancements and put forward some proposed urban design principles.</p>	
<p><b>General comments</b></p> <p>A range of comments and suggestions were made including references to '21<sup>st</sup> Century parking', adding Cannock railway station as a community use / asset, adding retail adjacent to the Ringway, better traffic control including the management of HGVs, better maintenance (eg block paving), demolish the market hall and open up with new shops and restaurants to open up the town centre, improved linkages between MGDOV and the town centre.</p>	<p>These are noted and will be considered further as the plan progresses.</p>
<p><b>Further evidence</b></p> <p>The need for further action in terms of transport evidence was cited including capacity, safety, severance, need for improvement etc. which should be established prior to the identification of particular schemes. In terms of the links (walking, cycling, public transport) between the town and MGDOV, it was commented that these would be improved as part of the planning permission and will be included with an updated Integrated Transport Strategy for the District.</p> <p>It was advised that in terms of sustainable movement around the town centre an audit would be helpful to identify constraints for all users including those with impaired mobility.</p> <p>The need to assess opportunity sites for impact on the historic environment (and possibly to devise specific policy), will need to be considered.</p>	<p>These issues will be considered and discussed with relevant parties.</p>

<b>Cannock Town Centre AAP Issues and Options consultation feedback</b>	
<p><b>Supporting information / actions</b></p> <p>A number of comments were made in terms of the possible actions beyond the scope of the AAP but which could support its development and implementation. These were welcomed: it was commented that these should be sympathetic to the historic environment, that there should be promotion of the town centre and MGDOV, that an investment vehicle should be established.</p>	Noted
<b>Chapter 6: Options for Change</b>	
This section set out the options for change under three different themes: Movement and Linkages; Place making and Areas of Change, suggesting a low, medium and high level of intervention for each with the high intervention option being 'preferred' (but clearly being the most aspirational). Comment was invited.	
<p><b>General comments</b></p> <p>In general, it was commented that there are a number of development strategies in this section but they do overlap and should therefore be integrated to take account of (for example) issues such as the historic environment.</p>	Noted – this is for ease of reference but the strategy will ensure these issues are integrated.
<p><b>Movement and Linkages</b></p> <p>Generally this theme was supported and many commented that the links were right and suggested particular priority areas (eg gateways). It was felt that more could be made regarding the linkages with MGDOV and the station.</p> <p>Reference to 'Active Design' guidance was made and should be used in any master planning process.</p> <p>It was commented that the sport and playing field evidence is out of date.</p>	Detailed comments are noted and will be considered further. The station and MGDOV are outside the AAP boundary but comments are noted and will be considered further in terms of how the AAP can support and link to the areas beyond.
<p><b>Place making</b></p> <p>Some technical references to the question numbering were made. There was broad support in principle, however it was commented that further detailed evidence would be needed in terms of transportation issues including funding and deliverability.</p>	Issues over transport and the evidence base will be discussed further with relevant parties.
<p><b>Areas of Change</b></p> <p>Generally, comments relating to areas of change were supportive of the high intervention option but subject to comments about evidence and funding / deliverability as set out above. Some specific comments were made however including: Cannock is too small to support two cinemas; the library should remain in the town centre close to amenities; improvements around Church Street and the theatre would be welcomed – improving the frontage and</p>	Comments are noted and will be considered in detail as the plan progresses. In terms of funding it will not be possible to identify every source at present as the AAP and associated documents will be utilised in relation to funding bids in the future.

<b>Cannock Town Centre AAP Issues and Options consultation feedback</b>	
opening up the area would increase footfall; care should be taken when locating town centre residential developments to avoid conflict with leisure and cultural uses (noise, movement etc.); would need to be parking permits for residents of the town centre.	
<b>Sustainability Appraisal</b>	
Comments were received from the Environment Agency, Historic England and Natural England. The SA was broadly welcomed and supported. Historic England commented on the importance of setting / appraisal and ensuring that findings are included in policy	Noted. The historic context will be given further consideration to ensure it is proportionate (i.e. does not duplicate other policy) and provides locally relevant information where necessary.

**Consultation Methods: Local Plan Part 2 and  
Cannock Town Centre Area Action Plan****Issues and Options Consultation Methods**Consultation timescale

30<sup>th</sup> January to 27<sup>th</sup> March 2017

Document availability:

- Consultation documents produced:
- Full Issues and Options documents and accompanying Sustainability Appraisals
- Non Technical Summary for Local Plan part 2
- Habitats Regulations Scoping Report for Local Plan Part 2
- Frequently Asked Questions leaflet covering both plans – and separate FAQ explaining the Sustainability Appraisal.
- Comments Sheets / how to respond

All documents displayed online on the Council's website (with link from the home page). Links provided to the supporting evidence base.

Hard copies of the documents were available to view (and take away in terms of the comments sheets) at the Civic Centre, Rugeley Area Office and at the Public Libraries at Cannock, Rugeley, Hednesford, Brereton, Norton Canes and Heath Hayes. In terms of the Sustainability Appraisal and Habitats Regulations Scoping report these were available at the main office (Civic centre).

Publicity

Publicity for the consultation utilised the following methods:

Direct correspondence:

- Letter / email to everyone on the Planning Policy database – this includes statutory and non statutory consultees, a range of organisations and interest groups, residents and businesses who have asked to receive notification (and through the process further names have been added and the request of the individual / group).
- Further email to all Duty to Co-operate bodies inviting discussion and engagement
- Further email to all Councillors
- Further email / follow up calls to all Parish Councils requesting that they link to the consultation via their websites and offering to come to a meeting / event to discuss the plans further
- Further email / calls to a range of organisations and local groups offering to come to local events or talk to communities

Website:

- Bespoke banner / link from the home page of the Council's website to the planning policy pages containing all the information. Correspondence contained a direct link to the relevant planning policy page. Over the consultation period the webpage had 4344 visits.

Press:

- An advertisement was placed in the Chronicle at the start of the consultation period. A press release was issued and articles were featured in the Chronicle, Express and Star and Staffordshire Newsletter.

Social Media:

- An extensive social media campaign via Facebook and Twitter was run throughout the consultation period with a reach of over 90,000 people.

Exhibitions

A number of staffed drop in sessions were held in libraries around the district. Libraries were chosen as they are accessible, attract passing footfall and provide a safe and friendly environment. These drop in sessions included exhibition displays, maps and a range of documents which had been used in formulating the plan. Some documents (comments forms, FAQs and non technical summaries) were available to take away, and copies posted to individuals where requested. With the exception of the targeted event on the Area Action Plan (AAP), all events contained the same materials so people could choose which event best suited their needs. To ensure a range of choice, times were varied and where possible arranged to coincide with 'busy' periods such as market days for example to attract more passers by.

Location	Date	Time	Attendees
Norton Canes Library	Thursday 16 <sup>th</sup> February	3.30-6.30pm	60 (approx.)
Hednesford Library	Tuesday 21 <sup>st</sup> February	1.30-4.30pm	49
Rugeley Library	Thursday 23 <sup>rd</sup> February	10am-1pm	60
Cannock Library	Friday 24 <sup>th</sup> February	10am-1pm	28
Heath Hayes Library	Thursday 2 <sup>nd</sup> March	3.30-6.30pm	30
Cannock Market Entrance, Littleton Square, Market Hall Street (AAP event with the consultants)	Friday 3 <sup>rd</sup> March	10am – 1pm	32
Brereton Library	Friday 3 <sup>rd</sup> March 2017	2.30-5.30pm	31

Unstaffed display boards and comments forms were also placed in the receptions at the Civic Centre, Rugeley Area Office and in the unit at the entrance to Cannock Market Hall.

All exhibition materials were also displayed on the website for those who could not / did not wish to attend an event.

Further events

A facilitated event was held for stakeholders on the Cannock Town Centre AAP.

Following the 'chase up' emails and phone calls officers gave presentations to the following: Rugeley Town Council and the Parish Councils of Norton Canes, Brereton and Ravenhill, Heath Hayes and Cannock Wood (the latter also being attended by around 130 local residents). A presentation was also given at a meeting of Hednesford in Partnership, and a further staffed exhibition was held at Rugeley Helping Hands community event which included organisations from the voluntary and community sector.

A number of meetings were held in relation to the Duty to Co-operate.

Response

Around 500 individuals and organisations responded to the consultation which is by far the highest response rate received to any planning policy consultation in Cannock Chase District under the current planning system. The majority of these responses related to Local Plan part 2 with a much lower response rate to the Area Action Plan which is to be expected given the much smaller area covered by the AAP.