

PART 2

Name: Clare Eggington (Planning Policy Manager)

Organisation (if applicable): Cannock Chase District Council

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates too:

Policy OS1

Please use the space below to make comments on this part of the Neighbourhood Plan

Policy OS1: as set out previously this would benefit from splitting the policy and delivery elements, including reference to CIL funds as a possible delivery mechanism. The wording of the last part of the policy might raise public expectations of what realistically can be delivered: alternative wording is suggested:

'We will seek to encourage landowners to appropriately maintain and enhance those local spaces which function as local visual amenities and wildlife corridors.'

The policy is rather restrictive, with any flexibility being restricted to estate regeneration and as a result could have unintended consequences if it restricts other opportunities (beyond estate regeneration initiatives) which may also benefit communities. The NPPF (paragraph 74) sets out circumstances where the development of open spaces may be considered acceptable e.g. with compensation measures or where alternative recreation provision on the site outweighs its loss in its current use. Local Plan (Part 1) Policy CP5 follows these national policy provisions and also elaborates on how to approach other designated Green Space Network sites (which may not be subject to national policy requirements e.g. private land, highways verges). Local Plan Part 1 Policy CP5 is worded somewhat more flexibly as shown below to enable exceptional circumstances to be considered in the planning balance. The District Council would recommend that similar wording is used here in Policy OS1 to help ensure consistency and broad conformity with the NPPF and Local Plan. Policy CP5 states:

'There will be a presumption against the loss of other green space network sites and community buildings (that are not subject to the above national policy requirements) unless they are surplus and clearly no longer required to meet demand for any of the identified purposes or:

- the wider sustainability benefits or major community benefits delivered by the proposal outweigh the loss (taking into account the value of the site);*
- appropriate mitigation measures and/or replacement space/facilities, equivalent or better in terms of quantity, quality and accessibility, can be provided to compensate for loss of the site and its value.'* **(REPRESENTATION CONTINUED OVERLEAF)**

The District Council is currently aware of one such example: a local scout group is looking for a site for new premises, and potentially may wish to explore one of the potential protected green space options (under the ownership of this Council). Under the policy as currently proposed, they would be excluded from any consideration as their proposal is not linked to estate regeneration. However, it could potentially have other recreational or community benefits. Amended policy wording would enable consideration of their proposal: it would not automatically ensure approval for their scheme but would at least enable the proposals to be considered 'in the round'.